



長春社 Since 1968

The Conservancy Association

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17th 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-TT-538

The Conservancy Association OBJECTS to the captioned application.

1. Not in line with the planning intention of Conservation Area (CA)

According to the approved Tai Tong Outline Zoning Plan(OZP) No. S/YL-TT/18, the planning intention of CA zone *“is intended to protect and retain the existing natural landscape, ecological or topographical features of the area for conservation, educational and research purposes and to separate sensitive natural environment such as Site of Special Scientific Interest or Country Park from the adverse effects of development. There is a general presumption against development in this zone. In general, only developments that are needed to support the conservation of the existing natural landscape or scenic quality of the area or are essential infrastructure projects with overriding public interest may be permitted.”*

From the application, however, we cannot see any details to justify that the plan would fulfill the above planning intention. We do not think such plan is in line with the planning intention.

2. Adverse environmental impacts

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





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- Sewage impact: According to the application, there are 9 structures, 72 camping sites, and 20 parking lots. It is predicted that the application site will contain considerable amount of people. However, we cannot see any detailed design of any sewage facilities but only a septic tank. 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 conservation area.
- Light and noise pollution: As the application mentioned that the proposed site will be opened 24 hours, light and noise pollution generated from various activities would be highly inevitable. However, no attempts have been proposed to tackle such disturbance within the CA zone.

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

This site has been subject to land formation and vegetation clearance since 2009 (Figure 1-4). It is 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 1-4 According to aerial photos (Source: Google Earth) 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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