



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

8th 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,

Comments on the Section 12A Application No. Y/YL-LFS/13

The Conservancy Association OBJECTS to the captioned application.

1. Loss of function of Green Belt (GB)

According to the draft Lau Fau Shan & Tsim Bei Tsui Outline Zoning Plan (No. S/YL-LFS/10), 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.”*¹

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 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. Approving the proposed application would set an

¹ 1 Planning intention of GB in OZP

https://www1.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_YL-LFS_10_e.pdf#nameddest=GB.pdf

² LCQ7: Changes in planned uses of sites, 14 December 2016

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



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undesirable precedent for similar cases in future and affect the integrity of habitats in different districts.

2. Not in line with Wetland Buffer Area (WBA)

From our observation, a part of the proposed GB site is within WBA (Figure 1). According to Application for Developments within Deep Bay Area under Section 16 of the Town Planning Ordinance (TPB PG-No. 12C), the intention of WBA is “to protect the ecological integrity of the fish ponds and wetland within the WCA and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds”. Although there are some degraded areas, which may be considered by the board as target areas to allow an appropriate level of residential/recreational development, we found that most of the areas have not been paved yet (Figure 2). The proposed rezoning site still serves the function to “prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds” in WCA.

By introducing a population of 2,352 and 840 flats, such large development scale would potentially induce adverse off-site disturbance impacts on adjacent wetland in WCA, affect ecological function and integrity of Deep Bay wetland ecosystems. We opine that this is definitely not in line with the TPB Guideline No. 12C and the planning intention of WBA.

3. Adverse environmental impacts

We worry that there would be several potential adverse environmental impacts caused by the rezoning application:

- Landscape impact: Refer to Figure 2, it shows that the landscape around the application site remains largely natural or with low-density village development. However, the application proposed to build 2 residential blocks with 25 storeys and 3 residential blocks of not more than 5 storeys. We are very concern the application will bring and change the landscape character of surrounding area, especially areas within WBA.
- Ecological impact: Also, the TPB PG-No. 12C mentioned that “within the WBA, for development or redevelopment which requires planning permission from the Board, an ecological impact assessment would also need to be submitted.” However, we cannot find any comprehensive assessment details submitted by the applicant. We especially worry potential adverse ecological impacts stated below:



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- i. Indirect disturbance on ponds/wetland within WCA during both construction and operation phases
- ii. Disruption on flight path of egrets and herons
- iii. Light disturbance on birds and other wildlife, such as *Pteroptyx maipo*

Yours faithfully,
Chow Oi Chuen
Campaign Officer
The Conservancy Association

Figure 1 The proposed rezoning site (marked as red) is within WBA

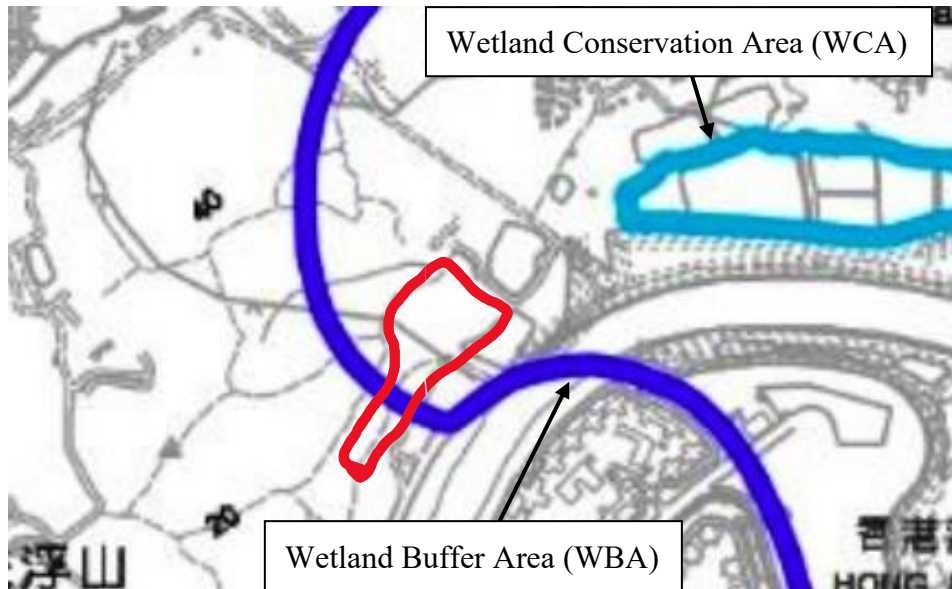


Figure 2 Existing condition of the proposed rezoning site (marked in red)

