



長春社 Since1968

The Conservancy Association

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18th October 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 Lam Tei and Yick Yuen Outline Zoning Plan (OZP) No. S/TM-LTY Y/11

Regarding the captioned, The Conservancy Association (CA) would like to express concern on the proposed amendments Item A.

1. Loss of Green Belt function

According to the Draft Lam Tei and Yick Yuen OZP (No. S/TM-LTY Y/11), 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. While we understand that some areas are indeed brownfield

¹ Planning intention of GB in Lam Tei and Yick Yuen OZP
https://www1.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_TM-LTY Y_11_e.pdf#nameddest=GB

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



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which contains less buffer and ecological function, areas close to hillslope is comparatively performing good buffer function. The proposed amendment in such large scale would set an undesirable precedent for similar amendment in future.

2. Potential visual impact despite mitigation

According to Environmental Impact Assessment (EIA) Report of “Development at San Hing Road and Hong Po Road, Tuen Mun”, a total of 11 visually sensitive receivers (VSR) have been selected to present the visual changes. However, according to the summary of visual impacts after mitigation³, “substantially adverse” visual impact would still be resulted in two VSRs, while “moderately adverse” visual impact would be found in five VSRs. More importantly, potential visual impacts before and after mitigation remain unchanged in all affected VSRs (Figure 1). Based on the result, We worry that potential visual impact brought by the development cannot be simply solved by any mitigations measures.

3. Impact on trees

From our site observation, a group of *Litchi chinensis* are located within the proposed development site (Figure 2-6). They are 6-8m in height, and 0.5-0.6m in DBH. Such observation is similar with the result of broad brush tree survey; Landscape and visual impact assessment in the EIA Report.

Section B.1.1.22 of the board brush tree survey has mentioned the following:

*“There was also a group of relatively mature *Litchi chinensis* trees in the centre of this tree group that are fenced off. They were all approximately 8m in height and 0.5m in DBH. Among these trees, one (1) large *Litchi chinensis* tree (CEDD-T23) with 1.0m in DBH was recorded by a survey commissioned by CEDD in 2015”*

And here is the Section 10.5.8 of Landscape and visual impact assessment in the EIA Report:

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

³ Table 10.21, Development at San Hing Rad and Hong Po Road, Tuen Mun Environmental Impact Assessment Report



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*“Two (2) large trees with DBH ≥ 1 m are located in this LR; which is one (1) *Litchi chinensis* (CEDD-T23) within SHR site ... A group of relatively mature Litchi chinensis are located at SHR site near CEDD-T23, ranging from 0.4 – 1m in DBH. These *Litchi chinensis* are recognized by villagers and would collect the Litchi during fruiting period every year. Though this is a man-made LR and with suitable conditions can be recreated, but the remaining agricultural land and orchards in this area are mostly traditionally managed and it contains a relatively high proportion of trees with high amenity value, quality and maturity”*

Currently this tree group would be directly affected 2 residential blocks and new road. While existing mechanism for tree compensation would be strictly followed to meet the target of tree compensation, it would not help preserve individual trees with high maturity and amenity value. Viewing that it is relatively high in maturity and amenity value within the proposed development site, a review on the development plan, such as development scale, urban design, tree transplantation plan, is necessary to avoid direct felling those trees.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association



Figure 1 Potential visual impacts before (marked in red) and after (marked in blue) mitigation remain unchanged in some VSRs

Table 10.21 Significance of Visual Impacts during Construction and Operation Phases Upon Mitigation

VSR	Description	Sensitivity (Low, Medium, High)	Magnitude of Change		Significance Threshold before Mitigation (C & O)	Recommended Mitigation Measures		Residual Significance Threshold Upon Mitigation		
			C	O		C	O	C	O (Day 1)	O (Year 10)
1	View from Car Park, Tuen Tsz Wai	High	Large	Large	Substantially adverse	MM8, MM9	MM8 (b)	Substantially adverse	Substantially adverse	Substantially adverse
2	View from Public Open Area between Tuen Mun San Tsuen and Botania Villa	Low	Small	Small	Slightly adverse	MM8, MM9	MM8 (a)	Slightly adverse	Slightly adverse	Slightly adverse
3	View from Piu Lin Garden, Siu Hang Tsuen	Low	Small	Small	Slightly adverse	MM8, MM9	MM8 (b)	Slightly adverse	Slightly adverse	Slightly adverse
4	View from Tsing Lun Road Footbridge	Medium	Intermediate	Intermediate	Moderately adverse	MM3, MM5, MM8, MM9	MM3, MM4, MM5, MM8 & MM7 (b)	Moderately adverse	Moderately adverse	Slightly adverse
5	View from Kei Lun Wai Children's Playground	Low	Small	Small	Slightly adverse	MM8, MM9	MM8 (b)	Slightly adverse	Slightly adverse	Slightly adverse
6	View from Po Tong Ha	High	Large	Large	Substantially adverse	MM8, MM9	MM8 (b)	Substantially adverse	Substantially adverse	Substantially adverse
7	View from Raised Public Road Outside Siu Hong MTR Station	Low	Intermediate	Intermediate	Moderately adverse	MM8, MM9	MM8 (b)	Moderately adverse	Moderately adverse	Moderately adverse
8	View from Tsing Chung Koon Road	Low	Small	Small	Slightly adverse	MM8	MM8 (b)	Slightly adverse	Slightly adverse	Slightly adverse
9	View from Miu Fat Monastery Public Viewing Platform	Medium	Intermediate	Intermediate	Moderately adverse	MM5, MM8, MM9	MM4, MM5, MM8 (b)	Moderately adverse	Moderately adverse	Moderately adverse
10	View from Tuen Mun Path, Route 1	Low	Small	Small	Slightly adverse	MM8, MM9	MM8 (b)	Slightly adverse	Slightly adverse	Slightly adverse
11	View from Trail between Castle Peak and Por Lo Shan	High	Intermediate	Intermediate	Moderately adverse	MM8, MM9	MM8 (b)	Moderately adverse	Moderately adverse	Moderately adverse
12	View from Chung Shan Hillside with Graves	Medium	Large	Large	Moderately adverse	MM1, MM8, MM9	MM1, MM8 (b)	Moderately adverse	Moderately adverse	Moderately adverse
13	View from West Railway heading South-west	Low	Intermediate	Intermediate	Moderately adverse	MM8, MM9	MM8 (b)	Moderately adverse	Moderately adverse	Moderately adverse
14 (a)	View from Hong Po Road Roundabout	Medium	Intermediate	Intermediate	Moderately adverse	MM8, MM9	MM3, MM5, MM8, MM11	Moderately adverse	Moderately adverse	Slightly adverse



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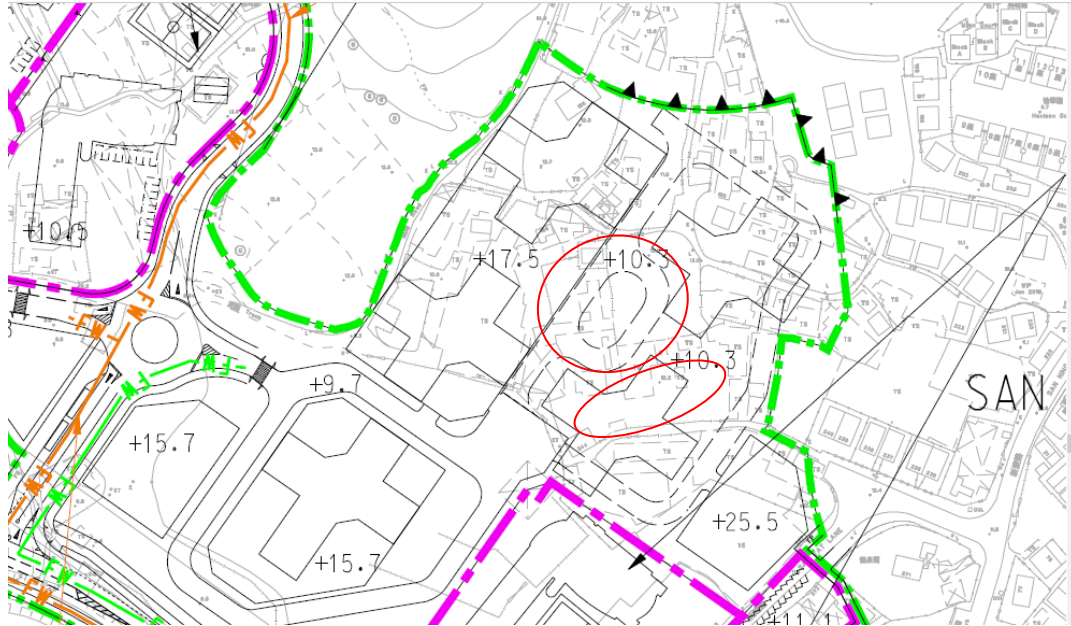
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Figure 2 Approximate location of the tree group *Litchi chinensis* (circled in red in red)





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Figure 3-6 Existing condition of the tree group *Litchi chinensis*





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