



長春社 Since 1968

**The Conservancy Association**

會址：香港九龍青山道 476 號 1 樓 102 室

Add.: Unit 102, 1/F, PeakCastle, 476 Castle Peak Road, Kowloon, Hong Kong.

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

電子郵箱 E-mail: cahk@cahk.org.hk 網址 Website: www.cahk.org.hk

29<sup>th</sup> November 2017

Town Planning Board  
15/F North Point Government Offices  
333 Java Road, North Point  
Hong Kong

By e-mail: [tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk)

Dear Sir/Madam,

**Re: Comments on the amendments to the Approved Tong Yan San Tsuen  
Outline Zoning Plan No. A/YL-TYST/10**

The Conservancy Association (CA) OBJECTS to the proposed amendment (Item B) under the approved Tong Yan San Tsuen Outline Zoning Plan (No. S/YL-TYST/10).

**1. Setting undesirable precedent**

The planning intention of 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”*. This GB includes lower hill slopes, woodland, traditional burial ground and vegetated land which are found at the urban fringe. We opine that such GB can still serve its function to contain urban sprawl. Approving the proposed amendments would set an undesirable precedent for similar amendments in the future.

**2. Under-estimation of impacts on woodland**

While it is estimated that approximately 1,135 out of 1,450 trees would be unavoidably removed, this estimation did not include some young trees or vegetation with less than 95mm in diameter at breast height (DBH) and they would not be

Registered Name 註冊名稱 : The Conservancy Association 長春社  
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)



長春社 Since 1968

**The Conservancy Association**

會址：香港九龍青山道 476 號 1 樓 102 室

Address: Unit 102, 1/F, PeakCastle, 476 Castle Peak Road, Kowloon, Hong Kong.

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

電子郵箱 E-mail: cahk@cahk.org.hk 網址 Website: www.cahk.org.hk

reflected in the current document. From our observation, apart from exotic species such as *Pinus massoniana*, *Acacia confusa*, *Lophostemon confertus*, etc., shrubs such as *Litsea rotundifolia*, *Psychotria asiatica*, *Adinandra millettii* can be spotted in the subject site (Figure 1 and 2). These native species can increase seed input in this GB site for natural regeneration. This is especially important for sites which are quite isolated from natural seed source. In this case, even there are mechanism for tree compensation and transplantation, it would only preserve individuals but not the habitat as a whole.

### 3. Alternatives not been explored and studied

We do not agree that the Administration has taken great efforts in exploring alternatives to avoid and minimize both ecological and social impacts on green belt as far as possible.

The RNTPC Paper No. 7/17 once mentioned that “*The GIC facilities are generally sufficient except secondary school (-29.59 classrooms)...*”<sup>1</sup>. A 36-classroom primary school, however, is now proposed and located exactly at the existing village area. Although this proposal “*was agreed with relevant stakeholders*”<sup>2</sup>, it is doubtful if comments of “*these stakeholders*” over-ride the assessment by the Administration. From the existing information provided, the proposal of a primary school in this site, in expense of the local settlement, lacks justification.

Besides, sites which are already devegetated, deserted or formed are available adjacent to the proposed development site (Figure 3 and 4). Instead of developing the proposed GB which is still covered by massive vegetation, these sites could be prioritized for residential development first. However, it has not been fully considered.

<sup>1</sup> Please refer to Section 5.2 of the RNTPC Paper No.7/17  
[http://www.info.gov.hk/tpb/en/papers/RNTPC/587-rntpc\\_7-17.pdf](http://www.info.gov.hk/tpb/en/papers/RNTPC/587-rntpc_7-17.pdf)

<sup>2</sup> Please refer to Section 7.2.2 of Final Executive Summary , Site Formation and Infrastructural Works for the Development near Tan Kwai Tsuen Yuen Long – Feasibility Study

Registered Name 註冊名稱 : The Conservancy Association 長春社

(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)



長春社 Since 1968

**The Conservancy Association**

會址：香港九龍青山道 476 號 1 樓 102 室

Add.: Unit 102, 1/F, PeakCastle, 476 Castle Peak Road, Kowloon, Hong Kong.

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

電子郵箱 E-mail: [cahk@cahk.org.hk](mailto:cahk@cahk.org.hk) 網址 Website: [www.cahk.org.hk](http://www.cahk.org.hk)

Finally, we are very disappointed that the feasibility study together with various technical assessment reports have not been published or attached in the Town Planning Board paper. While members of Town Planning Board (TPB) cannot get sufficient information prior to TPB meetings, they cannot make proper decision and all ecological and social impacts would be irreversible. Such arrangement is also unfair to public and concerned parties during the consultation process. We opine that all information related to this development should be open for public access before TPB discussion.

Yours faithfully,

Ng Hei Man

Campaign Manager

Registered Name 註冊名稱 : The Conservancy Association 長春社  
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)



長春社 Since 1968

The Conservancy Association

會址：香港九龍青山道 476 號 1 樓 102 室

Add.: Unit 102, 1/F, PeakCastle, 476 Castle Peak Road, Kowloon, Hong Kong.

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

電子郵箱 E-mail: cahk@cahk.org.hk 網址 Website: www.cahk.org.hk

**Figure 1 and 2** Apart from exotic species, shrubs such as *Litsea rotundifolia*, *Psychotria asiatica*, *Adinandra millettii* can be spotted in the plantation



Registered Name 註冊名稱 : The Conservancy Association 長春社  
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)



長春社 Since 1968

The Conservancy Association

會址：香港九龍青山道 476 號 1 樓 102 室

Address: Unit 102, 1/F, PeakCastle, 476 Castle Peak Road, Kowloon, Hong Kong.

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

電子郵箱 E-mail: cahk@cahk.org.hk 網址 Website: www.cahk.org.hk

**Figure 3 Sites which are already devegetated, deserted or formed are available (circled in red) adjacent to the proposed development site (marked in yellow). They could be prioritized for residential development first**



Registered Name 註冊名稱 : The Conservancy Association 長春社  
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)



長春社 Since 1968

The Conservancy Association

會址：香港九龍青山道 476 號 1 樓 102 室

Address: Unit 102, 1/F, PeakCastle, 476 Castle Peak Road, Kowloon, Hong Kong.

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

電子郵箱 E-mail: cahk@cahk.org.hk 網址 Website: www.cahk.org.hk

**Figure 4 Sites next to Shui Fu Road. These sites are either devegetated, deserted or formed.**



Registered Name 註冊名稱 : The Conservancy Association 長春社  
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)