



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
13 樓 1305-6 室

Address: 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

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

電子郵件 E-mail: cahk@cahk.org.hk

20th August 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 Section 12A Application No. Y/H10/13

The Conservancy Association (CA) is in reservation of the captioned application.

1. Not in line with the planning intention

According to the Pok Fu Lam Outline Zoning Plan No. S/H10/19, the planning intention of Green Belt (GB) is “*primarily for the conservation of the existing natural environment amid the built-up areas/at the urban fringe, to safeguard it from encroachment by urban type development, and to provide additional outlets for passive recreational activities. There is a general presumption against development within this zone*”. Viewing the existing built-up areas along Victoria Road, we opine that the proposed rezoned GB would still perform good buffering function to prevent excessive development pressure in this area.

2. Impact on woodland

The site is mostly occupied by natural woodland. According to the EcoIA, natural woodland is ranked “moderate” ecological value, with species of conservation interest such as *Aquilaria sinensis*, *Meottopteris nidus*, *Diospyros vaccinioides*, and so on. The well-wooded area is still in good condition and has potential in developing secondary woodland. However, the current development would imply massive tree felling and vegetation clearance. The direct loss of 0.55ha of this habitat can be irreversible.



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According to Section 9.3.1.1 of the EcoIA, “*woodland enhancement work for the remaining 1ha natural woodland within the Project Site is recommended as alternative measure to enhance the ecological value of existing woodland*”. Since details are lacking, we are in doubt of whether such proposal can re-create an equivalent ecological value and integrity of a woodland habitat.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association