



BY EMAIL ONLY

The Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road,
North Point, Hong Kong.
(E-mail: tpbpd@pland.gov.hk)

24 March, 2017

Dear Chairperson and Members,

**Objection to Application for
Proposed Temporary Warehouse, Workshop and Domestic Use for a Period of 3 Years
as well as Filling and Excavation of Land Lot 288 in D.D. 331, Lower Keung Shan, Lantau
(A/I-LWKS/2) (Review under Section 17)**

Supplement to previous objection

1. Green Power lodged an objection on 6 September, 2016 to the captioned application for temporary warehouse, workshop and domestic use, as well as filling and excavation of land.
2. The application site was visited in October, 2016 and suspected illegal developments were found which breached the statutory landuse planning including erection of metallic and concrete structures, excavation of stream bank. Photos are shown below.



3. Such suspected illegal developments in prior to any decisions of Town Planning Board clearly demonstrate that the landowner(s) or works operator(s) do not respect and have no will to observe the relevant ordinances. Therefore, it is unlikely that the land owner(s) or operator(s) will observe relevant ordinances, guidelines or conditions imposed by the Town Planning Board.
4. Green Power would like to object to this application which is undergoing review under Section 17, and re-iterate that the above-captioned application
 - (a) violates the planning intention of approved Luk Wu and Keung Shan Outline Zoning Plan No. S/I-LWKS/2,
 - (b) involves land excavation for site formation and road construction that violates the land use control stipulated in S/I-LWKS/2,
 - (c) contradicts the conservation objective for the application area in Lantau Development plan proposed by Development Bureau and Lantau Development Advisory Committee,
 - (d) threatens ecology and fragments the woodlands between Lantau North and Lantau South Country Park,
 - (e) pollutes the natural stream courses,
 - (f) increases additional traffic load to existing roads,
 - (g) opens the floodgate to further developments in Country Park enclaves.

Violate the Planning Intention

5. *The general planning intention for the Area is to protect the natural landscape and the special religious and tranquil character which complements the overall naturalness and the landscape beauty of the surrounding Lantau North and Lantau South Country Parks.* (Section 8.1, Explanatory Statement, S/I-LWKS/2). The captioned proposed project will obviously intrude the natural landscape and the operation will destroy the tranquil character of the Area.
6. The general planning intention also aims to *protect the natural habitats in the Area such as the wooded areas which form a continuous stretch of well-established vegetation with those located in the adjoining Lantau North and Lantau South Country Parks and some natural streams connecting with Lantau North and Lantau South Country Parks and Tai O.* (Section 8.2, Explanatory Statement, S/I-LWKS/2). The construction of captioned proposed project site will fragment the continuous stretch of well-established vegetation with those located in the adjoining Lantau North and Lantau South Country Parks and its operation will threaten the natural streams and aquatic ecology adjoining the application site.
7. The proposed project site is located within “Green Belt” (“GB”) zone. *There is a general presumption against development within this zone.* (Section 9.5.1, Explanatory Statement, S/I-LWKS/2). Also, warehouse, workshop, domestic use and drains are not land uses stated in both Column 1 and 2 in Schedule of Uses in S/I-LWKS/2.
8. The proposed project will breach the planning intention of “GB” *to preserve the existing natural landscape* (Planning Intention, GREEN BELT, Schedule of Uses in S/I-LWKS/2).
9. 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 9.5.3, Explanatory Statement, S/I-LWKS/2: *As diversion of streams, filling of land or excavation of land may cause adverse environmental and drainage impacts on the adjacent natural environment and the existing fauna and flora habitats, permission from the Board is required for such activities. Development in this zone (i.e. “GB”) should be strictly controlled. Also, any diversion of streams, filing of land or excavation of land.....shall not be taken or continued.....without the permission from the Town Planning Board.....* (Remarks, GREEN BELT, Schedule of Uses in S/I-LWKS/2).

Contradict Lantau Development Plan

10. The proposed project deviates substantially from the Lantau Development plan, *Space for All*, proposed by the Administration in January 2016, which *suggested that the predominant part of Lantau be used for conservation, leisure, cultural and green tourism with emphasis on protecting sites of conservation value and enhancing their linkages.* (p.9, Group 1: Spatial Planning and Landuse, Major proposal). It also acts contrarily to the proposal to designate Luk Wu and Keung Shan as *Zen Conservation Zone* proposed in Planning Framework for Recreation and Tourism in Lantau Development plan. (p.15 &16, Group 4: Recreation and Tourism, Major Proposal) (http://www.landac.hk/data/filemanager/uploads/miscellaneous/LanDAC_Digest_Submission10_20160125.pdf)

Incompatible Landscape Character

11. *The Area has high scenic and landscape value that complements the natural landscape..... with the natural habitats of the surrounding Lantau North and Lantau South Country Parks.* The Area is identified as *Landscape Protection Area under the Revised Concept Plan for Lantau promulgated in 2007*(Section 7.1.1 and 7.2.2, Explanatory Statement, S/I-LWKS/2). According to “Landscape Value Mapping of Hong Kong” study conducted by Planning Department, Keung Shan Valley (LNT-152) where the application site is located possesses “Good” landscape condition and “High landscape value.”

(http://www.pland.gov.hk/pland_en/p_study/prog_s/landscape/e_executive_summary_hp/fig_31.htm)

The proposed project is not compatible to the Landscape Protection Area, also the landscape condition and value of Keung Shan valley.

Threaten the Endangered Species and Ecology

12. *The Area has high ecological value which..... ecologically links up with the natural habitats of the surrounding Lantau North and Lantau South Country Parks* (Section 7.1.1, Explanatory Statement, S/I-LWKS/2). More importantly, Keung Shan valley is one of the important habitats of Romer’s Tree Frog (*Liuixalus romeri*) on Lantau (http://www.landac.hk/img/m6sm2_map.png) which is classified as “Endangered” in IUCN Red List.

Pollute Natural Stream

13. Section 7.2.4, Explanatory Statement, S/I-LWKS/2 mentions that *there is no existing or planned public sewer available in the Area. New development within the Area should be strictly controlled in order to avoid any possible water pollution so as to safeguard the quality of the quality of the water sources of the Area.* The proposed project involves domestic use that will generate sewage and pollute the adjoining natural streams. Developments which would cause adverse impacts on the water quality..... are not encourage. (Section 8.1, Explanatory Statement, S/I-LWKS/2).
14. Moreover, the proposed project deprives the 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 the adjoining natural streams. Soil erosion will cause geotechnical instability of river banks, especially with the proposed large physical structure and heavy load of goods, i.e. construction material as claimed by the proponent.

Increase traffic load and fly-tipping

15. Currently, no vehicular access road is connected to the project site. Then, the captioned proposed project required road construction that may breach planning control and imposes environmental and ecological impacts as stated in previous paragraphs. On the other hand, 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.

16. In conclusion, Green Power considers that the captioned application will deteriorate the environmental, landscape and ecological conditions of Lantau, open the floodgate to further incompatible developments in Country Park enclaves on Lantau. 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,

A handwritten signature in black ink, appearing to read "Cheng Luk Ki". The signature is written in a cursive, flowing style.

Cheng Luk Ki, Ph.D.
Division Head, Scientific Research and Conservation