



長春社 Since 1968

The Conservancy Association

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27th September 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/NE-TK/752

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 Ting Kok Outline Zoning Plan (OZP) No. S/NE-TK/19, 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 *Temporary Barbecue Site and Caravan Holiday Camp with ancillary facilities* are not related to agricultural purposes, especially land filling of 701m². 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 11 single-storey structures of about 2.8m to 5m in height, and 701m²-land filling for barbecue area, caravan holiday camp, refreshment kiosk, reception and storage of tools, washroom and changing room and rain shelter, would be temporarily proposed in the application site. However, no



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details are available to illustrate how the land would be recovered after the proposed temporary use.

- Adverse sewage and waste 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 of wastewater arising from operation, particularly potential oily wastewater from barbecue 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, which are active agriculture land, coastal protection area and Site of Special Scientific Interest.
- 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. 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”

According to the google earth aerial photos, this site has been subject to land formation and vegetation clearance (Figure 1-5) since 2015. Therefore we 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>

Figure 1-5 According to the aerial photos from Google Earth, the application site (marked in red) has been subject to land formation and vegetation clearance since 2015





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