



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

電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538

13 樓 1305-6 室

電子郵件 E-mail:cahk@cahk.org.hk

Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port Road, Kwai Chung, New Territories, H.K.

網址 Website:www.cahk.org.hk

19th February 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: Comments on the representations relating to the draft Ma On Shan Outline Zoning Plan (No. S/MOS/23)

The Conservancy Association (CA) has the following concerns for the captioned.

1. Objection to R1-38

CA OBJECTS to R1-38. These representations fail to consider the planning intention of “Green Belt” (GB) which 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. We note that the proposed GB sites for rezoning and the surrounding areas are still performing good buffer functions of GB. The sites are not fragmented habitat and have close linkages with adjacent habitats.

In response to some representations which highlight urgent need for housing land supply, we have to reiterate that provision of adequate housing and environmental conservation are not contradictory. To protect the integrity of Country Park and historical Iron Mine in Ma On Shan, Planning Department should withdraw the 7 GBs rezoning proposals, and consider alternatives on land supply, including the use

¹ Planning intention of GB in Ma On Shan OZP
https://www1.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_MOS_23_e.pdf#nameddest=GB



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of brownfield and idle lands.

2. Objection to R90

CA also OBJECTS R90 which suggest further improvement on the Ma On Shan Tsuen Road upgrading work, such as provision of cycle track. This representation neglects that environmental impact, both direct or indirect, would not be scaled down but on the contrary, would be further increased. Road upgrading and re-alignment work along Ma On Shan Tsuen Road would also not only pose adverse environmental impact in short-term but in long-term as well. GBs along Ma On Shan Tsuen Road would end up in more “connected” to town centre and their potential for development would be increased. Plantation, woodland, natural stream, the remaining part of Ma On Shan Village close to Site G, for example, would be vulnerable to development threats in future.

3. Support to R43-48, R50-51, R1640, R2465

CA SUPPORTS representations submitted by green groups. Green groups’ views are valid as the proposed amendments Item A, B1, C, D, E, F and G are not compatible with the surrounding environment. For GBs along Ma On Shan Road, they are very close to Country Park. Approving the proposed amendments would set an undesirable precedent for similar amendments in the future and affect the integrity of the habitats in different districts.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association