



長春社 Since 1968

The Conservancy Association

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Kwai Chung, New Territories, H.K.
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27th January 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-KTN/817

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 North Outline Zoning Plan (OZP) No. S/YL-KTN/9, the planning intention of agriculture 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*”. From the application, however, we cannot see any details to justify that the plan would fulfill the above planning intention, especially the need to propose 22% of paved area. We do not think such plan is in line with the planning intention.

2. Adverse environmental impacts

3 planning applications, namely A/YL-KTN/520, A/YL-KTN/665, and A/YL-KTN/772, have been approved with conditions at the proposed site. Comparing the existing application with the previous applications (see the table below), its development scale is larger, with larger site, more structures, parking spaces, higher maximum building height. We especially worry that the current paved area ratio is much higher than the previous applications. Paving too excessive materials such as concrete, brick, gravel on the existing farmland is largely incompatible with the subject site and its surrounding area.



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Major Development Parameters	A/YL-KTN/520	A/YL-KTN/665	A/YL-KTN/772	A/YL-KTN/817
Site Area	3,885 m ² (about)	3,885 m ² (about)	5,525 m ² (about)	6,002 m² (about)
Covered Area Ratio	12% (about)	12% (about)	12% (about)	15%(about)
Paved Area Ratio	11% (about)	11% (about)	10% (about)	22%(about)
Building Height	2.5m-3.8m	2.5m-3.8m	2.8m-4m	2.8m-4m
No. of structures	14 (reception and agriculture teaching Center, storage of agricultural tools and seeds, portable toilet, caravan camp)	14 (reception and agriculture teaching center, storage of agricultural tools and seeds, portable toilet, caravan camp)	23 (ancillary canteen, canteen kitchen, washroom, caretaker office, refreshment kiosk, agricultural education room, rain shelter (canopy) and caravan camp site)	32 (ancillary canteen, canteen kitchen, activity room, washroom, outdoor seating accommodation, guardroom, meter room, refreshment kiosk, rain shelter (canopy) and store room uses, and 15 caravans)
No. of Parking Spaces	15	16	17	20

Details above are extracted from Gist of A/YL-KTN/520, A/YL-KTN/665, A/YL-KTN/772

3. Undesirable precedent for similar applications

According to Statutory Planning Portal, we note that since 2015, 4 planning applications (Nos. A/YL-KTN/474, 520, 665 and 772) have been submitted for temporary hobby farm at the same site. However, none of them have been implemented until now.

- Application No. A/YL-KTN/474 was revoked in August 2018



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- Application No. A/YL-KTN/520, after applying extension of time limit 8 times, was lapsed on May 2019
- Application No. A/YL-KTN/665, with the planning permission valid until 5 July 2022, has already approved for extension of time limit 8 times. At this moment, merely the approval condition on submission of fire service installations proposal has been complied with¹

With the above observation, we doubt that the project proponent is not able to fulfil the conditions mentioned by Town Planning Board (TPB), and demonstrates large departure from the proposed use on a temporary basis. We do not think further sympathetic consideration should be given or it would set undesirable precedent for similar applications in future.

Yours faithfully,
Chow Oi Chuen
Campaign Officer
The Conservancy Association

¹ Please refer to Section 5 Previous applications, RNTPC Paper No. A/YL-KTN/772
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