

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 251220-000825-55855

Submission Number:
TPB/R/S/I-TCV/β- S5

提交限期
Deadline for submission: 31/12/2025

提交日期及時間
Date and time of submission: 20/12/2025 00:08:25

「申述人」全名
Full Name of "Representer": 先生 Mr. Chan Ho Yuen stephen

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/I-TCV/3

申述詳情
Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
要求申請人Coral Ching Limited 補充Landholding資料	提供意見 Provide views	<p>關於第763次（日期：2025年5月11日）會議記錄附件第568頁所載的「土地持有圖」，現有分類僅包含「申請人持有地塊」及「待收購地塊」。然而，根據2025年5月2日會議上申請人代表的說明，部分土地業權雖已完成購買程序，但因行政流程尚未完成過戶登記，故未能在現有文件中如實反映。</p> <p>此資訊缺口導致公眾無法知悉業權整合的實際進度，亦削弱了規劃申請的透明度。為確保公眾諮詢所依據的資訊完整、準確且為最新，本人謹此要求申請方必須在本次諮詢文件中，以補充資料或更新圖表的方式，清晰交代截至2025年12月31日的最新業權狀況。</p> <p>具體而言，「土地持有圖」中應增設「已購待過戶地塊」類別，並列明相關土地的具體數目與位置，使公眾能基於充分的資訊參與諮詢。</p>

對圖則是否有任何擬議修訂？如有的話，請註明詳情。

Any proposed amendments to the plan? If yes, please specify the details.

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☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy

Submission Number:

TPB/R/S/I-TCV/3- S6

tpbpd/PLAND

寄件者: henry [REDACTED]
寄件日期: 2025年12月22日星期一 15:00
收件者: tpbpd/PLAND
副本: 'Looking'
主旨: Green Power's Comments on the Amendments to Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/3
附件: GP-TCV OZP 20251222.pdf
類別: [REDACTED] printed, csmng, Internet Email

Dear Sir / Madam,

Green Power is writing to submit our views on the proposed amendments to the draft Tung Chung Valley Draft Outline Zoning Plan. Please refer to the attached document for details. Thank you for your kind attention.

Regards,
Henry Lui
Green Power

綠色力量 Green Power

電話 Tel: [REDACTED]
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地址 Address: [REDACTED]





BY EMAIL ONLY

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

22 December 2025

Dear Sir / Madam,

**Green Power's Comments on the Amendments to
Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/3**

Green Power is writing to submit our views on the proposed amendments to the above Draft Outline Zoning Plan (Draft OZP).

On-going Joint Effort to Conserve Tung Chung River

1. Tung Chung River (TCR) is often referred to as “the last large-scale natural river in Hong Kong”, which lower course is running within the Planning Scheme Area of Tung Chung Valley Outline Zoning Plan (TCVOZP). It is a recognized important biodiversity hotspot which harbours various species of conservation concern, as well as an invaluable natural asset of our city. Its conservation echoes the concept of “Rivers in the City” highlighted in the 2019 Policy Address, and deserves our utmost effort and attention.
2. Tung Chung River Basin *cum* Bay in Tung Chung West (TCW) is one of the few remaining major streams in Hong Kong which has been largely retaining its natural state from headwaters to its estuary, TCR is unique in the local context. Nurturing the second rich freshwater fish biodiversity, it is designed as Ecologically Important Streams (EIS). The high connectivity and continuity of the river system from the montane area to the estuary, as well as diverse habitat types available in the surrounding land area make the river valley exceptionally rich in aquatic, terrestrial and coastal biodiversity, and accommodate species of ecological importance, e.g. Beijiang Thick-lipped Barb (*Acrossocheilus beijiangensis*) 北江光唇魚, Philippine Neon Goby (*Stiphodon atropurpureum*) 紫身枝牙鰕虎魚, Romer's tree frog (*Liuixalus romeri*) 盧氏小樹蛙, Chinese Horseshoe Crab (*Tachypleus tridentatus*) 中國蠶, Seaweed Pipefish (*Syngnathus schlegeli*) 舒氏海龍, Swinhoe's Egret (*Egretta eulophotes*) 黃嘴白鷺, Mangrove Skimmer (*Orthetrum poecilops*) 斑灰蜻,



Common Birdwing (*Troides helena*) 裳鳳蝶 and Eurasian Eagle Owl (*Bubo bubo*) 鵰鴞.
(Appendix 1)

3. Since the early planning stages of the Tung Chung New Town Extension (TCNTE) in 2012, major local environmental groups have been advocating the importance and principles of conserving Tung Chung River *cum* Bay in TCW amid the increasing urbanization pressure, with emphasis on protecting its morphology, hydrology, water quality and biodiversity at the catchment scale. The Administration responded to these requests at various stages of the new town planning process, including the introduction of the city's first Sustainable Urban Drainage System (SUDS) and River Park (RP) during the design stage of the new town in Tung Chung West, as well as the incorporation of environmental groups' comments during the design, construction and operation planning of these elements. However, the aim of conserving TCR could only be achieved when all parties involved in the TCNTE understand its importance and commit to protecting it.
4. We are deeply concerned that the captioned amendments to the TCVOZP neglects the ecological and social value of Tung Chung River Basin *cum* Bay in TCW and undermine the vast and long-terms joint effort of the Administration, concerned groups and non-governmental organisations having been taken over decade to conserve and incorporate Tung Chung River Basin *cum* Bay in TCW as integral part of hydrology, biodiversity hotspot and blue-green component of new town landscape.

Drawback of Amendment Item A

5. We disagree to Amendment Item A – the rezoning of a site at the junction of Yu Tung Road and Chung Mun Road from “Residential (Group C)2” to “Residential (Group B)” with substantial increase of maximum building height from 55mPD to 100mPD.
6. “*The general planning intention of the Area (where Tung Chung River and Tung Chung Bay situated) is to conserve the ecologically sensitive areas, to protect the rural and natural character, to maintain the unique landscape character and cultural heritage of the Area*” (Sec 8.1, GENERAL PLANNING INTENTION, Explanatory Statement). Amendment Item A impose additional environmental impacts to an area of recognised ecological sensitivity, adjacent to the Tung Chung Stream riparian corridor and near culturally significant sites such as Hau Wong Temple. Increasing the building height and development density will interfere the already fragile ecosystem of Tung Chung River *cum* Bay in TCW through pollution and disturbance, such as noise nuisance, light pollution, polluted surface runoff and littering, and also threaten the unique landscape and heritage characters of Tung Chung Valley and Bay.



7. The Amendment Item A also contradicts the consensus achieved under three stages of public engagement for the *“Tung Chung New Town Extension Study (the Study) jointly commissioned by the Civil Engineering and Development Department (CEDD) and Plan Department with the overall objective to extend Tung Chung into a distinct community which can meet housing, social, economic, environmental and local needs”* (Sec.7.1, PLANNING DESIGN CONCEPT AND FEATURES, Explanatory Statement). The consequent land uses, zonings and planning parameters are reflected in the first draft of TCVOZP as a result of thorough researches and discussions in the society. Convincing reasons and enforceable measures should be provided to concur such public consensus.
8. In view that *“Development potential of the New Town extension has been maximized, taking into account various constraints and considerations”* and *“due care has been exercised to ensure that the development be balanced against environmental considerations”* (Sec.7.1.1 and 7.1.2 respectively, PLANNING DESIGN CONCEPT AND FEATURES, Explanatory Statement), expansion of development capacity will impact the environment and ecology irreversibly. Particular measures should be provided to avoid overloading of environmental capacity of Tung Chung River Basin *cum* Bay system in TCW.
9. While the amendment includes a non-building area (NBA) for air ventilation, additional measures should be in place to protect the adjacent “CA” and “CPA” zones against cumulative impacts of local traffic, polluted stormwater drainage, and utility infrastructure.
10. The Amendment Item A deviates from the planning goal to *“maximize integration with the existing built form and to balance the need for new residential developments with preservation of the natural environment”* (Sec.7.1.4, PLANNING DESIGN CONCEPT AND FEATURES, Explanatory Statement). The proposed built form should observe *“the overall stepped BH profile of Tung Chung New Town descending from the mountain side towards the waterfront and the estuary of the Tung Chung Bay..... from south to north”* (Sec.9.2.3 & 9.3.1, LAND USE ZONINGS, Explanatory Statement).
11. Owing to forementioned reasons, we urge the Board to retain the original “Residential (Group C)2” zoning for this site, or to subject any future development to stringent environmental impact assessments, with enforceable mitigation measures to secure the hydrological, ecological, environmental and landscape function of Tung Chung River Basin *cum* Bay ecosystem in TCW.

Measures Synchronizing Joint Effort to conserve Tung Chung River

12. Planning controls should be stipulated in the TCVOZP to avoid unnecessary disturbance and pollution to Tung Chung River and future Tung Chung River Park (RP) through adequate building,



site landscape and drainage design.

13. No public access should be connected to Tung Chung River Park (RP) to avoid uncontrolled human disturbance and pollution, as it is a flood prevention facility and ecologically sensitive site.
14. In this regard, proper fencing or escalated level in housing site (similar to Yat Tung Estate ground level relative to Ma Wan Chung village) should be in place to deter trespassing from the residential development to RP or Tung Chung River course.
15. The runoff of wet markets, if any, and refuse collection points, within the residential developments and in their periphery, is always heavily polluted, loaded with refuse and foul smelling that should be completely collected to sewers and should not be discharged, diverted and/or allowed to flow to RP, Tung Chung River or Tung Chung Bay.
16. Vehicular parking areas should locate in sheltered balconies that all surface runoff, with minimal rainwater received, should be completely collected to sewers that will not contaminate the surface runoff on ground level with fuel, lubricating oil and wastewater generated by car-washing.
17. The surface runoff should not be directly discharged to Tung Chung River on the ground surface and through stormwater drains. The ground level of the residential developments should be topographically inclined away from river course of Tung Chung River that the surface runoff will not flow into Tung Chung River directly by gravity.
18. Other measures proposed by environmental groups and relevant departments should be incorporated into the TCVOZP to avoid the non-point source pollution which occurs day-to-day in stormwater drainage system in the territory resulting in long-terms devastation of water quality and ecology of modified and natural watercourses. Forementioned preventive measures should be implemented at the commencement stage, or construction stage, and operation stage of residential developments. Retrofitting of these measures is not a feasible option for TCR, a fragile and one of the few last remaining local natural rivers.
19. Sustainable Urban Drainage System (SUDS), including but not limited to rain gardens, bioswales, permeable pavement, biological treatment wetlands, should be installed in residential developments to minimise the hydrological impacts and pollution loading to Tung Chung River. Also, the performance of these privately maintained SUDS facilities should be effectively monitored and overseen by governmental departments so as not to abuse the capacity of government-run SUDS for public assets.



Amendment Item B

20. We agree in principle to amendments under **Item B**. The rezoning of lands near Hau Wong Temple, Ngau Au and Shek Mun Kap to “Conservation Area” (“CA”), “Coastal Protection Area” (“CPA”), “Green Belt” (“GB”) and other low-impact zones should reflect planning intention to preserve the ecological integrity, natural landscapes and sensitive habitats of Tung Chung River Valley. The land uses under Column 1 and 2 should be consistent with the planning intention to protect the area’s high ecological value, including the Tung Chung Ecologically Important Stream, mature woodlands, and coastal habitat and the whole Tung Chung River Basin *cum* Bay ecosystems in TCW.

Thank you very much for your kind attention. For any inquiries, please contact the undersigned at Green Power [REDACTED].

Yours faithfully,

LUI Tak Hang, Henry
Senior Conservation Manager
Green Power

Appendix 1. Species of concern in Tung Chung River cum Bay



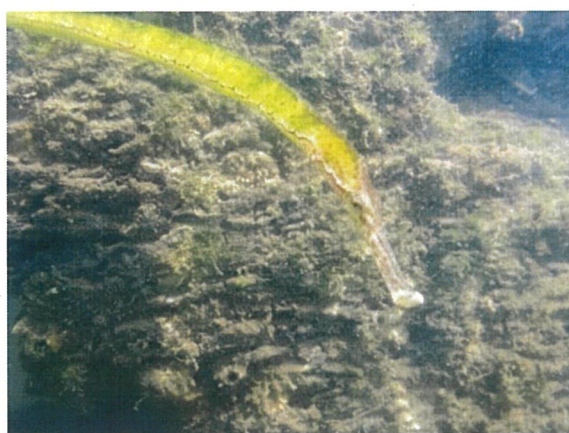
Beijing Thick-lipped Barb (*Acrossocheilus beijiangensis*) 北江光唇魚



Romer's tree frog (*Liuixalus romeri*) 盧氏小樹蛙



Chinese Horseshoe Crab (*Tachypleus tridentatus*) 中國蠶



Seaweed Pipefish (*Syngnathus schlegelii*) 舒氏海龍



Mangrove Skimmer (*Orthetrum poecilops*) 斑灰蜻



Common Birdwing (*Troides helena*) 裳鳳蝶

23 December 2025

The Secretary
Town Planning Board
c/o Planning Department
15/F North Point Government Offices
333 Java Road, Hong Kong

By Hand

Dear Sir

**Representation in Respect of Plan made under Section 6(1) of the Town Planning Ordinance (CAP. 131) –
Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/3**

Reference is made to the captioned plan, which was gazetted by the Town Planning Board (the Board) on 31 October 2025.

We act on behalf of Coral Ching Limited (the Representer) to submit herewith the duly completed Form No. S6 to the Board for consideration.

Thank you for your kind attention. Should there be any queries, please do not hesitate to contact the undersigned at [REDACTED] or our Mr Arnold Koon at [REDACTED] / Ms Samantha Chuang at [REDACTED]

Yours faithfully
for Llewelyn-Davies Hong Kong Limited



Winnie Wu
Planning Director

Llewelyn-Davies
Hong Kong Limited
Authorized Signature

Encl

WW/AK/sc

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[REDACTED]

- [illegible]

- | |
|--|
| <p>2. Authorized Agent (if applicable) 獲授權代理人(如適用)</p> <p>Full Name 姓名 / 名稱 (Mr./Ms./Company/Organization* 先生/女士/公司/機構*)</p> <p>Llewelyn-Davies Hong Kong Limited</p> <p>(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)
(注意: 若個人提交, 須填上與香港身份證/護照所載的全名)</p> |
|--|

Please fill in "NA" for not applicable item 請在不適用的項目填寫「不適用」

3. Details of the Representation (use separate sheet if necessary)* 申述詳情(如有需要，請另頁說明)*		
The plan to which the representation relates (please specify the name and number of the plan) 與申述相關的圖則 (請註明圖則名稱及編號)		Draft Tung Chung Valley OZP No. S/I-TCV/3
Nature of and reasons for the representation 申述的性質及理由		
Subject matters 有關事項@	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由^
Amendment Item A	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	Amendment Item A reflects TPB's previous decision on 2 May 2025 to partially agree to a S.12A application (No. Y/I-TCV/1) to rezone the subject site from "Residential (Group C) 2" to "Residential (Group B)" ("R(B)") to facilitate a proposed residential development with the provision of a private transport layby. The proposed development restrictions of the subject "R(B)" zone, i.e. a maximum domestic and non-domestic plot ratios of 2.1 and 0.22 respectively and maximum building heights of 50mPD, 80mPD and 100mPD, are in line with the aforesaid S.12A approval. Other appropriate planning controls, including building height profile, NBA and building setback, have also been incorporated accordingly. Relevant technical assessments have already been conducted under the aforesaid S.12A
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	application, and relevant government bureaux/ departments had no objection to or no adverse comments to the proposed rezoning, which demonstrates the technical feasibility of the proposed development.
Any proposed amendments to the plan? If yes, please specify the details. 對圖則是否有任何擬議修訂? 如有的話，請註明詳情。		

If the representation contains more than 20 pages, or any page larger than A4 size, 4 hard copies and 1 soft copy are required to be provided for the submission. Provision of email address is also required.
 若申述超過 20 頁或有任何一頁大小超過 A4，則須提交硬複本一式四份和一份軟複本。另須提供電郵地址。

@ Please describe the particular matter in the plan to which the representation relates. Where the representation relates to an amendment to a plan, please specify the amendment item number provided in the Schedule of Proposed Amendments. 請形容圖則內與申述有關的指定事項，如申述與圖則的修訂有關，請註明在修訂項目附表內的修訂項目編號。

^ Please also note that section 6(3A) of the Ordinance provides that any representation received under section 6(1) **may be treated as not having been made** if, in the opinion of the Board that, the reason for the representation is a reason concerning compensation or assistance relating to, or arising from resumption/acquisition/clearance/obtaining vacant possession of any land by the Government. The above matters should be dealt with in accordance with the relevant statutory provisions on compensation and/or promulgated policy on compensation. Should you have any views on compensation or assistance matters, you may separately raise your views to the Director of Lands or the relevant authority. 請注意，條例第 6(3A)條訂明，如委員會認為根據第 6(1)條收到的任何申述所提出的理由是與政府收回/徵用/清理/取得任何土地的空置管有權而引起的補償或援助有關，則有關申述可被視為不曾提出。上述事項應按照相關補償的法律條文和/或已公布的補償政策處理。如對補償或援助事宜有意見，可另行向地政總署署長或有關當局提出。

Please fill "NA" for not applicable item 請在不適用的項目填寫「不適用」

☒ at the appropriate box 請在適當的方格內加上 ☒ 號