

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



By email only

12 July 2019

香港觀鳥會  
THE  
HONG  
KONG  
BIRD  
WATCHING  
SOCIETY

Since 1957 成立

Dear Sir/Madam,

**Comments on the planning application for the proposed Temporary Holiday Camp (Caravan Holiday Camp) for a period of 5 years at Pui O, Lantau Island (A/SLC/155)**

The Hong Kong Bird Watching Society (HKBWS) would like to object to the planning application based on the following reasons:

**1. Not in line with the intention of the “Coastal Protection Area” (CPA) zoning**

- 1.1 The planning intention of the CPA zone under the approved South Lantau Coast Outline Zoning Plan No. S/SLC/20 is *“to conserve, protect, retain the natural coastlines and the sensitive coastal natural environment...with a minimum of built development...to safeguard the beaches and their immediate hinterland and to prevent haphazard ribbon development along the South Lantau Coast...There is a general presumption against development in this zone. In general, only developments that are needed to support the conservation of the existing natural landscape or scenic quality of the area or the development is an essential infrastructure project with overriding public interest may be permitted”*.
- 1.2 Pui O is one of the last remaining buffalo fields in Hong Kong and it is well-known for its rich biodiversity. The HKBWS has recorded over 180 bird species in Pui O for the past 15 years and more, which accounts for about one-third of the total number of bird species in Hong Kong. We are concerned that the proposed recreational development would increase human disturbance and adverse cumulative environmental impacts on the nearby wetland habitats in the area for buffalos, which are the key drivers to maintain the freshwater marshes as wetland habitats.
- 1.3 Moreover, we consider that the proposed caravan holiday camp is neither a development need to support conservation nor it is an essential infrastructure, while it would instead lead to a general degradation of the existing natural wetland landscape. As such, the current application is not in line with the planning intention of a CPA zone and thus should be rejected.



## 2. Adverse ecological impacts of the proposed development

- 2.1 According to supplementary information of the proposed development submitted by the applicant in June 2019, it is stated that there will be storage tanks to collect the waste water and vacuum truck will remove the sewerage from the tanks. Moreover, there will be ten caravans which are said to accommodate not more than 50 campers and 3-4 staffs, while the number of daytime visitors must not exceed the number of campers. That means there will be a maximum of 104 numbers of visitors, campers and staff at daytime.
- 2.2 Furthermore, no information is provided on how many campers will visit the holiday camp per week, and there is no calculation to demonstrate how the waste water storage tanks could cater all sewerage generated by campers/visitors/staff in a week.
- 2.3 Also, there seems to be no contingency plan if all storage tanks are full and a vacuum truck cannot be arranged in time. We are concerned the proposed development would have adverse ecological impacts on the nearby waterbodies if the sewerage from the proposed development is not properly treated.
- 2.4 Even if a Septic Tank System (STS) is proposed for sewerage treatment, the Drainage Services Department already recognized the environmental and hygiene problem of STS in various publications<sup>1,2,3</sup>. Moreover, the application site is immediate next to the wetlands in Pui O. We are concerned the treatment ability of the STS would not work effectively due to the high water table and would adversely affect the ecologically sensitive wetland habitats within the CPA zone.
- 2.5 As the site is highly connected with the wetland habitats within CPA zone (Figure 1), we are concerned the poorly treated sewage released from proposed recreational development would pollute the connecting wetlands, and affects the organisms and wildlife which inhabit wetlands. Considering the on-site and off-site adverse ecological impacts on Pui O wetlands, we urge the Town Planning Board (Board) to reject this application.

## 3. The Town Planning Board should not encourage “develop first, apply later”

- 3.1 During our site visit in June 2017 and July 2019, there were already caravans at the site and it seems that the holiday camp is in operation (Figure 2). There is also a website advertising the holiday camp since 2017(Figure 3) and the caravans can be booked at a rate of HK\$1999 per night per caravan<sup>4</sup> (Figure 4).

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<sup>1</sup> [http://www.dsd.gov.hk/SC/Files/publications\\_publicity/publicity\\_materials/leaflets\\_booklets\\_factsheets/Village%20Sewerage.pdf](http://www.dsd.gov.hk/SC/Files/publications_publicity/publicity_materials/leaflets_booklets_factsheets/Village%20Sewerage.pdf)

<sup>2</sup> [http://www.dsd.gov.hk/EN/Files/OpenDay2012/PDF/Sewage\\_Treatment\\_07.pdf](http://www.dsd.gov.hk/EN/Files/OpenDay2012/PDF/Sewage_Treatment_07.pdf)

<sup>3</sup> <http://www.legco.gov.hk/yr13-14/english/fc/pwsc/papers/p14-20e.pdf>

<sup>4</sup> <https://www.jkclub.com.hk/>

- 3.2 From Google Earth photographs, landscape changes such as vegetation clearance, land filling and storage of structures, were seen at the application site (Figure 5).
- 3.3 We consider that this is “develop first, apply later”. We are concerned the approval of the current application would further legitimize the current misuse of the CPA zone, leading to the promotion of “develop first, apply later” and “destroy first, develop later” attitudes among landowners in the locality.
- 3.4 Referring to the justification submitted by the applicant in June 2019, it is suggested that the site “*is already a brownfield site*”, and the Board should therefore approve the application in order to better “*conserve*” the site. We would like remind the Board that the current applicant, namely JK Group Ltd, is actually the same applicant of the previous withdrawn application (no. A/SLC/147) in 2017. Meanwhile, the holiday camp has been started operating in the brownfield since early 2017 without approval. The approval of the current application will definitely legitimize the encroachment of brownfield and give hopes to the developers in the locality to undertake eco-vandalism in hopes of the Board’s approval for development in the future.
- 3.5 We strongly urges the Board to proactively deter “destroy first, develop later” as stated in a press release in 2011, “*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”<sup>5</sup>, so as to reject the current application.*

#### **4. Set an undesirable precedent for future similar applications**

- 4.1 The approval of the current application would promote developments which associated with “destroy first, develop later” to encroach into the CPA zone, setting an undesirable precedent for future similar applications.
- 4.2 As the site is highly connected with the wetland habitats within CPA zone (Figure 1), and also the nearby Ecological Important Stream (EIS) at Pui O (Figure 6)<sup>6</sup>, we are concerned there will be further wetland loss and adverse cumulative ecological impacts on the connecting wetlands and EIS, and affects the organisms and wildlife which inhabit wetlands and stream, if more similar applications could be approved due to the undesirable precedent set in Pui O area.

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<https://blog.holimood.com/> 【貝澳露營車】 /

<sup>5</sup> Press Release – Town Planning Board adopts approaches to deter, “destroy first, build later” activities. 4 July 2011. Available at: <http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>

<sup>6</sup>[https://www.afcd.gov.hk/english/conservation/con\\_wet/streams\\_rivers\\_hk/Con\\_NSR/Ecologically\\_Important\\_Streams.html](https://www.afcd.gov.hk/english/conservation/con_wet/streams_rivers_hk/Con_NSR/Ecologically_Important_Streams.html)

4.3 We urge the Board to reject the current application to protect CPA areas in the South Lantau Coast area and the EIS from any environmental threats.

**5. Justifications for the decision and comments made by Government departments and the Board**

According to the Hong Kong Planning Standards and Guidelines (HKPSG), Chapter 10, Section 2.1 (ii), the Board has the responsibility to, “*restrict uses within conservation zones to those which sustain particular landscapes, ecological and geological attributes and heritage features*”<sup>7</sup>. We note that all other Government bureaux/ departments are also bound to the HKPSG, and the Agriculture, Fisheries and Conservation Department (AFCD) and the Planning Department (PlanD) have the responsibility to advise the Board on the ecological<sup>8</sup> and planning aspects in particular. Given AFCD’s mission to conserve natural environment and the ecological integrity<sup>9</sup>, and the proposed development is not in line with the planning intention of the statutory zoning, HKBWS would also expect AFCD and PlanD to object to this application. Should the departments or the Board feels otherwise, we urge that the appropriate justifications are provided.

The HKBWS respectfully requests the Board to take our comments into consideration and **reject** the current application. Thank you for your kind attention.

Yours faithfully,



Wong Suet Mei  
Assistant Conservation Officer  
The Hong Kong Bird Watching Society

cc.

The Conservancy Association  
Designing Hong Kong  
Kadoorie Farm and Botanic Garden  
WWF – Hong Kong  
TrailWatch

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<sup>7</sup> Hong Kong Town Planning Standards and Guidelines – Chapter 10 Conservation. Section 2.1 (ii).

<sup>8</sup> AFCD Role of Department. Available at: [http://www.afcd.gov.hk/english/aboutus/abt\\_role/abt\\_role.html](http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html)

<sup>9</sup> AFCD Vision and Mission. Available at: [http://www.afcd.gov.hk/english/aboutus/vision\\_mission/abt\\_vision\\_mission.html](http://www.afcd.gov.hk/english/aboutus/vision_mission/abt_vision_mission.html)

**Figure 1.** The Google Earth Aerial photograph in September 2018 and the site photo taken in June 2017 reveal that the site (marked with red line/ red arrow) is highly connected with the wetland habitats within CPA zone. We consider that the proposed caravan holiday camp is neither a development need to support conservation nor it is an essential infrastructure, while it would instead lead to a general degradation of the existing natural wetland landscape. As such, the current application is not in line with the planning intention of a CPA zone and thus should be rejected.



**Figure 2.** There are already caravans parked at the application site as observed in June 2017 (Upper) and July 2019 (Lower) respectively.



**Figure 3.** A website advertising the caravan holiday camp and said the site just started to operate in April 2017 (Upper). The recent booking was recorded on 12 July 2019 (Middle). The map provided in the website indicates the location of the caravan is exactly the same as the current application site (Bottom).

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Yee Hei Yuen Store 合誠飯店 的士站 Taxi Stand 貝澳新圍村休憩處 貝澳露營車會JK Club 杯澳公立學校 Bui O Public School

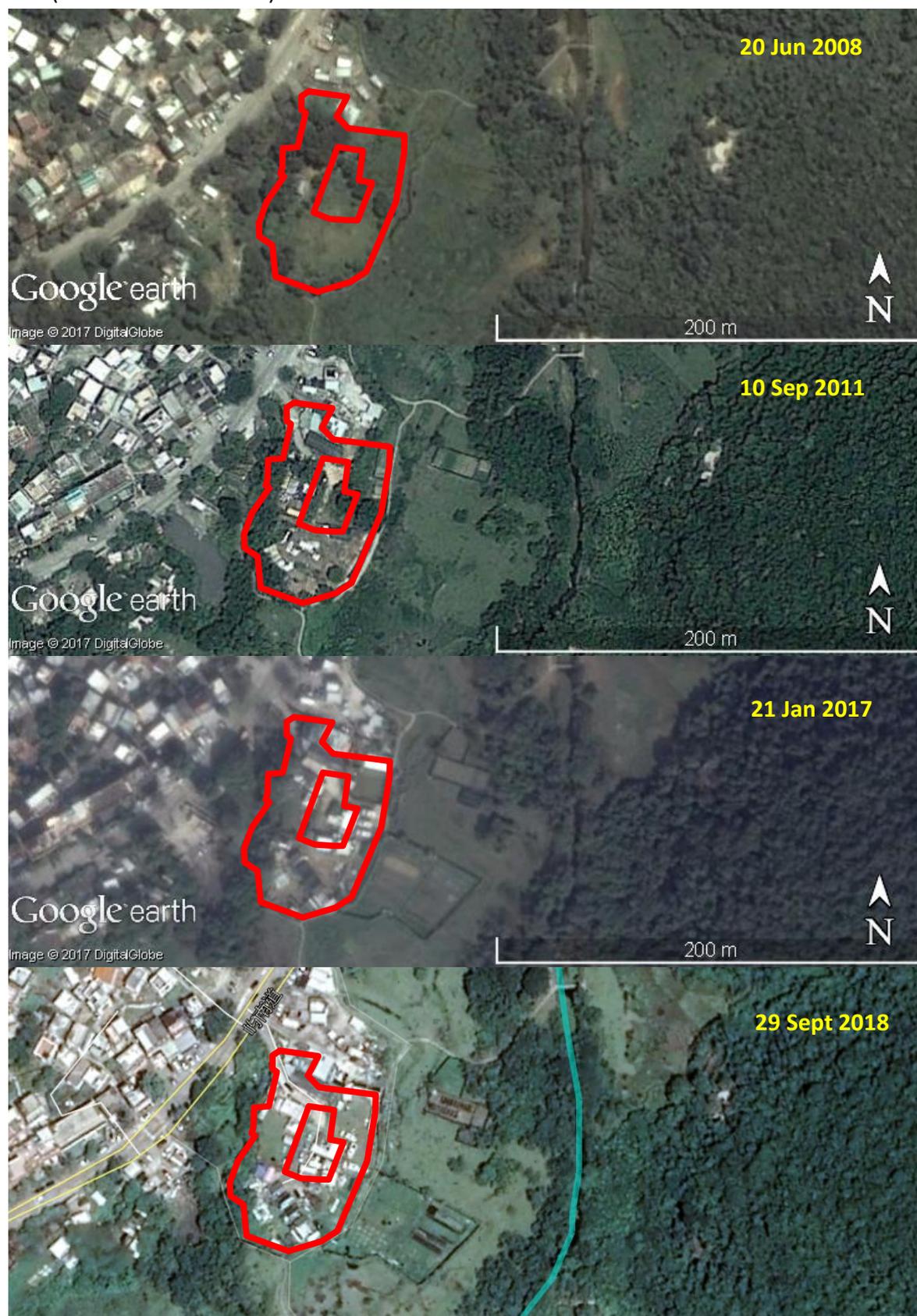
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**Figure 4.** A website offers an online system to book the caravan at a rate of HK\$1999 per night per caravan.

The image displays two screenshots of the JK Club website. The top screenshot shows the homepage with a navigation menu including 'HOME 主頁', 'ABOUT 關於', 'CARAVAN 露營車', 'SERVICES 服務', 'GALLERY 相冊', 'SEE & DO 活動', 'CONTACT 聯繫', and 'Q & A 問答'. A 'Book Now 預訂' button is visible in the top right. The main content area features a large image of a white 'Sprite' caravan with a family (a woman and two children) standing next to it. Below the image is a small text box: '【貝澳露營車】 讓慢生活步調的露營體驗 By Holimood May 19 2017'. The bottom screenshot shows a specific booking page for 'Caravan 101'. It includes a floor plan diagram of the caravan, a price box showing 'from HK\$1999 per Night', and a 'Book Now' button. Below the price box, there are fields for 'Check-In', 'Check-Out', and '1 Persons'. The page also lists 'Properties' (Accommodates: 4, Beds: 2 Double(s), Size: 120 sq ft), 'Amenities' (A/C, WiFi, Minibar, Shower), and 'Check In and Out' (Check-In: 05:00 PM, Check-Out: 03:00 PM).

**Figure 5.** The Google Earth aerial photographs showing landscape changes such as vegetation clearance, land filling and storage of structures, were seen at the application site (marked with red line).



**Figure 6.** The site (marked with red arrow) is connected with the wetland and the nearby Ecologically Important Stream at Pui O (marked with blue line). We are concerned the approval of the current application would promote developments which associated with “destroy first, develop later” to encroach into the CPA zone, setting an undesirable precedent for future similar applications. Subsequently, it would lead to adverse cumulative ecological impacts on the connecting wetlands and EIS, and affects the organisms and wildlife which inhabit wetlands and stream. We therefore urge the Board to reject the current application to protect CPA areas in the South Lantau Coast area and the EIS from any environmental threats.

