

16 December 2020

Chairman and Members

Town Planning Board

15/F, North Point Government Offices

333 Java Road, North Point

Hong Kong

Fax: 2877 0245;

Email: tpbpd@pland.gov.hk

**Re: Draft Ma On Shan Outline Zoning Plan No. S/MOS/23
(Amendments to the Approved Ma On Shan Outline Zoning Plan No. S/MOS/22)**

Dear Chairman and Members,

Designing Hong Kong objects to amendments items A, B1, C, D, E, F and G in the rezoning proposal with the following reasons:

- All of the amendment items in the rezoning proposal were originally zoned as “Green Belt (GB)”. The planning intention of this zone 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. The rezoning proposal against the planning intention of the “Green Belt” allowing urban sprawl to take over from the densely vegetated areas at Ma On Shan.

Amendment items A and B1

- According to the aerial view from the Google Earth in November 2019 (Figure 1) and our site visit in December 2020 (Figure 2 and 3), the proposed sites is still covered with dense vegetation. The residential development and the proposed extension of Nin Fung Road will destroy the natural features at Cheung Muk Tau, and bring adverse environmental and ecological impacts to the area.
- The proposed residential development with a building height and plot ratio up to 165mPD and 6.5 respectively is not compatible with the existing surrounding environment. The proposed sites are adjacent to the Cheung Muk Tau village which mainly consists of three-storeys tall village houses. The approval of the rezoning application would bring negative visual impacts and destroy the sub-urban landscape of the area.

Amendment items C, D and E

- The proposed residential development in amendment item D is only 35m away from the Ma On Shan Country Park. Any human activities in the area will bring negative impacts to the natural environment and habitat of the nearby country park. The possible damages to the valuable but natural assets of the city should be considered prior to development approvals.
- Development and road building in this steep natural terrain (Figure 4) will require extensive mitigation and slope stabilisation measures impacting the natural vegetation and country park areas. The plans are silent on these risks of ecological damage to the existing natural slopes along the Ma On Shan Tsuen Road.
- According to the aerial view from the Google Earth in November 2019 (Figure 5) and our site visit in December 2020 (Figure 6 and 7), the proposed sites is covered with dense vegetation. Construction of residential buildings, supporting infrastructure and amenities, and associated slope works will remove natural features and vegetation bringing adverse environmental and ecological impacts.
- The proposed residential development with building height and plot ratio up to 225mPD and 6.5 is not compatible with the existing surrounding environment. The proposed sites are adjacent to Shun Yee San Tsuen which is mainly one or two storey dwellings. The approval of the rezoning application would bring negative visual impacts and destroy the sub-urban landscape.
- Houses in the nearby Shun Yee San Tsuen are part of the Site Structures at Mining Settlement, Ma On Shan Iron Mine, which is listed in the Grade III Historic Buildings by the Antiquities and Monuments Office. However, in the current proposal, the departments did not provide any information on how to conserve and protect the monuments and landscape.

Amendment items F & G

- The proposed residential development in amendment item G is only 10m away from the Ma On Shan Country Park. The construction of the fresh water and salt water service reservoir is right next to the Ma On Shan Country Park. Any human activities in the area will bring negative impacts to the natural environment and habitat of the nearby country park. The possible damages to the valuable but natural assets of the city should be considered prior to development approvals.
- The proposed sites are far away from the main road and require significant supporting infrastructure and extensive slope works impacting large areas of Green Belt and country park.

- There is lack of transportation linkage or community facilities to support the development. Upgrading of the transportation network, construction of infrastructure and associated slope works will impact large areas of rural and natural landscape in Ma On Shan, including green belt and country park land.
- The steep natural terrain around the site and the connecting roads (Figure 8) will require extensive mitigation and stabilisation works to support development permitted under these amendment items. Slope works for amendment item D and E will damage the existing natural slope along the Ma On Shan Tsuen Road and reach far into the country park areas.
- The proposed residential construction with building height and plot ratio up to 250mPD and 3.6 is incompatible with the existing surrounding environment. The proposed sites include Ma On Shan Tsuen, a village consisting of single storey dwellings and farmland. The natural environment extends North, West and South. The approval of the rezoning application would bring negative visual impacts and destroy the rural landscape in the area.
- Amendment item G impacts a small agglomeration of licenced squatter huts and farm fields. These were formed on government land between 1950 and 1970, and residents have built up their own community and neighbourhood since then. These people are still active in the area and redevelopment will lead to destruction of the community with a forced relocation of residents.
- The government has proposed to construct a carriageway on the slope to connect the future private developments on amendment item G. Structure from the former Mineral Preparation Plant are found on the downslope of the Ma On Shan Tsuen Road, in the list of Grade III Historic Buildings by the Antiquities and Monuments Office. However, in the current proposal, the departments did not provide any information on how to conserve and protect the monuments during the construction of the proposed road.
- Ma On Shan Tsuen Road is the only way for hikers and residents to access the Ma On Shan Country Park. Thousands of people using the road as a pedestrian path shared with only a view vehicles on weekends and weekdays. Construction work and future development will have a disastrous impact on the enjoyment of this popular hiking route to barbecue sites and country park. Measures to mitigation road safety concerns will require more infrastructure leading to ever more slope works and damage to the natural environment.

Save our country park

- There is a public consensus not to develop the country park. This was well recorded during the land supply debate. We are disappointed with the proposal from government as it violates the consultation outcomes with this proposal to develop the vicinity of the country park.

- Future development in Ma On Shan should be in a lower density and clustered in areas with adequate and direct connections with existing road infrastructure, such as the area along the Ma On Shan Bypass (Figure 9), instead of sites up the mountain surrounded directly by a country park. This would reduce demand for road and slope works, and prevent disturbance to the nature and our valuable but vulnerable natural assets.
- The government should give priority to developing brownfield sites in the New Territories, rather than overriding the public consensus on halting development of the countryside. The government has a responsibility to ensure country parks are being protected and eliminate all development threats to country parks.
- We urge the Board to consider the cumulative impacts of approval of these rezoning plans. The approval of the rezoning would set undesirable precedents for other rezonings of Green Belts and fringes of country parks.

We call on the Town Planning Board to protect our city's grand natural environment for our future generations, and to ask Government and the Planning Department to revise the plans.

Here we submit our concerns for your consideration.

Yours,

Designing Hong Kong Limited

Figure 1: Google Earth's Aerial Photo of Cheung Muk Tau in November 2019



Figure 2: Existing dense vegetation in amendment item A in December 2020



香港 .com



Figure 4: Location of registered slope near amendment items C, D and E from the SMRIS

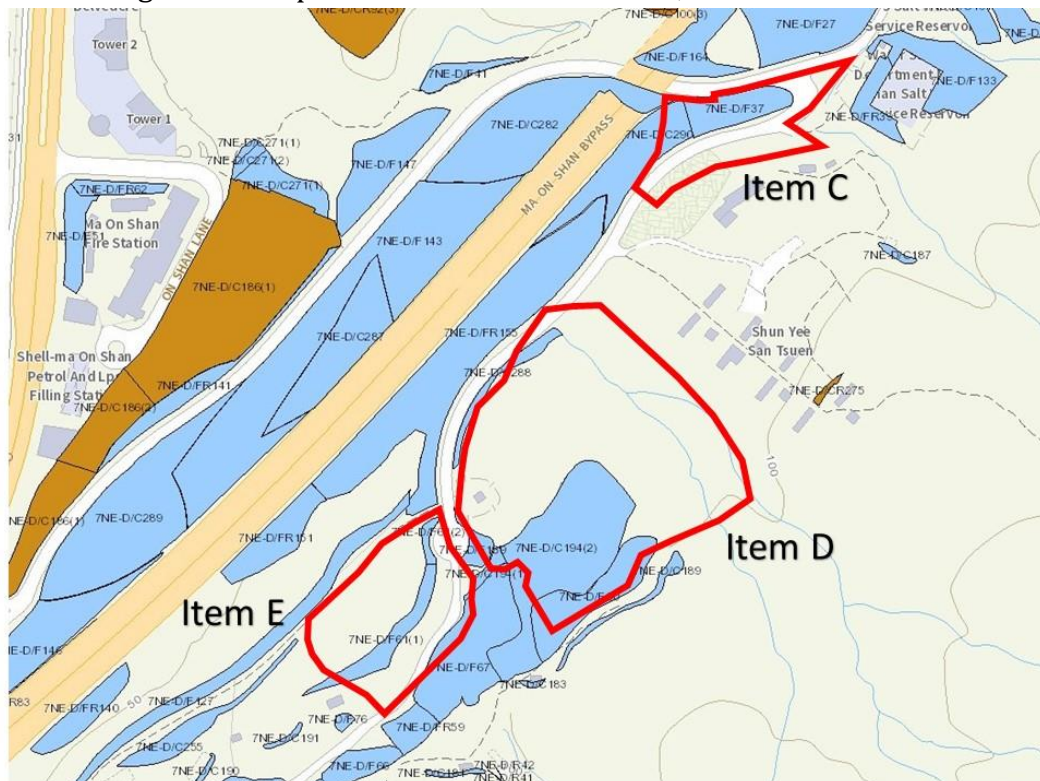


Figure 5: Google Earth's Aerial Photo of Shun Yee San Tsuen in September 2019

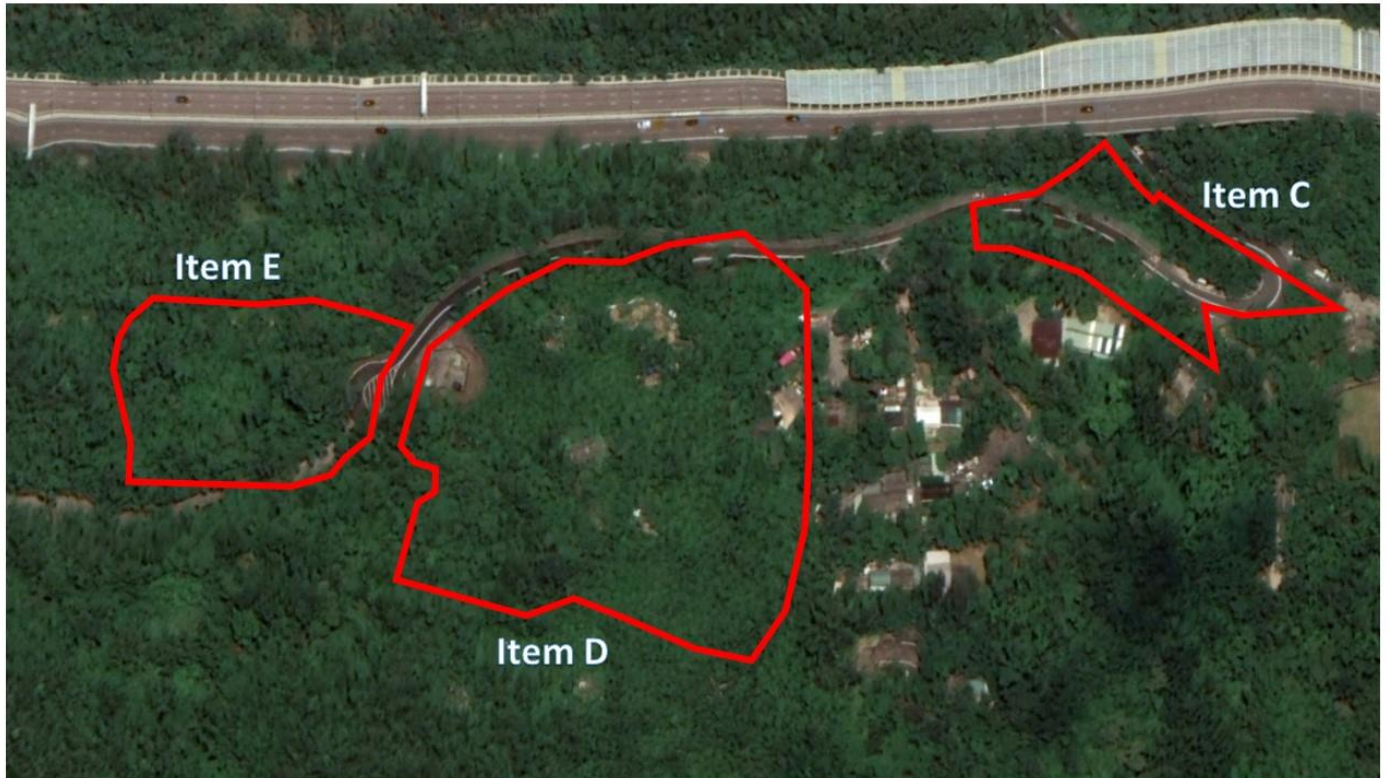


Figure 6: Existing dense vegetation in amendment item D in December 2020



Figure 7: Existing dense vegetation in amendment item E in December 2020



Figure 8: Location of registered slope near amendment items F & G from the SMRIS

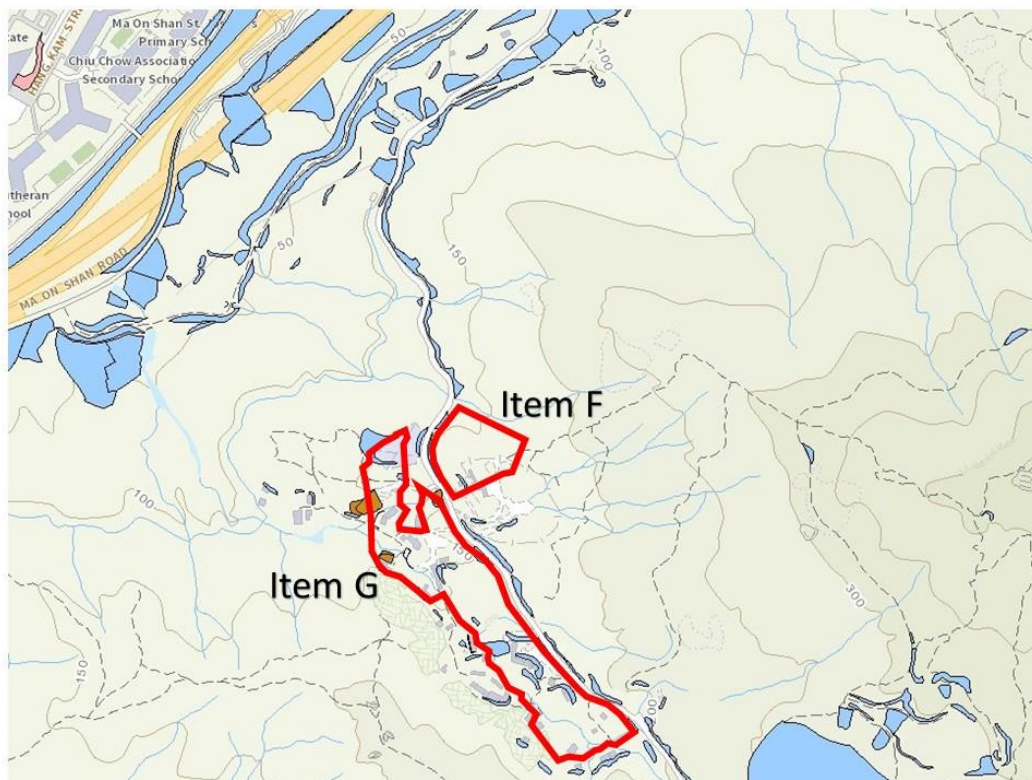


Figure 9: Proposed future development area in Ma On Shan

