



長春社 Since 1968

The Conservancy Association

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5th March 2019

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 Section 16 Applications No. A/TW-CLHFS/1

The Conservancy Association (CA) OBJECTS to the captioned application.

1. Not in line with the planning intention of the area

According to the Chuen Lung and Ha Fa Shan Outline Zoning Plan No. S/TW-CLHFS/1, the general planning intention for the Area is “to protect the natural environment and the rural landscape, with a view to complementing the overall natural environment and the landscape characters of the surrounding Tai Lam Country Park and Tai Mo Shan Country Park”. The application site is surrounded by “Green Belt” (GB) zones and Country Park, serving as an important buffer area to control urban sprawl. Therefore, the proposed hotel is not in line with the planning intention.

2. Landscape and ecological concerns

The application site is situated in the vicinity of Tai Mo Shan Country Park and Tai Lam Country Park. As mentioned in the OZP, “the landscape character of the Area is enclosed, tranquil and coherent...the overall landscape character area value of the Area is high”. The proposed hotel would introduce human disturbances and is incompatible with the adjacent environment, affecting the landscape value of the area.

According to the Ecological Impact Assessment submitted by the applicant, secondary woodland in the study area has moderate ecological value. The



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woodland is ecologically and closely linked to the adjacent habitats in the protected areas. Some protected species of flora and fauna or species with conservation value could be found in the study area, such as Crested Goshawk (*Accipiter trivirgatus*), Luofushan Joint-fir (*Gnetum luofuense*), Hong Kong Newt (*Paramesotriton hongkongensis*). We are concerned that vegetation clearance during the construction phase would affect the habitat integrity and decrease the ecological value of the area.

3. Undesirable precedent and potential cumulative impacts

Application with similar scale of development for building houses (No. A/DPA/TW-CLHFS/3) was rejected in 2017. Reasons for rejection were that “*the proposed residential development is considered not in line with the general planning intention for the Chuen Lung and Ha Fa Shan area to protect the natural habitats and the rural landscape which complement the overall natural environment and the landscape beauty of the surrounding Country Parks*” and “*approval of the application may set an undesirable precedent encouraging similar residential development nearby, the cumulative impact of which would result in general degradation of the rural landscape quality of the surrounding Country Parks*”. Approving the captioned applications is in contradiction to the Committee’s previous decision and would set an undesirable precedent for similar applications in the area. Development would further encroach into lands with conservation and landscape values, decreasing overall quality of the environment.

Yours faithfully,
Charlotte Chan
Campaign Officer
The Conservancy Association