



BY EMAIL ONLY

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Land Sharing Pilot Scheme – Panel of Advisors

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Dear Chairpersons and Members,

**Land Sharing Pilot Scheme application at various lots in Demarcation District 19
and the adjoining Government land, Tai Po, New Territories (Application No.: LSPS/004)**

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 (the 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 development is incompatible with the traditional rural setting and contradictory to this planning intention.
2. The proposed development will introduce 5 towers of residential building (ranging from 28 to 38 storeys) to the application site. Given that there is currently no high-rise building in Lam Tsuen Valley, the proposed development will unavoidably bring a huge adverse visual impact to the whole area. In addition, proposed residential development with such the building height will impose serious ecological fragmentation problems, blocking the ecological corridor between Lam Tsuen Country Park and Tai Mo Shan Country Park.

- The application site includes one of the largest active farmland aggregations (more than 33,000m²) in the Lam Tsuen Valley (Fig.1). The proposed development will result in a permanent loss of such a valuable farmland environment which is not aligned with the planning intention of “Agriculture Land” — 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).

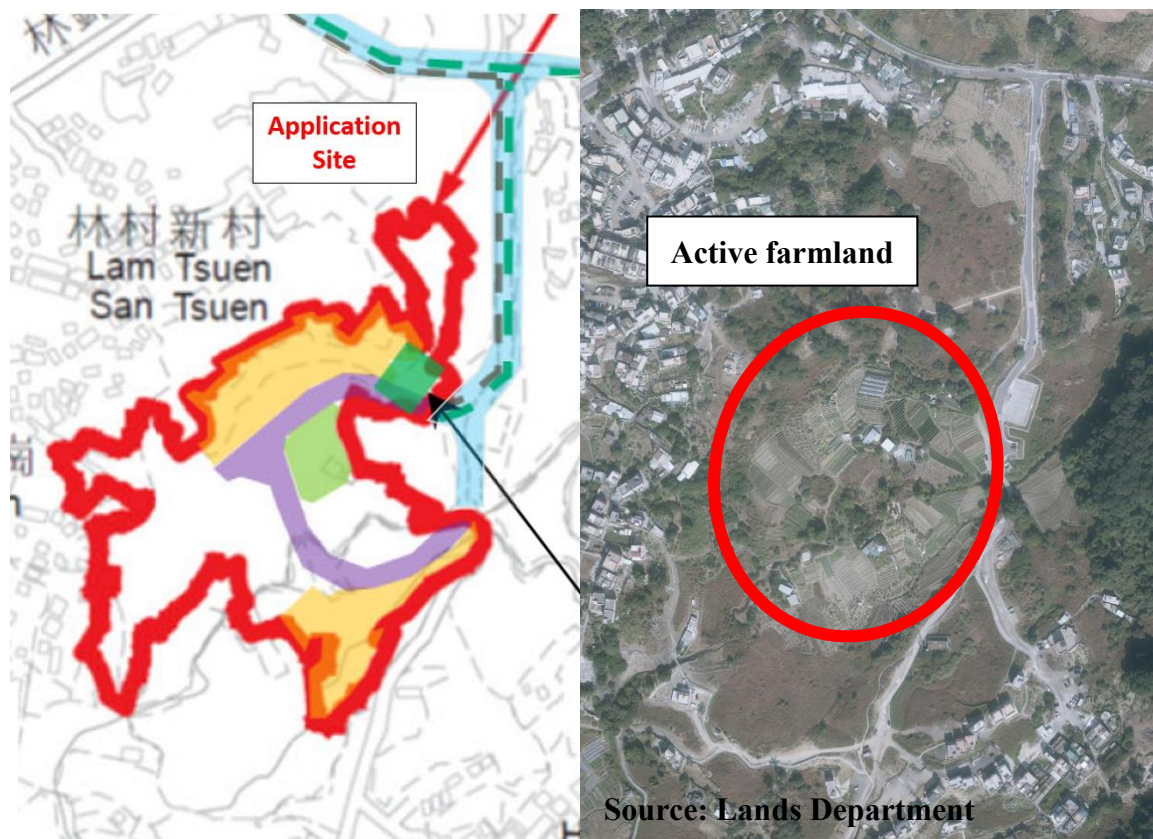


Fig.1 Aerial photo of the application site taken in 2021

- The Agriculture Land in the application site is ecologically linked with the nearby Conservation Area and Site of Special Scientific Interest (i.e. She Shan Fungshui Wood). It serves as an important foraging ground for some wildlife species of conservation value. According to our Lam Tsuen butterfly survey¹, some rare farmland-dependent butterflies such as *Udaspes folus* (薑弄蝶) and *Jamides alecto* (素雅灰蝶) were recorded in She Shan Village. The proposed development will potentially destroy their natural habitat.
- 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). However, 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.

6. The She Shan River that runs through the application site is a natural river with excellent water quality in the past decades². It has been identified as a “*key dragonfly site*” for some species of conservation interest³. Our unpublished dragonfly survey result has confirmed there are more than 30% of local dragonfly species in Lam Tsuen Valley, including the globally restricted *Lamelligomphus hainanensis* (海南環尾春蜓). However, the proposed development will build an over-head road on the river channel that may alter the alignment and fragment the important stream habitat. Besides, the new residential development will introduce massive human disturbances to the river.
7. The proposed development is expected to introduce 8,680 new residents, which is more than 41% of the existing population of the whole Lam Tsuen Valley according to the data of the 2021 Population Census⁴. 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 existing backbone road access in the Lam Tsuen Valley (i.e. Lam Kam Road) will not be able to support the massive increase in traffic flow induced by the proposed development.
8. In sum, we object the captioned application (LSPS/004) and the previous application (LSPS/003) of the Scheme, no matter adopting a standalone approach or an integrated approach. We are sure there are alternative land resources that can moderate the overwhelming need for new land and housing supply without compromising the ecology, 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: 39610200, F: 2314 2661, Email: wflo@greenpower.org.hk).

Yours faithfully,



LO Wing-fung
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References

¹ Green Power (2021) *Hong Kong Butterfly Inventory*.

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

² Environmental Protection Department (2020) *River Water Quality of Hong Kong 2020*

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<https://www.epd.gov.hk/epd/sites/default/files/epd/english/environmentinhk/water/hkwqrc/files/waterquality/annual-report/riverreport2020.pdf> >

³ 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.

⁴ HKSAR (2021) *2021 Population Census — Demographic Profiles of Population in Lam Tsuen Valley District Council Constituency Area, 2021*.

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