



長春社 Since 1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期十三樓 1305-6 室 電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538
Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port Road, Kwai Chung, New Territories, H.K. 電子郵件 E-mail:cahk@cahk.org.hk
網址 Website:www.cahk.org.hk

11th February 2022

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,

Comments on the Section 16 Application No. A/YL-LFS/422

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

1. Not in line with the planning intention

According to the drafted Lau Fau Shan & Tsim Bei Tsui Outline Zoning Plan (OZP) No. S/YL-LFS/10, the planning intention of green belt zone is “*primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.*”

It should also be noted that according to the Town Planning Board Guidelines for Application for Developments within Deep Bay Area (No. 12C), the application site is located within Wetland Buffer Area (WBA). The planning intention of WBA is “*to protect the ecological integrity of the fish ponds and wetland within the WCA and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds*”.

From the application, however, we cannot see any details to justify that the plan would fulfill the above planning intention. As entire site will be filled with concrete and asphalt, we do not think such plan is in line with the planning intention.



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2. Adverse environmental impacts in adjacent area

The proposed site is located very close (approximately less than 15m) to the Tsim Bei Tsui Egrettry which is currently zoned Sites of Special Scientific Interest (SSSI). The application mentioned that temporary warehouse for storage of electronic goods would be operated from 9 am to 6 p.m. from Mondays to Fridays and from 10 a.m. to 6 p.m. on Saturday. We worry that light and noise pollution during both construction and operation phase would be highly inevitable. However, no attempts have been proposed to tackle such disturbance.

3. Undesirable precedent of “destroy first, build later”

This site has been subject to land formation and vegetation clearance (Figure 1-4). It is suspected that this is a case of “destroy first, build later”.

Planning Department and members of Town Planning Board (TPB) should alert that TPB has announced approaches to deter “destroy first, build later” activities in 2011. It stated that “the Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned”¹. Therefore, this application should not be given any sympathetic consideration, or it will set an undesirable precedent for similar cases in future.

Yours faithfully,
Chow Oi Chuen
Campaign Officer
The Conservancy Association

¹ TPB Press Release. Available at: <http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>



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Figure 1-3 The proposed site (marked in red) has been subject to land formation and vegetation clearance. It is suspected that this is a case of “destroy first, build later”





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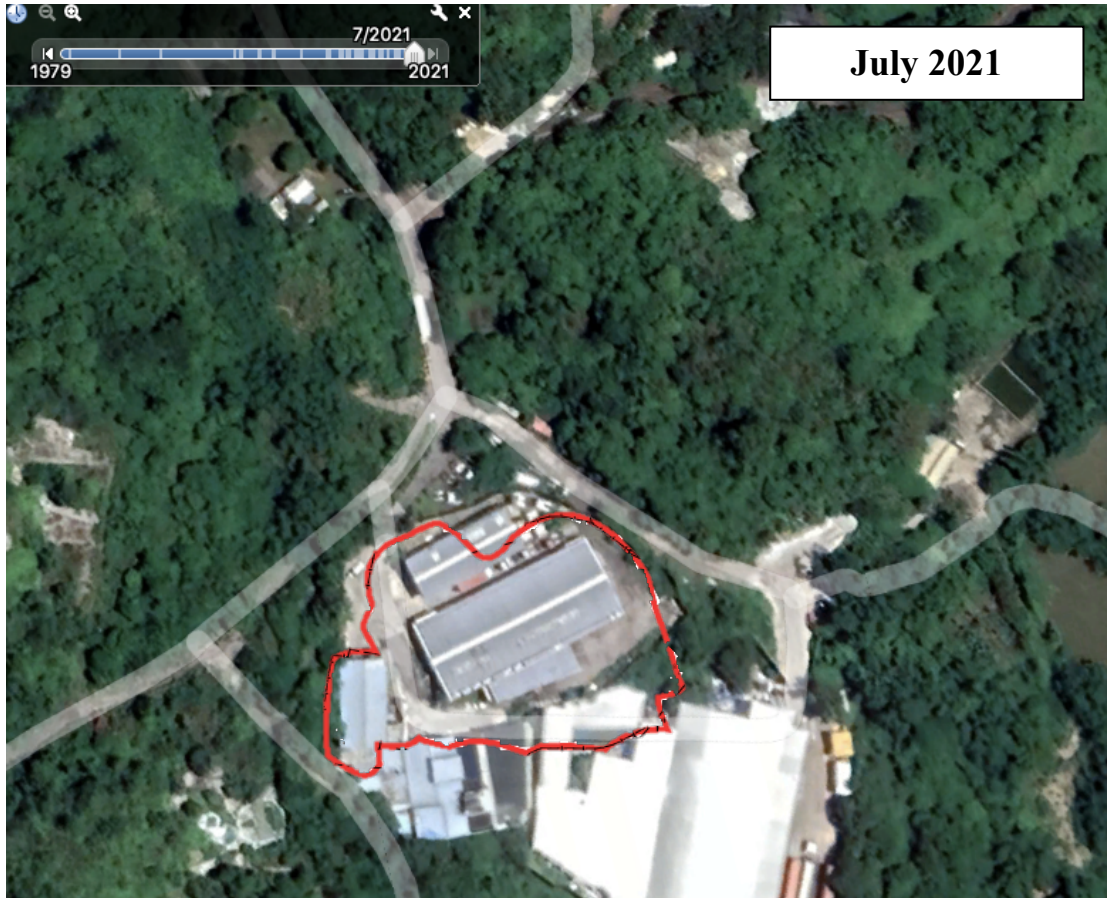
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Figure 4 Site condition (circled in red) observed during our site visit dated December 2021

