



BY EMAIL ONLY

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Dear Chairpersons and Members,

Land Sharing Pilot Scheme application at various lots in D.D. 7 and D.D.19 and the adjoining Government land in Tai Po (Application No.: LSPS/003)

Green Power would like to draw your kind attention to our grave concerns about the above-captioned application of the new Land Sharing Pilot Scheme.

1. The general planning intention of the Lam Tsuen Valley, according to the Explanatory Statement of The Approved Lam Tsuen Outline Zoning Plan (LTOZP) No. S/NE-LT/11, is “to retain the rural character of the Area by controlling development and promoting agricultural activities” to fulfil the “need to conserve/preserve the rural character, the natural landscape and the ecological interest of the Area” (Section 8.2). The proposed large-scale residential development is clearly against the traditional rural setting and contradictory to this planning intention.
2. The zoned “Agriculture” lands in the application site are aimed to “retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes” and “retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes” (LTOZP, Section 9.4.1). However, the proposed development will result in a

permanent loss of over 90,000m² of agricultural land, which consists of about 4.5% arable land resources of the whole Lam Tsuen Valley. In particular, the clusters of cultivated land near She Shan Tsuen that are “*under active cultivation and worthy of preservation*” (LTOZP, Section 9.4.2) will be completely eliminated under the proposed development.

3. The application site also falls within the water gathering ground (WGG) that is under the control of the legislation Waterworks Ordinance (Cap. 102). LTOZP has emphasized that “*developments in this area would be strictly controlled to protect the water resources from being contaminated by wastes and pollutants*” (Section 7.2.1). Yet, the proposed development will unavoidably pave up a large area of permeable agricultural lands and potentially become a major pollution source inside the WGG which may reduce the quantity of collected raw water and its water quality. Besides, the increase of paved area will drain a larger amount of stormwater to the Lam Tsuen River and She Shan River, and hence increase the risk of flooding of the site and the areas downstream during a rainstorm.
4. The highly natural She Shan River, that runs through the application site, is a “*key dragonfly site*” for some species of conservation interest¹. The proposed development will likely alter the alignment of some river sections and hence destruct the important stream habitat. Besides, the new residential development will introduce massive human disturbances to the river environment.
5. She Shan Village has long been recognized as a butterfly hotspot in Hong Kong. According to a Lam Tsuen butterfly survey², 171 butterfly species were recorded from 2009 to 2019 in that area, consisting of about 64% of local species. Some very rare butterflies, such as *Udara albocaerulea* (白斑嫵灰蝶) and *Jamides alecto* (素雅灰蝶), inhabit in the open wet agricultural land within the application site whereas such habitats will be permanently destroyed in the proposed development.
6. The applicants intend to introduce 28 towers of residential building (ranging from 17 to 39 storeys) to the application site, which is incompatible with the existing rural landscape in the Lam Tsuen area. Given that there is currently no high-rise building in Lam Tsuen Valley, the proposed development will definitely bring a huge adverse visual impact to the whole area. In addition, proposed residential development with such the building height and density will impose serious ecological fragmentation problems, blocking the ecological corridor between Lam Tsuen Country Park and Tai Mo Shan Country Park.

7. The proposed development is expected to introduce 33,937 new residents, which is more than 1.7 times the existing population of the whole Lam Tsuen Valley according to the data of the 2016 Population By-census³. Unfortunately, the LTOZP has clearly stated that “*the existing and committed transport and infrastructural networks will not be capable of sustaining additional (population) growth*” (Section 8.1). The major road access in the Lam Tsuen area - Lam Kam Road, will not be able to support the massive increase in traffic flow induced by the proposed development.
8. Extensive filling of construction and demolition waste was reported in and adjacent to the application site in 2003/2004, resulted in serious destruction and habitat deterioration on large areas of arable farmlands. If the current application is approved, it will set an undesirable precedent of “destroy first and develop later”.
9. In sum, we do not support the captioned application despite the overwhelming need for new land and housing supply. We are sure there are alternative land resources suitable for the Scheme without compromising the drinking water safety and valuable rural environment.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power (T: 3961 0200, F: 2314 2661, Email: wflo@greenpower.org.hk).

Yours faithfully,



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References:

¹ Wilson, K.D.P. (1997) *An annotated checklist of Hong Kong dragonflies with recommendations for their conservation*. *Memoirs of the Hong Kong Natural History Society* 21: 1-68.

² Green Power (2021) *Hong Kong Butterfly Inventory*.

< Available from: www.greenpower.org.hk/butterfly/eng/inventory.shtml >

³ HKSAR (2016) *2016 Population By-census — Demographic Profiles of Population in Lam Tsuen Valley District Council Constituency Area, 2016*.

< Available from: www.bycensus2016.gov.hk/en/bc-dp.html >