



BY EMAIL ONLY

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

28 August 2020

Dear Sir/Madam,

Proposed development proposal to rezone the application site from "Agriculture" zone to "Other Specified Uses" annotated "Columbarium" zone (Application no.: Y/YL-KTS/7)

Green Power, a local charitable green group, would like to draw Town Planning Board's attention to our grave concerns about the captioned application adjacent to Tai Lam Country Park.

1. The captioned application site ("The Site") falls right next to the study area of the "Development Feasibility Study on the Periphery of Country Parks" ("the Study") initiated by the government in 2018. The whole Study area was selected as a pilot for future public housing development because it was perceived as "*relatively low ecological and public enjoyment value*"¹.
2. However, Green Power opines that the ecological value of the periphery of Tai Lam Country Park has been underestimated. Our butterfly survey has recorded 159 butterfly species, including 41 "Very Rare" or "Rare" species, within the Site and the Study area from 2017 to 2020² that consists of about 60% of local butterfly species. The open green area within the Site serves as a foraging ground for butterflies and an important buffer zone to the Country Park, contributing to such a high butterfly diversity. The "Rare" Magpie Flat (*Abrahamia davidii*, 白弄蝶) and "Uncommon" Toothed Sunbeam (*Caretis dentata*, 尖翅銀灰蝶) are constantly spotted in the western part of the Site.
3. The Site is located at the starting point of the Tai Lam Chung Country Trail. The provision of public toilet and rest garden suggested by the applicant will likely attract more hikers to the trail. Whether the increase of passenger flow, especially around the Ching Ming and Chung Yeung Festival, would exceed the designed carrying capacity of the trail and the Tai Lam Country Park should be seriously considered.
4. The "Agriculture" land within the Site is zoned "*primarily to retain and safeguard good quality agricultural land/farm/fish ponds for agricultural purposes*"³, but a permanent loss of arable land will be anticipated if the Site is utilized for columbarium development.

5. Last but not least, grave sweeping often involves food offerings and burning of incense and ritual paper. Provided that the proposed columbarium is not enclosed by walls or fences according to the landscape drawings, wild animals such as Wild Boars will be attracted to forage that will disturb the ecology of Country Park and create conflict between humans and wildlife. The food waste also deteriorates the hygiene and allures pests. Although burning of incense and ritual paper is proposed to be forbidden inside the proposed columbarium area, the increasing risk of hillfire induced by uncontrolled burning is unavoidable.

Thank you very much for your kind attention.

Yours faithfully,



LO Wing-fung
Assistant Senior Education & Conservation Officer
GREEN POWER

References:

¹ Task Force on Land Supply (2018) Medium to Long Term Option Developing Two Pilot Areas on the Periphery of Country Parks.

(Available from: www.landforhongkong.hk/en/supply_analysis/country_park.php)

² Green Power (2020) Hong Kong Butterfly Inventory.

(Available from: www.greenpower.org.hk/butterfly/eng/inventory.shtml)

³ Town Planning Board (2018) Kam Tin South Outline Zoning Plan No. S/YL-KTS/15.

(Available from: <https://www2.ozp.tpb.gov.hk/gos/download.aspx?type=ozp&caseno=S/YL-KTS/15&lang=0>)