



長春社 Since 1968

The Conservancy Association

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7<sup>th</sup> December 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 representations relating to the draft Tsing Yi Outline Zoning Plan (No. S/TY/31)

The Conservancy Association (CA) has the following concerns for the captioned.

**1. Objection to R1-76, 78-79, 81-88, 3077, 3079, 5273, 5276**

CA OBJECTS to R1-76, 78-79, 81-88, 3077, 3079, 5273, 5276. These representations fail to consider the planning intention of “Green Belt” (GB) which *“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>”*. The Explanatory Statement also states that the GB *“serves the purpose of protecting the existing ridgeline which provides physical barriers separating the oil depots in the south and west of Tsing Yi from residential developments in the north-east<sup>2</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*

<sup>1</sup> Planning intention of GB in Tsing Yi OZP

[https://www2.ozp.tpb.gov.hk/plan/ozp\\_plan\\_notes/en/S\\_TY\\_31\\_e.pdf#nameddest=GB](https://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_TY_31_e.pdf#nameddest=GB)

<sup>2</sup> Section 7.9.1 of Explanatory Statement in Tsing Yi OZP

[https://www2.ozp.tpb.gov.hk/plan/ozp\\_plan\\_notes/en/S\\_TY\\_31\\_e.pdf](https://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_TY_31_e.pdf)



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*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*<sup>3</sup>. We note that the proposed GB site for rezoning and the surrounding areas is still performing good buffer function of GB. The site is not fragmented habitat and has close linkages with adjacent habitats.

## 2. Support to R90, 91, 93, 94

CA SUPPORTS representations submitted by green groups. Green groups' views are valid as the proposed amendment Item A is not compatible with the surrounding environment. 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.

In conclusion, we have to reiterate that provision of adequate housing and environmental conservation are not contradictory. Planning Department should withdraw this GB rezoning proposal, and consider alternatives on land supply, including the use of brownfield and idle lands.

Yours faithfully,  
Chow Oi Chuen  
Campaign Officer  
The Conservancy Association

<sup>3</sup> LCQ7: Changes in planned uses of sites, 14 December 2016  
<http://www.info.gov.hk/gia/general/201612/14/P2016121400612.htm?fontSize=1>