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**From:** Paul Zimmerman <[REDACTED]>  
**Sent:** 2025-04-07 星期一 23:31:50  
**To:** tpbpd/PLAND <tpbpd@pland.gov.hk>  
**Subject:** Representations regarding Tseung Kwan O OZP No. S/TKO/31  
**Attachment:** Tseung Kwan O OZP S TKO 31 Designing Hong Kong April 2025.pdf

Please confirm receipt of my representations with objections and proposals regarding Tseung Kwan O OZP No. S/TKO/31

Paul Zimmerman 司馬文

Mobile: [REDACTED]

**Submission Number:**

**TPB/R/S/TKO/31- S1**

CEO, Designing Hong Kong 創建香港

[REDACTED]

[REDACTED]

# 創建 Designing Hong Kong 香港 .com

Date : 14 April 2025  
 Pages : 7  
 To : Town Planning Board ([tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk))  
 From : Paul Zimmerman [REDACTED]  
 Re : Representation regarding Tseung Kwan O OZP No. S/TKO/31

I write to you as CEO of Designing Hong Kong. We object the proposed rezoning for reasons set out below:

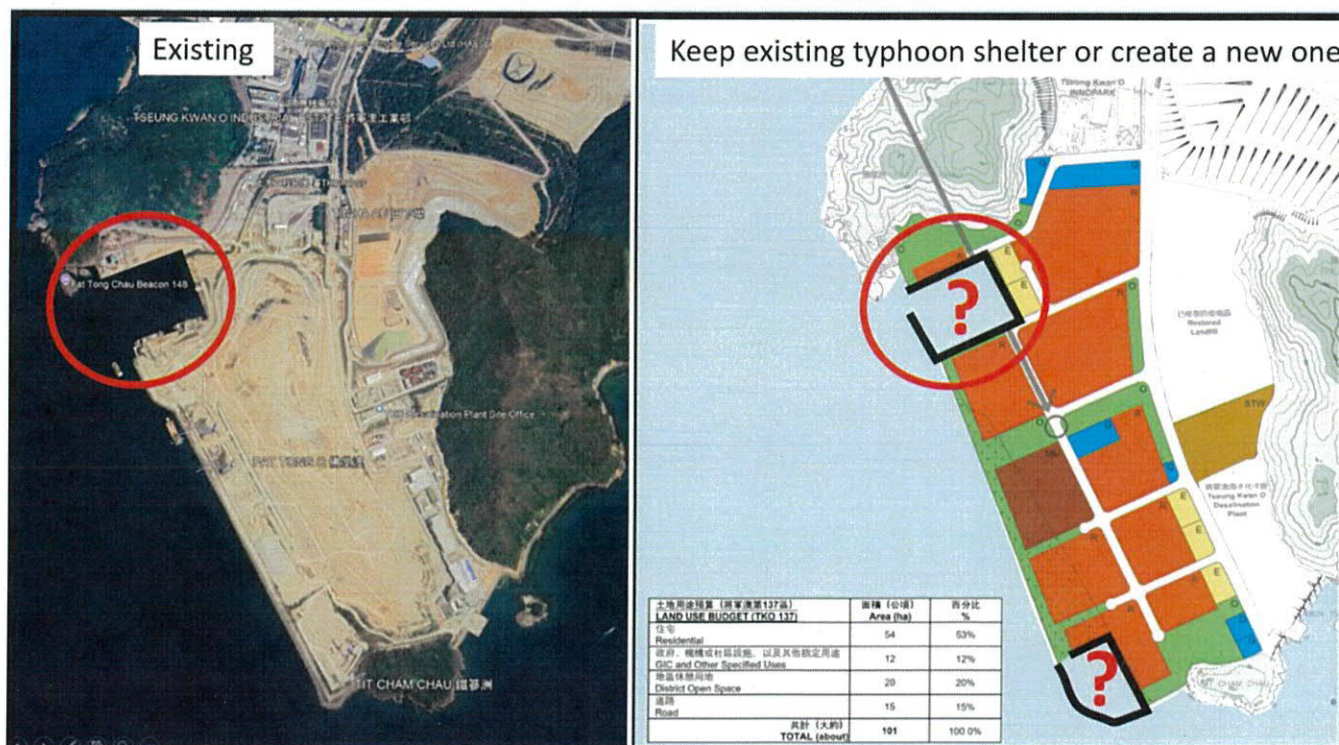
Item A – Area 137: Revising the land boundary and reclamation of the sheltered water body ('bay') thereby failing to re-use the bay and adjacent land for a public marine centre supporting yacht tourism and water sports. Detailed reasoning and proposals are set out below.

Item D – Area 132B: The failure (1) to plan for and incorporate pedestrian and cycling connections between Tseung Kwan O and Lei Yue Mun, and (2) the failure to integrate with the local environment. Detailed reasoning and proposals are set out below.

## Item A – Area 137

We object to revising the land boundary and reclamation of the sheltered water body ('bay').

We call for re-use of the existing bay (or part thereof) as a public marine centre including sheltered moorings in support of yacht tourism and water sports (or alternatively create a new bay in the area).





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## Risks to vessels without shelter

Sheltered moorings are essential for growing a marine based economy. Many vessels are currently moored on open waters at risk of adverse weather conditions. The damage caused by typhoons can be seen from a report by the Marine Department after typhoon Mangkhut.

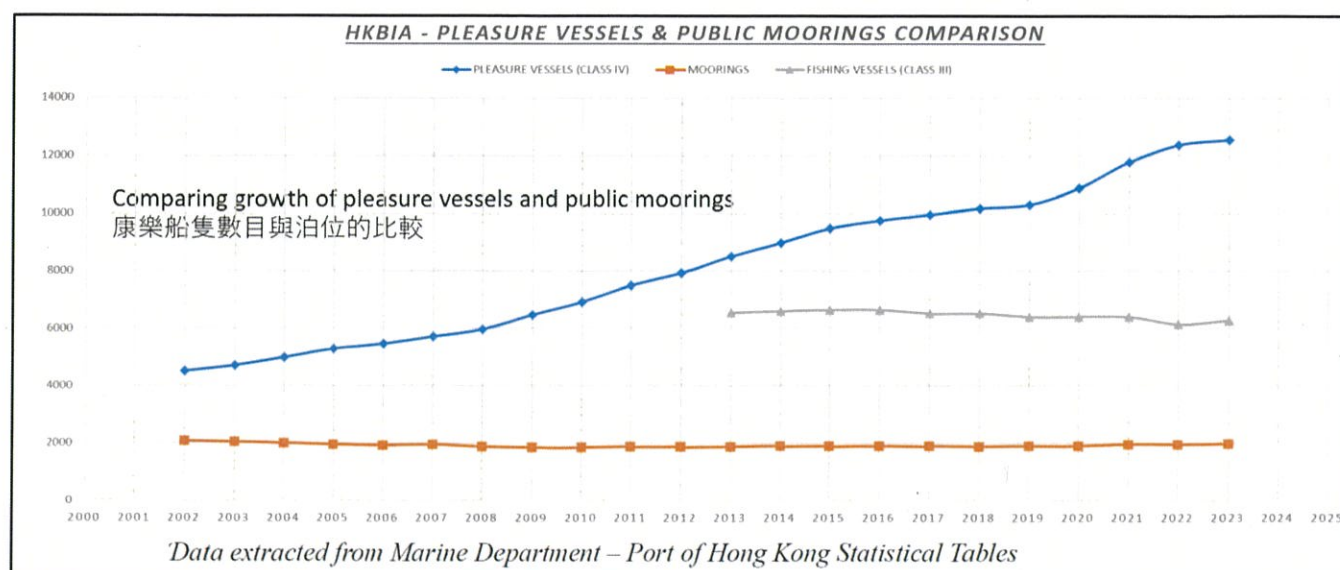
### Mangkhut damage reported by MarDep

Location	Type of vessel					No of salvage	No of disposal	Amount(\$)
	I	II	III	IV	Others			
Sai Kung	-	1	1	38	206	67	243	2,998,500
Tai Po	-	-	-	3	5	2	8	63,000
Victoria Harbour	-	4	9	7	52	17	70	789,500
Southern District	-	1	5	13	55	13	59	721,000
Tuen Mun	-	-	3	-	13	11	16	136,500
Abandoned floating structures							78	996,500
<b>Total</b>	<b>-</b>	<b>6</b>	<b>8</b>	<b>61</b>	<b>313</b>	<b>110</b>	<b>474</b>	<b>5,705,000</b>

Salvage from Sep 2018 to Jan 2019. Others: vessel which do not need to be licensed or floating object of similar size.

## Shortfall of 20,000 safe moorings in Hong Kong

The Hong Kong Boating Industry Association identified a shortfall of 10,000 safe public moorings for registered yachts and recreational boats (below). In addition, we estimate that there is a latent demand, suppressed due to the lack of safe, accessible and affordable moorings, for another 10,000 moorings.





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## **The demand for sheltered moorings continues to grow**

From 1999 onwards, the number of registered pleasure vessels constantly increased. Hong Kong's leisure marine industry is – for now – leading in the Asia Region. Hong Kong is also playing a key role in development of the yachting industry in our country and the Greater Bay Area.

Hong Kong has over 280 islands, 1,400km of mostly natural shorelines, and 1,500 sq km of water surface – more than our land. This is a magnificent resource in close proximity to business centres and residences. Hong Kong is an archipelago which provides a significant opportunity for developing marine recreation, tourism and supporting industries. A 'Monaco of the East' opportunity beyond that of our neighbours.

## **National and local policy to support the marine economy including yachting and water sports**

The Chief Executive in his 2024 Policy Address gave direction to developing tourism products. He foresees yacht tourism as a growth opportunity for Hong Kong's economy. At national level, Xi Jinping called for promoting high-quality development of the marine economy (推進海洋經濟高質量發展) and recognised that 'lucid waters and lush mountains are invaluable assets.' (綠水青山就是金山銀山)

## **Town Planning Board identified the lack of leadership in developing the marine economy**

The Chairman of the Town Planning Board called for a review of the need and provision of marine and water sports facilities at the 1037<sup>th</sup> Meeting of the Town Planning Board held on 12 July 2013 during the discussion regarding the Draft Pak Shek Kok (East) Outline Zoning Plan No. S/PSK/10 and proposals for a public marina:

- "76. On the proposed public marine centre, **the Chairman said** that after consultation with relevant bureau/departments including HAB, LCSD and MD, there was **no policy bureau to champion the provision of a public marine centre.**"
- "80. Other members considered that there was a need to seek policy support for the proposed public marine centre and, should that be confirmed, **a territorial study should be carried out** so as to identify a suitable site for the use."
- "85. ... For the proposed public marine centre, the Board would request DEVB to consult relevant bureau for a **review of the need and provision of the marine and water sports facilities** including the proposed public marine centre (editor: at Pak Shek Kok)."

## **Speeding up the delivery of new sheltered mooring areas**

The Hong Kong Boating Industry Association recognises 20 opportunities and actions required to improve the marine economy in Hong Kong. See Appendix 1 for the list in order of feasibility and immediacy.

## **Tseung Kwan O – Area 137 is readily available for mooring and other marine uses**

Among the options, Tseung Kwan O – Area 137 stands out as there is an existing basin ('bay') which can be readily used for moorings. A public marina here will serve visiting yachts and those living in Tseung Kwan O and the wider marine community in Hong Kong. The bay can be enhanced by adding a breakwater. Reclamation of this bay destroys value. Creating a new sheltered bay elsewhere is expensive and takes a long time. The existing bay is strategically located at the entrance of Tolo Harbour and near Victoria Harbour. The area will have rail access, rare for marinas. The government lacks alternatives for timely and cost-effective delivery of safe shelter for boats elsewhere in Hong Kong.

## Item D – Area 132B

We object to the lack of pedestrian and cycling connections. We urge government to construct cycling and pedestrian links between Tseung Kwan O and Lei Yue Mun. The proposed alignment is marked below in blue. This will contribute to connecting Lohas Park along the shore to Butterfly Beach in Tuen Mun for pedestrians and cyclists. (Alignment excluding container terminals: <https://www.coastaltrail.hk/ttct.html> )



We further object to the lack of visual integration of the reclamation and developments thereon with the local environment. The hard rectangular outline is incompatible with the natural shoreline. We propose to revise the outline of the reclamation as well as provide ample greening to soften the outlook and to better integrate the reclamation with the existing natural shore line. A conceptual graphic is appended below.



## Summary of our recommendations

### **Item A – Area 137**

To maintain in whole or in part the existing sheltered water body ('bay') and adjacent land for a public marine centre supporting yacht tourism and water sports.

### **Item D – Area 132B**

To incorporate pedestrian and cycling connections between Tseung Kwan O and Lei Yue Mun.

To change the outline of the reclamation to allow for a softer boundary and greening compatible with the existing natural shoreline.



## Standing of Designing Hong Kong in yacht tourism and marine based economy

Designing Hong Kong has since 2002 focused on development of waterfronts and marine based activities, including:

- 'Designing Hong Kong Harbour District' research and conference contributed to the convening of the Harbourfront Enhancement Committee. (2002 – 2004)
- As a representative on the Harbourfront Commission, we regularly propose yachting and water sports facilities – from landing steps to boat clubs – to allow the active use of the harbour itself. (2004 - 2025)
- Proposal to the Town Planning Board to redevelop the KCRC pier at Hung Hom including a range of marine supporting facilities (Application Y/K1/2). Recently, Government and MTRC restarted the planning for the former KCRC pier. (2006)
- Representations with proposals for land uses which support the active use of Tolo Harbour to the Town Planning Board regarding the Draft Pak Shek Kok (East) Outline Zoning Plan No. S/PSK/10 were rejected. (2013)
- Our proposals to the Town Planning Board to support a marina club and supporting facilities at Pak Shek Kok (Y/PSK/1A) were rejected. (2013)
- Our proposals to Government to include a marina / typhoon shelter in the reclamation at Tung Chung East were accepted and a marina is under construction. (2013)
- Our proposal as District Councillor to expand the Aberdeen Typhoon Shelter have been accepted and the project is proceeding (2014).

Yours sincerely,



Paul Zimmerman 司馬文

Mobile: [REDACTED]

CEO, Designing Hong Kong 創建香港



## **Appendix 1: Opportunities for new sheltered mooring areas**

The Hong Kong Boating Industry Association recognises 20 opportunities and actions required to improve the marine economy in Hong Kong – in order of feasibility and immediacy:

### **A. Facilities for mooring and other marine uses which can be made readily available**

1. Tseung Kwan O – Area 137 has an existing basin ('bay') which can be readily used for moorings. A public marina here will serve visiting yachts and those living in Tseung Kwan O and the wider marine community in Hong Kong. The bay can be enhanced by adding a breakwater. Reclamation of this bay destroys value. Creating a new sheltered bay elsewhere is expensive and takes a long time. The existing bay is strategically located at the entrance of Tolo Harbour and near Victoria Harbour. The area will have rail access, rare for marinas. The government lacks alternatives for timely and cost-effective delivery of safe shelter for boats elsewhere in Hong Kong.

2. Tai Tam Shek O Quarry – Existing basin ('bay') is readily available for moorings and water sports equipment storage. When will government restart letting the site out?

### **B. Facilities for mooring and other marine uses under construction**

3. Tung Chung East – Construction in progress of a small marina with club, repair and commercial facilities, a project initiated by Designing Hong Kong.
4. Aberdeen Harbour – Procedures for typhoon shelter expansion in progress, a project initiated by Paul Zimmerman as member of the Southern District Council.

### **C. Facilities for mooring and other marine uses under planning**

5. Lamma ex-Quarry – The viability of redevelopment of the area including a marina and moorings has yet to be proven. There is a need for a breakwater to protect the area from the prevailing easterly winds, and funding is required for compensation of fish farm operators. Cost of living will be high, and convenience low. There are viability lessons to be learned from the Sea Ranch on Lantau.
6. Hung Hom Station Pier – The redevelopment of the pier and adjoining land into a retail and commercial development can provide support for local cruises and a small number of visiting yachts. The viability is subject direct road access and pedestrian access to Tsimshatsui, Hung Hom and the Hung Hom Station. The opportunity for sheltered moorings is limited.
7. Skytopia at the airport – Airport plans for marina facilities in its 'Skytopia' plans are speculative. The water depths are limited, the area is remote and enjoyment is restricted by noise and exhausts from air traffic. Viability studies are needed and implementation will require time.
8. Kau Yi Chau – Although the plans include marinas, formation of islands including water sports facilities are delayed and no clear timeline is available.



## **D. Proposals for facilities for mooring and other marine uses**

9. Tseung Kwan O – In Area 77, the LCSD is planning a Water Sports Centre offering training. Once trained, these sailors, rowers and boaters will require space nearby to store their own equipment. In 2023, the Marine Department gazetted the Tseung Kwan O Sheltered Anchorage. The anchorage is located in the East Channel and is fully used. Adjacent to the channel is Area 65 which is allocated to the LCSD for a sports centre cum indoor heated pool and a Riverine Park. In support of the users of the anchorage we urge Government to set land aside here for a mariners' club with changing facilities and a yard for boat repairs, and to construct relevant marine infrastructure (boat ramps, etc).
10. Tolo Harbour – Include a typhoon shelter in the planned reclamation at Ma Liu Shui. Extending the shoreline of the planned reclamation to create sheltered water is more cost-effective than constructing a stand-alone typhoon shelter. The example was set with Tung Chung East.
11. Kai Tak – Set land aside for a full-scale marina or boat club at site 3E2 along the Kwun Tong Typhoon Shelter and Kai Tak Approach Channel – the last site available for such facility in the area.
12. Kai Tak – Provide space for a water sports club with changing facilities and equipment storage at the head of the Kai Tak Approach Channel near the sports stadium, and construct supporting infrastructure including landing steps and boat ramp.
13. Sai Kung – Increase mooring area in front of the Town Centre by adding breakwaters.
14. Sai Kung – Increase mooring area at Hebe Haven (Pak Sha Wan) with additional breakwaters.
15. Sai Kung – Allocate mooring spaces at Yim Tin Chai.
16. Yau Tong Bay – Add a breakwater and allocate moorings.
17. To Kwa Wan – Add landing steps to connect Victoria Harbour with Sports Stadium.
18. Wanchai (ex-Cargo Working Area) – Add breakwater.

## **Supporting measures required for development of marine and yachting industries**

19. Land required – We urge government to solicit applications for marine supporting facilities along public and private waterfronts throughout Hong Kong, and to offer long term land leases for marine supporting industries such as shipyards along Aberdeen Harbour and the north shore of Tsing Yi.
20. Decision on leadership required – Policy support for marine tourism, recreation and sports, including visiting yachts and local vessels, goes beyond the Marine Department, Leisure and Cultural Services Department, Tourism Commission, and CEDD. We urge government to recognize a dedicated authority for development of marine based tourism, recreation and sports.



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**From:** Peng Chau Reclamation Concern Group  
[REDACTED]  
**Sent:** 2025-04-09 星期三 10:46:25  
**To:** tpbpd/PLAND <tpbpd@pland.gov.hk>  
**Subject:** TKO OZP amendments - submission of comment  
**Attachment:** TKO OZP representation submitted by PCRCG.pdf

**Submission Number:**  
TPB/R/S/TKO/31- S2

To whom it may concern

Attached please find our comment on the amendments of the Tseung Kwan O OZP. (3 pages, in PDF)

Name of Representer: Peng Chau Reclamation Concern Group 坪洲填海關注組

Name of Representer's representative: Fung Kam Lam

First 4 Alphanumeric Characters of HKID Card: [REDACTED]

Thank you very much!

[坪洲填海關注組](#)

**S/TKO/31**

**We oppose the amendments.**

**1. TKO 137 development under uncertain reclamation regime in Hong Kong is not feasible.**

The majority of the land at TKO 137 is currently being used as a temporary fill bank for storing public fill for reuse in reclamation and/or other earth filling projects. In anticipation of future reclamation works that might take up the public fill from TKO 137 progressively, there is an opportunity to re-plan TKO 137 for gainful uses. (see the Development of Tseung Kwan O Area 137 and Associated Reclamation Sites [EIA Report](#), hereafter, the EIA Report, §2.2.1.2)

Currently, the landfill only received construction waste which was unlikely to generate odour. Under the current planning, the landfill is expected to be closed before population intake of Area 137...([Minutes](#) of 1330th Meeting of the Town Planning Board held on 17.1.2025, §74)

It seems the development of TKO 137, 132 and the amendments of the Plan are based on an assumption that large-scale land reclamations would be implemented *progressively* within the whole territory of Hong Kong, and therefore TKO 137 will fit for residential use in the future. However, the administration does not provide further projections or estimations on the volume of landfill generated locally, and the consumption of these landfill in the following years to support the above assumption. If there is still a need to keep using the temporary landfill bank in the future, is it still feasible (or reasonable) to ask people to settle there? The administration needs to explain scenarios in which no large-scale reclamation would be seen in the middle to long term period of time and the impact on the development of TKO 137.

**2. Environmental impacts. The TPB needs to think twice before “accepting” the approval of the EIA report.**

The Advisory Council on the Environment (ACE) agreed to endorse the EIA Report on April 7, 2025 with conditions. We are not going to repeat all the conditions here but would like to highlight the first condition, on coral, here. According to the ACE meeting paper,

The Project Proponent shall –

- (a) in consultation with the Agriculture, Fisheries and Conservation Department (AFCD), submit a Coral Translocation and Enhancement Plan (CTEP) to the Director of Environmental Protection for approval no less than three months before commencement of marine works of the relevant parts of the Project. The CTEP shall provide details on the results of the



pre-construction coral survey, coral translocation methodology, location and suitability of the coral recipient site(s), the post-translocation monitoring programme, the implementation details of the proposed coral enhancement measures (such as collection of bodies of unmovable corals, and coral fragments for coral plantation, etc.) and the overall implementation programme; (see ACE meeting paper [5/2025](#))

The extensive coverage of the CTEP the ACE required reflects the fact that the EIA Report fails to provide substantial and essential information on coral. The TPB may wish to learn from the experience of the Fanling / Sheung Shui Extension Area Outline Zoning Plan making. At that time the ACE had required a lot of further information from the proponent of the project instead of simply agreeing with conditions. And finally, the relevant EIA report is under judicial review. Perhaps the Planning Department senses the uncertainty and therefore suggests the TPB to revise the amendments and propose an “undecided” (U) zone prior to the court case. Embarrassment is avoided to a certain extent.

Thus, the TPB may wish to assess and evaluate all relevant information or justifications related to the amendments of the Plan, including the EIA report, *independently* before reaching a decision.

Below is an extract from our submission to the EPD on the matter of coral as a reference.

**The Report fails to assess the effectiveness of coral translocation as a recommended mitigation measure.**

The Report said, “two hard coral species, *Acropora solitaryensis* and *Duncanopsammia peltata*, which are listed as “Vulnerable” in the IUCN Red List (IUCN, 2024), were recorded with low abundance and converge” in spot-dive survey transect Z1a and 1b . The Report further lists findings of REA surveys. (§9.5.2.5 and respective Appendix)

The REA findings are welcome but they also tell us (i) the only *Acropora solitaryensis* recorded in REA surveys in Western Junk Bay (coral number 8 in REA 1) is **not feasible to translocate**. (ii) the three REA surveys in Western Junk Bay did not record any *Duncanopsammia peltata*, (though they are identified in spot-dive surveys). It means we have to wait for further dive surveys to confirm the feasibility and number of translocation of this particular species. The missing of such data cannot help us to determine the effectiveness of coral translocation, as a recommended mitigation measure.

Indeed, as the Report said, only “around 4-5% of coral colonies recorded during the REA survey (REA 1-3) were considered as translocatable” (§9.5.2.5) We summaries the above 4-5% translocatable coral in the following table. No recorded coral in REA 3 is feasible to translocate.

Coral number	Coral Species	Health Condition
REA1 20	<i>Oulastrea crispata</i>	Good
REA1 21	<i>Oulastrea crispata</i>	Good
REA1 31	<i>Tubastraea sp.</i>	Good
REA1 47	<i>Oulastrea crispata</i>	Good
REA2 14	<i>Oulastrea crispata</i>	Fair
REA2 30	<i>Oulastrea crispata</i>	Fair
REA2 104	<i>Tubastraea sp.</i>	Good
REA2 113	<i>Oulastrea crispata</i>	Fair
REA2 131	<i>Oulastrea crispata</i>	Fair
REA2 132	<i>Oulastrea crispata</i>	Fair

In sum, the existing information given by the Report fails to tell how effective the translocation could be. No existing information able to confirm the IUCN vulnerable coral species in the Western Junk Bay could be translocated.

A detailed dive survey to confirm all the number and species ought to be translocated should be given **at this stage**.

### 3. Visual impact, from the TPB point of view...

We have already expressed our concern on visual impacts of the amendment to the TPB by our letter on January 16, 2025, a day before the TPB discussing the draft amendments. (see §64 of the [minutes](#) of the relevant meeting)

In sum, we questioned the reason for omitting one of the most striking visual impact photomontages in the drawings provided by the Planning Department. We suggested the Board take a look at the photomontage we had extracted from the EIA Report. (i.e. [Figure 11.4.11](#)) Yet, this photomontage is also available in the Consolidated Planning and Engineering Assessment Report tabled to the Board on the above meeting, but as an appendix only. (i.e. Appendix E of the meeting paper No. 10992) We recommend the Board taking a look again on the visual impact, is it acceptable? Whether the “mitigations” are sufficient enough or relevant?