



長春社 Since 1968

The Conservancy Association

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26<sup>th</sup> April 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 Tsuen Wan Outline Zoning Plan (OZP) No. S/TW/34

Regarding the captioned, The Conservancy Association (CA) OBJECTS to the proposed amendments Item A and B.

**1. Loss of function of Green Belt**

According to the Draft Tsuen Wan OZP (No. S/TW/34), 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<sup>1</sup>”*.

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*

<sup>1</sup> Planning intention of GB in Tsuen Wan OZP

[https://www1.ozp.tpb.gov.hk/plan/ozp\\_plan\\_notes/en/S\\_TW\\_34\\_e.pdf#nameddest=GB](https://www1.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_TW_34_e.pdf#nameddest=GB)



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*urban expansion*”<sup>2</sup>. 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 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 article<sup>3</sup> 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”*

MPC Paper No. 1/21 mentions that the proposed sites “*are located at the fringe of existing built-up areas of Tsuen Wan New Town and are in close proximity to existing roads*”. However, they are actually far away from the existing new town or gateway nodes such as Tsuen Wan or Tsuen Wan West MTR Station.

For Site A, the so-called “*close proximity to existing roads*” is just confined to the western part of the site which is connected by Po Fung Road. Indeed, the site is so large that a new road has to be built within the GB site to connect all 9 residential blocks and recreation house cum social welfare facilities back to Po Fung Road (Figure 1). These 2 sites, under such condition, should be eliminated from the initial stage of GB review, rather than undergoing detailed investigation stage.

<sup>2</sup> LCQ7: Changes in planned uses of sites, 14 December 2016

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

<sup>3</sup> “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](https://www.devb.gov.hk/en/home/Blog_Archives1/index_id_80.html)



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### 3. Incompatible with adjacent environment

The development intensity of the proposed 2 residential development is too high and not compatible with the surrounding environment. For Site A, adjacent village houses in Yau Kom Tau Village are only 2 to 3 storeys. Meanwhile, the northern part of Site A is a large GB extending to Ha Fa Shan and Route Twisk, and this is well-connected to adjacent Tai Lam Country Park which is less than 100m from the western fringe of Site A (Figure 2).

However, the proposed residential blocks are 10 to 25 storeys with a maximum building height of 180 mPD. Such building height is too high in this area and totally not compatible with Yau Kom Tau Village and the adjacent GB.

### 4. Adverse impact on woodland

The proposed amendments would involve turning GB into housing development areas, leading to a loss of approximately 5.76 hectares of GB and its corresponding functions performed. While it is estimated that 1,615 trees<sup>4</sup> would be removed, this estimation did not include some young trees with less than 95 mm in diameter at breast height (DBH) and they would not be reflected in the current document. Moreover, while no detailed vegetation survey and tree survey are currently available for public inspection, we worry that if adverse impact on woodland would be still under-estimated. It seems that vegetation clearance in large scale, if rezoning the proposed GBs for housing and road work, would be inevitable, and this would lead to fragmentation of woodland habitat in the area.

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 meeting 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.

In conclusion, we have to reiterate that provision of adequate housing and environmental conservation are not contradictory. Planning Department should

<sup>4</sup> Section 4.4, MPC Paper No. 1/21,  
[https://www.info.gov.hk/tpb/en/papers/MPC/665-mpc\\_1-21.pdf](https://www.info.gov.hk/tpb/en/papers/MPC/665-mpc_1-21.pdf)



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withdraw the 2 GBs rezoning proposals, and consider alternatives on land supply,  
including the use of brownfield and idle lands.

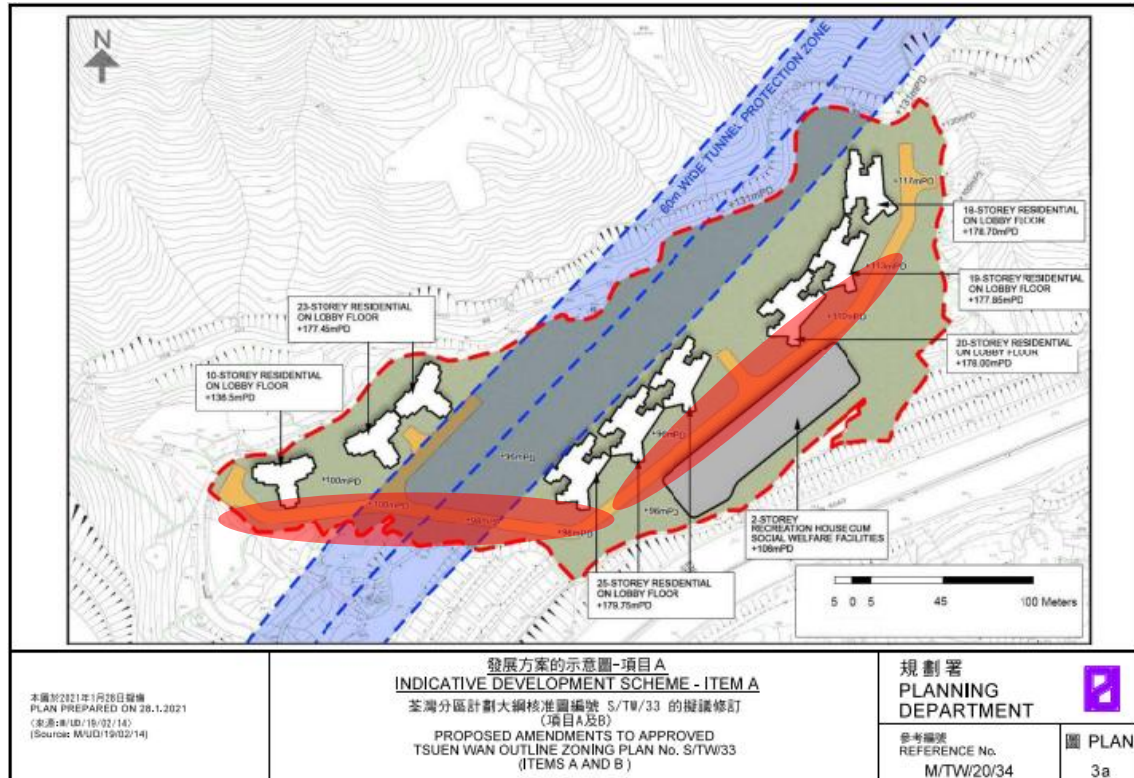
Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

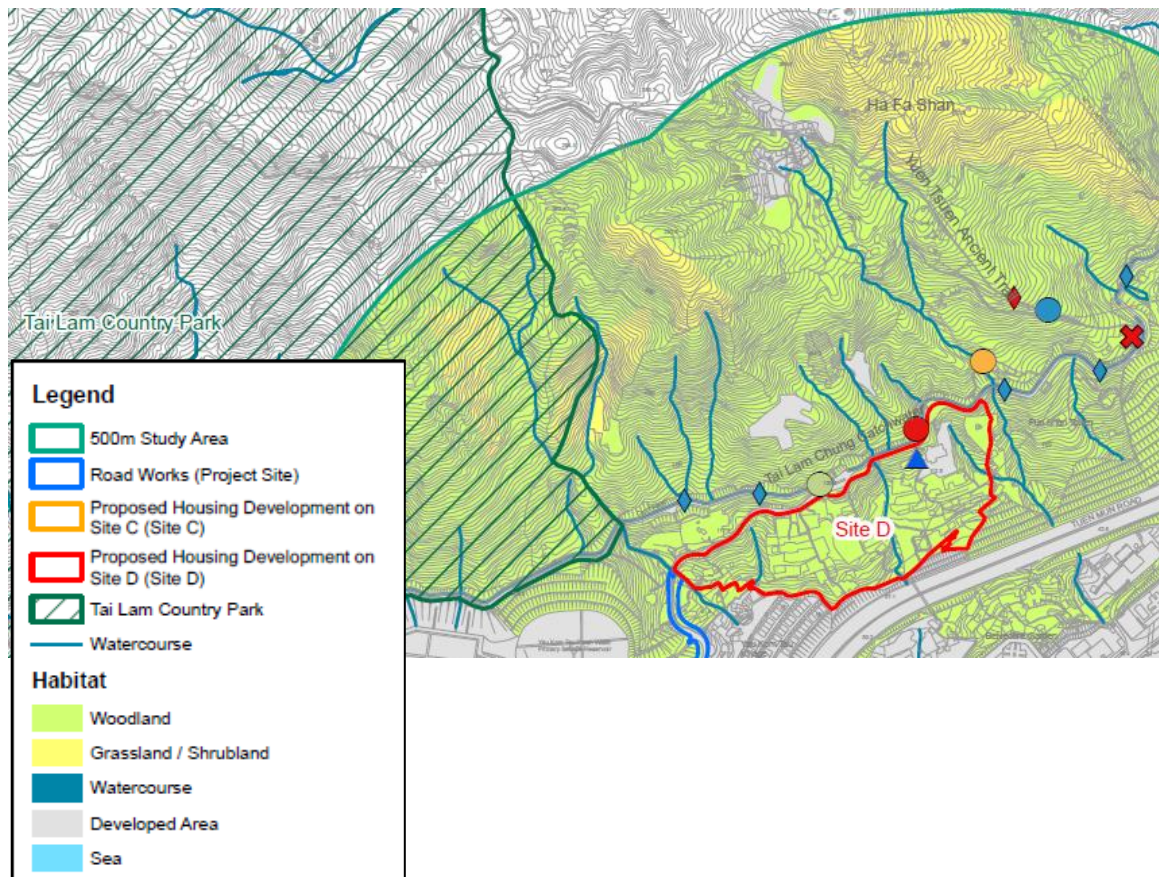
**Figure 1** From the indicative development plan<sup>5</sup>, a new road has to be built (shaded in red) within Site A to connect all 9 residential blocks and recreation house cum social welfare facilities back to Po Fung Road



<sup>5</sup> Please refer to the indicative development scheme – Item A  
[https://www.info.gov.hk/tpb/en/papers/MPC/665-mpc\\_1-21.pdf](https://www.info.gov.hk/tpb/en/papers/MPC/665-mpc_1-21.pdf)



**Figure 2** From the habitat map<sup>6</sup>, the GB (Site D in this map) is well-connected to the northern GB and Tai Lam Country Park in the west



<sup>6</sup> Habitat Map and Species of Conservation Importance for Site C&D – Tsuen Wan West. Agreement No. CE 46/2018(HY) Road Work in Connection with Proposed Housing/ Commercial Development on Eight Sites (package A) - Feasibility Study