



長春社 Since 1968

## The Conservancy Association

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Kwai Chung, New Territories, H.K.  
網址 Website:www.cahk.org.hk

24<sup>th</sup> August 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-WKS/18

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 Wo Keng Shan Outline Zoning Plan No. S/NE-WKS/10, 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, we cannot see any details to justify how such plan would fulfill the above planning intention, especially land filling of 1562m<sup>2</sup> which occupies 23.3% of the site.

#### **2. Adverse environmental impacts**

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

- No plans on land recovery: The application, including 5 single-storey structures of about 4m in height, and 1568m<sup>2</sup> land filling for parking space, 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.
- No details on the proposed landscape pond: Currently the applicant does provide any details of the landscape pond, including design, source of water, maintenance works required, any potential discharge of water within the site or its surrounding



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environment. We especially worry that the landscaped pond can be a potential source of water pollution (either from visitors or operators) during operation phase. For example, if chemical pesticides would be used in the maintenance of the landscaped pond, the site runoff would be contaminated. All contaminated water from the landscaped pond would end up in entering adjacent watercourse.

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

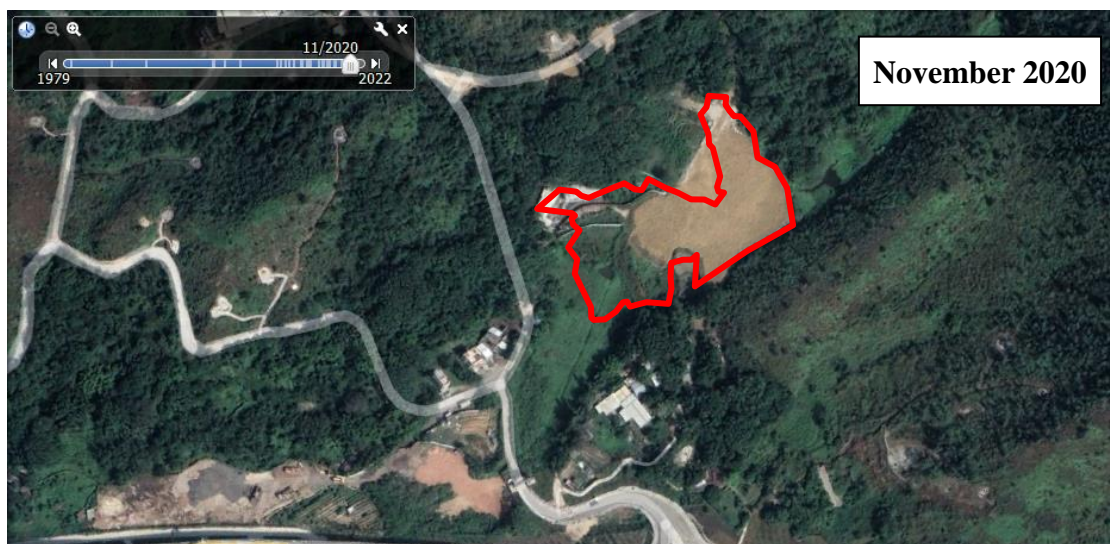
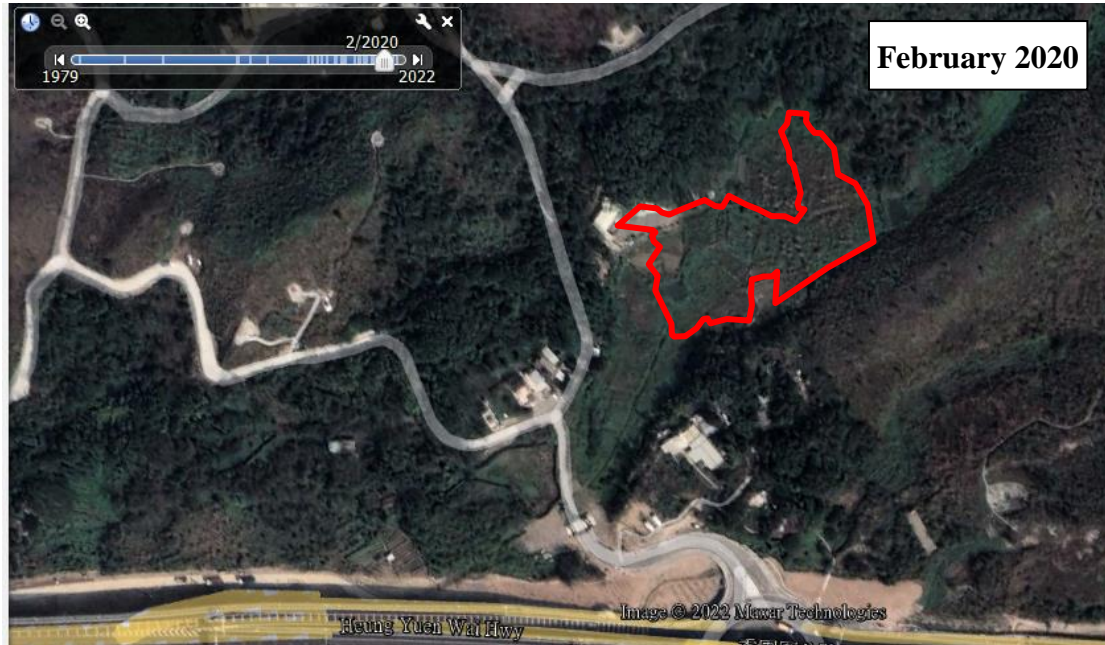
According to the google earth aerial photos, this site has been subject to land formation and vegetation clearance (Figure 1-4) since 2020, and we also reported the site as suspected unauthorized activities to several departments includes Lands Department, Environmental Protection Department, and Planning Department in 2020 (Figure 5-6). 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*”<sup>1</sup>. 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

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

**Figure 1-4** This 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”

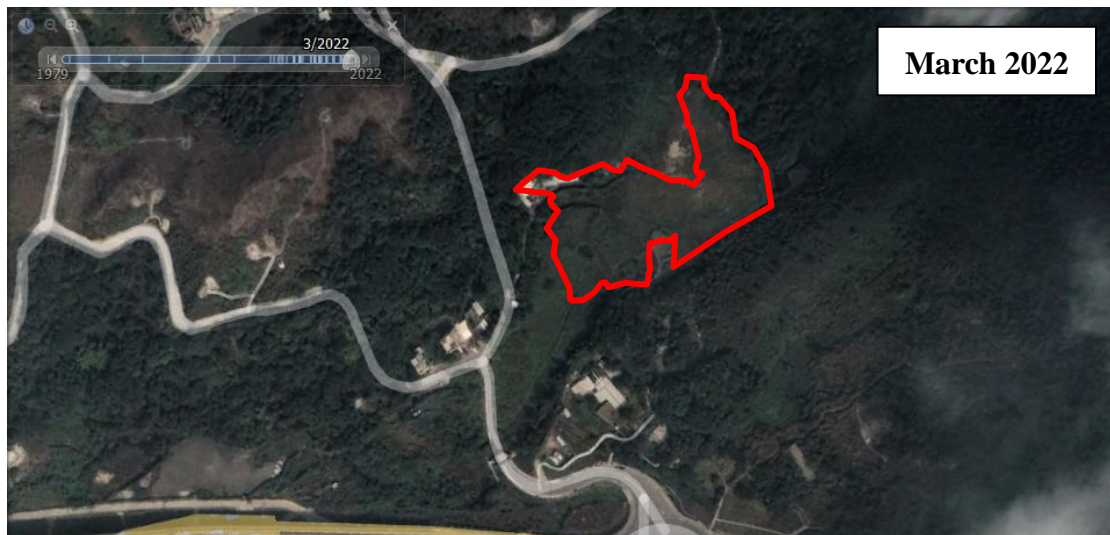
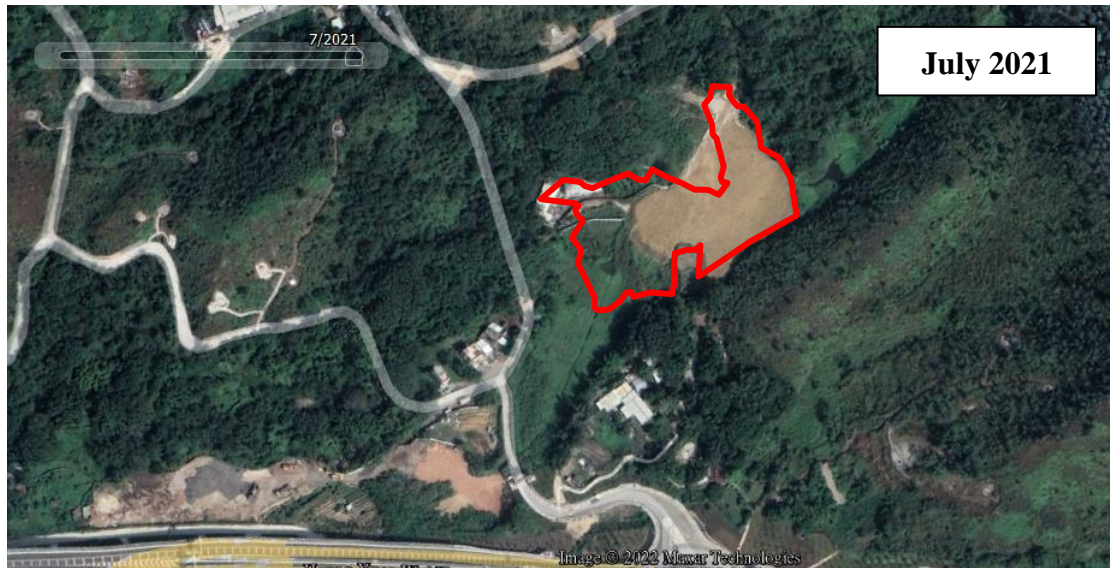




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**Figure 5-6 Site visit observation in October 2020 (marked in blue)**

