



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 電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538  
Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port Road, 電子郵件 E-mail:cahk@cahk.org.hk  
Kwai Chung, New Territories, H.K.  
網址 Website:www.cahk.org.hk

25<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 12A Application No. Y/YL-KTS/8

The Conservancy Association OBJECTS to the captioned application.

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

According to the approved Approved Kam Tin South Outline Zoning Plan 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.*”

There was a previous request for amendment (Z/YL-KTS/P7) rejected by Rural and New Town Planning Committee in 2002. The committee pointed out that:

*“(a) the site fell within an area with active agricultural activities and available agricultural infrastructures. The agricultural land in the area was of good quality and had significant ecological and conservation value. The proposed rezoning for residential development was considered piecemeal and would diminish the rural character of the area; and*

*(b) approval of the rezoning request would set an undesirable precedent for intensive developments to penetrate into the rural area and the cumulative effect of approving such similar requests might have adverse implications on the long term planning and future provision of infrastructures for the area.”*



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By introducing 969 flats with 18-23 storeys, such large development scale would potentially induce adverse off-site disturbance impacts on adjacent active agricultural land, especially disruption on its hydrological system. Besides, the development may reduce the quality of agricultural land for rehabilitation and cultivation of future agriculture purposes. We opine that this is definitely not in line with the AGR zone.

### **2. Incompatible with the surrounding environment**

Comprising 6 residential towers, 1 residential clubhouse, and 1 GIC block with 3 to 23 storeys, the proposed development density would be a large amendment to the original planning circumstance. It is highly incompatible with the rural setting surrounded by active agricultural land, and with low development density which is usually no more than 3 storeys high, such as adjacent Yuen Kong San Tsuen.

### **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 1-9), 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

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

**Figure 1-9** This application site (marked in red) has been subject to land formation and vegetation clearance (Source: Google Earth & Google street view). It is suspected that this is a case of “destroy first, build later”

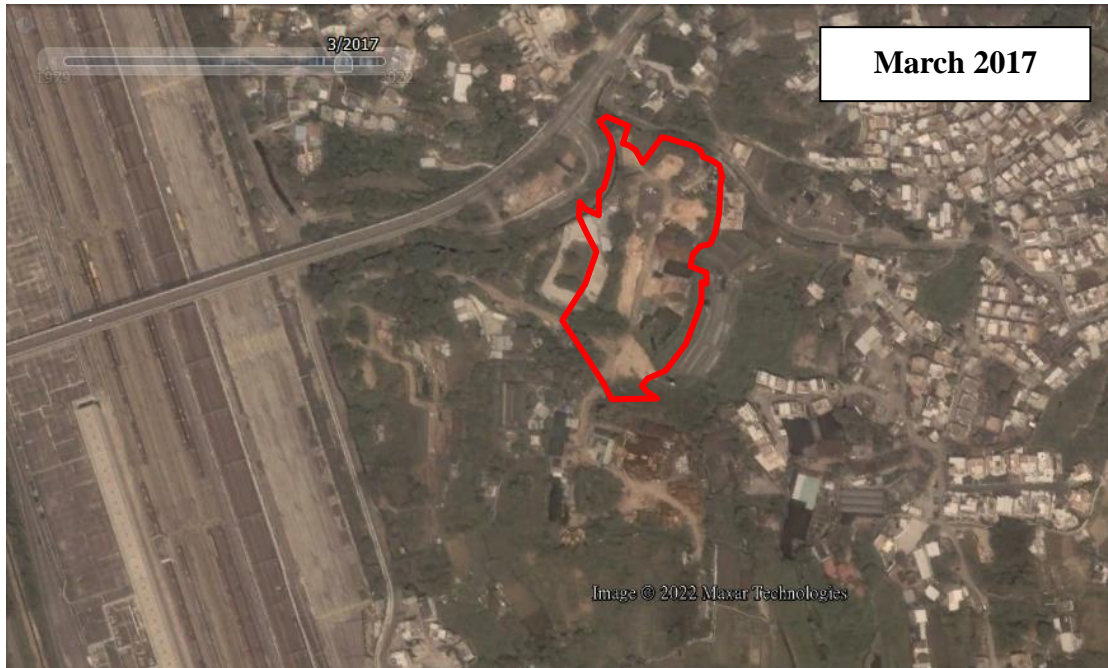




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