



Secretary
Town Planning Board
15th Floor, North Point Government Offices,
333 Java Road,
North Point, Hong Kong

Submission by email to tpbpd@pland.gov.hk

28 September 2017

Objections to Planning Application No. A/SLC/147

Proposed Temporary Holiday Camp (Caravan Holiday Camp) and Tent Camping Ground with ancillary Hobby Farm for a Period of 3 Years and Excavation of land (Sewage Facilities)

Dear Secretary

Living Islands Movement (LIM) still strongly objects to the captioned Planning Application (A/SLC/147) in its entirety. We made our first submission on 22 June, a second submission on 28 July and now this third submission in response to the additional information supplied by the applicant on 24th and 28th August. However, the additional information the applicant supplied in August contains no material changes that make a difference to our original or second objections (copy attached), which we reiterate and supplement our objections as follows:

1. In respect of the claimed Brownfield part of the site, approval would set a highly undesirable precedent encouraging others to extend illegal landfill deep into the Pui O wetland area and later claim development rights.
2. In respect of the Greenfield part of the site, approval would lead directly to draining and degrading of scattered Lots that are currently intact wetland. The activity would also cause collateral damage to the surrounding Lots that are not owned by the applicant, as well as impinging on existing footpaths from which the public can enjoy the natural wetland environment as it currently exists. This is not acceptable.
3. Following on from 1 & 2, approval would directly contradict current government policy in respect of both existing Coastal Protection Area (CPA) zoning and stated intentions in the Sustainable Lantau Blueprint to conserve the Pui O wetland area for future generations.

In general, we are concerned that during the application process to date we have seen the local community become ever more confused over the Government's planning intentions for a Coastal Protection Area zone on South Lantau.

Therefore we urge the Town Planning Board to reject this application (**A/SLC/147**) and any other similar planning applications until a new Development Permission Area (DPA) has been prepared for South Lantau.

Regards

Living Islands Movement

Email: info@livingislands.org.hk

Copy of submission on 28 July 2017

Dear Secretary

Living Islands Movement (LIM) strongly objects to the captioned Planning Application (A/SLC/147) in its entirety. We made our first submission on 22 June and this follow up submission is in response to the applicant submitting further information on 27.6.2017, 28.6.2017 and 5.7.2017, in response to comments from Water Supplies Department, Transport Department, Urban Design Unit of Planning Department, Agriculture, Fisheries and Conservation Department and Environmental Protection Department as well as the public.

The additional information **does not** alleviate our concerns with this project.

Since our original submission we have become aware of further applications for caravan parks on South Lantau. LIM is not against Caravan Parks per se, rather we are against ad hoc applications by private land owners to establish caravan parks. Without any significant planning rules or guidelines we are concerned of a large portion of South Lantau coastline and farmland being covered in "Temporary" caravan parks.

LIM is unclear which Government department monitors and inspects the safety of caravan based accommodation. Caravans may not form part of the rules for Hotels and Guesthouses under the Home Affairs Department's, [Office of the Licensing Authority](#).

We urge the Town Planning Board to consider this application (A/SLC/147) in conjunction with the Cheung Sha Caravan Park Application ([A/SLC/146](#))

Our objection is based on the following grounds:

1. According to the Development Bureau's recently published Sustainable Lantau Blueprint (June 2017), proposals for the conservation of the Pui O Wetlands are to be brought forward and controls on the illegal dumping of construction waste in Pui O are to be enhanced. Approval of this application may compromise both of these valuable initiatives.

2. The Application Site is within the Coastal Protection Area (CPA) that consists of the ecologically sensitive Pui O wetlands area, according to the South Lantau Coast Outline Zoning Plan (S/SLC/19), and the proposed activities are not compatible with this environment.
3. Large parts of the application site have been the subject of unauthorized in-fill over a number of years, and retrospective validation of this activity would be an example of the “destroy first develop later” syndrome in practice and is therefore not in the public interest. The fact that this has been achieved by accessing the site across government land is also unacceptable.
4. Characterization of the proposed development as “temporary” is not credible given the extent of the compacting and concreting over of the aforementioned unauthorized landfill within the area surrounded by a brick retaining wall, the proposed installation of a sewerage system and the irreversible damage to the wetland areas likely from extending the site to an area outside the brick retaining wall.
5. Whether or not the lessee of the Lots to be encircled by, but not included in, the development (Lot Nos 638 and 643 to 645 in DD 316L according to the Location Plan) explicitly objects, approval of the application would pre-empt and dictate future land use decisions regarding those Lots and compromise access to them. This would not be an acceptable precedent and is not in-line with an orderly approach to development. Either the lessee should join the application or the applicant should demonstrate how free access to the lots will be maintained and how the lots will be protected from encroachment.
6. The southern part of the main application site is currently used for storage of scrap metal and a number of abandoned shipping containers that are in poor condition. We are concerned that this material will be disposed of in an unsuitable manner adding further to the existing widespread degradation of the strip of land to the seaward side of the South Lantau Road in Pui O. The applicant should explain how and where the rusted containers and other scrap items are to be disposed of and provide proof that they have disposed of the items legally.
7. We believe the proposed arrangement of septic tanks and sewerage lines into the centre of the site, surrounded by accommodation units, will not be acceptable on environmental hygiene grounds. The location of the central septic tank and soak-away and the line of “portable toilets” right next to the Lots that are not included in the application threatens to export the hygiene issues to others. This seems quite irregular.
8. Further the location of the central septic tank is on raised ground that is compacted building material from the previously mentioned unauthorized land fill. We do not believe this is appropriate ground for a septic tank. The fact that the site has been enclosed by a brick retaining wall that prevents septic tank soak-away in the normal way into surrounding unoccupied land highlights further the unsuitability of this proposal.

9. Extension of the Caravan site outside the above-mentioned brick retaining wall and across the public footpath to Lot Nos. 624, 625 and 626 in DD 316L is not acceptable. These Lots are virgin wetland and approval of this extension would set a precedent encouraging further encroachment on, and land formation in, the core wetland area.
10. In addition, it is not clear how the sewerage line back (uphill) into the main part of the site will be installed. It appears the applicant may be intending to close the public footpath, which would also be totally unacceptable.
11. Extension of the Application Site to include scattered and unconnected Lots in the core wetland area (Lot Nos. 606, 611, 705, 706 and 707 in DD 316L) is wholly unacceptable as this would permanently compromise the integrity of the wetland area by fragmentation and degradation of these Lots and of adjacent lots under other ownership, over which the applicant appears to presume right of access.
12. We are also concerned about the location and nature of the “hobby farm” activities that are proposed. We do not consider that a wetland habitat is suitable for enclosure of farm animals such as goats, and we oppose any concreting over, fencing or other type of enclosure of the outlying scattered Lots referred to above since this would cause further degradation and fragmentation of the core wetland area.
13. We believe that introduction of exotic species of plant for agricultural purposes could irretrievably alter the natural wetland flora and this could spread over a wide area well beyond the isolated Lots that are the subject of this application. In summary, hobby farming is not an appropriate activity for a conservation area, especially as in this case where the hobby farming would be within an area zoned as a Coastal Protection Area (CPA).

Based on the numerous points of objection raised we hope the Town Planning Board will **reject application A/SLC/147**.

Regards

Living Islands Movement

Email: info@livingislands.org.hk