



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)

7 July 2022

Dear Chairperson and Members,

**Objection to Application for
Proposed Temporary Place of Recreation, Sports or Culture (Hobby Farm)
for a Period of 3 Years at Tung Chung Valley, Lantau Island (A/I-TCV/19)**

1. Green Power would like to lodge an objection to the captioned application for temporary place of recreation, sports or culture (hobby farm) for a Period of 3 Years at Tung Chung Valley, Lantau Island because this project
 - (a) violate the planning intention of approved Tung Chung Valley Outline Zoning Plan(OZP) No. S/I-TCV/2,
 - (b) legalize and promote the use of unauthorized road access and illegal structures,
 - (c) threaten ecology of ecologically important Tung Chung River
 - (d) pollute ecologically important Tung Chung River,
 - (e) open a floodgate to further incompatible developments in Tung Chung Valley.

Please note that the citations in this letter refer to the Tung Chung Valley OZP No. S/I-TCV/2

Violate the Planning Intention and Threaten the Endangered Species and Ecology

2. *The general planning intention of the Area (Tung Chung Valley) is to protect the ecologically sensitive areas and to preserve the natural environment.....of the Area. (Section 8.2, EXPLANATORY STATEMENT).*
3. The Ecologically Important Streams (EIS) near the application site (No.27. Tung Chung (Mok Ka and Shek Mun Kap)) 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*) (Section 5.2, EXPLANATORY STATEMENT). The proposed operation of the application may rear exotic, invasive or genetically modified fish species. These reared fish species will be introduced into the EIS intentionally or accidentally during rainstorms, floods or escape from fish tanks through an existing channel connecting to the EIS (as mentioned in the gist of the application). These invaded fish species from the application site will threaten the survival the existing freshwater fish species, cause genetic pollution and damage the ecology of the Tung Chung River EIS. The impacts are very likely disastrous and irreversible.

4. Although the proposed project site is located within “R(C)2” zone, the access roads (i.e. mentioned “local access” in the application) connecting to the site encroaches “CONSERVATION AREA”(“CA”) and “OTHER SPECIFIED USES”(“OU”) zone which is for “River Park” only (p.10 and 13, Schedule of Uses). Obviously, road access is not land uses stated in both Column 1 and 2 under “CA” or “OU”. Planning approval for a particular application should not allow or promote unauthorized developments or incompatible landuses in other zones.
5. 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* (Planning Intention, OTHER SPECIFIED USES, Schedule of Uses).
6. The access road connecting to the proposed project site will also breach the planning intention of “CA” where *only developments that are needed to support the conservation of the existing natural landscape or scenic quality of the area or are essential infrastructure projects with overriding public interest may be permitted* (Sec. 9.8.1, EXPLANATORY STATEMENT).

Legalize Illegal Structures

7. More importantly, the proposed project site is ONLY accessible through “local access” via two bridges which encroach the ecologically important Tung Chung River that have been recognized as illegal by the Administration (please refer to map and photos below). Approval of the captioned applications virtually legalizes these illegal structures that the reinstatement enforcement may be forfeited. That will also lead to contradiction in law when different relevant ordinances are enforced and cause confusion to the public.

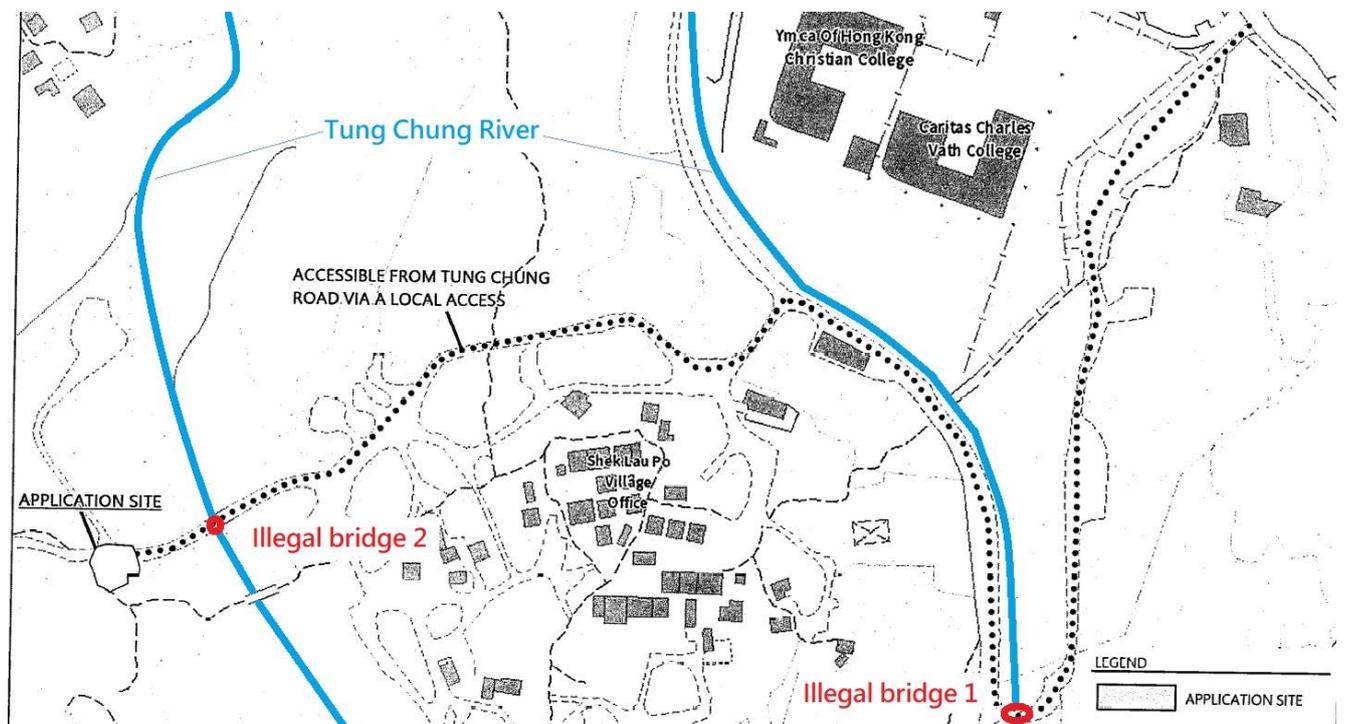




Photo shows the Illegal Bridge 1 with Government department's notice sign erected.



Photo shows Illegal Bridge 2 with Government department's notice signs erected.

Pollute Natural Stream

8. Section 10.3, EXPLANATORY STATEMENT mentions that *provision of sewerage and drainage systems.....are being planned*. Without any sewerage and drainage facilities, the proposed project will pollute the adjoining Tung Chung River and Tung Chung Bay with aquacultural wastewater (containing fish feed, fish excreta, veterinary drug such as antibiotics), domestic sewage, fertilizers and surface runoff through an existing channel connecting to EIS intentionally or accidentally during rainstorms and floods. Eutrophication, deterioration of water quality and establishment of drug-resistant bacteria may be resulted in the Tung Chung River EIS that will destroy the pristine and ecologically rich Tung Chung River.
9. The access road connecting the proposed project site deprives the river 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. Soil erosion will cause geotechnical instability of river banks.
10. The connecting access roads to the application sites have encroached ecologically important Tung Chung River, i.e. EIS, and brought about adverse effects of development including increase in suspended solid of river water by runoff from unpaved access road.,
11. In conclusion, GREEN POWER considers that the captioned application will threaten the unique but fragile ecological conditions of Tung Chung River which might be disastrous and irreversible. Moreover, it would trigger further environmental problems and set a bad precedent to further similar incompatible developments in Tung Chung Valley. We urge the Town Planning Board to reject the captioned application.

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

Yours faithfully,



Cheng Luk Ki, Ph.D.
Director