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The Conservancy Association

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7th September 2021

Mr Leung Tung-choi, Thomas
Head of Land Sharing Office
Planning and Lands Branch
Development Bureau

By e-mail: lso@devb.gov.hk

Dear Mr Leung,

RE: Comments on Land Sharing Pilot Scheme in She Shan Road and Lam Kam Road in Tai Po (Application No. LSPS/003)

The Conservancy Association (CA) STRONGLY OBJECTS to the captioned application.

1. Not in line with the planning intention of Agriculture (AGR) zone

According to the Approved Lam Tsuen Outline Zoning Plan No. S/NE-LT/11, the planning intention of "Agriculture" (AGR) zone is "*primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes. It is also intended to retain fallow arable land with good potential for rehabilitation for cultivation and other agricultural purposes*". This Land Sharing Pilot Scheme (LSPS) application is a development project in expense of large area of agricultural land. This is definitely not in line with the planning intention of AGR zone.

Despite large pieces of abandoned agricultural land, we consider that they are still high potential for agricultural rehabilitation. For active agricultural land, from our observation, some are still remained within the application site (Figure 1). To be in line with the planning intention, significant loss of agricultural land in this site should be prevented.

2. Incompatible with surrounding environment

Compared with some previous planning applications submitted to Town Planning



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Board (TPB), the development scale has significantly increased. For example, the maximum height of residential blocks is proposed to be 39 storeys. Plot ratio of private and public housing is 5.01 and 7.45 respectively. Total anticipated population of the LSPS application would be over 33,000. Such development scale is no differences to that in highly urbanized area and it will greatly alter the tranquil rural character surrounding She Shan Tsuen and even the entire Lam Tsuen Valley setting. Together with additional infrastructure such as public transport interchange, public vehicle park, road widening work, footbridges, and so on, more human disturbance would be introduced and then lead to degradation of environmental and landscape quality in the area.

3. Adverse environmental impact

The eastern part of the application site is very close to She Shan Tsuen “fung shui” woodland Site of Special Scientific Interest (SSSI) and woodland currently zoned “Conservation Area” (“CA”). Both SSSI and “CA” zone are ecologically linked to each other. Since the application site is serving an important buffer between the built environment and SSSI and “CA” zone, we worry that such buffering effect would be loss finally and any forms of human disturbance would threaten ecological condition in SSSI and “CA” zone in future.

Regarding the Master Layout Plan and Infrastructure Location Plan, we also have the following specific concerns:

- i. Open space along She Shan River: it is doubtful if it can perform any buffering purposes to protect the river. For example, open space might attract certain recreation activities and this would be potential source of disturbance to the river. Meanwhile, a cycle track (Figure 2) is now proposed at the western riparian zone very close to the river. Associated impacts during both construction and operation phase of this work would be resulted
- ii. A new road from Hang Ha Po to the application site: such alignment (Figure 3) would directly pass through part of the She Shan River and a hill slope zoned AGR zone. Even a viaduct there might still cause direct and indirect impacts on these habitats
- iii. Proposed drainage tunnel: the proposed alignment would pass through well-wooded area (Figure 4) near the woodland in “CA” zone. While large



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scale of vegetation clearance and tree removal would be resulted, ecological linkage between these two woodland areas would be loss.

4. Undesirable precedent of “destroy first, build later”

It is reminded that land-filling activities in the application site were spotted between 2003 and 2005 (Figure 5). The Administration therefore sought ways¹ to control land-filling activities on farmland. Despite of the fact that the works did not constitute an “unauthorized development” under the Town Planning Ordinance at that time, CA is of grave concern that approving the proposed development on this disturbed land would result in a undesirable precedent of condoning the act of “destroy first, develop later”

TPB has announced approaches to deter “destroy first, build later” activities in 2011. It stated that “*the Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned*”². We opine that Land Sharing Office should do the same by NOT giving any sympathetic considerations to this application or it will set an undesirable precedent for similar cases in future.

Best regards,

Ng Hei Man

Campaign Manager

The Conservancy Association

¹ Please refer to the minutes of 115th and 125th Meeting of the Advisory Council on the Environment:
http://www.epd.gov.hk/epd/english/boards/advisory_council/files/ace_mins_115_e.pdf
http://www.epd.gov.hk/epd/english/boards/advisory_council/files/ace125.pdf

² TPB Press Release. Available at:
<http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>



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Figure 1 For active agricultural land, from our observation, some are still remained within the application site (circled in red)





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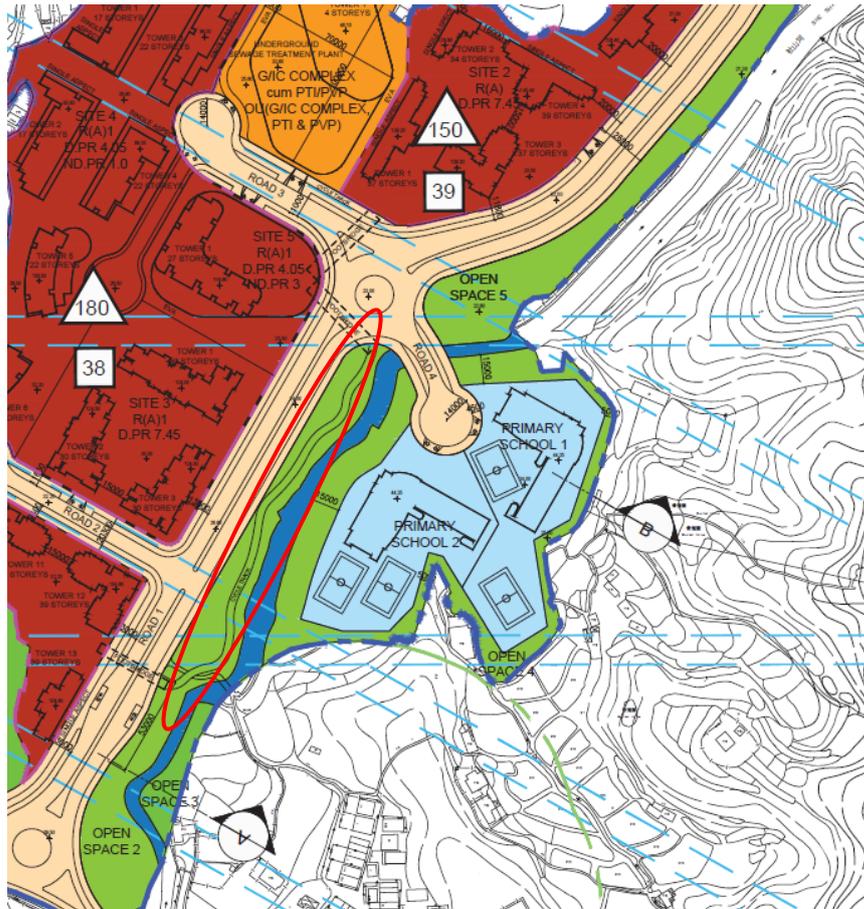
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Figure 2 According to Plan 3a of the LSPS application, a cycle track (circled in red) is now proposed at the western riparian zone very close to the river. Associated impacts during both construction and operation phase of this work would be resulted





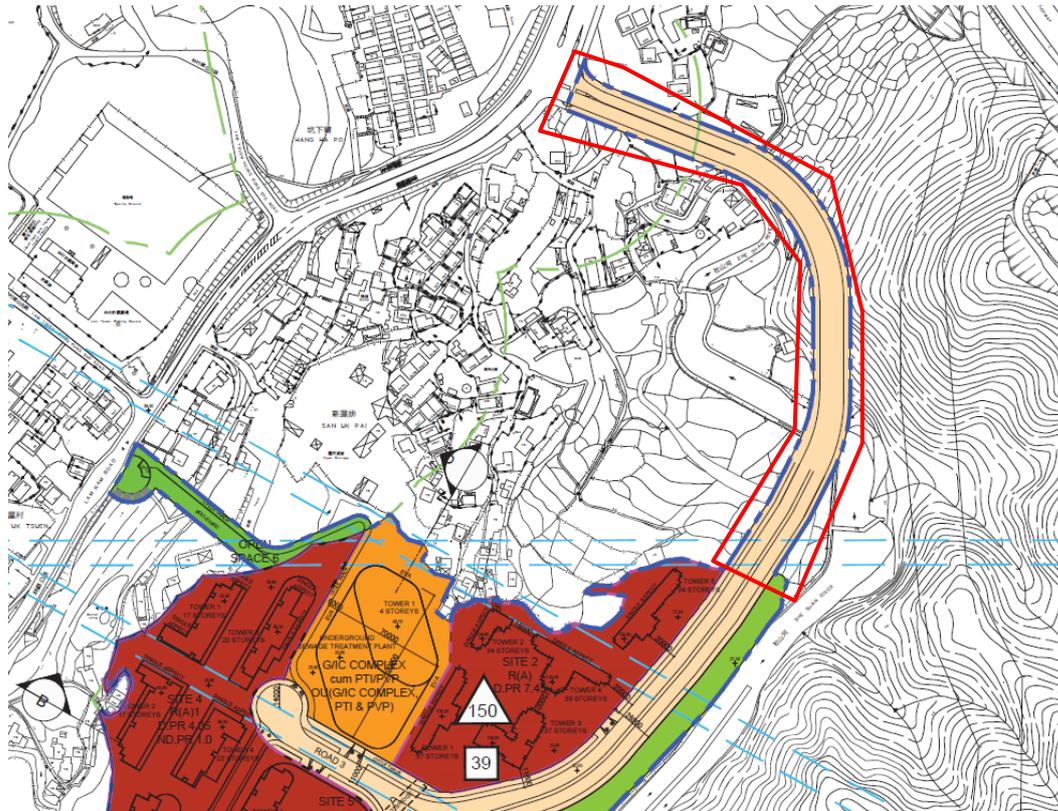
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Figure 3 According to Plan 3a of the LSPS application, a new road will be built connecting Hang Ha Po and the application site. A section (marked in red) would directly pass through part of the She Shan River and a hill slope zoned AGR zone. Even a viaduct there might still cause direct and indirect impacts on these habitats





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Figure 4 The proposed drainage tunnel (marked in light green) would pass through well-wooded area. Large scale of vegetation clearance and tree removal would be resulted (the application site marked in red)



Figure 5 Land filling in She Shan Tsuen in 2004

