

Recommended Advisory Clauses

1. to note the comments of the District Lands Officer/Islands, Lands Department (LandsD) that:
 - (a) regarding the proposed installation within the PGLA, the Applicant is required to obtain a prior agreement from the Drainage Services Department (DSD). Subject to an approval of the STT application mentioned in paragraph (b) below, DSD is required to submit an application to LandsD to modify the use of the PGLA to implement the Applicant's proposal under the subject planning application. The modification of the PGLA is subject to approval; and
 - (b) the Applicant has submitted an application for a short term tenancy ("STT") for deploying local High-Frequency Radars network at various locations including the Sites. Should the subject planning application be approved, the STT application will be considered by LandsD acting in the capacity of landlord at its sole discretion, and there is no guarantee that such application will be approved. If such application is approved, it will be subject to such terms and conditions including, among others, delineations of areas to be possessed, management and maintenance responsibilities, and the payment of rent and administrative fee as may be imposed by LandsD.
2. to note the comments of the Director of Fire Services that:
 - (a) in consideration of the design/nature of the proposal, fire service installations (FSIs) are anticipated to be required. Therefore, it is advised to submit relevant layout plans incorporated with the proposed FSIs to his department for approval with advice as follows:
 - (i) the layout plans should be drawn to scale and depicted with dimensions and the nature of occupancy; and
 - (ii) the location of the proposed FSIs to be installed should be clearly marked on the layout plans.
 - (b) however, if the proposed structures are required to comply with the Buildings Ordinance (Cap. 123), detailed fire service requirements will be formulated upon receipt of the formal submission of general building plans.

3. to note the comments of the Chief Highway Engineer/New Territories East, Highways Department that:
 - (a) no excavation works should be carried out within public road without an excavation permit;
 - (b) any damage done to public pavements, street furniture and highway structures arising from the activity should be made good by the proponent at his own cost; and
 - (c) the proponent should indemnify the Government and its officers from and against all liabilities, claims, costs, demands, actions or other proceedings whatsoever arising out of or incidental to any works carried out for or in connection with the activity.
4. to note the comment of the Director of Electrical and Mechanical Services that in the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organizing and supervising any activity near the underground cable under the mentioned document should approach the electricity supplier (i.e. CLP Power) for the requisition of cable plans to find out whether there is any underground cable within and/or in the vicinity of the concerned site. They should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the “Code of Practice on Working near Electricity Supply Lines” established under the Regulation when carrying out works in the vicinity of the electricity supply lines.
5. to note the comment of the Executive Secretary (Antiquities and Monuments)², Antiquities and Monuments Office (AMO), Development Bureau that it should be ensured that the proposed works will not cause any adverse impacts on the Graded Building (Old Tai O Police Station, Shek Tsai Po Street). AMO should be informed when any antiquities or supposed antiquities are discovered in the course of works pursuant to the Antiquities and Monuments Ordinance (Cap. 53) and it is required to inform AMO on the works schedule for carrying out site inspection as and when necessary. AMO’s comments on the proposed installation will be offered upon receiving any referrals from respective departments under the current internal monitoring mechanism for the protection of the historic buildings.

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主旨:	Planning Application A/I-TOF/9
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Planning Application A/I-TOF/9

Dear Sirs,

There are landscape and environmental concerns in relation to Planning Application A/I-TOF/9 submitted by the Hong Kong Polytechnic University (PolyU) that would affect Government Land within the Tai O Fringe Outline Zoning Plan, including the Tai O Island Coastal Protection Area.

It is noted that the main goal of the project is the provision of a coastal network capable of monitoring wave and sea levels over a wide area in the direction of Hong Kong Island and the Pearl River Delta. PolyU have identified the coastline of Tai O Island as being a well-suited location for the implementation of this project, and have obtained support from various Hong Kong Government departments, in particular the Civil Engineering and Development Department (CEDD) and the Hong Kong Observatory (HKO). The Applicants explain that this project is part of a wider regional and global effort at understanding various sea conditions, resulting in potential benefits to coastal communities especially during extreme weather events.

PolyU emphasize that rather than it being a radar station with a single base, High Frequency Radar (HFR) systems are composed of a number of

thin poles less than two metres in height and three centimeters in diameter lined up along coastlines, in this instance the north-western coastline of Tai O Island. The Applicants appear to believe that this level of visual intrusion on coastal landscapes can be considered to be minimal when compared to single-site radar systems, and that the expected benefits from this project outweigh the causing of landscape and other environmental impacts.

The coastal area of Tai O Island as observed from the sea and from the historic Tung Chung to Tai O Ancient Trail has long been an important landmark associated with Tai O. The Tai O Island's sea coast is widely recognized as being a pleasing and special topographical feature. With the exception of the Drainage Services Department's Sewage Treatment Plant (DSD STP), this coastline has largely remained untouched for centuries. For this reason the creation of even minor new visual impacts has the potential to negatively affect the amenity value of this landscape featuring the Fu Shan hill range and the rugged coastline below. Visitors approaching Tai O by sea or along the Tung O Ancient Trail would not fail to notice the fence-like radar structures lined up along the island's rocky coastline. These structures could come across as being highly intrusive, especially due to their repetitiveness. Cabling affixed to rock surfaces or placed under cemented strips in between poles could exacerbate the visual impact further.

It would therefore seem not to be possible to claim, as the Applicants do in their submission, that the HFR structures would be "assimilated into the landscape, with no material change to its character". Nor would it appear accurate or meaningful to describe HFR antennas as being "imperceptible at any meaningful distance from the coast". What is meant by "meaningful distance" in this context?

The reason for the Planning Department (PlanD) to categorize the Tai O Island coastline below the Fu Shan Hill Range as a Coastal Protection Area (CPA) is that it is recognized as having high landscape, scenic and ecological value. It would appear that there could be a degree of conflict between the PlanD zoning intention and the PolyU planning application.

There are also some apparent contradictions in the explanations given in the Application. On the one hand it is claimed that there would be “no concrete pouring” as part of the project, while elsewhere in the paper the provision of “cement strips” in between radar poles is mentioned. Another example is the assertion that “no vegetation would interfere” with antennas, while elsewhere in the text it is stated that “poles will be effectively screened by existing vegetation”. Clarifications would be useful here.

Apart from the landscape impact mentioned above there are other aspects that could be related to this project if it proceeds. One of them is the potential impact on the Chinese White Dolphins who live in the waters around Tai O Island. While HFR are generally not known to affect fish and other creatures living under the surface of the sea, dolphins regularly emerge to breathe and play on the surface of the water. They are often seen from the Fu Shan Country Trail, sometimes at distances of just twenty or thirty metres from the coastline. As such they could be susceptible to the effects of HFR. There is no mention of this potential impact in the PolyU report.

Sections of the local Tai O community might have concerns about the deployment of lines of HFR antennas on the shore of the island, perhaps in particular fishermen and tour boat operators. The best way to understand local feelings would be to consult the local community, which currently remains in the dark about these HFR plans.

Regarding the portable cabin planned for a place just above the high water mark on the beach near the Tai O Old Pier shown in one of the pictures, it has to be noted that this is not a closed area, as the Applicants appear to believe. The beach has traditionally been accessed by the public. Some years ago the provision of planters along the path leading to the Tai O Heritage Hotel resulted in the beach access being obscured and partly blocked. Behind the planters there are some remaining steps leading down to the beach. This access is still being used by local people, by volunteer beach cleaners and by staff from the Food and Environmental Hygiene Department (FEHD). The proposal to place a cabin at this location and to cover it with camouflage sheets or nets could lead to additional clutter and visual impacts. Directly painting the cabin in camouflage colour patterns might prove to be less intrusive. However, the location chosen for the cabin is highly exposed to the elements. There would be a probability of the proposed structure being overturned or swept away by winds and waves during severely adverse weather events. The cabin would be air-conditioned and would require electricity supply however there is no explanation about how the power link would be established even though power cables could constitute an additional visual impact or affect beach users. There is also mention of gravel having to be used on the beach though the purpose of this is not immediately clear. The depth, thickness and width of cement strips that would be used to cover cables in between radar posts is not given thereby making it difficult for readers to visualize how they would look like.

Though this is nominally a temporary planning application covering a period of three years, it is clear from the nature of the project that it is in fact a long-term project and that the occupation of the coastal land under application would be permanent. In this regard, it is mentioned in the PolyU submission that “HFR systems have a long expected life time and that there is the possibility of easy extensions”. This opens up the question

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as to whether the proposal under application and its associated landscape impacts might be but the initial phase of what could become an even larger and more impactful plan for the provision of HFR systems on Tai O Island.

It is noted that over a year ago DSD had, in their memo of 23 March 2025, advised PolyU to consult the local community. A Home Affairs Department District Office Islands (HAD DO/Is) contact was provided through which public consultation could be facilitated. It would appear that PolyU did not act on this advice, and instead decided to proceed with the planning application while questions related to their proposal remain.

In recent correspondence with PolyU, I had suggested that considering the timing circumstances, it might be preferable for the current planning application to be withdrawn so that the local community could be consulted first, then for the application to be re-submitted if the result of the consultation exercise is favourable to the project. This would provide time for PolyU to answer questions from concerned parties, explain why Tai O Island was chosen from possibly a number of potential alternative locations, and hopefully allay some of the concerns such as those outlined above.

As there has so far been no response from PolyU and considering that tomorrow 23 June 2026 is the time line for the submissions of objections to the application, I would be grateful if you could consider this letter to be an objection to Planning Application A/I-TOF/9.

I am grateful for your understanding of environmental and landscape protection issues which are close to the heart of some members of the Tai O community.

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Yours faithfully

Fabian Pedrazzini



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A/I-TOF/9

Government Land in D.D. 302L, Tai O, Lantau Island

Site area: About 31.875sq.m

Zoning: "Coastal Protection Area", "Other Specified Uses" annotated "Sewage Treatment Works" and "Green Belt"

Applied development: Radar Installation / Ancillary Facilities / **Filling of Land**

Dear TPB Members,

While the facility will no doubt provide very useful data on marine conditions, the questions is WHY THIS LOCATION.

We are bombarded on a daily basis with reports on the measures being taken to increase the number of visitors and attractions. Tai O figures prominently.

*"The primary planning intention for Tai O is to preserve its unique rural character, cultural heritage, and historic stilt houses, **while enhancing the area as an eco-tourism and cultural destination.** It also strictly **emphasizes conserving the surrounding ecologically sensitive coastal environments, mangroves, and wetlands.**"*

In fact, the main attraction of visiting Tai O for both locals and visitors is its unique and unspoiled panorama. The only visual distraction is the DSD Sewerage Plant, which provides an essential community service.

The proposed location is not an isolated and distant coast line as is mentioned in the Paper. It can be seen from boats approaching Tai O and those walking the Tung O Ancient Trail. A line of poles imbedded in concrete foundations would certainly stand out as intrusive. The details provide are contradictory as it is claimed that there would be "no concrete pouring" involved in the project,

The possible negative impact of exposure to HFR has been sidelined. While the coast line in question is not in the public domain, what if some visitors decide it would be cool to pose beside the poles? It would not be difficult to access the site.

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Also, from time to time fishermen venture along the coast line to try their luck

There is also no mention of any possible danger to the Chinese White Dolphins who can be spotted in the waters around Tai O Island. They cavort on top of the water so there is the potential of exposure.

Of concern also is the failure to follow the advice of DSD given over a year ago to conduct a consultant with the local community. Tour guides, F&B outlets, boat operators and fishermen may have concerns.

Re the location of the portable cabin, why is this not integrated into the DSD facility together with the power supply?

This is not a temporary facility and in fact it comes with a strong likelihood of extension in the future. This is in line with the development of the Chung Hom Kok that has turned part of the Stanley coast line into a forest of antenna.

So why was Tai O Island chosen for this project? Was the choice anything to do with convenient access and the nearby heritage hotel and many eating places when PolyU brings visiting academics to visit its installation?

Despite the support from a slew of government bodies, TPB has a duty to look into the impact on the daily lives and livelihoods of local residents and on the possible danger of placing an installation with health risks that should be in a closed area at a relatively accessible location.

The application should be rejected.

Mary Mulvihill