



長春社 Since 1968

The Conservancy Association

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15th November 2021

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,

RE: Representations relating to the Draft Tai Po Outline Zoning Plan (OZP) No. S/TP/29

Regarding the captioned, The Conservancy Association (CA) OBJECTS to the proposed amendments Item A.

1. Loss of function of Green Belt

According to the Draft Tai Po OZP (No. S/TP/29), the planning intention of “Green Belt” (GB) “*is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone*¹”.

In general, the government has completed GB review covering sites based on a basic principle that “*though vegetated, they have relatively less buffering effect and lower conservation value. Moreover, as these sites are close to supporting infrastructure facilities such as transport, water supply and sewerage, they are considered as having good potential to be rezoned for housing purposes, and are clear choices for urban expansion*”². We note that the proposed GB site for rezoning is indeed the

¹ Planning intention of GB in Tai Po OZP

https://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_TP_29_e.pdf#nameddest=GB

² LCQ7: Changes in planned uses of sites, 14 December 2016



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remaining one that performs good buffer function for that particular region. Approving the proposed amendment would set an undesirable precedent for similar amendments in future and affect the integrity of the habitats in different districts.

2. Adverse impact on woodland

From our observation, the proposed GB site and its adjacent hillslope are still well-wooded (Figure 1-3). The proposed amendment would involve turning GB into housing development area, leading to a loss of approximately 3.87 hectares of GB and its corresponding functions performed. While it is estimated that 1,330 trees³ would be removed, this estimation did not include some young trees with less than 95 mm in diameter at breast height (DBH) and they would not be reflected in the current document.

While no detailed vegetation survey and tree survey are currently available for public inspection, we worry that if adverse impact on woodland would be still under-estimated. It seems that vegetation clearance in large scale, if rezoning the proposed GBs for housing and road work, would be inevitable, and this would lead to fragmentation of woodland habitat in the area.

Similar to other GB rezoning case in other districts, we have grave concern that the existing mechanism for tree compensation and transplantation would be adopted to so-called meeting the target of tree compensation. It might, to a certain extent, help preserve individuals trees but certainly it would not re-create an equivalent ecological value and integrity of a habitat.

<http://www.info.gov.hk/gia/general/201612/14/P2016121400612.htm?fontSize=1>

³ Section 4.17, RNTPC Paper No. 7/21,

[https://plandcss2-my.sharepoint.com/personal/tpbsubmission_pland_gov_hk/Documents/Meeting%20Folder/RNTPC/RNTPC-20210827/STN/S-TP-28A_\(Tai%20Po%20OZP%20Amendments\)/S-TP-28A_Main%20Paper.pdf?CT=1636712203124&OR=ItemsView](https://plandcss2-my.sharepoint.com/personal/tpbsubmission_pland_gov_hk/Documents/Meeting%20Folder/RNTPC/RNTPC-20210827/STN/S-TP-28A_(Tai%20Po%20OZP%20Amendments)/S-TP-28A_Main%20Paper.pdf?CT=1636712203124&OR=ItemsView)



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In conclusion, we have to reiterate that provision of adequate housing and environmental conservation are not contradictory. Planning Department should withdraw the GB rezoning proposal, and consider alternatives on land supply, including the use of brownfield and idle lands.

Yours faithfully,

Ng Hei Man

Campaign Manager

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Figure 1 The proposed GB site and its adjacent hillslope are still well-wooded





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Figure 2-3 Current condition of the GB site

