



長春社 Since 1968

The Conservancy Association

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15th November 2019

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Re: Comments on the Section 16 Application No. A/NE-LK/125

The Conservancy Association (CA) OBJECTS to the captioned application.

1. Not in line with the planning intention

According to the Approved Luk Keng and Wo Hang Outline Zoning Plan No. S/NE-LK/11, the planning intention of “Recreation” zone is “*primarily for recreational development of active and/or passive recreation and tourism/eco-tourism. Uses in support of the recreational developments may be permitted subject to planning permission*”. Therefore, the proposed New Territories Exempted House (Small House) is not in line with the planning intention.

2. Ecological concerns

The application site is situated in fallow arable land. The surrounding areas are connected to Conservation Area, which protects important ecological features of the areas. Therefore, the “Recreation” zone serves as important buffer areas between village development and Conservation Area / SSSI. The applicant did not demonstrate whether the application would bring any negative impact on ecology. We are concerned that approving the application may affect the landscape and ecological value of the areas.



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3. Availability of land in “Village Type Development” (V Zone)

According to the Statutory Planning Portal of Town Planning Board, land is still available within the V Zone of Yim Tso Ha. Applicants should prioritize and concentrate development in V Zone over other land-use zonings to prevent adverse landscape and ecological impact on the surrounding areas.

4. Undesirable precedent and potential cumulative impacts

Similar applications (Section 16 Application No. A/NE-LK/76, A/NE-LK/102) for building small house in “Recreation” zone were rejected in 2012 and 2015. One of reasons for rejection was that *“the approval of the application would set an undesirable precedent for similar applications in the area. The cumulative effect of approving such applications would result in a general degradation of the environment of the area”*. Approving the captioned applications is in contradiction to the Committee’s previous decision and would set an undesirable precedent for similar applications in the area. Development would further encroach into lands with conservation and landscape values, decreasing overall quality of the environment.

Thank you for your attention.

Yours faithfully,
Charlotte Chan
Campaign Officer