



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
Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port
Road, Kwai Chung, New Territories, H.K.
網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
電子郵件 E-mail: cahk@cahk.org.hk

18th November 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/864

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 31.5% of paved area. We do not think such plan is in line with the planning intention.

2. Adverse environmental impact

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

- No plans on land recovery: Various structures/uses, including site reception, storage, toilet, changing room and rain shelter 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.
- Sewerage impacts: According to the application, we cannot see any details of the proposed toilets (both portable toilets and a toilet in a container), such as design; collection, treatment and disposal of sewage, and so on. We especially worry that leaking of human sewage can cause serious environmental and hygiene problems.
- Lacking details of drainage design: The application fails to demonstrate that filling of land would not cause adverse drainage and environmental impacts on the surrounding farmland.



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- Light and noise pollution: The application mentioned that the proposed site will be opened 24 hours daily including public holiday. Therefore, light and noise pollution generated from various activities would be highly inevitable. Unfortunately, no attempts have been proposed to tackle such disturbance.
- 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, and so on. 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.

Yours faithfully,
Chow Oi Chuen
Campaign Officer
The Conservancy Association