

27 October 2017

By Fax (2151 5303) & Post

The Honourable WONG Wai Lun, Michael, JP  
Secretary for Development  
Development Bureau  
18/F, West Wing, Central Government Offices  
2 Tim Mei Avenue  
Tamar, Hong Kong

Dear Mr WONG,

### **Consultation on Development of the Periphery of Country Parks**

The Land Policy Panel of the Hong Kong Institute of Surveyor (HKIS) organised a members' forum (the Forum) on 26 June 2017 to discuss the development of periphery land of country parks. The previous Chief Executive Mr CY Leung in his Policy Address suggested the society should consider the development of certain periphery areas of country parks for public housing and non-profit-making elderly homes. The Government announced in May 2017 that the Hong Kong Housing Society accepted the Government's invitation to undertake ecological and technical studies of two identified sites situated at the periphery of country parks.

On behalf of the HKIS, I have pleasure in appending below a summary of the views and comments expressed in the Forum by our members for your consideration and if you considered appropriate, further actions.

#### **1. Presentation on Development of Country Parks**

The Forum was presented with the findings of a research conducted by our Land Policy Panel. It covered inter alia the background of country parks, scientific criteria for assessing land conservation, exchange for higher ecological value land, landslide hazards and the challenges and resistance for creating development land. Details please refer to the attached slides, and the major findings are extracted below:

- a. Most of the trees in existing country parks are non-naturally grown.** In studying historical photos, there were limited trees in the countryside of Hong Kong after the World War II. Tree planting programmes were implemented by the Government since 1948. The Country Parks Ordinance (Cap 208) was enacted in 1976 and the earliest country parks were only announced in 1977.
- b. Guidance for assessing land conservation by scientific criteria.** The "New Nature Conservation Policy" introduced in 2004 by the Government has made use of a scoring system for assessing the ecological importance of sites.

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- c. **Precedent cases of conservation of sites with high ecological value.** Sha Lo Tung is quoted as a latest case with non-insitu exchange. There were two other examples of reduction of country park areas for public use in 1990s.
- d. **Landslide hazards should not be overlooked in developing slope areas.** Major landslide incidents at sloping areas had caused fatalities and injuries, e.g. Shum Wan Road Landslide in 1995.

## 2. Comments and Discussions

During the discussion session, different views and comments were expressed by the members.

### a. Development on Country Parks

There were views both for and against the idea of development of part of the country parks. Those who opposed had argued that Hong Kong has always maintained a well-established ratio between development and conservation; the total area of country parks (representing some 40 per cent of Hong Kong's total land area) should not be reduced to make way for development. Instead, more attention should be paid to developing the under-utilised, but developable, in the remaining 60 per cent of the land.

On the other hand, those who supported the idea had acknowledged that the creation of new development land was difficult (e.g. due to terrain limitation and land ownership issue) and time consuming. It is a long-term process to create land by way of the traditional methods, including reclamation and resumption of privately owned land. They maintained that development of periphery of country parks could be one of the possible ways of solving the housing supply problem.

It was also pointed out that the scale of proposed development in country parks should be limited due to the geotechnical and/or slope concerns. Further, any proposed development of the country parks should only be confined to the periphery areas.

Some other members suggested that the Government should improve the existing country parks in terms of accessibility, facilities and biodiversity. The 2017 Policy Address has also stated the objective to increase the total area of ecological conservation sites and country parks, and enhance their recreational and educational values. Members generally agreed with such suggestion.

### b. Alternative Sources of Development Land

The discussions also touched upon alternative sources of development land, including the removal of the container ports, the sites held on recreational leases as well as the reservoirs. A member further suggested that the plot ratio restriction in urban areas / new towns should be relaxed to solve the housing supply issue in the short run.





In this regard, some members advised that the constraints on development intensity due to infrastructures should not be underestimated. It should also be a balanced consideration for exchanging of “high-value” recreational sites for residential use.

### 3. **Conclusion**

The HKIS appreciates the Government’s efforts in up-keeping the ecological and conservation sites; and enhance their recreational and educational values. However, the shortage of longer term development land is also an important issue which should be addressed without delay. On the question of development of periphery areas of the country parks, we trust that a detailed report covering scientific research and assessment criteria will help the Government and the public for further discussions.

We sincerely hope the above views and comments will be useful to you. We shall be pleased to share our further thoughts with you. Please feel free to contact myself and/or the HKIS Secretariat on 2526 3679 if you require more information or would like us to elaborate on the above.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'T. Ho', written over a horizontal line.

Sr Thomas Ho  
President  
The Hong Kong Institute of Surveyors

Encl. Power Point Slide presented in the Forum

# Country Park Study – Value Creation

**Presentation by Land Policy Panel**

# Outline

- A. Why study the peripheral areas of country parks?
- B. Background of country parks
- C. Scientific criteria for assessing land conservation
- D. Exchange for higher ecological value land
- E. Landslide hazards
- F. Challenges and resistance for creating development land

***Part A.***

***Why study the peripheral areas of  
country parks?***

# 2017 Policy Address

- To increase the total area of ecological conservation sites and country parks
- To consider allocating a small proportion of land on **the periphery of country parks** with relatively low ecological and public enjoyment value **for public housing and non-profit-making elderly homes**



# The Hong Kong Housing Society Study (“the Study”)

Acceptance of government invitation in mid-May 2017

- 2 selected sites - **Tai Lam & Shui Chuen O**
- To look into (a) the ecological, landscape and aesthetic values, (b) recreational and development potentials and (c) practical constraints
- *18 months* to submit the Study report



Tai Lam Tunnel Toll Plaza  
source: hkej



Shui Chuen O Estate  
source: wenweipo



# Selected sites of the Study



	<b>Tai Lam, Yuen Long</b>	<b>Shui Chuen O, Sha Tin</b>
Location	The west of Tai Lam Tunnel Toll Plaza	Adjacent to Shui Chuen O Estate
Site area	<b>About 20 ha<sup>#</sup></b>	<b>About 20 ha</b>
Country Park involved	Tai Lam Country Park	Ma On Shan Country Park

Selection of sites:

- Basic transport network and infrastructure facilities
- Housing in the nearby areas

**#Sr. PC Lau's 2015 Proposal for Tai Lam Study Area: 170 ha**

# Other new development areas

<b>NDAs/NTEs</b>	<b>Planning Area (ha)</b>	<b>Development Area (Residential area) (ha)</b>	<b>Planned Population Capacity</b>	<b>Flat Yield (per residential area (ha))</b>
Kwu Tung North & Fanling North	612	320 (83)	176,900	60,000 (723)
Hung Shui Kiu	714	441 (80)	176,000	61,000 (763)
Yuen Long South	223	183 (65)	82,700	27,700 (426)
Tung Chung Extension	250	196 (71.9)	144,400	49,400 (687)
<b>Total</b>	<b>1,799</b>	<b>1,140 (299.9)</b>	<b>580,000</b>	<b>198,100 (661)</b>

NDAs = New Development Areas

NTEs = New Town Extensions Projects

# Comparison of public housing development

Development	Residential Development Area [about] (ha)*	Flat Yield (Plot Ratio)	Flat Yield (per residential area (ha))
Wang Chau (Phase 1, 2 & 3)	19	17,000 (6)	895
Sha Tin Area 52 (Shui Chuen O Estate)	13	11,000 (4.03 – analysed from OZP)	846
Anderson Road Quarry Site (On Tat & On Tai Estate)	20	18,000 (6.3)	900
5 Sites in Tuen Mun Area 54 (Sites 1&1A,2,3,4,4A&5) (PRH + SSF)	12.4 (5 sites range 0.8 – 4.2)	15,800# (5-6)	1,274
<b>Total</b>	<b>64.4</b>	<b>61,800</b>	<b>960</b>

\* The residential development area may include the area for G/IC & Road.

# Proposed PR from 5 to 6 in Site 1, 1A, 3 & 4 under District Council's document.

PRH = public rental housing  
 SSF = subsidised sale flats

# Discussion on the development of periphery of country parks

## 郊野公園應否發展？

劉炳章建議郊野公園地建屋 林超英批欺善怕惡

梁振英：騰出低生態郊野公園用地建屋

梁振英再提郊野公園建屋 環團感憂慮

郊野公園地「一幅都不能少」可思考將郊野公園邊陲地帶建公屋  
不滿削郊野公園建屋論 林超英網上再發炮

郊野公園委員會有委員支持於郊野公園建屋

梁振英郊野公園「可加可減」論 林超英：可加不可減

徵郊野公園建屋「有病」  
梁粉林超英：是思想癌細胞

郊野公園應為香港未來發揮更好作用

特首：研郊園地建公屋老人院

與環保部門商選址 馬紹祥：邊陲地帶生態價值較低

林超英：範圍不減可商量

施永青：「攬着不放」忽視貧苦 陳啟宗：郊野公園1至2%也不可動用不合理



# Consideration of developing low ecological value sites for residential use

2011

- Discussion Argument started from public
- DEVB: No plans in hand  
*LCQ14: Expand land resources*

2012

- Business sector suggested development at CPs for PH  
*Hong Kong Commercial Daily*

2013

- Secretary for DEVB: “still not to be touched on or discussed today?”  
*Blog of Sec. for DEVB*
- Developers supported housing development in periphery of CPs  
*HKEJ*
- DEVB: No plan to develop CPs for housing purposes  
*LC Paper No. CB(1)352/13-14*

2014

- DEVB: No plan to develop in CP & continue to listen to public  
*LC Paper No. CB(1)1755/13-14*

2015

- A former housing policy adviser: Develop a small portion of the Tai Lam CP as a pilot project for PH  
*HKEJ*
- CE: Worth looking into development in some CP areas  
*DEVB*

2016

- DEVB: No plan to change the use of CPs and special areas
- Priority to convert suitable GB sites to residential  
*LC Paper No: CB(1)452/15-16(04)*

2017

- CE: To consider a small proportion of land on the periphery of CPs for PH & non-profit-making elderly homes purposes  
*2017 policy address*
- HKHS study  
*LCQ16*

# ***Part B.***

## ***Background of country parks***

# Background of Hong Kong's Country Parks

**1844**

Good Order  
Cleanliness  
Ordinance



**1965**

Then governor:  
David Trench invited  
Professor Lee Talbot  
to conduct a study



Report:  
Conservation of the  
Hong Kong  
Countryside



**1977**

The earliest Country  
Parks announced:  
- Shing Mun, Kam  
Shan, Lion Rock,  
Aberdeen & Tai Tam



**1976**

- Enact Country  
Parks Ordinance  
(Cap 208)



**1971**

- Pilot program for  
countryside  
recreation facilities  
- Shing Mun

# View of Hong Kong's countryside (After World War II)



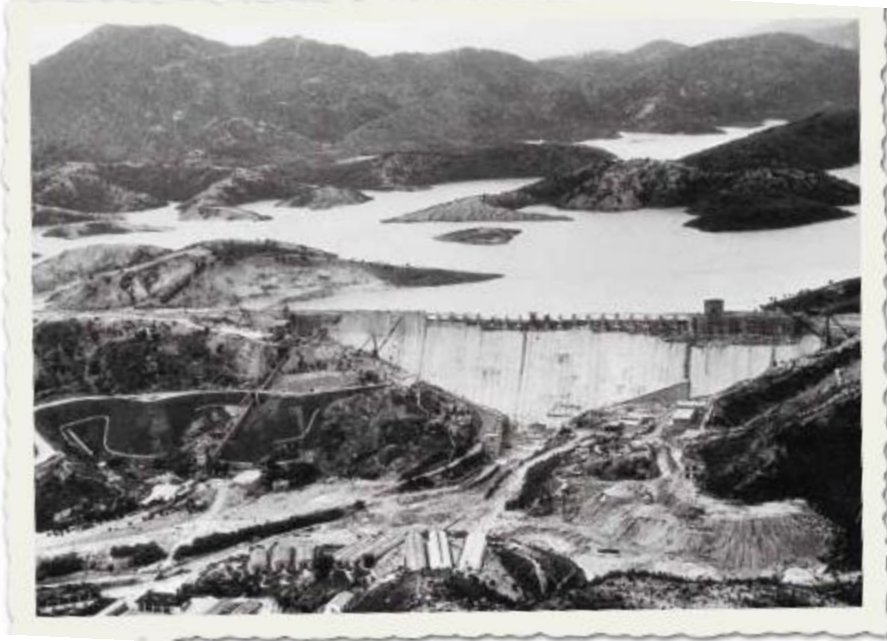
劣地 — 戰後香港郊野的典型景觀



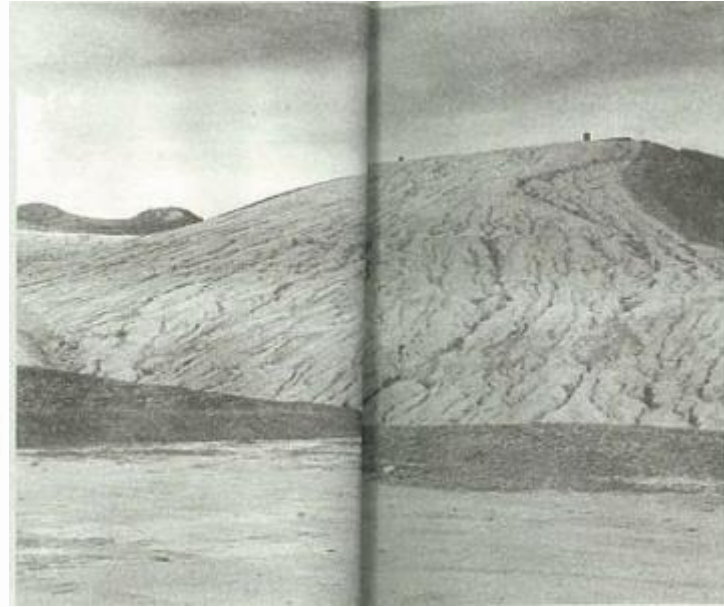


# Hong Kong's Countryside

**Tai Lam Chung Reservoir in 1959**



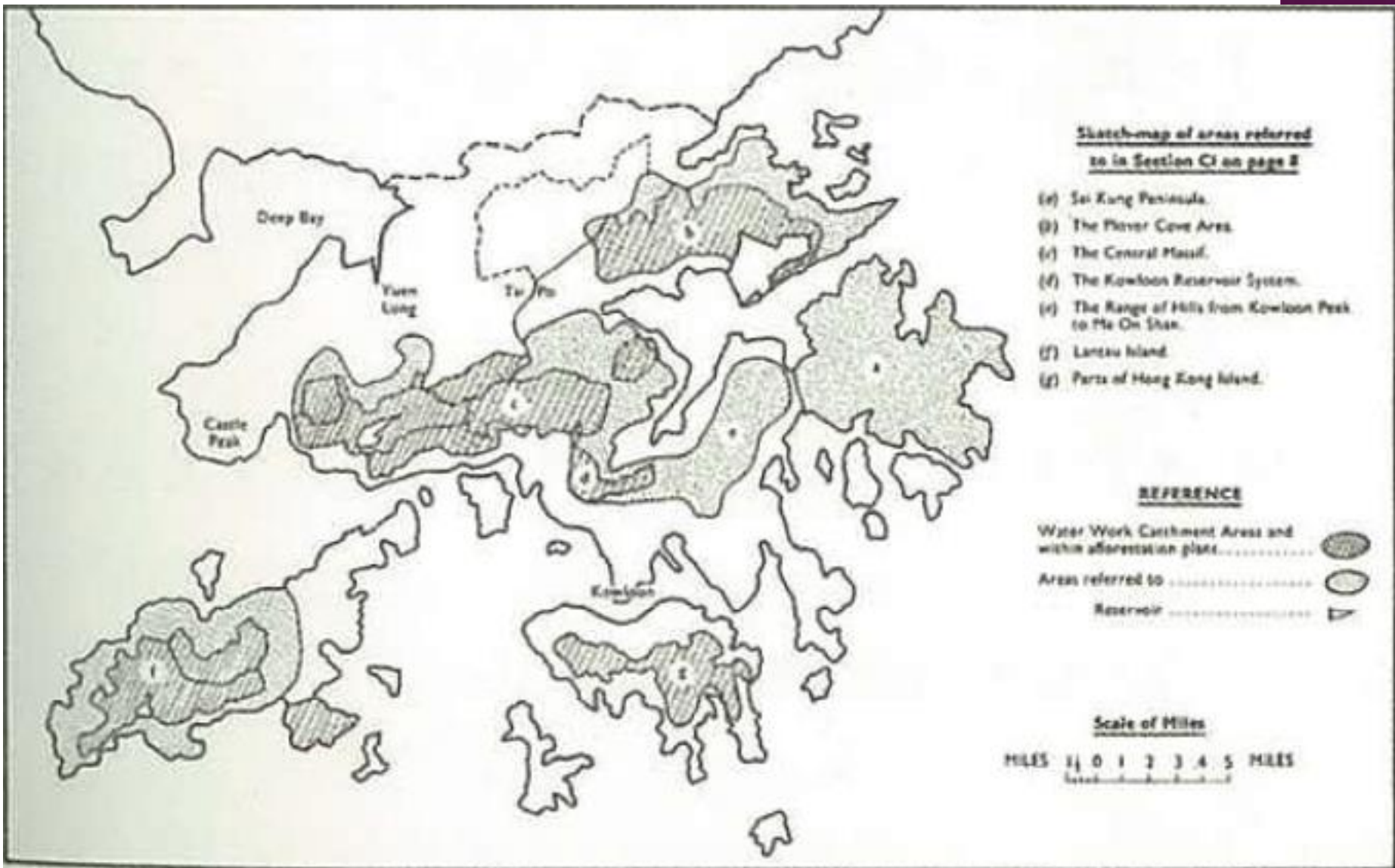
**Shing Mun in 1967**



**Tree planting during 1948 - 1960**



# Draft plan of Country Parks proposed by Professor Lee Talbot

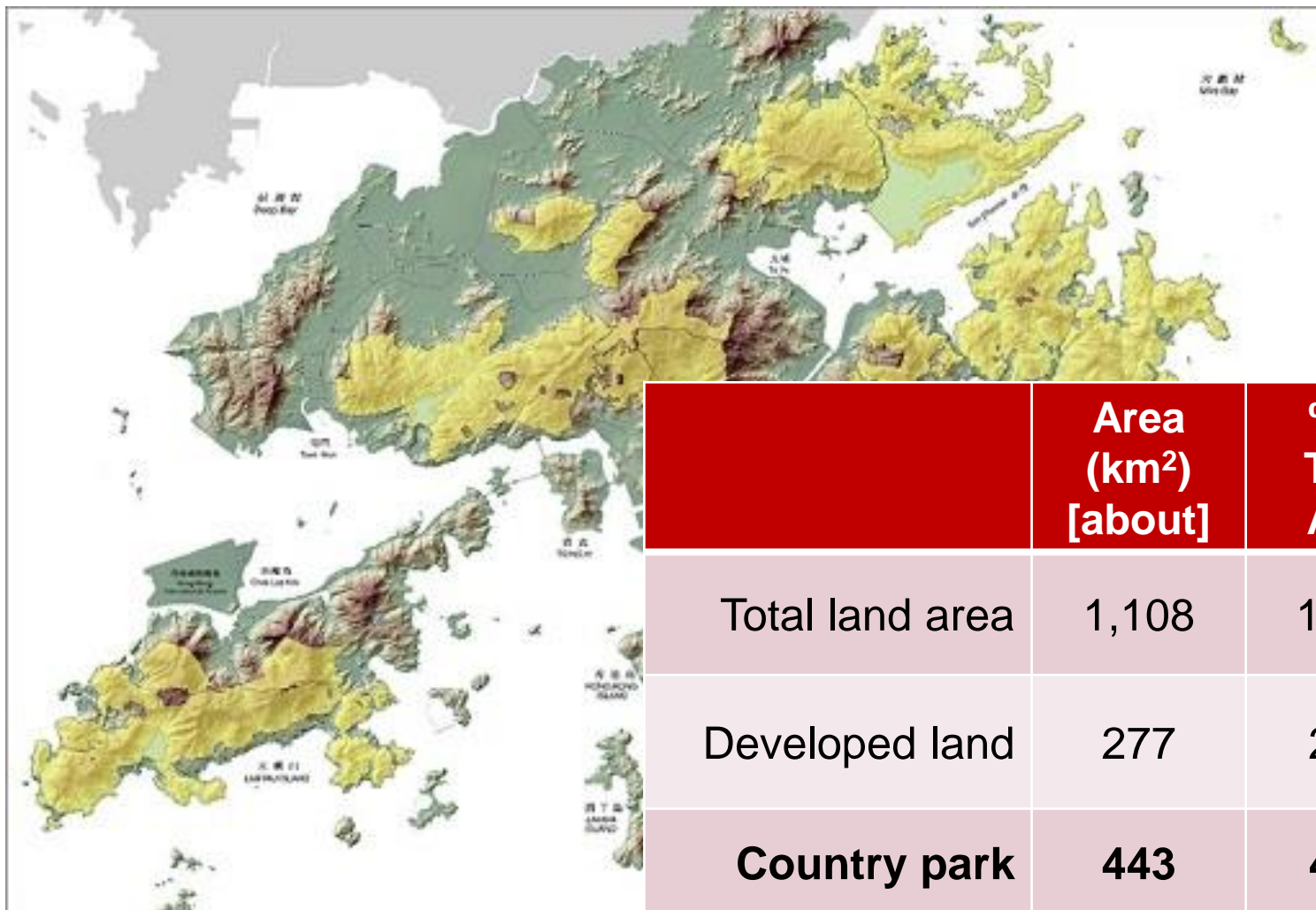


Hong Kong Agriculture & Fisheries Department, Forest Service, May 1965.





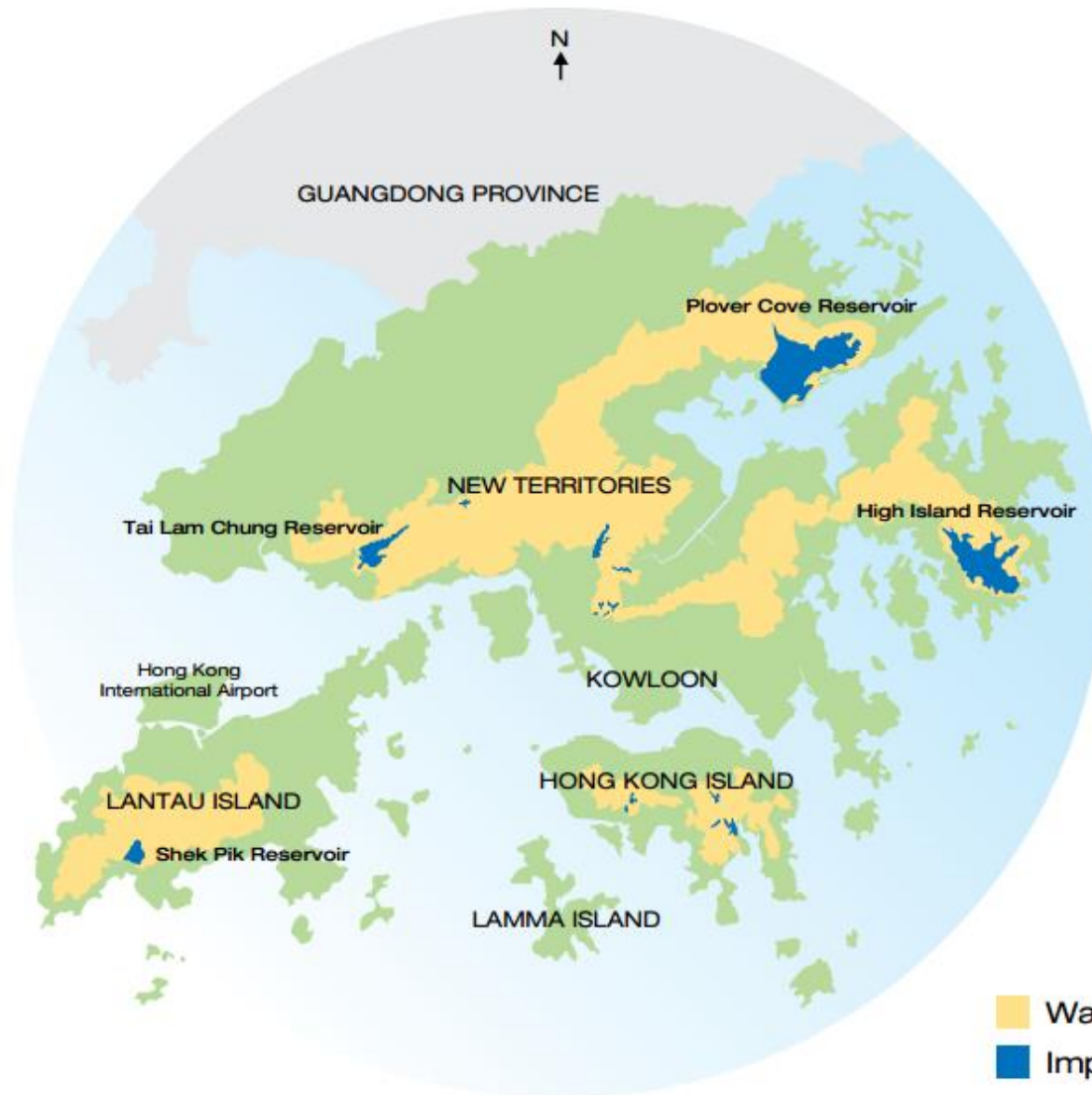
# Country Park Areas in 2016 (shaded in yellow)



	Area (km <sup>2</sup> ) [about]	% of Total Area
Total land area	1,108	100%
Developed land	277	25%
<b>Country park</b>	<b>443</b>	<b>40%</b>



# Water Gathering Grounds



## Water Gathering Grounds

360 km<sup>2</sup> [about]

33% of the total land area \*

\* Not all overlap with country parks

# ***Part C.***

## ***Scientific criteria for assessing land conservation***

- ***The Hong Kong Planning Standards and Guidelines  
(HKPSG)***  
***Planning Department***
- ***New Nature Conservation Policy***  
***Agriculture, Fisheries and Conservation Department***

# HKPSG (August 2010)

## Conservation-related zonings, i.e.

- Site of special scientific interests (SSSI)
- Conservation area (CA)
- Coastal protection area (CPA)
- Green belt (GB)



Source: HKPSG, Planning Department

[http://www.pland.gov.hk/pland\\_en/tech\\_doc/hkpsg/sum/ch10/ch10\\_sum.htm](http://www.pland.gov.hk/pland_en/tech_doc/hkpsg/sum/ch10/ch10_sum.htm)

Legislative Council Secretariat

<http://www.legco.gov.hk/research-publications/english/essentials-1617ise06-country-parks-and-protected-areas-in-hong-kong.htm>

# Chapter 10: Conservation

## Principles stipulated:

- Retaining sites with significant landscape, ecological and geological attributes;
- Restricting land uses to those sustaining these retained sites;
- Controlling adjoining uses to minimize adverse impacts &
- Creating new conservation sites in compensation





# New Nature Conservation Policy

- Introduced by Environment, Transport and Works Bureau (November 2004)
- Implementation: Agriculture, Fisheries and Conservation Department (“AFCD”)
- **Scoring system** for assessing ecological importance of sites

Criteria	Weighting
(A) Naturalness	15%
(B) Habitat diversity	15%
(C) Non-recreatability	10%
(D) Species diversity & richness	30%
(E) Species rarity/ endemism	30%

Score: 0, 1, 2 & 3

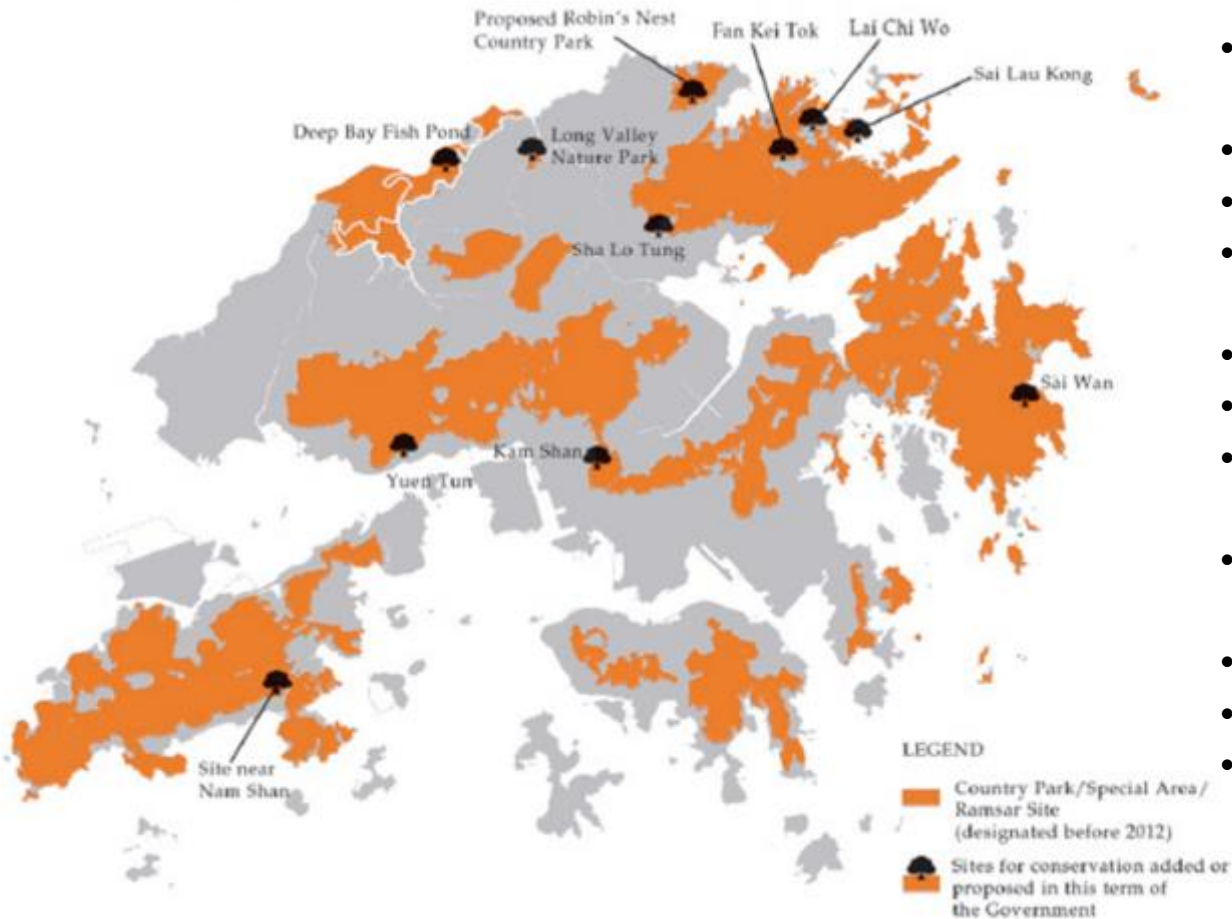
***Part D.***  
***Exchange for higher ecological  
value land***

# Precedents of conversion of country park areas for public utilization

- Since 1992, 2 cases whereby boundaries of country parks modified to suit alternative uses. Another attempt not successful.

Clear Water Bay Country Park		Tai Lam Country Park
1992	2010	1995
18 ha excision	5 ha excision	2 ha excision
<ul style="list-style-type: none"> <li>• For Southeast NT Landfill</li> <li>• To be returned to AFCD after the closure of the landfill</li> </ul>	<ul style="list-style-type: none"> <li>• Proposed for extension of Southeast NT Landfill</li> <li>• <b>Proposal Cancelled</b></li> </ul>	<ul style="list-style-type: none"> <li>• For the use of Route 3's approach road</li> <li>• Incorporated 42 ha of land into country park</li> </ul>

# 2017 Policy Address- Upcoming 11 sites for conservation



- Deep Bay Fish Pond
- Yuen Tun
- Kam Shan
- Site near Nam Shan
- Sai Wan
- Sha Lo Tung
- Long Valley Nature Park
- Proposed Robin's Nest Country Park
- Fan Kei Tok
- Lai Chi Wo
- Sai Lau Kong



# AFCD - New nature conservation policy for private ownership

- To conserve ecologically important sites under private ownership  
i.e. Management Agreement (MA) & Public-private Partnership (PPP)

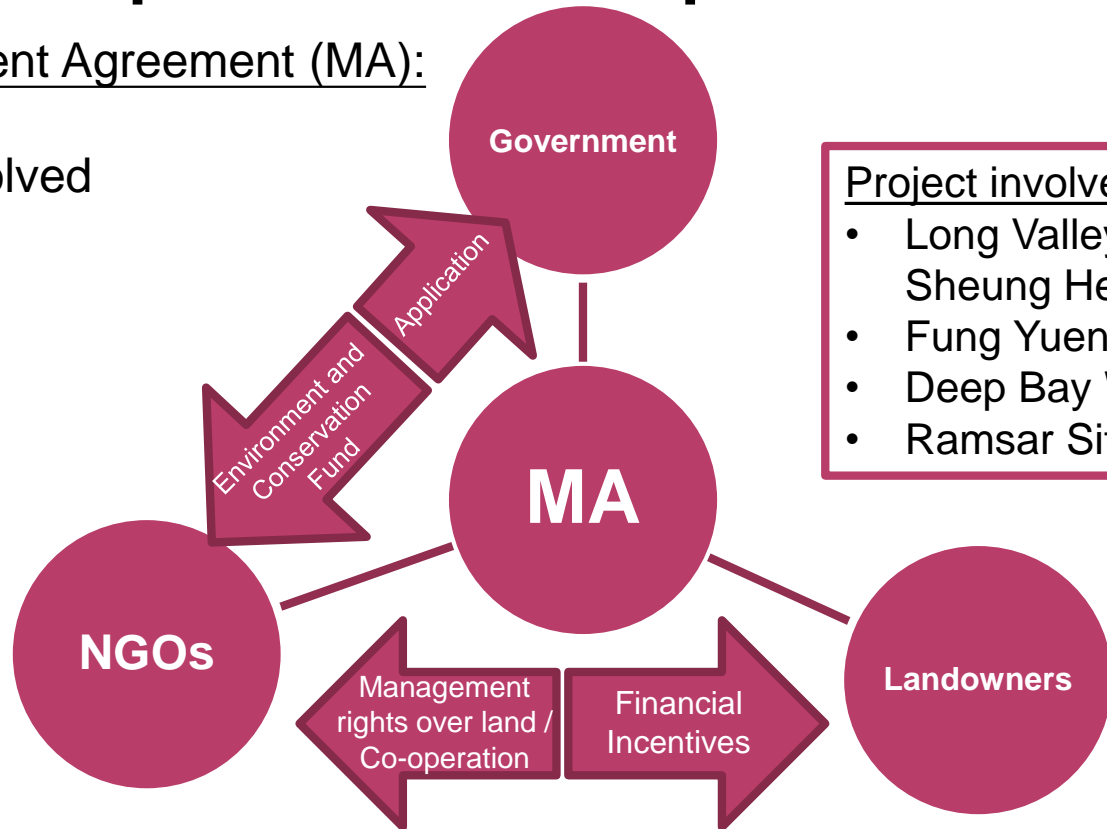
List of Priority Private Sites for Enhanced Conservation



# AFCD - New nature conservation policy for private ownership

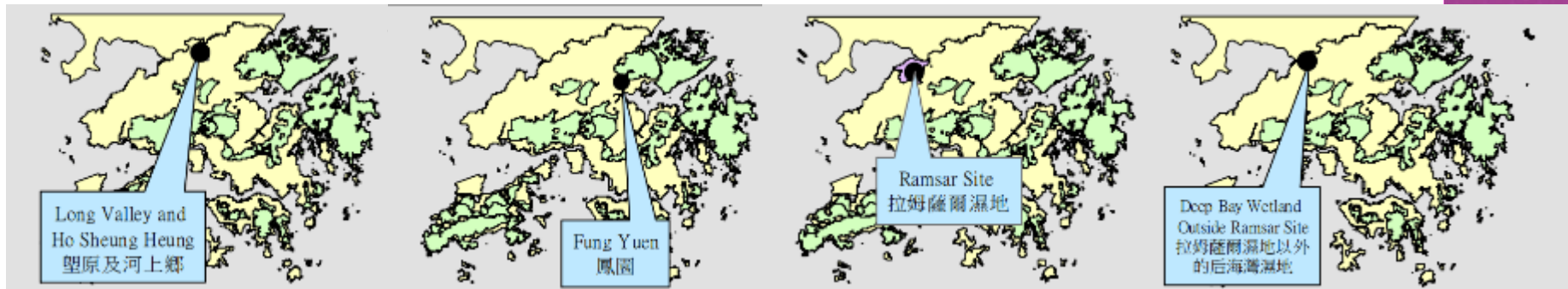
Management Agreement (MA):

NGOs involved



Project involved

- Long Valley and Ho Sheung Heung
- Fung Yuen
- Deep Bay Wetland
- Ramsar Site

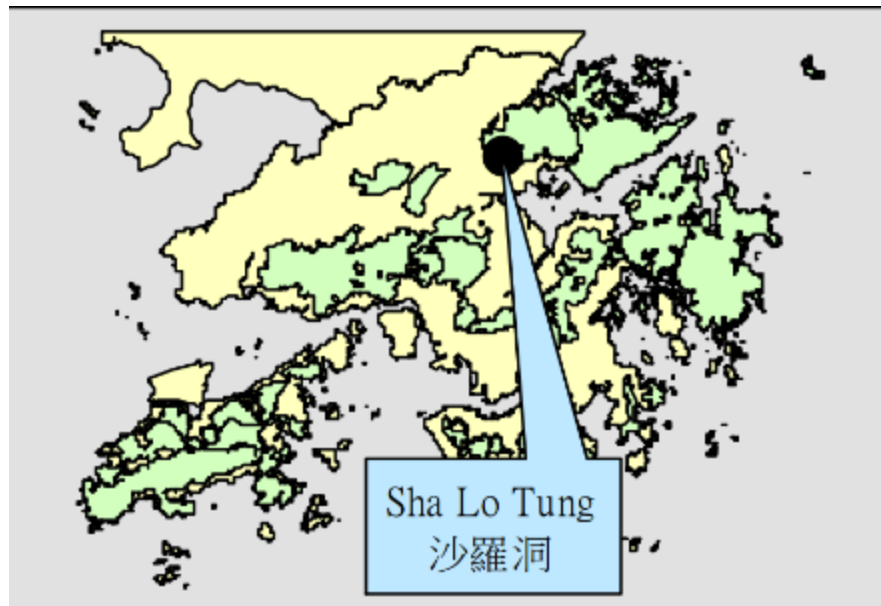


# AFCD - New nature conservation policy for private ownership

## Public-private Partnership (PPP)

- **No NGOs involved**
- Only partnership between Government & Landowner
- To allow limited development
- May consider non-in-situ land exchange to provide the flexibility
- E.g. **Sha Lo Tung – Non-in-situ land exchange to Shuen Wan Restored Lanfill in June 2017 (on full market value for private golf course)**

Government land	29.1 ha
Private land	25.5 ha



# ***Part E.***

## ***Landslide hazards***

### ***Case:***

***(1) Shum Wan Road Landslide, 1995***

***(2) North Lantau Highway Landslides, 2008***



# The risk of development of country parks

## 環境局:郊野公園邊陲地帶發展須符條例

前立法會議員、港大建築系名譽教授劉秀成早前受訪時則指，郊野公園覓地建屋，首要條例是植披不多，想建屋也要環境適合，「要無乜樹，不太斜，太斜起唔到，好多石都唔得！」

## 郊園邊建屋 大過兩維園

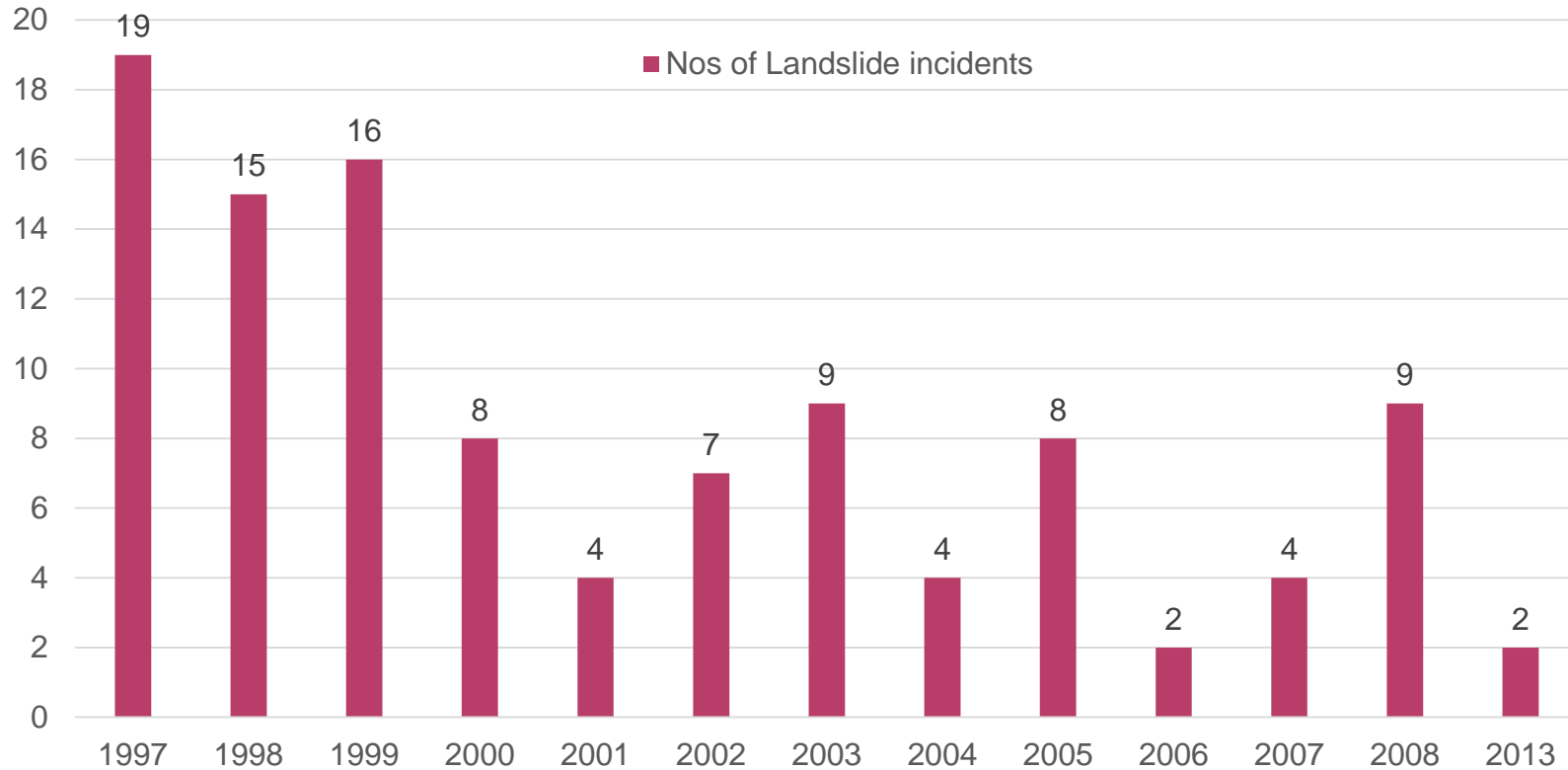
房協受託研可行性 特首表明跟足程序

## 劉炳章歡迎房協研郊野公園地建屋可行性

劉炳章表示，該用地符合五大條件：

- 生態價值不高
- 植披不多
- 邊陲位置不多人用
- 鄰近現有基建、交通樞紐和社區配套設施
- 開發成本較便宜和時間較短，不涉及收地和搬遷問題

# Landslide incidents in and round sloping areas in recent years



**Ma On Shan Road 1997**



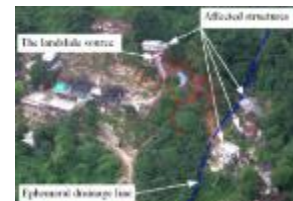
**Fei Ngo Shan Road 1998**



**Kwai Chung 2001**



**Tai Po 2003**



**Tsuen Wan 2005**



**Tung Chung 2008**

# Shum Wan Road Landslide (13 August 1995)

香港仔黃竹坑深灣南朗山道山泥傾瀉毀海邊船廠：2名外籍人士死亡





# North Lantau Highway Landslides (7 June 2008)

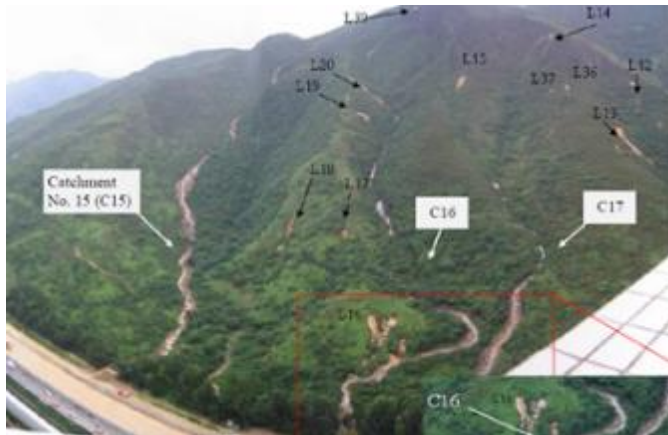
大嶼山僅得一橋連接市區 封路即變 如三條瀑布流下  
孤島

空前暴雨

癱瘓香港

洪水泥石淹大嶼山幹線  
機場大動脈截斷

多人送機尾



***Part F.***  
***Challenges and resistance for  
creating development land***



# Challenges and resistance for creating development land

- Resumption of private land
- Payment of compensation to the owners
- Long planning and development process
- Restriction on private land development
  - Delays and overrun
  - Objections
  - High cost for compensation

# The Study on potential development at peripheral areas of country parks

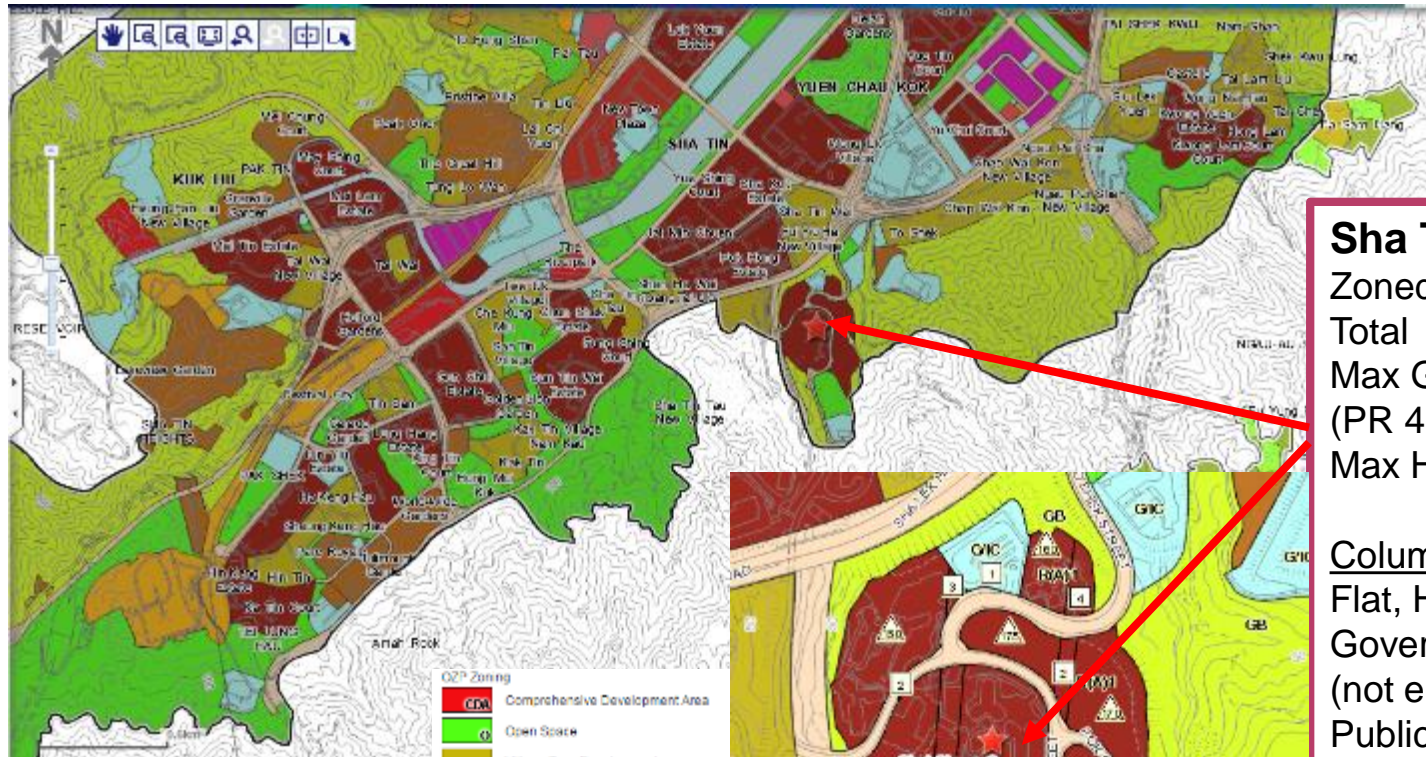
- To provide a solid basis for Government and public to further consider:
  - Ecological conservation value
  - Landscape and aesthetic values
  - Public enjoyment value (Recreational & Educational)
  - Water gathering consideration
  - Development potential and constraints
- To increase the land supply for public housing and non-profit-making elderly homes
- The highest and best use of land

**Thank You**

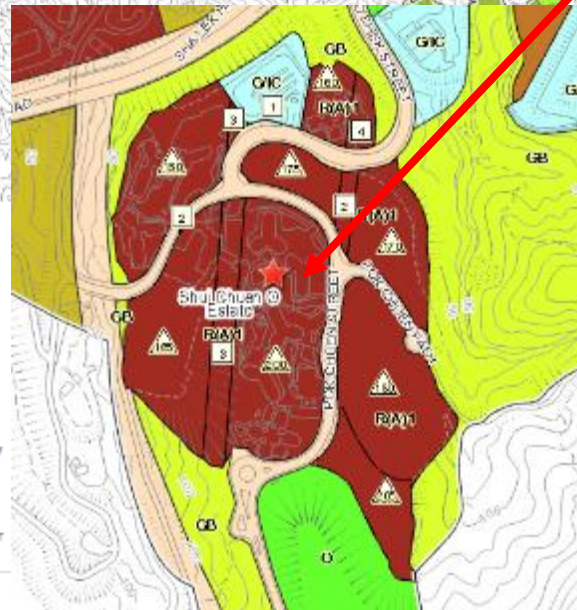
# Appendix



# Shui Chuen O Estate



OZP Zoning	
	CDA Comprehensive Development Area
	O Open Space
	V Village Type Development
	GB Green Belt
	(R/A) Residential (Group A)
	CR Commercial/Residential
	CA Conservation Area
	GIC Government, Institution or Community
	(R/B) Residential (Group B)
	Maximum Building Height (in Metres Above Principal Datum)
	Maximum Building Height (in Number of Storeys)



**Sha Tin OZP no. S/ST/33**  
 Zoned : R(A)1  
 Total area : 124,459m<sup>2</sup>  
 Max GFA : 501,800m<sup>2</sup>  
 (PR 4.03 – analysed)  
 Max Height : 160 - 205 mPD  
  
Column 1  
 Flat, House,  
 Government Use  
 (not elsewhere specified)  
 Public Clinic, PTT or station  
 (excl. open-air terminus or  
 station) & residential institution  
 etc.

Planning intention:

- High-density residential developments
- Commercial uses are always permitted on the lowest 3 floors of a building or in the purpose-designed non-residential portion of an existing building

# Areas adjacent to Shui Chuen O Estate

21 Jan 2017

【封面•唔係拜山時節】46小時離奇山火 689卸任前趁機劫郊野地

26,220 views | 2017年06月21日

【封面●復原要三十年】離奇山火後 走訪水泉澳邊陲的生態核心

10,099 views | 2017年06月21日

其中位於馬鞍山郊野公園邊陲的水泉澳，五個月前曾發生一宗燒足四十六小時的離奇山火，面積達四十公頃，災後只剩下枯木和野草

今年的一月二十日，沙田水泉澳邨東面山坡發生了一場嚴重的山火，火勢一發不可收拾，足足燒了約四十六小時，火場面積達四十多公頃。政府指由於現場位置陡峭，沒有小徑或車輛通道，消防人員要用直升機到達距離山火較近位置撲救。這宗山火，消防處一共調派二百多名消防員外，政府飛行服務隊派出超級美洲豹直升機及海豚直升機，飛行逾三十小時，亦共投擲了五十八次水彈，成為水泉澳一帶最嚴重的一場山火。



站在山火後的馬鞍山郊野公園邊陲，不再見到綠油油的草地，只剩下枯樹、野草，如政府把這裡一帶納入起樓的研究範圍，環評一關就較易通過，亦等於趁火打劫。