



**BY EMAIL ONLY**

The Secretary, Town Planning Board  
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21 November, 2017

Dear Chairperson and Members,

**Objection to  
Application for Proposed Temporary Warehouse for Storage of Construction Materials for a Period of 5  
Years on “Road” zone at Tung Chung Valley, Lantau Island (A/I-TCV/1)**

1. Green Power would like to lodge an objection to the captioned application for temporary warehouse for storage of construction materials because it
  - (a) violates the planning intention of approved Tung Chung Valley Outline Zoning Plan No. S/I-TCV/2,
  - (b) legalizes and promotes the use of unauthorized road access,
  - (c) threatens ecology of Ecologically Important Stream(EIS), i.e. Tung Chung River, and Tung Chung Valley
  - (d) pollutes the Tung Chung River EIS,
  - (e) increases additional traffic load to existing roads,
  - (f) opens the floodgate to further incompatible developments in Tung Chung Valley.

***Violate the Planning Intention***

2. *The general planning intention of the Area is to conserve the ecologically sensitive areas, to protect the rural and natural character, to maintain the unique landscape character and cultural heritage.* (Section 8.1, Explanatory Statement, S/I-TCV/2).
3. The captioned proposed project is only 35 metre away from the ecologically sensitive stream, i.e. Ecologically Important Stream(EIS) at Tung Chung (Mok Ka and Shek Mun Kap) designated by Agriculture, Fisheries and Conservation Department. The building structure of the proposed project and its operation is obviously incompatible with the rural and natural character of Tung Chung Valley, and consequently destroys the unique landscape character and cultural heritage of pristine Tung Chung Valley.
4. Although the proposed project site is located within “Road” zone, the access road (i.e. mentioned “local track” in the application) connecting to the site trespasses “OTHER SPECIFIED USES”(“OU”) zone which is for “River Park” only (p.10, Schedule of Uses in S/I-TCV/2) which should be farmlands before the implementation of Tung Chung New Town Extension development which has not yet commenced. More importantly, road access is not land uses stated in both Column 1 and 2 under “OU”. Planning approval for a particular application should not allow or promote unauthorized developments or incompatible landuses in other zones.
5. Also, the access road connecting to the proposed project site will breach the planning intention of “OU” *to protect and retain the existing natural landscape, ecological or topographic features of the Area for preservation, flood prevention, educational and research purposes through the development of River Park and to separate sensitive natural environment of the Tung Chung Ecologically Important Stream from the adverse effects of development* (Planning Intention, OTHER SPECIFIED USES, Schedule of Uses in S/I-TCV/2).

6. The access road has encroached Tung Chung River EIS and bring about adverse effects of development including deteriorating of air quality by vehicular exhaust, noise pollution from vehicles and site operation, increase in suspended solid of EIS river water by runoff from unpaved access road, and toxic sewage and solid waste discarded to the river generated from the site.
7. Green Power urges the Administration to take enforcement to stop any illegal land use operation in the Schedule Area, if any, such as filling or excavation of land. As stated in Section 17, Explanatory Statement, S/I-TCV/2: *Any diversion of streams, filling of land or excavation of land in relevant zones ..... be subject to enforcement proceedings*

#### ***Incompatible Landscape Character***

8. *The landscape setting of the Area is very distinct* (Section 5.2, Explanatory Statement, S/I-TCV/2). The proposed project is not compatible to the landscape condition of Tung Chung Valley.

#### ***Threaten the Endangered Species and Ecology***

9. The proposed project is about 35 metre away from Tung Chung River EIS and the access road connecting the site encroaches the EIS. *The EIS is characterized by its high diversity of freshwater fish species, with records of species of conservation importance and concerns such as Beijiang Thick-lipped Bard (Acrossocheilus beijiangensis), Philippine Neon Goby ( Stiphodon atropurpureus) and Rich Fish (Oryzias curvinotes). The endangered Romer's Tree Frog (Liuixalus romeri) which is classified as "Endangered" in IUCN Red List, and the rare Jhora Scrub Hopper (Aeramachus jhora) have also been recorded in the vicinity of the proposed project site.* (Section 5.2, Explanatory Statement, S/I-TCV/2).

#### ***Pollute Natural Stream***

10. Section 10.3, Explanatory Statement, S/I-TCV/2 mentions that *provision of sewerage and drainage systems .....are being planned.* Without any sewerage and drainage facilities, the proposed project that involves storage of construction materials will pollute the adjoining Tung Chung River EIS and Tung Chung Bay with toxic substances (e.g. paints and solvents) or fill materials through sewage generated or surface runoff.
11. The access road connecting the proposed project site deprives the EIS stream bank of vegetation that leads to soil erosion. Lack of vegetation on river bank to filter surface runoff will deteriorate the water quality of Tung Chung River EIS. Soil erosion will cause geotechnical instability of river banks, especially with the use of heavy goods lorry.

#### ***Increase traffic load and fly-tipping***

12. The proposed project will generate additional vehicular traffic that will increase the traffic load, worsen air pollution, noise nuisance, water pollution, ecological impacts and fly-tipping. And fly-tipping of wastes and land filling are difficult to spot and prevent in such a remote area, even with statutory landuse plan covered, but its adverse consequences are usually irreversible, especially in ecologically sensitive areas such as Tung Chung Valley.
13. In conclusion, Green Power considers that the captioned application will deteriorate the environmental, landscape and ecological conditions of Tung Chung Valley, set a bad precedent to further incompatible developments in Tung Chung Valley. We urge the Town Planning Board to reject the application.

Thank you very much for your kind attention. We look forward to your favourable decisions.

Yours faithfully,



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