



長春社 Since1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊
Add.: Jockey Club - The Conservancy Association Urban Forestry
Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon
網址 Website:www.cahk.org.hk

電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538
電子郵件 E-mail:cahk@cahk.org.hk

15th November 2023

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Representations relating to the Draft South Lantau Coast Area Outline Zoning Plan (OZP) No. S/SLC/21

Regarding the captioned, The Conservancy Association (CA) has the following comments:

Item A2

1. Lacking conservation elements in planning intention of Recreation (REC) zone

Here's the planning intention of REC zone:

“intended primarily for recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism. Uses in support of the recreation developments may be permitted subject to planning permission.”

While a proper land use planning would facilitate the proposed measures in the previous Ecological Study for Pui O, Shui Hau, Tai O and Neighboring Areas – Feasibility Study (the Study) to be implemented, it seems that there are great inconsistencies between the planning intention and suggested measures of the Study, as the planning intention lacks conservation and environmental elements.



長春社 Since1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊
Add.: Jockey Club - The Conservancy Association Urban Forestry
Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon
網址 Website:www.cahk.org.hk

電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538
電子郵件 E-mail:cahk@cahk.org.hk

According to the Study, a series of management strategies have been proposed to maintain quality of the habitats in long run (Figure 1). At least 2 measures have been proposed in the proposed Recreation (REC) zone:

“4. Prevent further expansion of the paved areas along South Lantau Road and Chi Ma Wan Road, control pollution to/ impacts on the adjacent wetlands to be restored, i.e. sewage/ waste water discharge and dumping/ littering, with proper drainage system”

“14. Set up water quality monitoring station(s) and control water pollution”

The Study also proposed the Priority Site (i.e. study area of Pui O) to be divided into 2 zone: Core Conservation Zone and Other Zone. The proposed REC zone mostly falls within the Other zone. We note that Other Zone would include *“areas other than the Core Conservation Zone where ecologically compatible activities could be promoted”*.

All the above indicate that conservation elements should be incorporated when planning Pui O area. However, we cannot see how the proposed planning intention of REC zone cannot fulfill these.

2. No restriction clauses on promoting low-impact leisure and recreational use

When promoting environmentally friendly recreation or sustainable tourism activities in other rural areas, some additional efforts have been put in the past plan-making process. Here we would list out our observation in some of the recreation-related zonings in South Lantau and some other rural areas:



長春社 Since 1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊
 Add.: Jockey Club - The Conservancy Association Urban Forestry
 Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon
 網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
 電子郵件 E-mail: cahk@cahk.org.hk

OZP	Zoning	Planning Intention	Remarks	Explanatory Statement
Tai Kwu Ling North (S/NE-TKLN/2)	REC	<p><i>“This zone is intended primarily for low-density recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism. Uses in support of the low-density recreational developments may be permitted subject to planning permission.”</i></p>	<p><i>“<u>Any diversion of streams or filling of pond...shall not be undertaken or continued...without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance.</u>”</i></p>	<p><i>“This area is designated for recreational purposes as it <u>has low environmental value, low scenic value with a mixture of temporary structures.</u>” (Section 9.3.2)</i></p> <p><i>“<u>However, the recreational development in this Area should be restricted to low-intensity development so as not to overload the infrastructure of the Area and create nuisance to the villagers.</u>” (Section 9.3.4)</i></p> <p><i>“<u>As diversion of streams or filling of pond may cause adverse drainage impacts</u>”</i></p>



長春社 Since 1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊
 Add.: Jockey Club - The Conservancy Association Urban Forestry
 Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon
 網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
 電子郵件 E-mail: cahk@cahk.org.hk

				<i>on the adjacent areas and adverse impacts on the natural environment, permission from the Board is required for such activities.” (Section 9.3.6)</i>
Man Kam To (S/NE-MKT/4)	REC	<i>“This zone is intended primarily for low-density recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism. Uses in support of the low-density recreational developments may be permitted subject to planning permission.”</i>	<i>“<u>Any diversion of streams or filling of pond...shall not be undertaken or continued...without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance.</u>”</i>	<i>“<u>Any potential adverse impacts on drainage, landscape and ecology that might be caused by new developments, of which planning permission is required from the Board, should be addressed by the applicant and examined by concerned Government departments during planning application stage</u>” (Section 9.3.2)</i>
Sha Tau Kok	REC(1)	<i>“<u>This zone is intended primarily for</u></i>	<i>“<u>Any diversion of streams or</u></i>	<i>“However, the recreational</i>



長春社 Since 1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊
 Add.: Jockey Club - The Conservancy Association Urban Forestry
 Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon
 網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
 電子郵件 E-mail: cahk@cahk.org.hk

(S/NE-STK/2)		<p><u>low-intensity recreational developments to promote agri-tourism and eco-tourism. Major recreational facilities and uses in support of the recreational developments may be permitted subject to planning permission.</u></p>	<p><u>filling of pond...shall not be undertaken or continued...without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance.</u></p>	<p><u>development in this area should be restricted to low-intensity development so as not to overload the infrastructure of the area. For better control of any high intensity future development in the area, 'Place of Recreation, Sports or Culture' use is under 'Column 2' of the zone...</u> (Section 9.4.1)</p>
Kam Tin South (S/YL-KTS/15)	OU(RU)	<p><u>"This zone is intended primarily for the preservation of the character of the rural area. Uses or developments compatible with the rural landscape, such as passive recreation uses and a selected range of rural uses, may be allowed on application to the Town</u></p>	<p><u>"Any filling of pond or excavation of land...shall not be undertaken or continued...without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance."</u></p>	<p><u>"Low-rise recreational and residential development compatible with the rural landscape may be permitted on application to the Board subject to the demonstration of sustainability in ecological,</u></p>



長春社 Since 1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊

Add.: Jockey Club - The Conservancy Association Urban Forestry Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon

網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

		<i><u>Planning Board, with a view to upgrading or improving the area or providing support to the local communities.”</u></i>		<i><u>environmental, traffic and infrastructural terms.”</u></i>
South Lantau Coast (S/SLC/22)	GB	<i>“The planning intention of this zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to <u>contain urban sprawl</u> as well as to <u>provide passive recreational outlets</u>. There is a general presumption against development within this zone.”</i>	<i>“<u>any diversion of stream, filling of land/pond or excavation of land...shall not be undertaken or continued...without the permission from the Town Planning Board under section 16 of the Town Planning Ordinance.</u>”</i>	<i>“<u>Low impact, environmentally sustainable and compatible low-rise leisure and recreation uses and facilities for eco-tourism... with appropriate supporting facilities which have proved to have no adverse impacts on environmental and other relevant aspects could be favourably considered</u>” (Section 7.3.3)</i>



長春社 Since 1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊
Add.: Jockey Club - The Conservancy Association Urban Forestry
Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon
網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
電子郵件 E-mail: cahk@cahk.org.hk

What we would like to conclude from the above table is that:

- Some restriction clauses on, for example, filling of land/pond, excavation of land, stream diversion, can be included to reflect the importance to promote low-impact leisure and recreational uses compatible with the natural and rural setting.
- Conservation-related elements can be incorporated in planning intention of correspondent zonings to maintain the unique natural and rural character and promote recreational uses at the same time.
- To promote low-impact leisure and recreational uses compatible with the rural setting, there would be additional elaboration on how to promote low-impact leisure and recreational uses compatible with the natural and rural setting in Explanatory Statement.

However, viewing the current proposed REC zone, the above elements have not been included. We worry that area covered by the proposed REC zone would finally end up in promoting recreational activities only without further efforts in safeguarding natural habitats and conserving rural landscape.

3. Potential environmental disturbance on Pui O

Some of the areas in proposed REC zone still remain vegetated and not encroached by land uses such as open storage, holiday camp, paved road, etc.. Meanwhile, a watercourse can be spotted running in the middle of the proposed REC zone eastward to adjacent seasonal wet grassland, Ecologically Important Stream (EIS) and the estuarine mudflat currently zoned Conservation Area and Coastal Protection Area (CPA) zone (Figure 1).

From a rough glance in OZP portal, most of the previous Section 16 planning applications in Pui O were within the proposed REC zone. In the past, we have repeatedly express our grave concerns on some of the planning applications in Pui O area, such as caravan holiday camps with ancillary hobby farm. Here we would highlight some of them:

- Increase in noise and light disturbance due to long operation hours (e.g. 24 hours daily)
- Adverse sewage impact, leading to serious hygiene and environmental problems



長春社 Since 1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊
Add.: Jockey Club - The Conservancy Association Urban Forestry
Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon
網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538
電子郵件 E-mail: cahk@cahk.org.hk

- Direct loss in wetland due to introduction of dry farming
- No plans on land recovery after the proposed temporary recreational use
- Discharge of untreated runoff to the proposed drainage system
- No proper site and operational plans such as crowd control, waste management, additional provision of ancillary facilities, etc.

Whether these planning applications were approved or objected by TPB, all of these planning applications have once been reviewed and commented by TPB members which are supposed to be a 3rd party in giving independent and professional comments. We are particularly concerned that some uses in Column 1, particularly holiday camp, Place of Recreation, Sports or Culture, would not need further planning permission and discussion in TPB in future. Without further gatekeeping role from TPB on those planning applications, we highly worry that the habitats within the proposed REC zone as well as its adjacent areas of conservation importance would be subject to adverse or even irreversible environmental impacts.

4. Undesirable precedent for “destroy first, apply later”

From aerial photos, the proposed REC zone was once well-wooded and covered by vegetation. Signs of vegetation clearance and land excavation could be spotted and the scale kept on expanding (Figure 2-9). We have, again, warned that such practice is suspected to be cases of “destroy first, apply later”. Such act should not be tolerated and approved or it will set an undesirable precedent for similar proposals in future. However, the current proposal to rezone the area to REC zone would even legitimize the concept of “destroy first, apply later” among landowners, operators and some other locals.

Based on the above, we would suggest TPB to consider the following:

- OBJECT TO the proposed amendment Item A2
- Replace the current REC zone with conservation-oriented zone
- Revise its planning intention to reflect the importance to protect ecological environment and rural setting in Pui O
- Revise the Remarks of the Notes of the zone to include planning permission requirement for filling of land/pond, excavation of land, stream diversion, etc.
- Include the area in Regulated Area Plan to provide enforcement power for



長春社 Since1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊

Add.: Jockey Club - The Conservancy Association Urban Forestry
Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon

網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

Planning Department to combat various forms of eco-vandalism in South Lantau

Item A3, C1, C2, C3, D1

We SUPPORT the above amendments as these would strengthen conservation efforts in safeguarding wide diversity of natural and cultural resources in South Lantau.

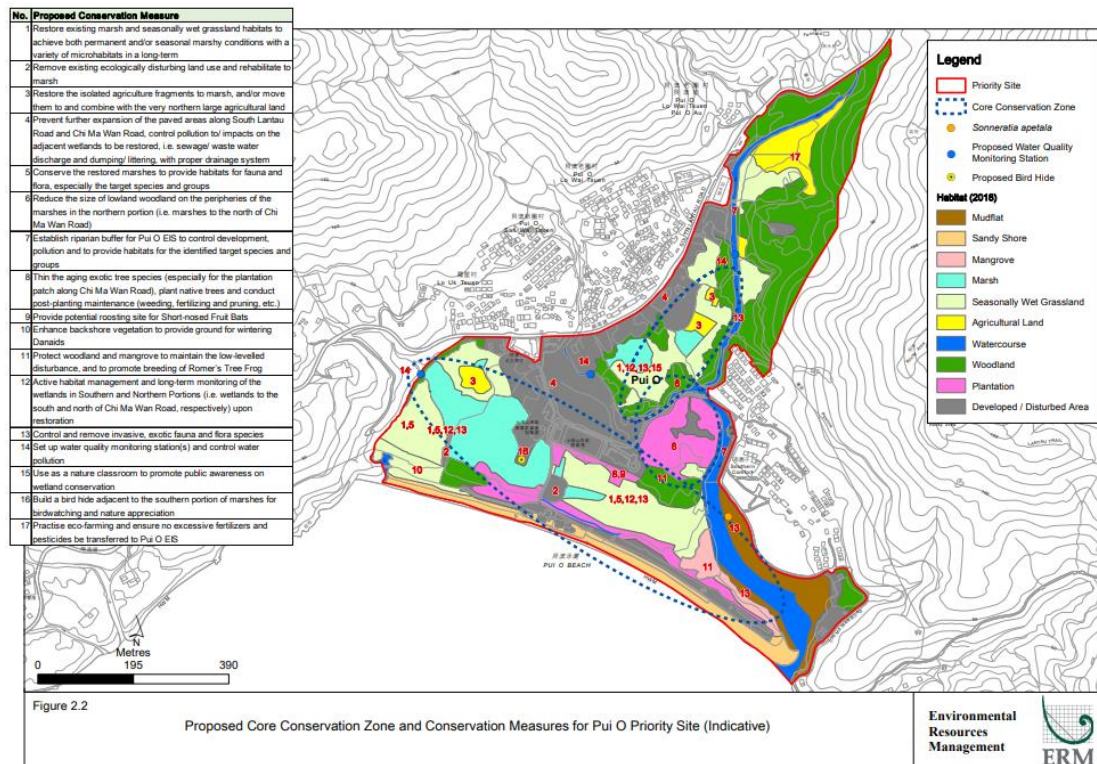
Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association

Figure 1 According to the Study, a series of management strategies have been proposed to maintain quality of the habitats in long run





長春社 Since 1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊

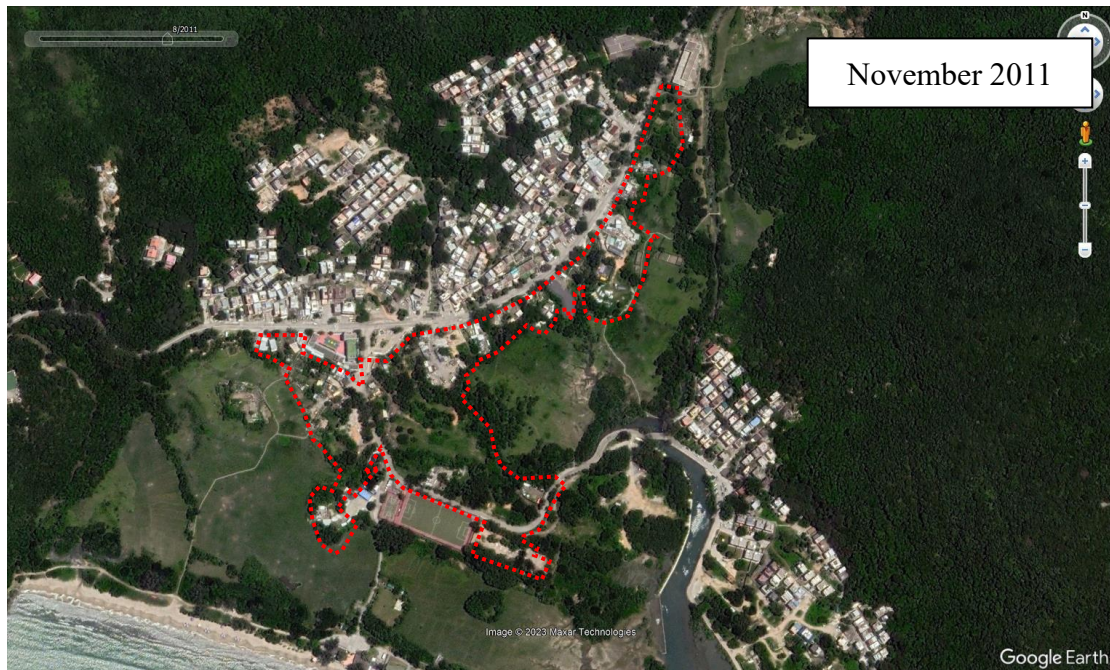
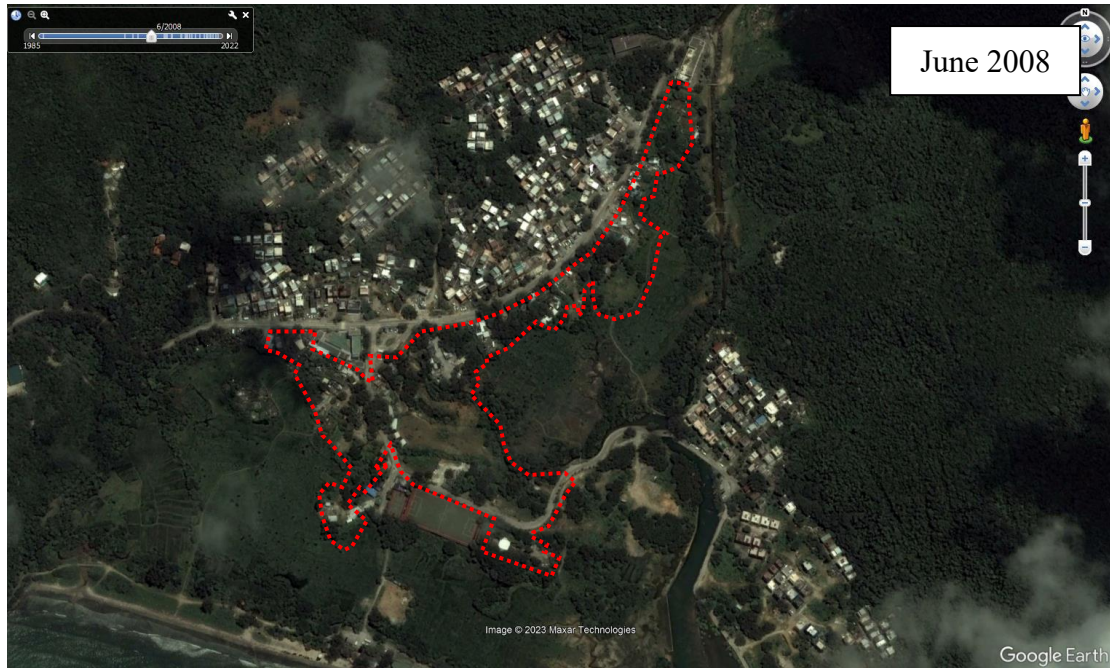
Add.: Jockey Club - The Conservancy Association Urban Forestry Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon

網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

Figure 2-9 Signs of vegetation clearance and land excavation could be spotted and the scale kept on expanding in the proposed REC zone (marked in red)





長春社 Since1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊

Add.: Jockey Club - The Conservancy Association Urban Forestry Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon

網址 Website:www.cahk.org.hk

電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538

電子郵件 E-mail:cahk@cahk.org.hk





長春社 Since1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊

Add.: Jockey Club - The Conservancy Association Urban Forestry Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon

網址 Website:www.cahk.org.hk

電話 Tel.:(852)2728 6781 傳真 Fax.:(852)2728 5538

電子郵件 E-mail:cahk@cahk.org.hk





長春社

Since 1968

The Conservancy Association

通訊地址: 九龍深水埗欽州街西 26 號賽馬會-長春社綠滿林廊

Add.: Jockey Club - The Conservancy Association Urban Forestry
Green Hub, 26 Yen Chow Street West, Sham Shui Po, Kowloon

網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

