

Why Gillman Forest

Gillman Forest Development

This document has been prepared in line with the framework set out in the Maju Forest Development proposal,¹ which similarly calls for a sequenced approach — avoid, minimise, mitigate — when assessing forest clearance against housing needs.

It has been put together with the intention of advocating for the future of Gillman Barracks and Gillman Forest. The information, analyses, and proposals presented here are drawn from publicly available and official sources. If any inaccuracies or misstatements are found, we welcome corrections and invite you to reach out.

Immediate Requests

1) Parliamentary Consideration

We request that our Members of Parliament raise this matter through an **Adjournment Motion**.

The proposed development involves the permanent clearance of an important secondary forest that is currently taking on additional ecological load due to the Berlayar development nearby. Broader public discussion and accountability is required due to implications for biodiversity, resident welfare, transport, neighbourhood planning and long-term land use.

2) Extension of the Public Consultation Period

The public consultation period currently closes on 6 August 2026, only 27 days after the announcement of the proposal on 10 July 2026.

The field study for this EIA lasted 5 months, and data analysis and publication took another 16 months for the 255-page report. In addition to the scale and long-term implications of the proposed development, the public should be granted sufficient time for:

- residents to understand the proposal;
- community groups to review the available information;
- independent experts to provide technical input; and
- constructive dialogue between residents and the relevant agencies.

Meaningful consultation requires sufficient time for informed participation.

Executive Summary

This document responds to the proposed residential development at Gillman Barracks announced on 10 July 2026. The deadline for public feedback is 6 August 2026 – just 27 days compared to the 21 months taken to conduct the field study and publication. Given the scale and permanence of clearing an intact secondary forest, and the heritage significance of the Gillman Barracks, we request that this matter be raised in Parliament through an Adjournment Motion, and that the consultation period be extended to allow meaningful public engagement with experts and the relevant authorities and/or agencies. This document will focus on the environmental and humanistic aspect rather than the heritage aspect of the site.

Our primary position is that Gillman Forest should be preserved in its entirety. The forest provides residents with immeasurable quality of life (i.e. ventilation, reduction of urban heat, air quality, daylight, and psychological and health benefits) – supported by peer-reviewed evidence on nature exposure and natural soundscapes; this cannot be replicated once cleared. It also forms part of a documented ecological corridor connecting Berlayer Creek and Labrador Nature Reserve, and the wider Southern Ridges. This connectivity has been independently recognized by HDB's own consultants and NParks. Furthermore, the Minister of National Development committed in Parliament (April 2024) to factor this into Gillman's planning.

We identify three underutilised brownfield and undetermined-use sites for residential development in place of forest clearance — the Depot Lane Industrial Estate (7.3 ha), the former CMPB site at 3 Depot Road (5.6 ha), and Pasir Panjang Distripark together with an adjacent 33.8-hectare Reserved Site. These could collectively deliver upwards of 17,500 housing units without clearing forested land. We ask HDB, URA, NParks and other relevant agencies to confirm the status of each site and whether residential redevelopment has been evaluated ahead of forest clearance at Gillman.

If development is nonetheless deemed necessary, our fallback position asks that it be reconfigured to retain one large, contiguous forest block rather than a narrow, edge-effect-vulnerable strip – concentrating housing within land already committed to development. This configuration would strengthen ecological connectivity to Labrador Nature Reserve/Berlayer Creek, HortPark/Kent Ridge Park and Telok Blangah Hill Park, retain the forest stream identified in the EIA's own habitat mapping, and preserve Gillman Barracks' existing food, arts and culture identity through adaptive reuse. We further note that the steepest zones on site (1A, 1B, 2B and 4) coincide with the areas of highest existing ecological value (as per the EIA), reinforcing that retention is preferable on engineering and cost grounds as well as ecological ones.

Should development proceed regardless, we request clear commitments on wildlife management, construction traffic (given the area's already-constrained single-lane roads), neighbourhood access, construction amenity, transport and infrastructure capacity, and accessibility for the area's ageing population — alongside an ongoing programme of community engagement that continues beyond this single consultation window.

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INTRODUCTION

According to Dr Chong Fook Loong, HDB's chief town planner and Group Director of its Urban Planning Division, during the [Sunset Way Dialogue](#): "we have to make trade-offs. We have to understand how to balance housing and nature to bring about the best plan, as we always do wherever we go."²

We would have to respectfully disagree with Dr Chong's statement. Many members of the public acknowledge and understand the insatiable need for housing in land-locked Singapore. However, it has come to a point where the balance between housing and nature no longer exists and is instead heavily skewed towards the former.

1. Impact on Existing Residents' Living Environment and Wellbeing

Beyond its ecological value, the Gillman forest also functions as a buffer that directly shapes the living conditions of nearby residents. Its removal would be expected to affect existing homes in the following ways:

1.1 Reduced natural ventilation and increased mould risk

Forested land currently allows wind to pass relatively unobstructed toward surrounding lower estates, especially for low- to middle-floor dwelling units. Replacing this with high-rise development risks disrupting this airflow: studies specific to Singapore's high-rise residential context have shown that tall buildings can significantly alter downstream wind flow patterns, reducing ventilation reaching lower-rise blocks behind them.³ Given the site's proximity to the coast, reduced natural airflow combined with Singapore's high ambient humidity raises a tangible risk of increased mould and dampness in existing homes that currently rely on cross-ventilation rather than mechanical cooling.

1.2 Increased urban heat

Secondary forest is not just green cover, it is one of the most effective urban cooling types available. A study monitoring air temperatures at 88 locations across Singapore over a period of 18 months found that secondary forest produced the greatest cooling effect among all vegetation types tested, including managed trees, shrubs, and grass, with the cooling benefit extending well beyond the treeline itself.⁴ Separately, Singapore's own urban climate modelling shows that the canopy-layer urban heat island effect can reach up to 5°C in compact, built-up areas during the night.⁵ Replacing Gillman's secondary forest with high-rise development would remove one of the most effective cooling land covers available, especially in a country already facing intensifying heat from increasing urban density.

1.3. Reduced daylight and natural brightness

New high-rise blocks replacing the current low-lying forest canopy would introduce taller, denser structures directly in the sightline of existing homes, with the potential to cast shadows and reduce natural daylight reaching nearby units — particularly for lower and mid-floor units that currently benefit from an unobstructed, low-rise outlook over the forest.

1.4. Increased particulate matter and reduced air quality

Trees play a measurable role in filtering airborne particulate matter: foliage acts as a natural bio-filter, trapping fine particulate matter (PM_{2.5}) on leaf and stem surfaces that would otherwise remain suspended in the air.⁶ Removing a substantial area of forest cover would reduce this natural filtration capacity for surrounding residential areas, particularly relevant given the site's proximity to Alexandra Road, West Coast Highway and the AYE, all existing sources of vehicular air pollution.

1.5. Loss of daily visual and psychological connection to nature

Beyond air quality, the visual presence of forest canopy and wildlife directly outside one's window has a demonstrated restorative effect. A now-classic study found that hospital patients with a window view of trees had shorter recovery times, fewer complications, and required less pain medication than those with a view of a brick wall⁷ — a finding that has since been extended to residential contexts, where high-quality natural views have been linked to better life satisfaction and reduced stress.⁸ For residents who currently look out onto the forest canopy and birdlife daily, this is a real and quantifiable loss, not merely a matter of preference.

1.6. Reduced access to forest bathing, walking and recreational green space

The forest currently provides a walkable, accessible green space for activities such as forest bathing and dog walking — uses that depend specifically on proximity and ease of access. It cannot be fully substituted by parks located further away. Reducing the area and contiguity of the retained forest would directly reduce the practical availability of this kind of everyday nature access for nearby residents.

1.7. Loss of broader health benefits associated with proximity to nature

More broadly, reduced daily exposure to green space removes a body of documented health benefits. A comprehensive review of the evidence found associations between nature exposure and improved cognitive function, reduced blood pressure, better mental health, increased physical activity, and improved sleep.⁹ These are benefits tied specifically to proximity and regular exposure — meaning they are most at risk when nearby forest, rather than a distant park, is removed.

Beyond air quality and thermal comfort, the forest's natural soundscape, eg. birdsong in the mornings and evenings, and crickets at night — contributes directly to residents' wellbeing. Experimental research has found that exposure to birdsong soundscapes produces significant improvements in mood and reduces state anxiety and paranoia compared to urban traffic noise.¹⁰ Physiological studies measuring brain activity, heart rate variability, and mood have similarly found that natural forest soundscapes produce measurable relaxation responses compared to urban traffic sound.¹¹ Nature sounds have also been shown to restore cognitive attention relative to urban soundscapes.¹² For residents like myself who rely on these natural sounds as part of daily life, their loss represents a tangible reduction in everyday psychological wellbeing, not merely an aesthetic preference.

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2. Problems with the Greater Southern Waterfront Plans



Figure 2-4: Ecologically Sensitive Receptors within the EIA Study Area and Its Vicinity

Figure 1. The Gillman Barracks EIA Study Area in relation to the Southern Ridges network. Source: Jacobs, Specialist Consultancy Services for Environmental Impact Assessment (EIA) at Gillman Barracks (2026), Figure 2-4.¹³

2.1. Losing the Cumulative Ecological Connectivity: Berlayer and Gillman Forest

The [Environmental Impact Study \(EIS\) supporting Berlayer's development](#) (Final Report Revision 2) was published in 7 July 2022. The underlying ecological field surveys informing this assessment were conducted between late 2020 and 2021, predating the present proposal by three to four years.¹⁴

The EIS identifies the site as an integral component of a wider ecological network. Specifically, the report's biodiversity impact assessment states that "without Keppel Club, the ecological connectivity between Southern Ridges and Labrador Nature Reserve/Berlayer Creek is likely to deteriorate."¹⁴ On this basis, the approved mitigation measures for Berlayer — including a system of green corridors linking the estate to Telok Blangah Hill Park, Mount Faber Park, Kent Ridge Park, and Labrador Nature Reserve — were designed to preserve connectivity across this network as it existed at the time of assessment.

Material Change in Circumstances

Gillman Barracks was not identified for redevelopment at the time the Berlayar EIS was prepared, and does not appear at any point within the report. The proposed development of Gillman Barracks was only announced in 2024, with the corresponding EIA's field surveys conducted between 21 October 2024 and 21 March 2025¹³ — after Berlayar's ecological baseline had already been established and its mitigation measures approved.¹⁴

Notably, the Gillman EIA independently confirms that the Gillman site is itself "partially located within the Southern Ridges,"¹³ (p.7) described in the EIA as a 10km stretch of green area connecting HortPark, Mount Faber Park, Telok Blangah Hill Park, Kent Ridge Park, and Labrador Nature Reserve¹³ — the same ecological network referenced in Berlayar's 2020–2021 assessment.

As such, two separate government-commissioned environmental studies, conducted several years apart, each describe overlapping segments of the same connectivity system without either study accounting for the other site's proposed clearance.

Corridor Width Falls Short of the EIA's Own Benchmark

Gillman's EIA itself establishes that where development flanks both sides of an ecological corridor, as is the case at Gillman, a minimum width of 60m is required to account for "double edge effects," compared to the 30m minimum used where development sits on only one side.¹³ (p.95) This 60m benchmark is drawn from the same precedent as Berlayar's own corridor design, where a 30m corridor was used along Berlayar Creek (with development on one side only) and a 60m Central Green Corridor was used elsewhere on the Keppel site (development on both sides).¹⁴

However, the Gillman EIA's own Proposed Retained Area achieves only a 30m minimum width in its narrowest sections, only expanding closer to 200m within denser existing forest.¹³ This means that, by the EIA's own stated standard, sections of the proposed corridor fall short of what is required to avoid double edge effects — precisely the scenario the Berlayar EIS's connectivity assumptions depend on remaining intact.

Government's Prior Commitment on This Issue

This is not a new concern. In Parliament on 02 April 2024, in response to a question on whether the Keppel Club EIS findings on ecological connectivity would be factored into Gillman Barracks' planning, the Minister for National Development (MP Desmond Lee) confirmed that Gillman's masterplanning would take into account the Keppel Golf Course site's EIS findings, "in as far as the [Ecological Profiling Exercise] findings are concerned," and that ecological connectivity would be ensured around the Keppel Golf Course site.¹⁵

However, this commitment was made in April 2024 — six months before Gillman's own EIA field surveys even began. It is therefore unclear from the published Gillman EIA whether a

quantitative reassessment of Berlayar's approved corridor design, accounting for Gillman's now-confirmed clearance, was actually carried out — as opposed to a general policy assurance that prior findings would be "taken into account."

Implication and Request

This sequencing raises a material question as to whether the mitigation measures approved for Berlayar remain valid under current circumstances, and whether the Government's 2024 commitment to factor in Keppel's findings has been operationalised in concrete, technical terms. Berlayar's approved corridor design, species movement provisions, and cumulative impact assessments were premised on the continued ecological function of surrounding habitat, including areas within the Southern Ridges network which Gillman Forest is a part of.

We request that HDB, URA and NParks confirm whether:

(a) a quantitative reassessment of Berlayar's approved mitigation measures has been conducted in light of Gillman Forest's proposed clearance and its corridor design falling below the 60m double-edge-effect benchmark established in Gillman's own EIA, consistent with the Government's April 2024 Parliamentary commitment; and

(b) if such a reassessment has been conducted, its findings be published alongside the current consultation, so the public can assess whether the cumulative environmental impact of both developments — assessed independently and years apart — has been adequately addressed.

2.2 Compromised plot ratio and housing yield in favour of an aesthetic skyline¹⁶

HDB has stated that the [Berlayar estate will be designed with staggered building heights](#) "to form a distinct terracing skyline along Singapore's southern coast." While this may enhance the visual character of the precinct, it represents a deliberate tradeoff of housing yield for aesthetic effect.

On a 48-hectare site as strategically significant as Berlayar (one of the few remaining large-scale waterfront redevelopment opportunities in Singapore), plot ratio and building form should be optimised to maximise the number of units, not moderated to create a particular skyline silhouette. Every storey of height sacrificed for a "terraced" profile, and every setback introduced purely for view corridors rather than structural or environmental necessity, represents homes that could have been built but were not.

If Singapore's housing agencies are willing to accept a lower yield in the name of skyline aesthetics on a prime, already-cleared brownfield site, this raises a fair question of consistency: is the same discipline being applied when justifying the clearance of ecologically sensitive greenfield sites such as Gillman Barracks on the basis of "insatiable housing need"?

We ask that HDB publish how much housing yield was foregone in Berlayar for aesthetic and view-corridor considerations, so the public can assess whether this tradeoff was made consistently and transparently across all planning decisions.

2.3. Low GLS plot ratio for private developments in Berlayar

The [Berlayar Drive GLS site](#) — part of the same 48-hectare Berlayar estate — was released by URA with a [Gross Plot Ratio of just 1.4](#), capped at a maximum height of only 5 storeys.¹⁷ This stands in stark contrast to the neighbouring Telok Blangah Road site within the same estate, which was permitted a Gross Plot Ratio of 4.7 with no comparable height restriction, [yielding 745 units on a smaller footprint](#).¹⁸ The 5-storey cap at Berlayar Drive is not a market outcome — it is a URA-stipulated planning constraint. Given that HDB's own BTO towers within the same estate reach up to 46 storeys, this raises a legitimate question: why was a private residential parcel in the same waterfront precinct capped at low-rise scale, forgoing potentially hundreds of additional homes, while forest sites elsewhere are cleared to meet "insatiable" housing demand?

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3. Mitigation Hierarchy

Following the [Gillman Barracks/Forest EIA](#)'s mitigation hierarchy



Figure 2. Mitigation Hierarchy¹³

Prevention/Avoidance

Given how little greenfield land remains in Singapore, clearing it should be a last resort — one that URA can only justify after proving no viable brownfield or lower-impact option exists.

Reduction

In the event the development at Gillman Barracks/Forest is proven absolutely necessary, minimize development footprint and maximize forest retention.

Remedy/Mitigate

Implement specific measures to minimize impact on current residents and existing flora/fauna.

3.1 Prevention/Avoidance

Avoid clearing greenfield sites where reasonable alternatives exist. Forest clearance should be the last resort.

URA/HDB (or other relevant agencies) should demonstrate why reasonable brownfield or lower-impact alternatives cannot provide the required housing. Some examples include but are not limited to: redeveloping underutilized brownfield sites or older HDB estates.

According to [HDB's 2025 Town Developments report](#)¹⁹, the projected dwelling units for Bukit Merah is 82,000 compared to the current 54,151.

Based on this data, we can infer that HDB seeks to provide an additional 27,849 housing units in the Bukit Merah area.

Existing and Projected number of Dwelling Units in Bukit Merah¹⁹

Total projected units (A)	82,000
Existing units (B)	54,151
Additional units required (A-B)	27,849

BTO Projects Launched in Bukit Merah from 2025–2026²⁰

Launch Date	Project Name	Units
Jul 2025	Alexandra Peaks ²¹	498
	Alexandra Vista ²²	609
Oct 2025	Redhill Peaks (1st launch) ²³	1,021
	Berlayar Residences ²⁴	870
Feb 2026	Redhill Peaks (2nd launch) ²⁵	1,052
Jun 2026	Berlayar Rise ²⁶	1,976
Total		6,026

This means that 21,823 dwelling units are still required to hit the projected number of units in Bukit Merah.

Housing Source	Status	Land Size	GFA at Plot Ratio 3.5	Estimated Number of Units
Depot Lane Industrial Estate	Committed	7.3 ha*	255,500m ²	~2,560 – 2,750
Former CMPB Site (3 Depot Road)	Opportunity (relocated)	5.63 ha*	197,100m ²	~1,970 – 2,120
Pasir Panjang Distripark	Brownfield site (Existing Industrial Use)	3.4 ha*	~119,550m ²	~1,195 – 1,285
Pasir Panjang Reserved Site	Opportunity (undetermined use)	33.8 ha**	1,183,084m ²	~11,830 – 12,720

The above information is taken from public sources including URA's Draft Master Plan 2025 and MINDEF/SAF announcements. A plot ratio of 3.5 is assumed based on the Gross Plot Ratio (GPR) for Bukit Merah HDB developments without park/green-corridor. Estimated unit counts are illustrative approximations only.

**Land sizes are based on a manually drawn polygon estimate based on visual boundary tracing on a mapping tool from URA Master Plan.*

***Reserved Site land size is taken directly from URA's Master Plan area-measurement annotation.*

Potential Within Bukit Merah's Existing Housing Stock

Beyond specific brownfield parcels, Bukit Merah itself represents a significant, often-overlooked source of housing potential. As one of Singapore's first-generation HDB towns, much of its original housing stock (built from the 1960s through the 1980s) was constructed under a fixed density standard of 200 dwelling units per hectare, rather than the plot-ratio-based system used today. This means many of these older blocks sit on land that is significantly under-utilised relative to what the same site could support if redeveloped.

Historically, about a third of all housing sites selected nationally for the Selective En bloc Redevelopment Scheme (SERS) have come from Bukit Merah, reflecting HDB's own long-standing recognition that this town's older blocks are prime candidates for redevelopment at higher density. Looking ahead, Bukit Merah has also been widely identified as one of the towns expected to be among the first waves considered under the Voluntary Early Redevelopment Scheme (VERS), given its status as a first-generation town whose oldest blocks are approaching the 70-year mark.

Given this, we ask HDB to clarify how much additional housing yield could realistically be unlocked through accelerated SERS/VERS intensification of Bukit Merah's own existing, ageing housing stock — before turning to the clearance of ecologically valuable forest sites such as Gillman Forest to meet the town's housing targets. If substantial latent capacity already exists within the town's own built footprint, this raises the question of whether forest clearance is being pursued as a last resort, or simply as a faster and administratively simpler alternative to the more complex process of redeveloping occupied estates.

3.1(a) Housing Source 1: Depot Lane Industrial Estate

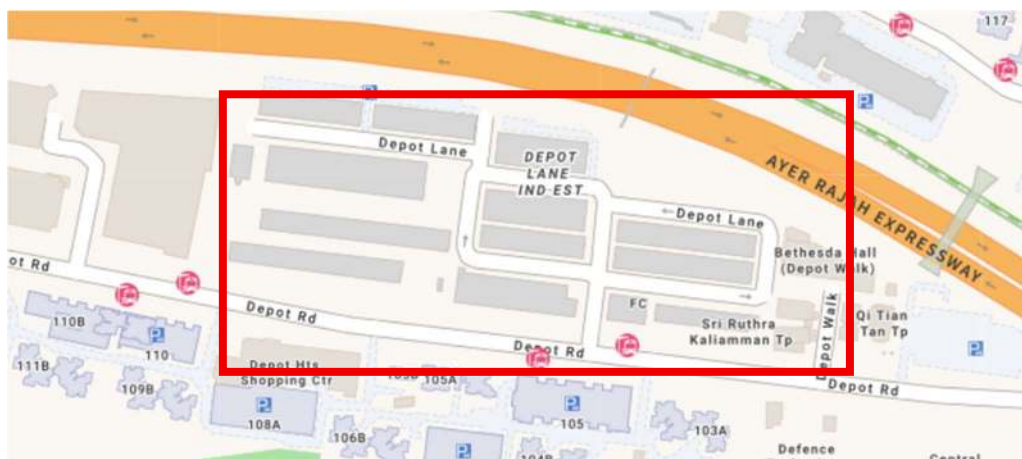


Figure 3. Depot Industrial Estate. Source: Urban Redevelopment Authority.²⁷

1. Brownfield site for residential redevelopment adjacent to Gillman Barracks²⁸

According to secondary reporting on URA's Draft Master Plan 2025, Depot Lane Industrial Estate (situated next to Gillman Barracks) is planned to be returned to the state by the end of 2025, with the approximately 7.3-hectare site earmarked for residential redevelopment. We note that we have not been able to independently verify this specific figure or designation through URA's own published materials, and would ask URA to confirm the site's status, size, and redevelopment timeline directly.

2. Reportedly planned as part of a joint cluster with Gillman Barracks – what are the combined housing targets?²⁸

If it is accurate that Depot Lane and Gillman Barracks are being grouped together under a single planning designation, it would be reasonable to ask whether the two sites' housing contributions are being assessed jointly, and whether Depot Lane's yield has already reduced, or could further reduce, the pressure to clear Gillman Forest. Given that we could not confirm this cluster designation through URA's own published Master Plan materials, we would ask URA to clarify whether such a joint plan exists, and if so, how the cluster's overall housing target is split between the two sites.

3. Precedent for converting brownfield/relocated sites to housing first²⁹

The Alexandra Road brownfield site nearby was held for future residential redevelopment before becoming the Alexandra Peaks and Alexandra Vista BTO projects, launched in July 2025. This confirms that HDB and URA have an established practice of prioritising brownfield redevelopment over greenfield clearance in this part of Singapore when land becomes available.

We ask HDB and URA to confirm: (i) the current status and land area of the Depot Lane Industrial Estate site; (ii) whether it is indeed planned jointly with Gillman Barracks under a combined cluster designation; and (iii) if so, what housing yield Depot Lane alone is projected to contribute, and whether this has been factored into the case for clearing Gillman Forest.

3.1(b) Housing Source 2: Former CMPB Site

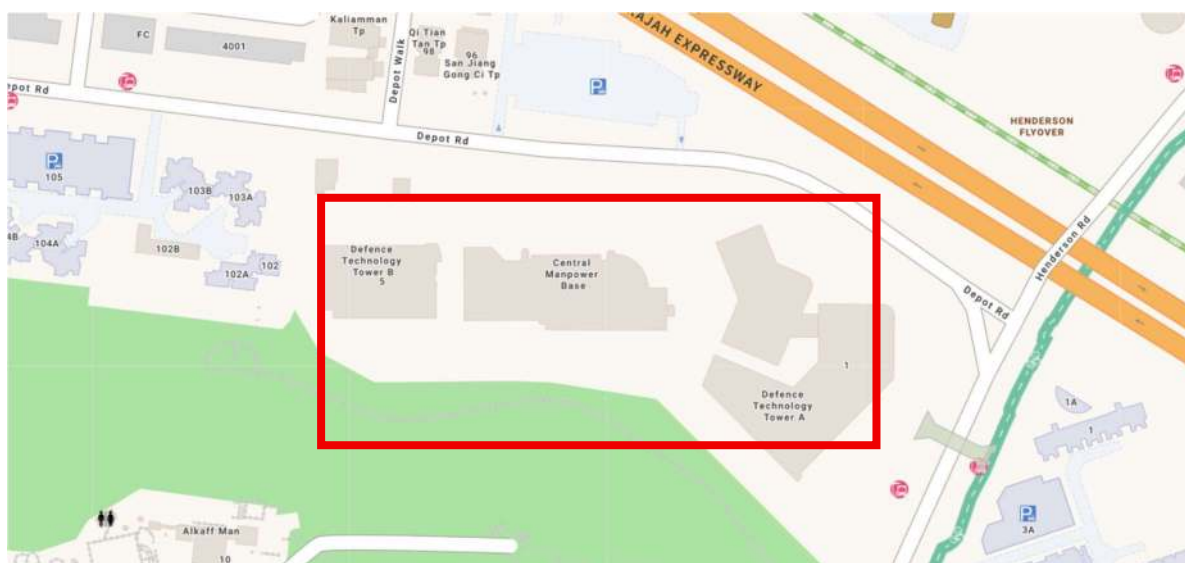


Figure 4. Central Manpower Base (CMPB). Source: Urban Redevelopment Authority.²⁷

1. A vacated government site in a mature, well-connected part of Bukit Merah³⁰

The former CMPB compound sits on approximately 5.63 hectares along Depot Road, within Bukit Merah town and close to Redhill MRT and the Central Expressway. Unlike Gillman Forest, this is not an intact ecosystem — it is a cleared, built-up government compound that has already served a non-residential institutional purpose for over three decades. Since CMPB's relocation to Bukit Gombak was completed in October 2025, this site now sits vacant, with no operational use.

2. No current plot ratio or redevelopment plan assigned — a genuine planning gap³¹

Under Master Plan 2025, the site remains zoned "Civic & Community Institution" with no Gross Plot Ratio assigned, confirming that it has not yet been committed to any specific future use. This stands in contrast to Gillman Forest, where clearance is being actively pursued despite the forest's irreplaceable ecological value. HDB/URA should exhaust redevelopment options on land that requires no ecological loss before turning to forested sites.

3. Precedent for converting relocated government/institutional land to housing²⁹

There have been multiple instances where vacated government and institutional sites were converted into public housing after relocation. The Alexandra Road brownfield site was similarly held for redevelopment before eventually becoming the Alexandra Peaks and Alexandra Vista BTO projects launched in July 2025.

We ask HDB and URA to clarify whether the former CMPB site at 3 Depot Road has been considered for public housing redevelopment, and if not, why a vacant, already-cleared government site within Bukit Merah town has not yet been prioritised ahead of proposals to clear Gillman Forest.

3.1(c) Housing Source 3: Pasir Panjang Distripark and Reserved Site



Figure 5. Pasir Panjang Distripark and Reserved Site. Source: Urban Redevelopment Authority.²⁷

1. Undetermined land available for residential redevelopment

Pasir Panjang Distripark occupies an estimated 3.4-hectare footprint (based on manual boundary tracing) sitting between Pasir Panjang MRT and Labrador Park MRT.²⁷ Immediately adjacent to it is a substantially larger 33.8-hectare parcel currently designated "Reserved Site" under URA's Master Plan, meaning its future use has deliberately not yet been committed.²⁷ Using well-located, transit-adjacent land for low-intensity industrial use, while a much larger neighbouring parcel sits with no assigned use at all, represents a significant opportunity cost compared to what this land could deliver as housing.

2. It sits within the broader Greater Southern Waterfront transformation zone³²

URA has planned to relocate PSA's port operations (Tanjong Pagar, Keppel, and Pulau Brani by 2027, and Pasir Panjang by 2040)³², freeing up land across this entire waterfront corridor for urban renewal. Pasir Panjang Distripark (a PSA-linked logistics facility in the same corridor) fits the same long-term direction.

3. Precedent for converting industrial/warehousing land to housing²⁹

An example of this in the immediate area: the Alexandra Peaks and Alexandra Vista BTO sites (launched July 2025) were previously a brownfield site along Alexandra Road that has since been converted into housing.

While not yet slated for redevelopment, Pasir Panjang Distripark represents a longer-term intensification opportunity consistent with the broader relocation of port operations to Tuas already underway across the Greater Southern Waterfront.

We ask URA to: (i) confirm whether Pasir Panjang Distripark has any current redevelopment plans, given its size and transit-adjacent location; and (ii) clarify what future use is being considered for the adjacent Reserved Site parcel, and whether residential development has been evaluated as an option, given its size and connectivity. Both parcels stand in contrast to Gillman Forest, an intact ecosystem that offers zero substitutability for its ecological function.

3.2 Reduction

If development is demonstrated to be necessary despite the above measures, the next priority should be to reconfigure the site to retain one large, contiguous block of forest rather than a narrow strip vulnerable to edge effects. The aim is a better-connected, higher-quality forest that continues to function ecologically, while providing meaningful benefits to both existing and future residents.

Proposed Alternative Planning Concept

HDB, URA and other relevant agencies can consider alternative planning concept:

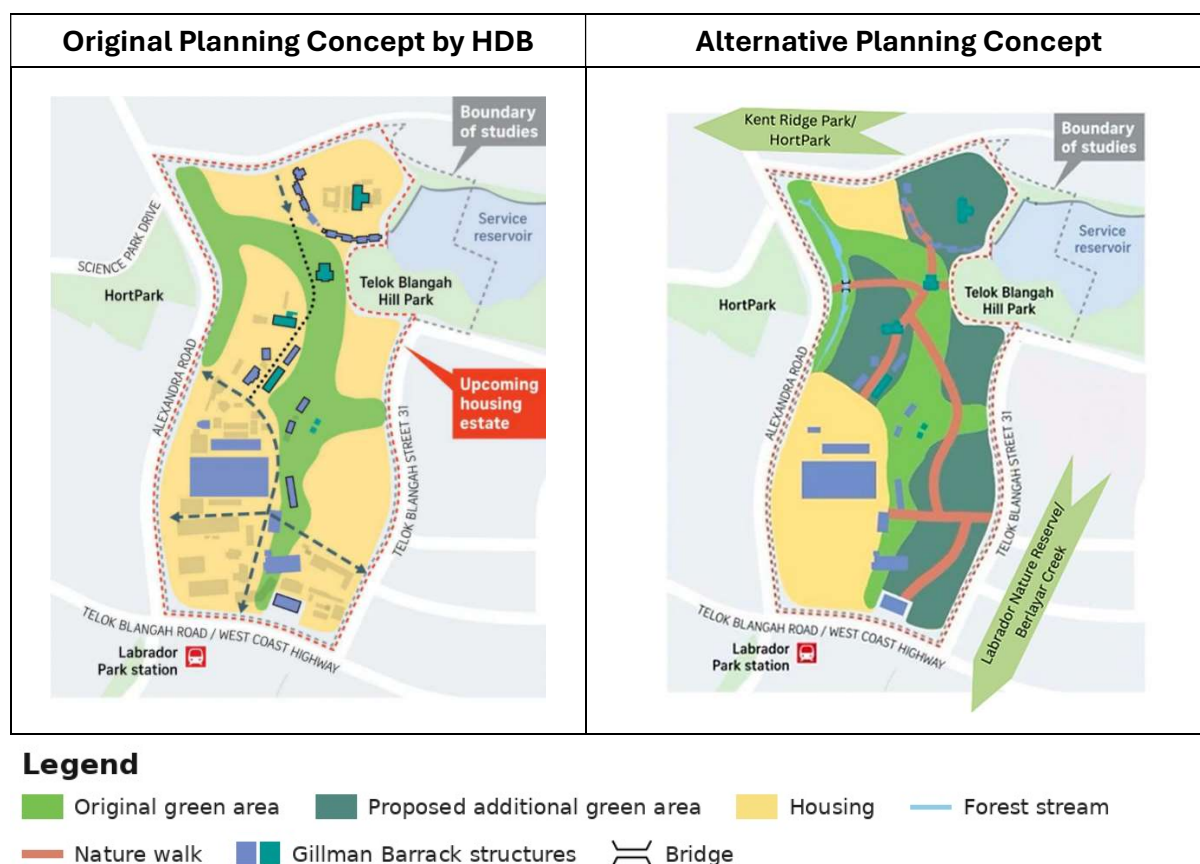


Figure 6. Left: Original planning concept by HDB, adapted from The Straits Times (Ng, 2026)³³. Right: Alternative planning concept proposed by the author.

Ecological advantages:

- retains a larger contiguous forest habitat, reducing edge effects and fragmentation;
- strengthens ecological connectivity all around Southern Ridges;
- improves thermal comfort through greater tree canopy cover; and
- retains majority of the forest stream* (Appendix B, Figure 4-21);

Community, health and wellbeing benefits:

- preserves Gillman Barracks' food, arts and culture identity;
- provides a more effective buffer between existing and new residential areas;
- reduces construction disruption and long-term impacts on neighbouring homes;
- preserves the character of the surrounding landscape; and
- supports residents' physical and mental wellbeing through greater access to forested green space, consistent with reviewed evidence linking nature exposure to improved mental health, cognitive function, blood pressure and sleep.⁹

* Note: Based on the forest stream identified in Appendix B (Figure 4-21). The hydrological survey (Appendix C, Figure 6-3) was not considered, as the ecological value of the numerous surveyed streams and drains was not stated.

This alternative configuration retains two residential areas consistent with HDB's original plan: a larger southern area comprising the Academy of Singapore Teachers site and non-conserved portions of Gillman Barracks, and a smaller northern area beside the retained string of Gillman Barracks structures. Remaining parcels are converted to additional green areas, concentrating new housing within land already committed to development rather than displacing additional forest. Current residents in existing estates will benefit from the retained greenery, rather than limiting the advantageous health and physical effects of the forests to residents of the new estate.

The wider green corridors created by this configuration also strengthen connectivity in two directions: southward to Labrador Nature Reserve and Berlayer Creek, and westward to HortPark and Kent Ridge Park — reinforcing the site's role within the broader Southern Ridges network.³⁴

Gillman Barracks buildings within the retained green area should continue to serve food, arts and culture uses, as they do today — mirroring 195 Pearl's Hill Terrace, a former barracks now a thriving creative enclave with over 90% occupancy.³⁵ Notably, Pearl's Hill Terrace itself has faced repeated redevelopment pressure for housing,³⁶ underscoring the same tension this submission's alternative configuration seeks to resolve. The proposed nature walk reinforces this by connecting surrounding residences to the wider Southern Ridges network while directing footfall past the retained buildings to sustain their commercial viability.

Slope, Habitat and Development Considerations

The EIA's slope map (Appendix A, Figure 5-2) identifies Zones 1A, 1B, 2B and 4 as predominantly >30% slope ("very steep" under the USDA classification). These zones closely overlap with the native-dominated secondary forest which the EIA's habitat mapping (Appendix B, Figure 4-21) has marked as Proposed Retained Area. The terrain too steep to develop historically is also the terrain of highest ecological value today. Developing these zones would require extensive cut-and-fill earthworks and slope-retaining structures, increasing cost, erosion risk, and sediment yield into drainage that ultimately reaches Berlayer Creek — compounding ecological loss with construction risk and higher cost. Concentrating development in the flatter, already-disturbed zones (e.g. Zone 5) is therefore preferable on ecological, engineering, and cost grounds alike.

3.3 Remedy/Mitigate

If development proceeds, it should minimise impacts on existing residents while creating a safe, well-connected and liveable neighbourhood for future residents. Relevant authorities should provide clarity on how these impacts will be managed before commencing any works.

3.3(a) Wildlife and Environmental Management

3.3 (b) Construction Traffic and Road Safety

3.3 (c) Neighbourhood Access and Connectivity

3.3 (d) Construction Amenity

3.3 (e) Future Neighbourhood Planning and Resilience

3.3 (f) Accessibility and Emergency Planning

3.3(a) Wildlife and Environmental Management

Forest clearance may temporarily displace Gillman's wildlife into surrounding residential areas on top of the disruption from Berlayar's development. Planning should include:

- Considerate and humane wildlife management during construction;
- ecological monitoring, particularly for species of conservation significance recorded in the EIA;¹³
- measures to maintain habitat connectivity for Gillman's area with the Southern Ridges network;
- landscape design that minimises unintended attraction of wildlife into residential areas; and
- long-term health and management of the retained forest and forest stream.

3.3(b) Construction Traffic and Road Safety

Majority of roads in the surrounding area — including Telok Blangah Drive, Telok Blangah Street 31, and Telok Blangah Heights — are effectively single-lane roads with street parking scattered throughout the area. Should these roads be used extensively by construction vehicles, worker transport and heavy equipment, it could lead to:

- Increased traffic congestion, given the already-reduced effective road width from street parking;
- reduced visibility and manoeuvring space at junctions;
- increased risk of accidents involving vehicles, cyclists and pedestrians, including users of the Southern Ridges walking routes; and
- delays and access difficulties for existing residents.

The Government should therefore provide information for discussion on:

- the proposed construction vehicle routes, and how these will account for the limited effective road widths;
- heavy vehicle parking and staging areas, given limited road capacity for additional heavy vehicle movement;
- traffic management measures, including whether temporary parking restrictions will be needed during construction; and
- the basis for selecting specific access routes over alternatives.

Where feasible, construction traffic should minimise reliance on roads already constrained by street parking.

3.3(c) Neighbourhood Access and Connectivity

Beyond construction-phase impacts, introducing a new residential estate could increase long-term traffic demand and create congestion at key points if the development relies primarily on these same roads.

Clarification should be provided:

- whether these roads will become the primary or sole vehicular access for the new estate;
- whether alternative access arrangements have been evaluated;
- expected simulated peak-hour traffic volumes;
- emergency vehicle access; and
- whether additional vehicular access has been considered to improve network resilience.

The existing pedestrian and park connections — including access to Telok Blangah Hill Park and HortPark — should remain open wherever safely practicable throughout construction.

3.3(d) Construction Amenity

Construction is expected to continue over several years. Concerns remain about prolonged exposure to construction noise, dust, vibration, construction lighting, and extended working hours.

The Government should provide information and open for discussion with the neighbourhood on the proposed:

- construction working hours;
- noise and dust mitigation measures;
- environmental monitoring programme;
- complaint response process; and
- performance standards that contractors will be required to meet.

3.3(e) Future Neighbourhood Planning and Resilience

The scale of the proposed development should be matched by increased transport, community infrastructure and environmental resilience. The Government should provide clarity on:

- the planned number of homes and expected resident population;
- planned bus services and public transport improvements, including connections to Labrador Park and Telok Blangah MRT (the estate is currently served only by Bus 124 and Bus 120);
- neighbourhood shops and amenities;
- childcare, healthcare and community facilities;
- supporting infrastructure required to serve the future population; and
- stormwater and drainage management.

Given the site's hilly terrain identified in the EIA's slope mapping (Appendix A, Figure 5-2) and the replacement of permeable forest with buildings and roads, planning should demonstrate how stormwater will be managed to ensure the development does not increase surface runoff, erosion or flood risk to neighbouring properties, roads, or the forest stream and Berlayar Creek downstream.

This should include the proposed drainage strategy, stormwater management measures, and where practicable, the use of nature-based solutions such as retained vegetation, bioswales and rain gardens to complement conventional drainage infrastructure so that the development will remain resilient to future climate and rainfall events.

3.3(f) Accessibility and Emergency Planning

The Gillman Barracks area is characterised by sloping terrain and proximity to an ageing residential population in surrounding older estates. Planning should provide:

- barrier-free pedestrian connections;
- elderly-friendly walking routes;
- accessible gradients where feasible, given the site's steep zones;¹³
- sheltered links to surrounding amenities and MRT access; and
- safe access for mobility device users.

Emergency access and evacuation arrangements should also be designed to ensure there is no excessive reliance on a single access point.

Request for Ongoing Community Engagement

The residential discussion on 30 July 2026 and public feedback form – closing on 6 August 2026 – should mark the start of a longer conversation with the community, not the end of one. Gillman Barracks sits within a 47-hectare site bordering the Southern Ridges, and the scale of change proposed here (new housing, altered forest boundaries, and the future of heritage structures within the estate) will unfold over many years of planning, design and construction, well beyond this single feedback window.

We ask that engagement continue at each stage of that process, rather than concluding once the current EIA and heritage study public feedback window closes. This should include:

- publication of updated site plans and habitat/heritage retention maps as the development proposal is refined, so residents can track how the final configuration compares to what has been consulted on;
- regular dialogue with residents, nature groups and heritage advocates who have already engaged closely with this site — including those who contributed to the petition supporting its preservation;
- opportunities to comment on the master plan, detailed building and landscape design, and construction sequencing, rather than only at the environmental study stage;
- advance notice of construction milestones, particularly changes affecting Telok Blangah Drive, Telok Blangah Street 31 and Telok Blangah Heights, given their already-constrained road capacity; and
- public reporting on environmental monitoring outcomes, including the health of the retained forest, forest stream, and wildlife corridors connecting to the Southern Ridges.

Sustained engagement of this kind would help ensure the eventual development reflects both the ecological and heritage value already identified by HDB's own studies, and the lived experience of residents who will be most affected by construction and by the neighbourhood that follows. This should be a continuing partnership between HDB, URA, NParks, heritage and nature stakeholders, and the community — not a single round of feedback treated as final.

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APPENDIX

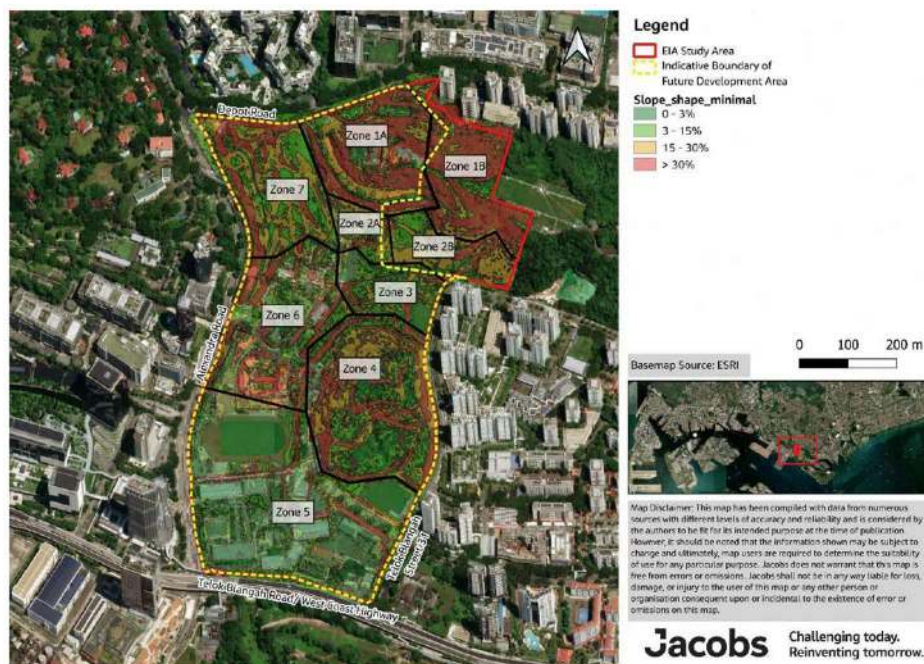


Figure 5-2: Slope Map and Zoning for the EIA Study Area

Appendix A. Figure 5-2: Slope Map and Zoning for the EIA Study Area. Reproduced from Jacobs, *Specialist Consultancy Services for Environmental Impact Assessment (EIA) at Gillman Barracks* (2026), prepared for NParks on behalf of HDB.¹³

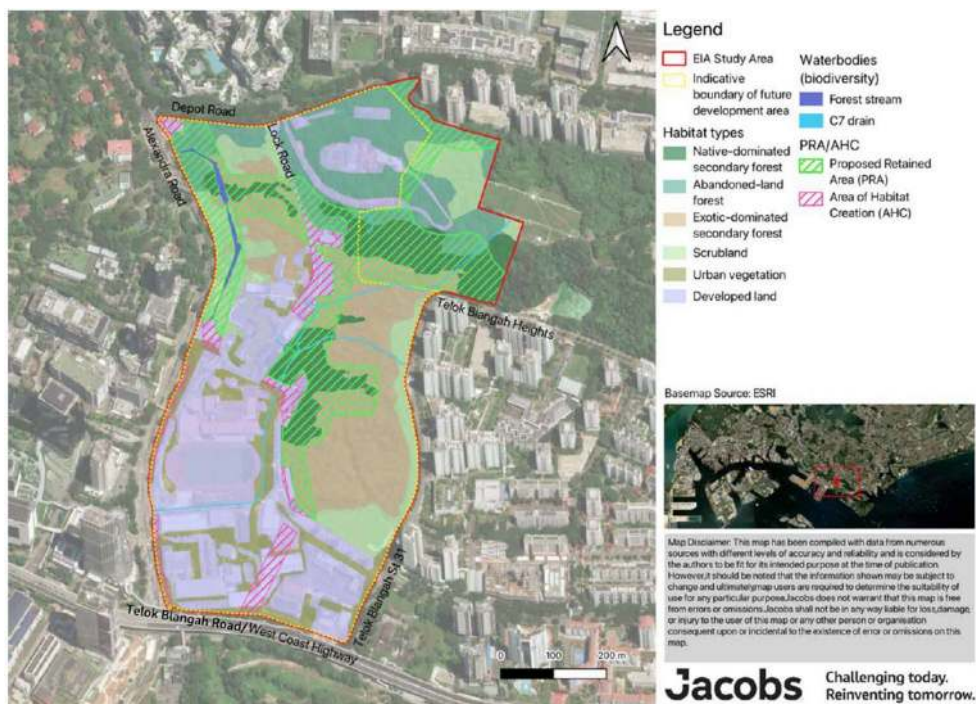


Figure 4-21: Proposed Retained Area and Area of Habitat Creation

Appendix B. Figure 4-21: Proposed Retained Area and Area of Habitat Creation for the EIA Study Area. Reproduced from Jacobs, *Specialist Consultancy Services for Environmental Impact Assessment (EIA) at Gillman Barracks* (2026), prepared for NParks on behalf of HDB.¹³

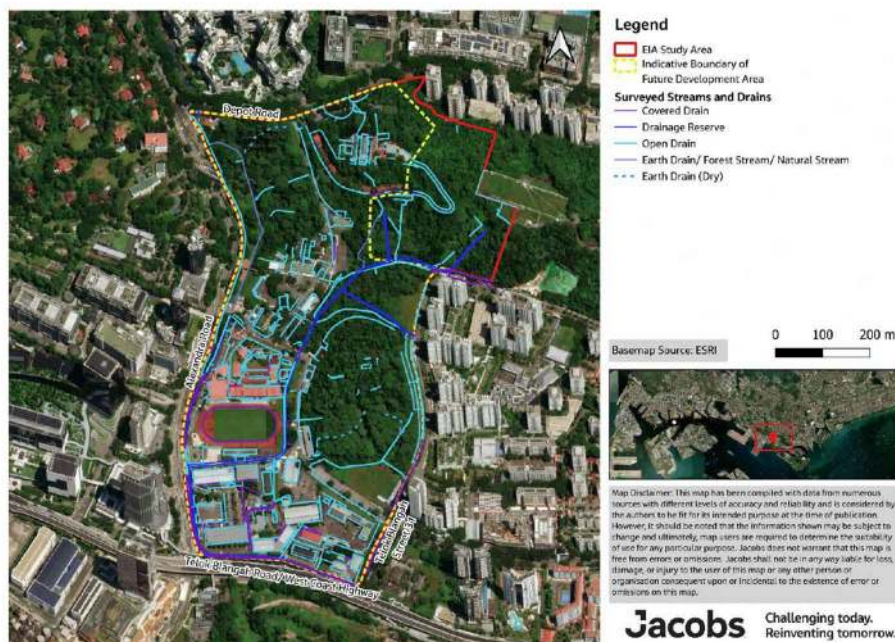


Figure 6-3: Identified Streams and Drains within the EIA Study Area from Hydrological Survey

Appendix C. Figure 6-3: Identified Streams and Drains within the EIA Study Area from Hydrological Survey. Reproduced from Jacobs, *Specialist Consultancy Services for Environmental Impact Assessment (EIA) at Gillman Barracks* (2026), prepared for NParks on behalf of HDB.¹³