



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 一期十三樓 1305-6 室
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

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
電子郵件 E-mail: cahk@cahk.org.hk

25th April 2022

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,

Representations relating to the Draft Tseng Lan Shue Outline Zoning Plan (OZP) No. S/SK-TLS/9

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

1. Loss of function of Green Belt

According to the Draft Tseng Lan Shue OZP (No. S/SK-TLS/9), 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 zone¹*”. 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 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. Approving

¹ Planning intention of GB in Tseng Lan Shue OZP
https://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_SK-TLS_9_e.pdf#nameddest=GB

² LCQ7: Changes in planned uses of sites, 14 December 2016
<http://www.info.gov.hk/gia/general/201612/14/P2016121400612.htm?fontSize=1>



the proposed amendments would set an undesirable precedent for similar amendments in the future and affect the integrity of the habitats in different districts.

2. Not in line with the criteria of GB review

The blog article³ of the former Secretary for Development has mentioned the criteria for rezoning GB for development.

“We began with devegetated, deserted or formed GB sites in the first stage of the review, and then progressed to sites located on the fringe of urban areas or new development areas with a relatively lower buffer or conservation value, including those which are close to developed areas or public roads, in the second stage. As the latter sites are close to existing transport infrastructure and supporting facilities such as water supply and sewerage, they have good potential for residential use and it is natural to consider them for further developments.”

RNTPC Paper No. 1/22 has mentioned the site condition and the rezoning proposal:

“There is a level difference of about 40m to 70m between Area (a) and Clear Water Bay Road at about 183mPD to 187mPD.” (Section 4.1)

“Area (a) includes an area designated for low-density private residential development and a private lot with an existing house. Area (b) is designated as non-building area (NBA) mainly for the associated access road and pedestrian facilities connecting with Clear Water Bay Road.” (Section 4.3)

“The Site is currently accessible via a local track connecting Ta Ku Ling San Tsuen Access Road to Clear Water Bay Road ... a new access road and pedestrian facilities are proposed in Area (b) to serve the proposed development at the Site.” (Section 4.4)

From the above, it is clear the Area (a), the core of the private housing development site, is away, or even isolated from the main access (i.e. Clear Water Bay Road). The

³ “Rezoning of Green Belt sites is open, transparent and reasonable” dated 6 July 2014 - https://www.devb.gov.hk/en/home/Blog_Archives1/index_id_80.html



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development site can only be accessible once a new access road has been built in Area (b). Worse still, from the indicative development scheme, additional roads have to be built to connect all 14 private residential blocks. The site, under such condition, should be eliminated from the initial stage of GB review, rather than undergoing detailed investigation stage.

3. Adverse impact on woodland

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 2.55 hectares of GB and its corresponding functions performed.

Moreover, the approximate estimation in the tree survey did not include some young trees with less than 95 mm in diameter at breast height (DBH). While detailed vegetation survey and tree survey are currently not available for public inspection, we worry that adverse impact on woodland would be still under-estimated. Moreover, from the Ecological Survey Data attached in the Road Works in Connection with Proposed Sites for Housing/Commercial Development (Package 1) – Feasibility Study: Interim Report on Viability of the Proposed Road Scheme of Amendment Item A, some flora species of conservation importance have been recorded within the Study Area, such as *Aquilaria sinensis*, *Elaeocarpus nitentifolius*, *Euonymus tsoi*, *Gymnosphaera podophylla*, *Morinda cochinchinensis*. We are concerned that if these species of conservation importance are located within the development site, removing them from the woodland would be inevitable.

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 meet 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.

4. Not providing affordable housings

Rezoning GB is to meet the pressing need for housing land supply, but we do not understand how such aim can be fulfilled by providing more private housing units in



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the proposed site. We can foresee that after the project is finished, there would not be any affordable housing for residents, especially those in poor living conditions.

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

The Conservancy Association

Figure 1-3 The proposed GB site and its adjacent hillslope are still well-wooded (Source: RNTPC Paper No. 1/22)

