

2 September 2021

Chairman and Members
Town Planning Board
15/F, North Point Government Offices
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**Re: Draft Tsing Yi Outline Zoning Plan No. S/MOS/31
(Amendments to the Approved Tsing Yi Outline Zoning Plan No. S/TY/30)**

Dear Chairman and Members,

Designing Hong Kong objects to amendment item A for the following reasons:

- The amendment area was originally zoned as “Green Belt (GB)”. The planning intention of this zone 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. The proposed rezoning is against the planning intention of the “Green Belt” zone. It allows urban sprawl to take over the densely vegetated areas at Tsing Yi.
- In the Explanatory Statement of the Tsing Yi Outline Zoning Plan, it also stated that *“this zoning is intended to establish the limits of urban expansion and comprises mainly steep hillsides not suitable for urban development. It 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.”*
- According to Google Earth’s satellite photo (Figure 1), the area is currently dense vegetated and functions well as a “Green Belt”. It is estimated that at least 1,264 trees would have to be removed and transplanted for the development, which hasn’t counted some young trees in the area. With such a large-scale vegetation clearance, it brings permanent destruction to the existing landscape and habitat.

- The natural stream in the site will have to be diverted. Even though government proposes mitigations works to minimize possible impacts to the existing hydrology and ecology, we are doubtful the revitalisation and accessibility to the water would provide any compensation. Rather we see a high risk of further destruction of the stream. The channelised stream cannot replace the original natural habitat. It will destroy natural habitats of animals and plants growing in the valley.
- The steep natural terrain (Figure 2) around the site will require extensive mitigation and stabilisation works to support the development permitted under this amendment. Slope works for this amendment item will damage the existing natural slope of Liu To Valley. Future residents will be required to bear the cost and responsibility for slope maintenance and repair.
- A total of 11 viewing points were selected to illustrate the visual impacts after the construction of three high-rise residential buildings on the proposed site. The mountain ridge will be blocked by the development from several viewpoints. The Tsing Yi Nature Trail along the mountain ridge and the scenery of the popular trail would be blocked (Figure 3) and affect the enjoyment by hikers and residents.
- Furthermore, in *the Final Interim Report for Rezoning* which was submitted by the Civil Engineering and Development Department, 10 of the 11 viewing points will have moderately or significantly adverse visual impacts, and the report shows that the impact would be unchanged after taken mitigation action. It implies the visual impacts cannot be solved easily in this development and bring adverse impacts to the resident in Tsing Yi.
- The development project interrupted a portion of the popular Tsing Yi Nature Trail. The reroute of the Trail may cause inconvenience to the trail user as the trail act as the back garden for many Tsing Yi resident.
- The high-rise and huge building mass of the proposed development may affect the air ventilation for the community. The prevailing wind direction is mainly from the East and South. The development may affect the air ventilation of the housing estates nearby such as Mount Heaven and Cheung Wang Estate.
- Construction is expected to last for 10 years. There is a secondary school (Lok Sin Tong Leung Chik Wai Memorial School) and a primary school (Po Leung Kuk Chen Yat Primary School) right opposite the proposed site. The long period of construction would generate nuisance to students' school life, and residents' life for a decade.

- The applicant has underestimated the traffic flow in the current application. Compared with several traffic impact assessments for other proposed development on Tsing Yi Island, the traffic forecast on junctions and roads are unreasonably lower than the previous assumptions. The population and road usage will increase due to the completion of several housing projects in the coming years in the area.
- The Traffic Impact Assessment also fails to illustrate the real traffic needs and practices from the drivers and road users. In the Interim Report, the traffic assumption is “*based on that right-turn exit from the proposed development is not allowed*”. Under this assumption, drivers have to make a u-turn at the busy Tam Kon Shan Interchange to access the Ting Kau Bridge, Tsing Ma Bridge and Tsing Yi Bridge, which are the main access from Tsing Yi to New Territories West, Lantau Island, Kowloon and Hong Kong Island. It is more reasonable to allow a right-turn exit from the development, but it would require further improvement of the junction and may affect the existing traffic flow on Tsing Yi West Road.
- There is a shortage of several ancillary facilities around the proposed development. The document shows that the 10,300 population in the proposed development will cause a shortage in community care service facilities, elderly services and hospital beds. Even though social welfare facilities will be provided in the development, the gross floor area provided in the plan cannot accommodate all these shortages.
- Besides, there is a lack of facilities to support the community needs for the housing development. The location of ancillary facilities is not balanced on Tsing Yi. Including this proposed development, there are at least 5 new housing development to be completed on the uphill side of Tsing Yi, mainly along the Ching Hong Road and Tsing Yi West Road. However, most of the ancillary facilities such as sport centres, standard swimming pool, sport ground, library are mostly concentrated far downhill.
- The proposed development is within the 1000m Consultation Zone from the Oil Depot. According to the *Hong Kong Planning Standard and Guideline*, it is recommended that statutory re-zoning should be to “*reduce development potential with regard to population in buildings*” within the Consultation Zone. However, this application is acting the opposite by bringing in more population into this hazard zone.
- According to the Outline Zoning Plan, the ridge line on the west of Tsing Yi “*provides physical barriers separating the oil depots in the south and west of Tsing Yi from residential developments in the north-east*”. However, the proposed building height up to 220mPD exceeds the height of the mountain and causes a direct exposure to the resident to the Oil Depot (Figure 4).

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- The government should give priority to developing brownfield sites in the New Territories, rather than overriding the public consensus on halting development of the well vegetated countryside near urban conglomerations. The government has a responsibility to ensure the greenery of our city is being protected and eliminate all development threats to ensure a green and healthy living environment for qnearby residents.
- 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.

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 withdraw the plans.

Here we submit our concerns for your consideration.

Yours,

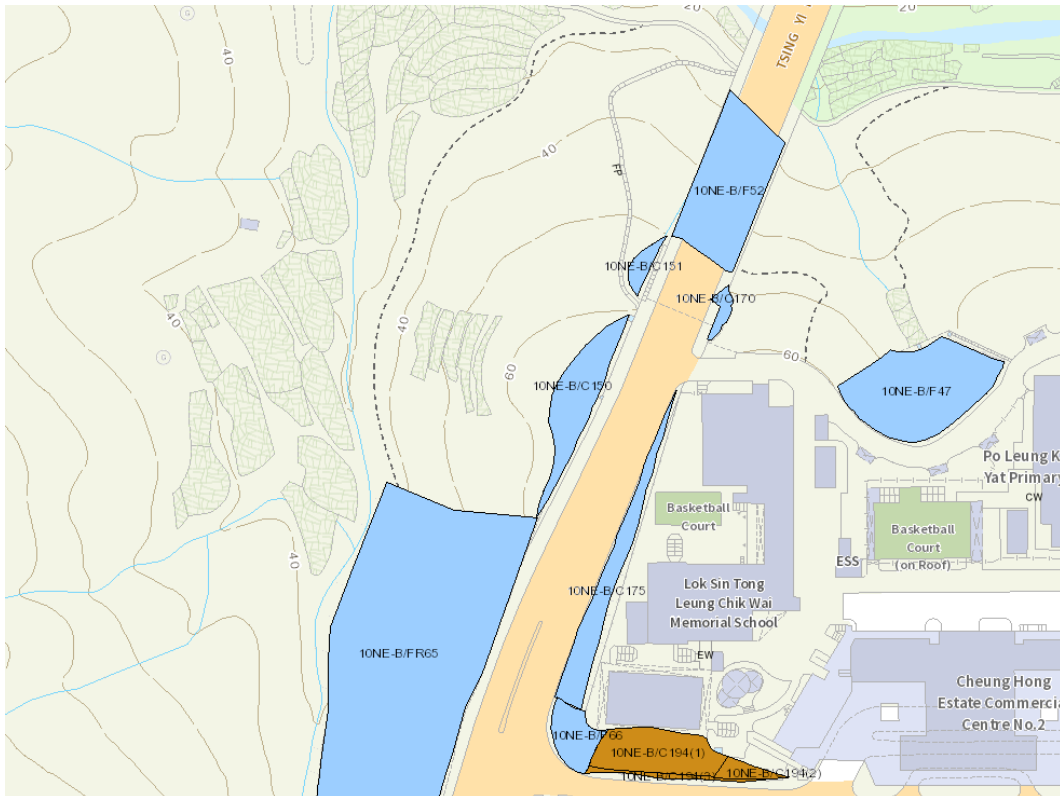
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Figure 1: Dense vegetation at the proposed site (Source: Google Earth)



Figure 2: Steep terrain and slope at the site (Source: SMRIS)



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Figure 3: Current view at the Tsing Yi Nature Trail with the location of the proposed development



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Figure 4: Location of Oil Depots, “Physical barrier” and height reference for the new development

