



長春社 Since 1968

The Conservancy Association

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13th May 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-KTS/921

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

1. Not in line with the planning intention of Agriculture (AGR) zone

According to the approved Kam Tin South Outline Zoning Plan (OZP) No. S/YL-KTS/15, the planning intention of AGR zone is “*intended primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes*”. However, all the proposed uses in this application are not related to agricultural purposes. We cannot see any details to justify how such plan would fulfill the above planning intention.

2. Adverse environmental impacts

We worry that there would be several potential adverse environmental impacts caused by the application:

- No plans on land recovery: Various structures/uses, including recreation activities room, site office, storage of goods, barbeque site uses, and so on, would be temporarily proposed in the application site. However, no details are available to illustrate how the land would be recovered after the proposed temporary use.
- Adverse sewage impact: The applicant does not provide any details of sewage arrangement, such as design, collection, treatment, disposal of sewage, back-up plans, and so on. Besides, insufficient details are available to identify other sources



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of wastewater arising from operation, particularly potential oily wastewater from recreation and floor washing activities in barbeque site, and how these pollution sources would be treated. We worry that if the above issues cannot be properly addressed, it may lead to serious environmental and hygiene problems within the application site and its surrounding area.

- Other sources of environmental impacts not clearly addressed: There are no site management and operational plans to describe issues such as number of expected visitors/users, crowd control, waste management, additional provision of ancillary utilities, and so on. Regarding the proposed recreation activities rooms, no details are available to describe their exact uses and activities, and whether additional wastewater would be generated during operation. All these would help identify source of environmental impacts and then suggest measures to minimize or mitigate potential environmental disturbance, but we cannot see the project proponent has attempted to address this.

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

This site has been subject to land formation and vegetation clearance (Figure 1-3). Enforcement Notice (Case No. E/YL-KTS/0464) has been issued by Planning Department. 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,
Ng Hei Man
Campaign Manager
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 This site has been subject to land formation and vegetation clearance. It is suspected that this is a case of “destroy first, build later”

