

TPB/R/S/I-TCV/1-1

就草圖作出申述

Representation Relating to Draft Plan

參考編號

Reference Number:

160207-111721-28810

提交限期

Deadline for submission:

08/03/2016

提交日期及時間

Date and time of submission:

07/02/2016 11:17:21

提出此宗申述的人士

Person Making This Representation: 榴埔村村民

南嶺村村代表李康庭、石榴埔村村代表羅維洪及石

申述詳情

Details of the Representation:

與申述相關的草圖

Draft plan to which the representation relates:

S/I-TCV/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
贊成將稔園村繼續劃為鄉村式發展用途，並反對改建為「靈灰安置所」。	支持 Support	<p>稔園村已經荒廢多年，沒有居民居住，數年前告示板上已貼出通告申請重建，因只屬鄉村慣常事宜，所以沒有理會。此村一直被圍封，禁止其他人內進。直至二零一五年四月中，村民收到一封匿名信，內有多張村內房屋被改建成靈灰安置所的照片，村民才發現此村將會變成骨灰龕場。當時村民已經馬上向有關部門提出投訴，各部門立刻作出調查及跟進。村民於二零一五年七月初在稔園村地盤外進行抗議，並希望籍著傳媒表達自己對龕場之厭惡。地政署已於二零一五年八月二十八日宣佈稔園村違反土地用途，並將私人地段轉歸政府所有。</p> <p>不論過往或現在，稔園村一直都是認可鄉村，村內之土地是用作鄉村式發展，但發展商卻希望混淆視聽，將私自更改的土地用途變為現有土地用途，並要求貴會列出，但實際上唯一合法的用途只有鄉村式發展。</p> <p>設置一所「靈灰安置所」需要考慮周詳細節，胡亂安放會對社區及生態造成深遠而負面的影響，我們相信政府深深明白這個道理，因此才會立例規管，以防奸商為謀取暴利而置他人於不顧，村民盼貴會會維持此裁定，將稔園村劃為鄉村式發展用途，讓村民有一個安穩及健康的生活環境。</p>

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

001

敬啟者：

就有關於《東涌谷分區計劃大綱圖 S/I-TCV/1》提出申述

二零一六年一月八日，貴會將《東涌谷分區計劃大綱草圖編號 S/I-TCV/1》刊憲並取締《東涌谷發展審批地區草圖編號 DPA/I-TCV/1》及對較早前市民提供的申述作出回應，經我們詳閱過後有意見如下：

稔園村已經荒廢多年，沒有居民居住，數年前告示板上已貼出通告申請重建，因只屬鄉村慣常事宜，所以沒有理會。此村一直被圍封，禁止其他人內進。直至二零一五年四月中，村民收到一封匿名信，內有多張村內房屋被改建成靈灰安置所的照片，村民才發現此村將會變成骨灰龕場。當時村民已經馬上向有關部門提出投訴，各部門立刻作出調查及跟進。村民於二零一五年七月初在稔園村地盤外進行抗議，並希望籍著傳媒表達自己對龕場之厭惡。地政署已於二零一五年八月二十八日宣佈稔園村違反土地用途，並將私人地段轉歸政府所有。

不論過往或現在，稔園村一直都是認可鄉村，村內之土地是用作鄉村式發展，但發展商卻希望混淆視聽，將私自更改的土地用途變為現有土地用途，並要求貴會列出，但實際上唯一合法的用途只有鄉村式發展。

設置一所「靈灰安置所」需要考慮周詳細節，胡亂安放會對社區及生態造成深遠而負面的影響，我們相信政府深深明白這個道理，因此才會立例規管，以防奸商為謀取暴利而置他人於不顧，村民盼貴會會維持此裁定，將稔園村劃為鄉村式發展用途，讓村民有一個安穩及健康的生活環境。

此致：
城市規劃委員會

南嶺村發展及管理團體
南嶺村村代表李康庭、石榴埔村村代表羅維洪 及 石榴埔村村民 敬上
電郵：[REDACTED]

二零一六年二月十一日

RECEIVED

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TOWN PLANNING BOARD

敬啟者：

有關：建議修改東涌谷分區計劃大綱圖編號 S/I-TCV/1 內
第 67 區為「機構或社區」用地

本人關偉安，為東涌稔園村原居民代表。

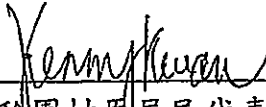
本人亦是東涌第 1 約地段 1862、1885、1887 及 1892 業權人。

上述土地全部位於上述大綱圖內第 67 區，規劃用途顯示為低密度住宅(R(C)2) 用地。

大嶼山快將成立發展局，但區內照顧老年人設施，乏善足陳。因此，本人與其他鄰近村民業主溝通，都感覺第 67 區若能發展成護老院，包括日托等服務設施，區內長者均受惠。

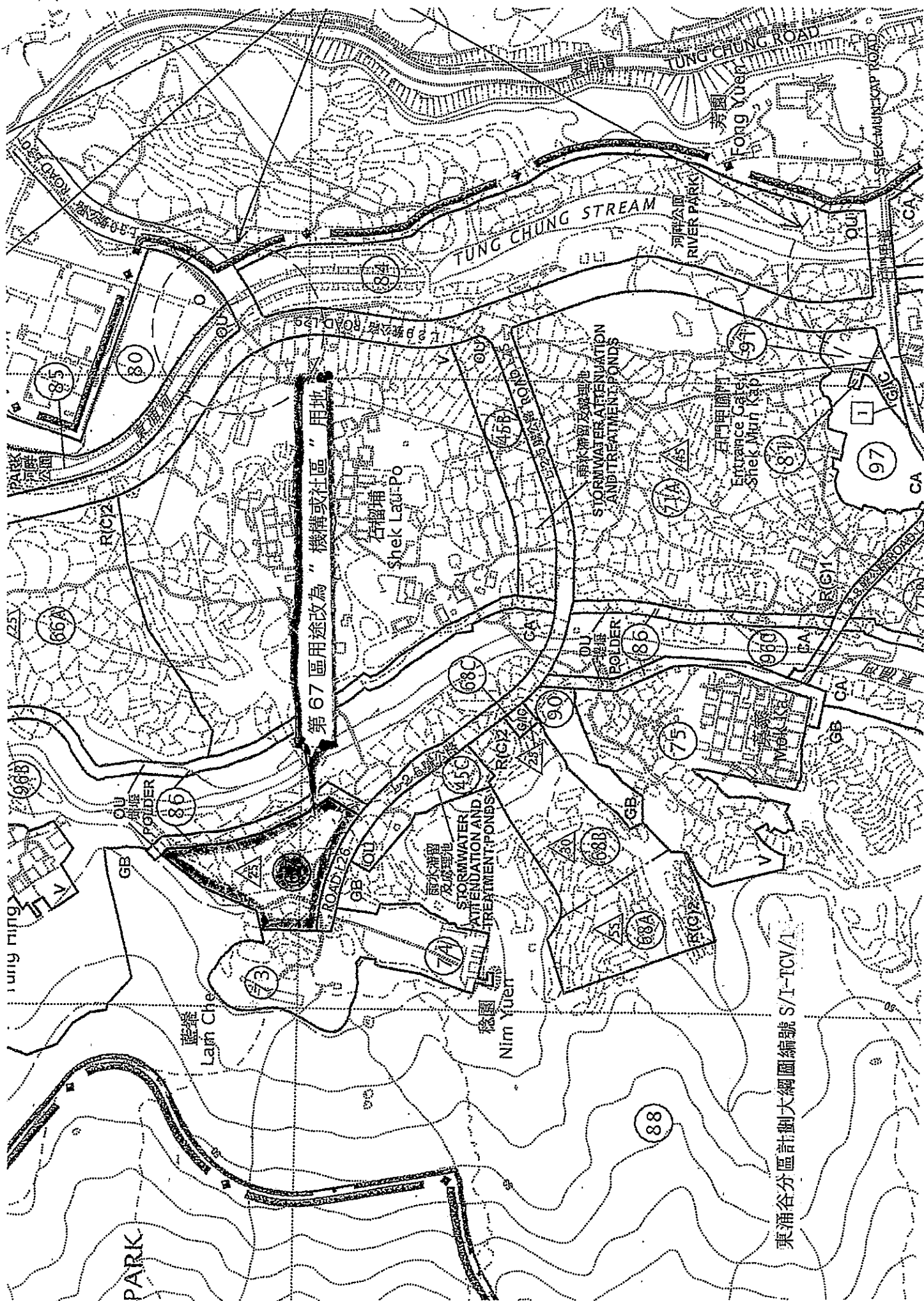
有見及此，本人希望貴會能體會地區實際所需，將第 67 區的土地規劃用途修改成：機構或社區用地，實感德便。

此致
城市規劃委員會秘書


東涌稔園村原居民代表關偉安
暨
村民 上

聯絡電話：[REDACTED]

2016 年 3 月 1 日



敬啟者：

有關東涌谷分區計劃大綱圖編號 S/I-TCV/1

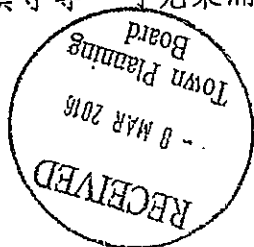
自古以來我族族人過身後均安葬於稔園村內土地或村外附近山丘。我族其中兩座祖墳座落於稔園村兩側，根據碑文顯示，該兩座祖墳分別於清朝咸豐五年（即公曆 1855 年）及同治六年（即公曆 1867 年）重修，可見稔園村墓地歷史久遠。除稔園村村民外，鄰近的藍峯村（「李」氏原居民村）、及石榴埔村（「羅」氏原居民村）的村民亦有將先人遺骸安葬於稔園村內或村周邊地方的習慣。根據傳統風俗，部份骸骨於下葬十餘年後會被起出「刮骨」及安放於金塔中。後來後人將部份的金塔移至稔園村邊界的地方統一安放，附近村民均稱其為「金塔山」。孝子賢孫近年更為該「金塔山」進行翻新工程，確保金塔能敵風吹雨打。上述該等墓地、祖墳和金塔於本人出生時已經存在於稔園村內及村周邊山坡上的不同位置，另外每當稔園村或其他附近村落有人過世，區內的墓地、祖墳或金塔的數量亦會相應增加。

多年來稔園村內及村附近一帶範圍一直被上述村的村民用作墓地和金塔安放區，村民不時來往此地區向先人拜祭供奉。因此，發展商在稔園村興建骨灰龕場乃貫徹附近土地的一向傳統用途，並不會對附近村民日常生活構成厭惡影響或心理不安，更不會破壞風水。

稔園村地處幽谷，風水樹林環抱，貼近天然溪澗，如前文所述山丘滿佈村民祖墳、金塔安放區及墓地，年代久遠。值得一提的是政府漁農自然護理署郊野公園及海岸公園管理局亦有在通往稔園村的行人路旁豎立警告牌，提醒掃墓人士應在鐵桶等器皿內燃燒冥鏹及必須確保火種完全熄滅才離開墓地，以防止山火。據本人所知該警告牌已在行人路上豎立超過十五年，可見政府亦一直承認稔園村以及其周邊地區均有殯葬用途。

事實上，就發展商在稔園村土地上發展及經營合法私營骨灰龕場，稔園村村民均表示支持。

眾所皆知，大嶼山自古數百年以來都是宗教廟宇林立的風水寶地，其中不少設置存放僧人及信眾骨灰的地方。又根據政府發展局於 2015 年 9 月 30 日發表的私營骨灰龕資料，大嶼山有 9 所廟宇設有存放骨灰設施，例如昂平寶蓮寺、大澳龍巖寺及東涌羅漢寺等，可見東涌多處的現有土地用途也包括「靈灰安置所」。

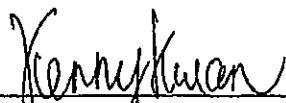


東涌念園於去年五月經已落成開業，現場被高樹環繞營運情況寧靜舒適，建築物外觀低調與私人住宅並無甚大分別。據聞發展商將設計美化東涌念園附近私人土地為優美花園，確保景觀上與周邊翠綠環境協調，使村民在觀感上不會產生厭惡感覺，更不會令村民覺得破壞風水。再者，本人獲悉東涌念園推行「環保拜祭」理念，場內禁止燃燒香燭冥鏹和進行打齋法事，確保該龕場不會滋生噪音、臭味和環境污染等問題及不會對周邊居民造成滋擾。

於東涌稔園村內設立「靈灰安置所」不獨為香港市民提供理想龕位安置先人骨灰，舒緩公營骨灰龕位長期不足狀況，更起步為地區帶來經濟動力，值得村民及區內人士繼續予以支持。

再者，東涌稔園村私人土地全部售予外來發展商，村民再沒有持有任何土地，亦不會以高價錢向發展商購回土地建丁屋。村民如需建丁屋可到附近村落，買地興建。因此，村民認為把稔園村私人土地規劃成 I/C（「機構或社區」）用地，最為合理。

此致
城市規劃委員會秘書


東涌稔園村原居民代表關偉安
暨村民上
及藍寧軒

2016 年 2 月 29 日

(聯絡電話：[REDACTED])

附簽名冊

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
035 甘兆基		
李家柱		
郭仁以		
胡港泰		
葉樹森		
An Wai Kei		
Poon Sam Mei		
Chen Ho Wan		
MAN TSZ KEE GHOS		
徐錦泉		
黃延彬		
046 簡善全		

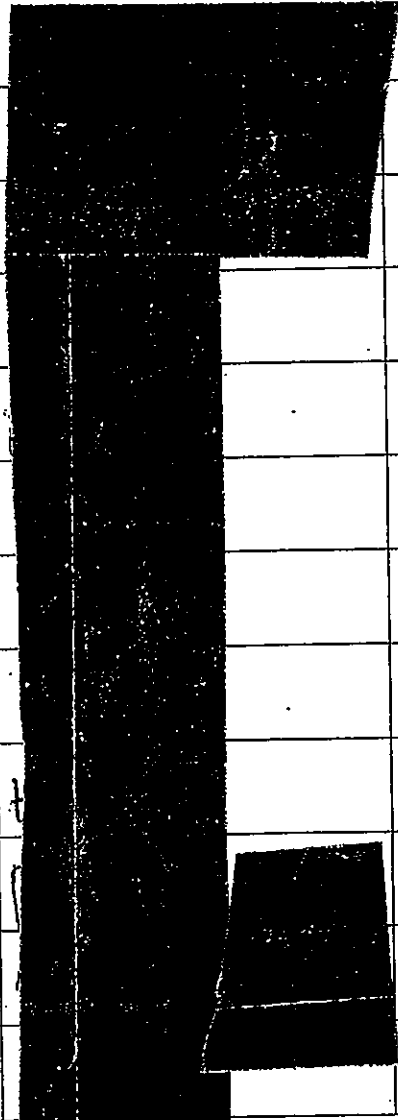
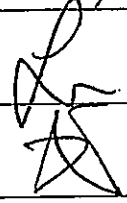
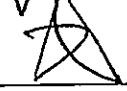
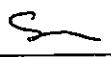


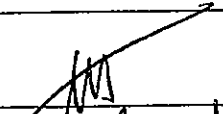
支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽 名

姓 名	香 港 身 份 證 號 碼	簽 署
梁湘濤		梁湘濤
Cheung Mai Chi		
劉國成		
Sara Chin		
黃中正		
何金娣		何金娣
區惠珍		
陳佩珊		
莫煥輝		莫煥輝
劉幼蘭		蘭
李富瑜		LI FU YU
戴士		戴士

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支持東涌稔園村發展合法私營骨灰龕

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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
鄭國斌		Jacky
鄭國威		JP
鄭云峰		JP
陳桂花		陳
鄭慧詩		鄭
鄭國權		鄭
黃嘉彬		彬
黃昭棠		棠
黃麗雲		雲
黃家鳳		鳳
黃志長		長
廖朝金		金



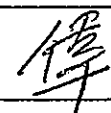



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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
張日強		
黃錦全		
蔡志偉		偉
程志強		強
沈華有		有
陳慧雅		Maggie
林妹妹		林妹妹
張松為		張松為
張保兒		張保兒
張劍輝		輝
何志恒		恒
傅嘉敏		

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
黃志偉		偉
羅雪琴		雪琴
周怡龍		龍
王美映		A. Li
蔡小玲		玲
黃田		田
張嘉欣		嘉欣
黃嘉欣		嘉欣
吳麗珊		麗珊
應海鳳		應
黃嘉欣		嘉欣
黃嘉欣		嘉欣

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
吳志鵬		
溫凱澄		
李惠珠		
黃謙佳		
林偉樂		
謝永軒		
吳俊祐		
彭志榮		
周思華		
山本崇		
廖嘉偉		
張德斌		

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
吳國鋒		吳國鋒
吳仲		吳
陳銀來		陳銀來
張祥凱		張祥凱
許志勇		許
陳偉國		陳
張德應		張
陳銳玲		ling
吳宇珠		珠
陳昭妃		妃
黃觀平		Wong
蔡毓卿		蔡

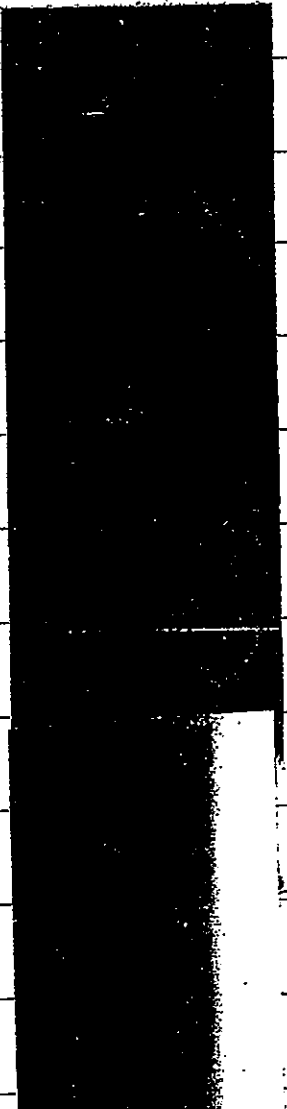
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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
梁新霞		霞
謝萍		萍
梁志仁		仁
陳月娟		娟
梁蓮娣		娣
黃偉豪		豪
區江田		田
陳偉平		平
劉永		劉
王敏		敏
高瑞平		平
陳永蘭		蘭

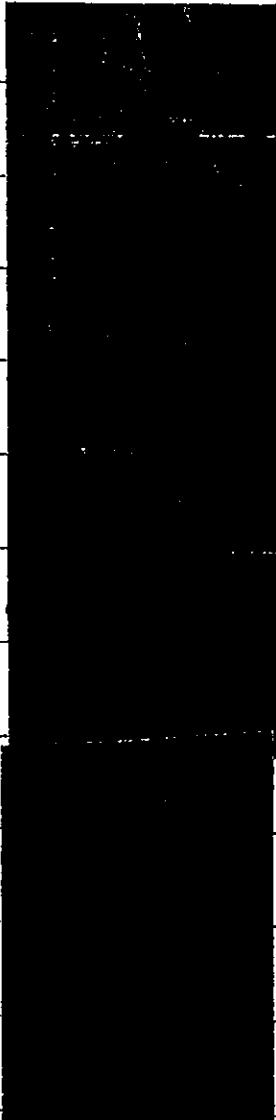
支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
潘家榮		潘
陳燕群		陳
傅代彬		傅
唐妙嫻		嫻
梁村光輝		光輝
溫祖強		強
潘德釗		釗
葉應強		葉
鍾子華		鍾
劉健華		劉
丁貴龍		丁貴龍
符光		符

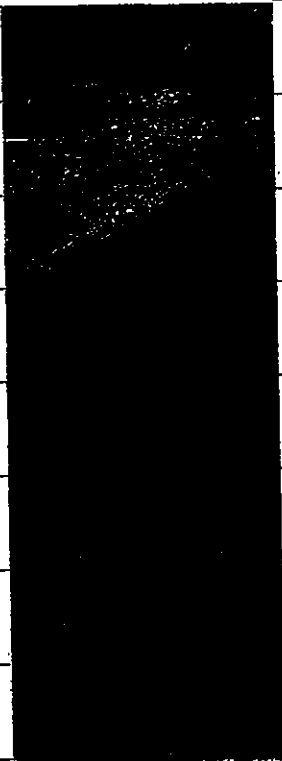
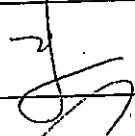
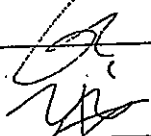
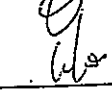
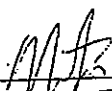
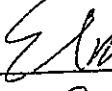


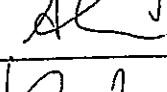
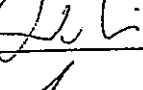
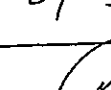
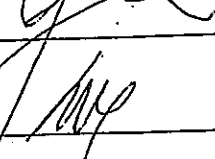
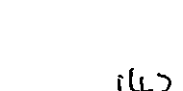

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
朱國榮		
梁詠賢		
陳偉業		
張洪廷		
官家豪		
張瑋駿		
岑偉成		
吳志傑		
麥煥軒		
潘柏榮		
胡兆峰		
伍立德		

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
張玉玲		張玉玲
蔡有富		蔡有富
何妙嫻		何妙嫻
黃廷俊		黃廷俊
楊少玲		楊少玲
Lin 陳妙玲		Lin 陳妙玲
尹東南 天		尹東南 天
麥家正		麥家正
鄺冬杰		鄺冬杰
何修毅		何修毅
趙文謙		趙文謙
陳喬華		陳喬華

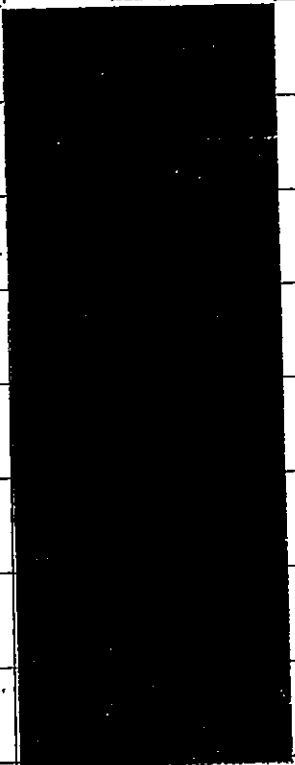
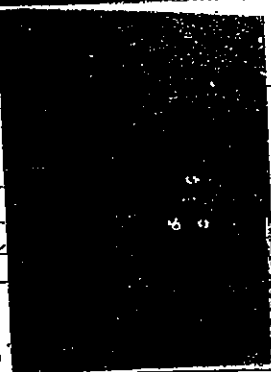
支持東涌稔園村發展合法私營骨灰龕

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支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
呂漢昆		呂漢昆
李有興		李有興
江恩怡		江恩怡
甘孝娟		甘孝娟
楊淑嫻		楊淑嫻
黃俊輝		黃俊輝
張偉志		張偉志
陳		陳
黃耀		黃耀
鄭天添		鄭天添
梁文傑		梁文傑
張仕光		張仕光

支持東涌稔園村發展合法私營骨灰龕

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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
林素清		2/12
胡卓忠		胡
梁威洪		梁
張達良		良
陳有真		真
覃喬芝		芝
黃旺生		生
李金添		添
陳香環		環
李紅艷		艷
駱昌忠		忠
陳偉雄		雄

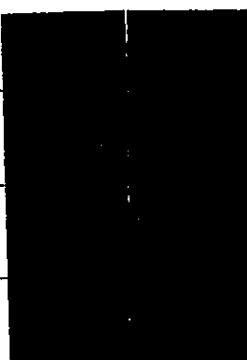


支持東涌稔園村發展合法私營骨灰龕

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簽名

姓名	香港身份證號碼	簽署
周浩軒		周
張榮軒		Sing
張嘉賢		大
邵康民		邵
竺梓山		竺
馬曙祺		Ma
黃佳恩		黃佳恩
彭祥興		彭
李廣晉		李
吳均儒		Ng
李家強		李
黃松培		黃

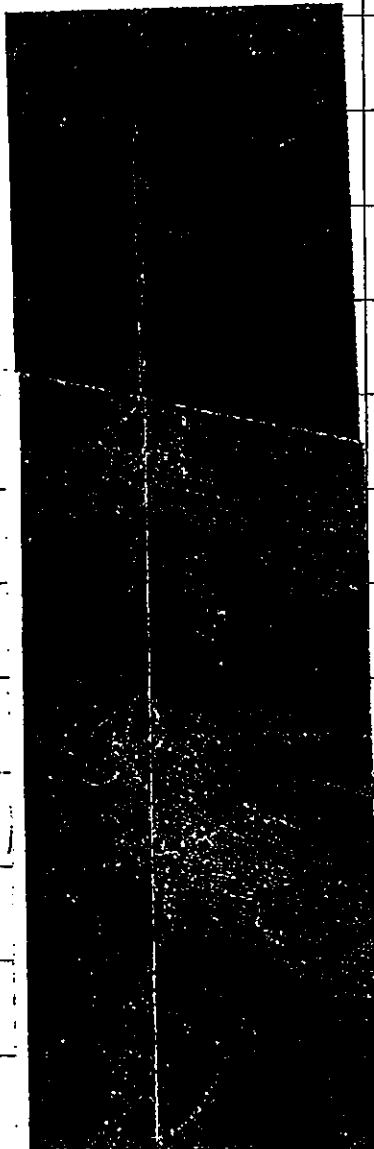
支持東涌稔園村發展合法私營骨灰龕

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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
李微		G12
黃德昆		Kun
李淑賢		Sun
陳東亮		Chen
譚婉微		Tan
高嘉偉		Gao
張宜田		(王)
張祝念		張
陳淑琴		Chen
許青玉		21
張輝娟		張
陳可兒		W8

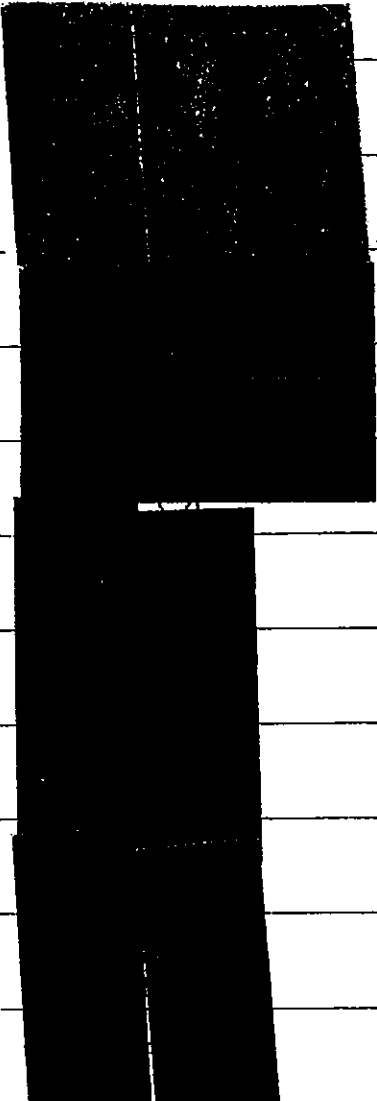

支持東涌稔園村發展合法私營骨灰龕

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簽名

姓名	香港身份證號碼	簽署
李顯榮		黃
黃振芳		林
黃紀遠		達
鍾慧蓮		
王有銘		Wang
陳衍		Chen
黃世信		黃世信
黃德暉		Bruce
何宛玲		玲
黃紀蓮		達
區永		永
李錦波		李

支持東涌稔園村發展合法私營骨灰龕

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簽名

姓名	香港身份證號碼	簽署
黃俊豪		Wing
黃俊傑		黃
陳元九		九
盧繼祖		Joe
李耀基		Alan
李耀坤		Jun
何晉榮		shun
何声宇		何.
何顯明		Alan
郭俊豪		郭.
蔡白良		蔡
劉銘豐		劉

支持東涌稔園村發展合法私營骨灰龕

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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
周界業		Chau Sai Yip
曾伯明		明
徐素森		素森
麥玉潤		潤
徐詠堂		堂
徐振華		華
梁顯威		威
翁偉真		真
傅天明		明
楊傲麟		麟

敬啟者：

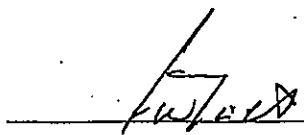
有關東涌谷分區計劃大綱編號 S/I-TCV/1

東涌石榴埔村羅豫德堂、羅豫成祖及羅芳圖祖於東涌藍
輦村附近持有土地：

東涌第1約地段1864, 1876, 1878, 1880, 1884, 1908。
全部座落在上述大綱圖內第67區(見附圖)，貴會規劃其用途
為R(C)2低密度住宅用地。

鑑於社區人口老化加速，公營安老服務經常短缺，上述祖
堂子孫及村民均認同向貴會建議修改第67區用途為：I/C (機
構或社區)用地，俾便發展老人護理院舍，及相關設施，為有
需要的長者提供護理服務。

此致
城市規劃委員會秘書


石榴埔村居民代表羅禮詞
暨村民上
2016年3月7日

(聯絡電話：██████████)

簡圖

249 35



敬啟者：

有關東涌谷分區計劃大綱圖編號 S/I-TCV/1 意見

位於東涌稔園村經已荒置多年，鄰近一帶山丘，遍佈屬於附近南輦、石榴埔、莫家村及稔園村村民先人墳墓及金塔，該處俗稱“金塔山”。

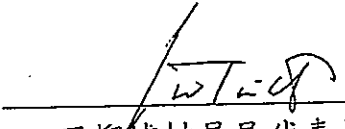
本人知悉有發展商已於稔園村內發展東涌念園骨灰龕以作「靈灰安置所」，本人認為此發展項目非常符合有關地區的土地用途，亦不會造成破壞環境，引致厭惡狀況。


村民亦表示支持稔園村骨灰龕發展商，向貴會建議修改稔園村土地規劃為「機構或社區」用途，反映現時該村土地真實狀況。

此外，政府近年致力發展東涌新市鎮，居住人口達 20 多萬，著實有需要安放先人骨灰位的城市規劃。所以東涌念園在現址營運「靈灰安置所」可以彌補當前公營骨灰位供應嚴重短缺，及迎合新市鎮實際需求。

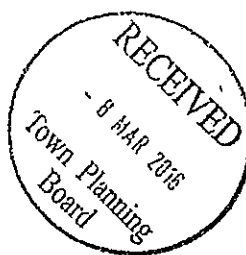
隨本函附上村民支持稔園村內發展合法私營骨灰龕，及將稔園村土地規劃為「機構或社區」用途。

此致
城市規劃委員會秘書


石榴埔村居民代表羅禮詞
暨村民上
2016 年 3 月 7 日

(聯絡電話： )

附件：
簽名冊



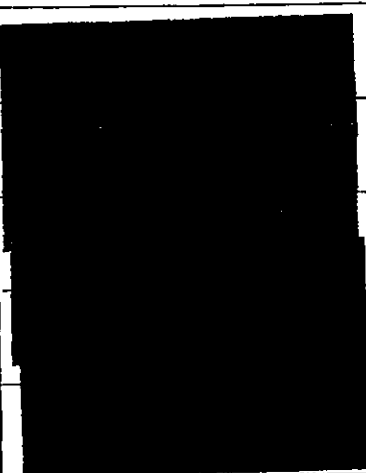
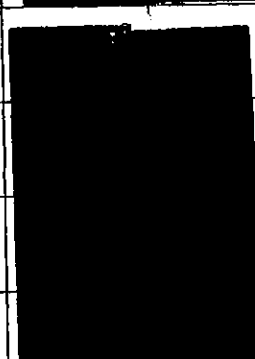
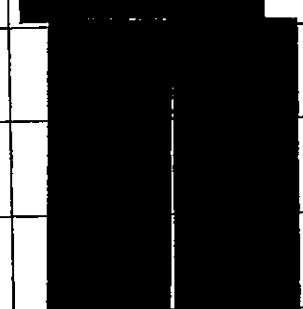
支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
陳錦基		Chin
陳偉言		Chen
袁玉華		袁玉華
李荷芳		李荷芳
王超		Wong
潘桂成		Man
馮樹建		Wong
羅耀邦		羅耀邦
羅祖聰		Lo
王玫瑰		Wong
鄧佩珊		Ng
羅耀宇		Lo

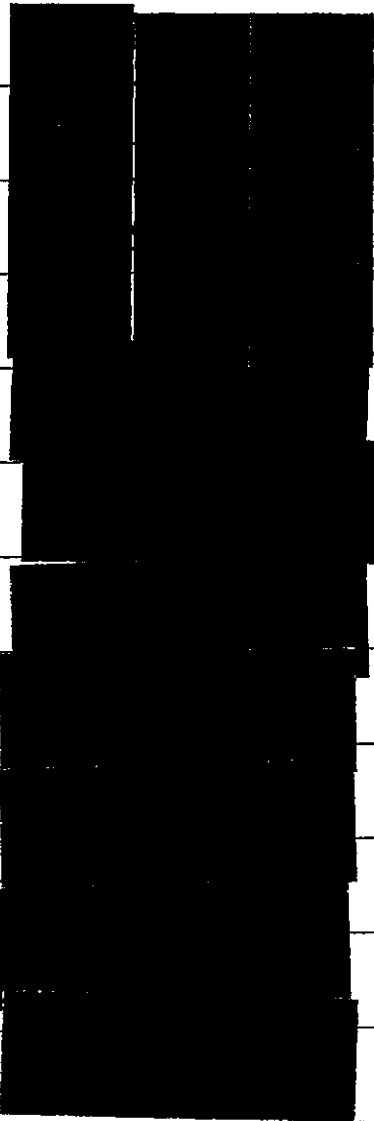

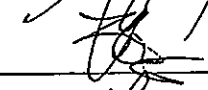

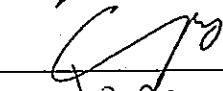
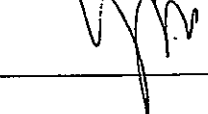
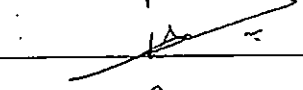
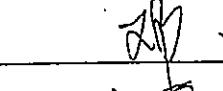

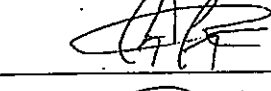
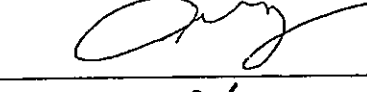


支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
羅競浩		
陳雙蘭		
羅仲持		
陳佩怡		
陳慧怡		
蔡國和		
鄧秋強		
羅仲豪		
梁詩敏		
陳嘉敏		
馬 Tony		
黃嘉敏		

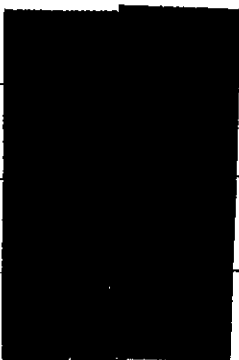
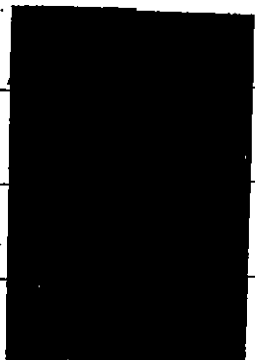

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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
274 鄭春梅		鄭
鄧桂清		鄧
洪少珊		洪
孔麗玲		孔
梁偉健		健
鄧麗		鄧
梁卓賢		梁
黃貴勝		黃
張家隆		張
黃財強		財
劉秉梁		劉
275 梁卓賢		梁

支持東涌稔園村發展合法私營骨灰龕

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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
Wong Wo		
文慶安		文
林月鈴		林
唐麗萍		唐
梁國明		梁
黃大		黃
張詠欣		張
吳明輝		吳
葉常青		葉
曹華材		曹
葉偉林		Yip Wai Lan
陳蔓輝		陳

286-297

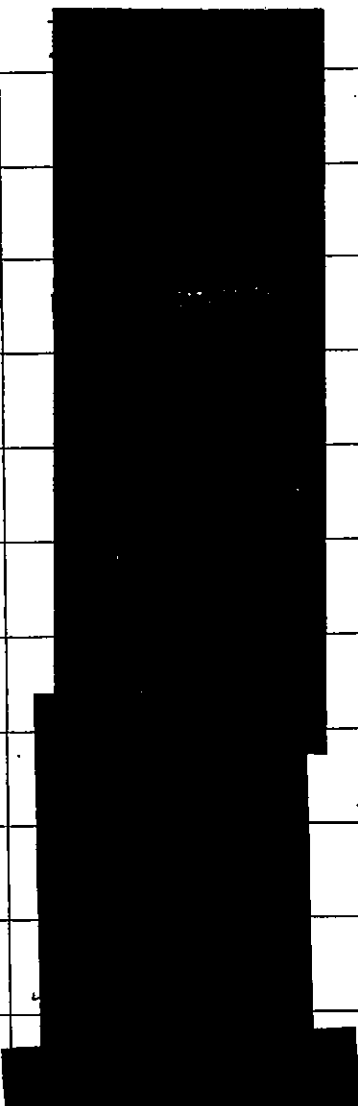
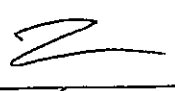
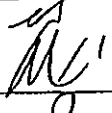

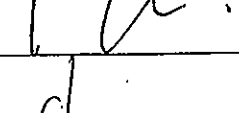

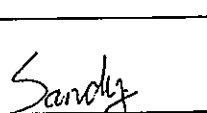
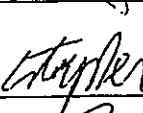

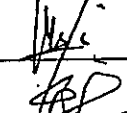
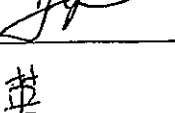
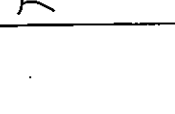

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
298 IP. CHUN KIT		
NG PAK LUN		
Ho Yau Man		
Yung Chiu'ho		
Lai Wai Pui		
Chow Ho Leung Eric		
Kwok Yau Fung		
CHOW KA MING		
羅凌菊		
羅禮釗		
莫樹秋		
209 鍾素英		

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
黃永泉		黃永泉
馮銀蘭		馮銀蘭
張寶儀		Dr
李		✓
李		✓
賴青		賴
陳		
Wong Kam Fai		張
陳		陳
陳		陳
李		李

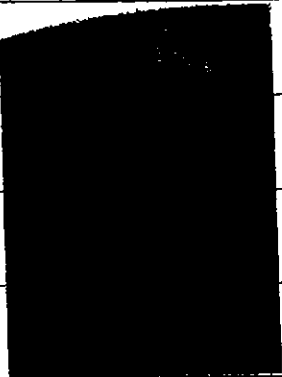

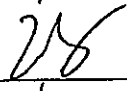


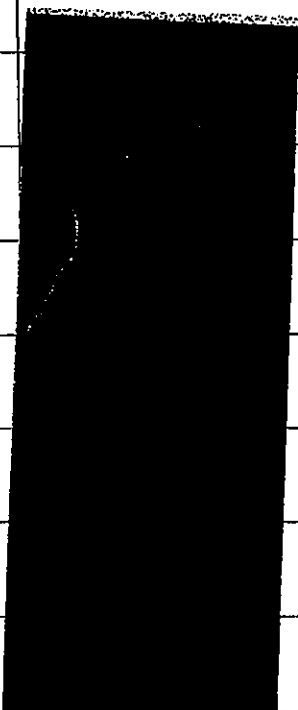

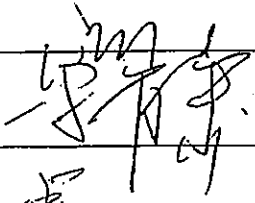



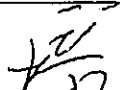
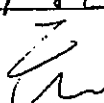
支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
黃健榮		
馮紹源		
郭偉傑		
李德超		
梁展蕙		
傅玉霞		
梁有武		
黃志勤		
陳志輝		
李三三		
郭煥		
李元法		

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
張卓如	[REDACTED]	張
李若蘭	[REDACTED]	李
曾詠儀	[REDACTED]	曾
陳潔茹	[REDACTED]	陳
鄧長安	[REDACTED]	鄧
陳瑞昭	[REDACTED]	陳
江高永	[REDACTED]	江
張炳坤	[REDACTED]	張
蔡時紅	[REDACTED]	蔡
周錫文	[REDACTED]	周
蔡金菊	[REDACTED]	蔡
何少楓	[REDACTED]	何

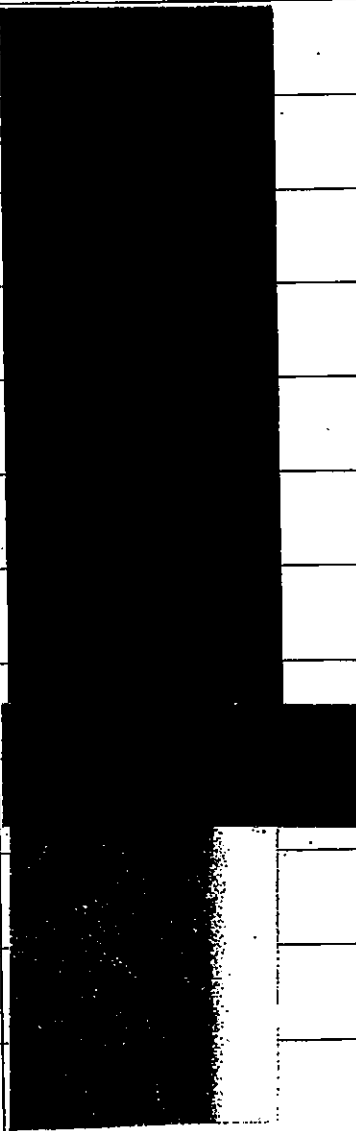
支持東涌稔園村發展合法私營骨灰龕

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簽名

姓名	香港身份證號碼	簽署
鄧志昌		Chris
廖順宜		廖
鄧德文		DeDe
張海翔		Y
鄧秋彤		鄧秋彤
岳芷芯		Sum
周泰香		lois
吳志恒		AS
鄧景源		Terence
鄧永權		鄧永權
馬寶芝		Milly
鄧漢勇		Y

346-357

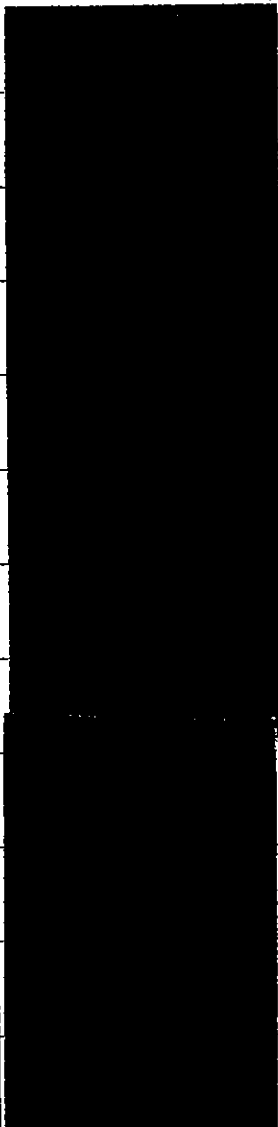
支持東涌稔園村發展合法私營骨灰龕

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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
鄭忠輝		輝
梁楚欣		欣
傅益味		傅益味
張國榮		張國榮
余植棠		余植棠
邓卓如		邓
吳德志		
張少強		少強
孫紫霞		孫紫霞
吳偉明		Ming
王善詩		王
杜梓媚		Mey

358-369

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
吳國成		Shing
莫文超		
鄭嘉林		lam
王建順		
梁肇輝		
陳建武		
吳宇傑		
盧國枝		
曾樹平		曾平
趙貫昆		
葉文錦		
陳國華		陳國華

支持東涌稔園村發展合法私營骨灰龕

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簽名

姓名	香港身份證號碼	簽署
張德威		張
郭麗欣		郭
陳永安		安
李村		中
黃耀彰		耀
黃仕燭		燭
鐘俊洪		洪
謝鎮光		光
范岐峰		峰
文孝嬌		嬌
陳敏		敏
應海鳳		鳳

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簽名

姓名	香港身份證號碼	簽署
馬惠貞		馬惠貞
鄭以強		鄭以強
張秀云		張秀云
羅志安		羅志安
趙百光		趙百光
伍兆億		伍兆億
俞高春		俞高春
林健		林健
林惠平		林惠平
吳麗美		吳麗美
林陳清		林陳清
陳鈺		陳鈺

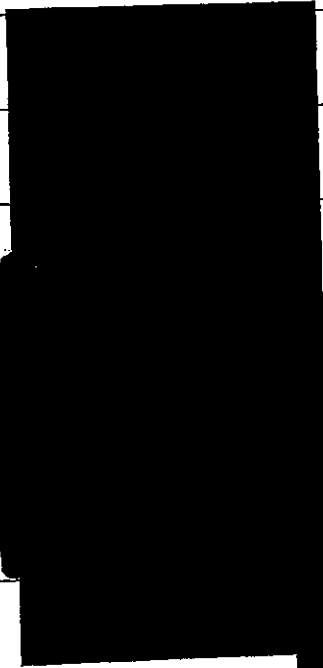
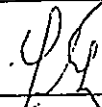
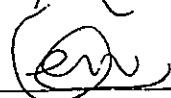
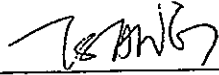
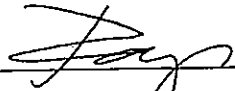
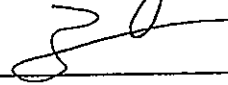
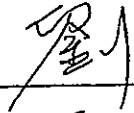

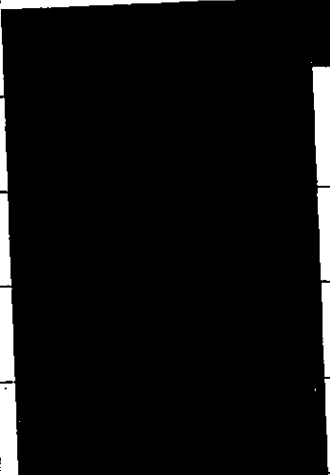
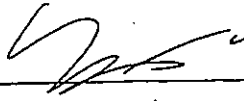
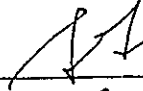

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
黃新怡		
王國強		
曾浩堅		
羅志強		
李萬昌		
劉小玲		
李竹平		
陳建華		
村建局		
施松霖		
張善子		張善子
張春艷		張春艷

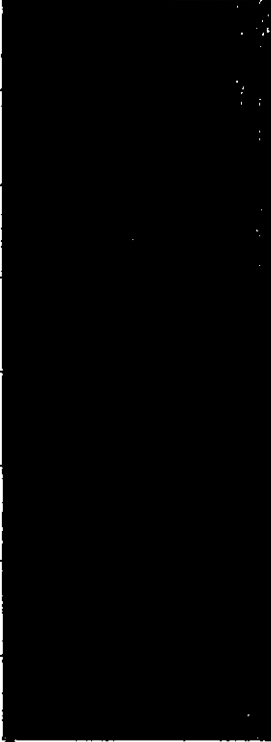









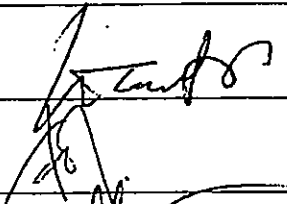
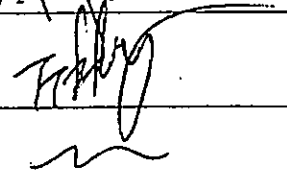
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支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
甘曉帶		
鄭錦輝		
譚家球		
林桂龍		
何文		
陳重亮		
陳紅蓮		
簡轉文		
羅孔河		
郭晉明		
范煥強		
范家豪		

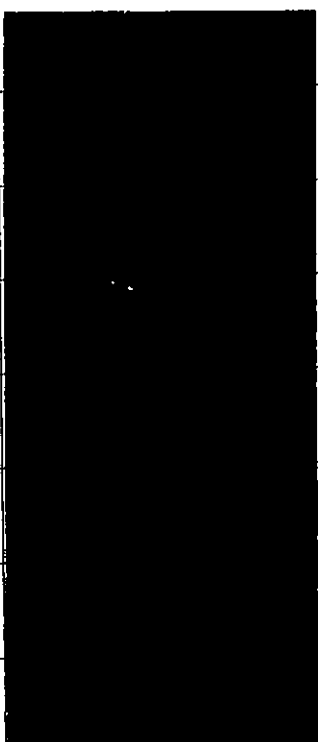
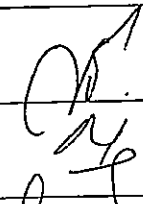


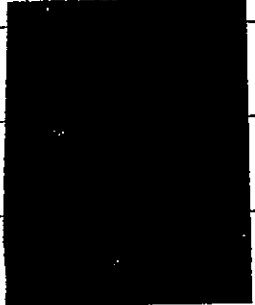
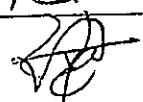
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及

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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
Jack Wong Y.C. 黃福華		
郭麗貞		樹
潘國同		同
楊炎端		
王賜蓮		王賜
楊興		楊興
韓秀玉		韓秀玉
甘俊偉		
葉永春		永春
俞玉春		玉春

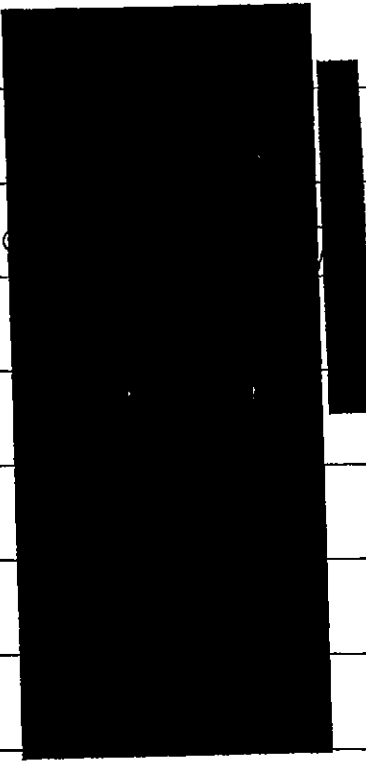

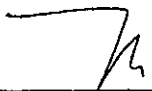

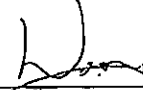



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支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽 名

姓 名	香 港 身 份 證 號 碼	簽 署
442 麥嘉豪		
葉志康		
馮煥文		
溫不曲		
吳仕豐		
吳俊龍		
448 吳翠婷		

442 - 448


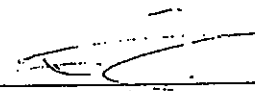
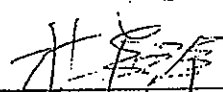
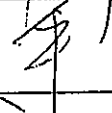
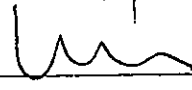



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地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
449 SEE MAN HO		
林華群		
楊榮平		
CHUI YIM LIN		
陳柏璇		
李應力		
455 梁炯煥		

449-455

致：城市規劃委員會秘書處

敬啟者：

有關東涌谷分區計劃大綱圖編號：S/I-TCV/1 意見

近日媒體報導，政府仍然未能完成在全港 18 區找到適合土地，興建公營骨灰龕。兼且在 2016 年至 2018 年骨灰位零供應，希望各宗教和志願團體能撥出骨灰位應急。

又悉有發展商在大嶼山東涌稔園村，重建舊村屋經營《東涌念園骨灰龕》，該處位於幽靜山谷，遠離民居，貼近村民傳統先人墳墓及金塔區域，確實與週邊環境協調，不會造成噪音、臭味或產生厭惡感覺。

固此，我們認為應該支持，俾便提供骨灰位，迎合廣大市民對骨灰位的需求。

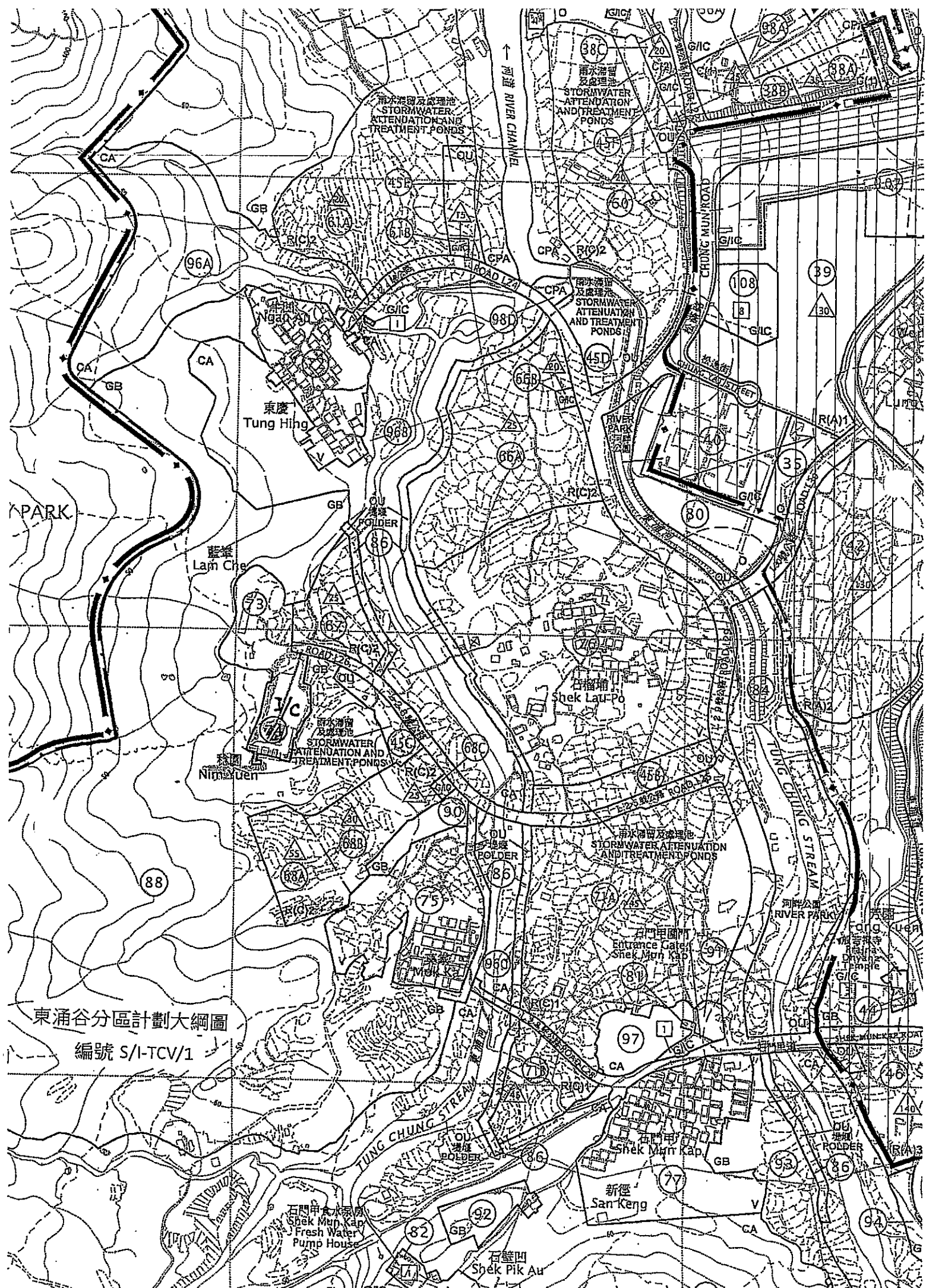
再者，村民亦支持有關發展商，向貴會建議修改上述大綱圖內稔園村土地為 'I/C'，即「機構或社區」用途。



前任東涌莫家村原居民代表莫業林
暨村民上

(聯絡電話：[REDACTED])

2016 年 3 月 5 日



東涌谷分區計劃大綱圖

編號 S/I-TCV/1

東涌鄉事委員會

TUNG CHUNG RURAL COMMITTEE

TUNG CHUNG, LANTAU ISLAND, N.T. HONG KONG

地址：大嶼山東涌上嶺皮村壹號

電話：29888228 傳真：29888924



敬啟者：

有關東涌谷分區計劃大綱圖編號 S/I-TCV/1

根據東涌稔園村原居民代表關偉安表示，始自八十年代，稔園村村民經已遷離該村，私人土地及村屋荒置，並全部出售予發展商。

由於稔園村地處僻靜山谷，被阡斜山坡及茂密樹林圍抱，剩餘政府土地狹小，因此村內無土地能夠預留作鄉村式發展用途。有關村民亦認為規劃稔園村土地為「機構或社區」（I/C）用途，較為合適。

自古以來，附近村民（包括南嶺、石榴埔及稔園村村民）在稔園村貼鄰東涌念園骨灰龕現址一帶土地，安葬先人及建金塔屋安置先人金塔。村民日常往返途經，歷歷在目，習以為常，公認該處為村民先人墓地及金塔安置區。實地視察所得，東涌念園骨灰龕與附近村民用作先人墓地及金塔安置區土地用途協調，現址為高密樹林圍抱，遠離民居，外觀整潔，與一般三層高村屋無異，並無破壞環境或構成厭惡。

最近食物及衛生局局長高永文先生公開表示，未來數年公營骨灰位近乎零供應，寄望志願及宗教團體提供骨灰位；東涌念園骨灰龕的投入服務，正合時宜，有助舒緩公營骨布位嚴重不足情況，應該予以支持。

此致
城市規劃委員會秘書



樊志平

東涌鄉事委員會主席：樊志平

日期：2016年3月4日

日期: 08日03月2016年星期二 14:41
收件者: tpbpd@pland.gov.hk
主旨: Re: Representation on draft Tung Chung Valley Outline Zoning Plan No. S/I-CV/1
附件: AS01713'REDETV'15.pdf

Dear Sir/Madam,

We refer to the captioned and attach herewith our self-explanatory letter for your perusal.

Should you have any queries, please feel free to contact us. Thank you.

Best regards,
Ermine Li

Assistant Surveyor
Albert So, Surveyors Limited
Tel: [REDACTED]
Fax: [REDACTED]
Address: [REDACTED]

Disclaimer:

This message including any attachment(s) is intended for the use of the addressee only. It may contain information which is confidential, non-public, proprietary, protected by the attorney/client or other privilege. If you are not the intended recipient, please accept our apology and you must not use, retain, disclose, copy, print, forward or disseminate this e-mail or any attachment(s). Also, please notify the sender immediately and delete all copies from your computer system without reading, saving, or using it in any manner. Although it has been checked for viruses and other malicious software ("malware"), we do not warrant, represent or guarantee in any way that this communication is free of malware or potentially damaging defects. All liability for any actual or alleged loss, damage, or injury arising out of or resulting in any way from the receipt, opening or use of this email is expressly disclaimed.



(Est. 1995)

ALBERT SO SURVEYORS LTD.

Your Ref. : TPB/R/DPA/I-TCV/1-R644

Our Ref. : AS017/13/REDE/IV/15

8th March 2016

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Jaya Road, North Point
Hong Kong

By Email & hand

Dear Sir/Madam,

Tung Chung Nim Yuen (東涌念園)
Representation on draft Tung Chung Valley
Outline Zoning Plan No. S/I-TCV/1

We refer to the captioned and attach herewith the Form No. S.6 and the letter from representor (the lot owner) for your consideration.

Please feel free to contact our Ermine Li or the undersigned if necessary.

Yours faithfully,
For and on behalf of
ALBERT SO SURVEYORS LTD.

Albert So
Managing Director

Encl.

c.c. Client

AS/el

\\Ermine\2013\AS01713\Redevelopment\AS01713'REDE'IV'15.doc

P. 1 of 1

估價、租賃、規劃及發展顧問 董事總經理 • 蘇耀輝 地產代理 (公司牌照號碼: C-007868)

Regulated by NCS

香港九龍紅磡彌敦道133號17樓1702室 電話: (852) 2882 3183 國文傳真: (852) 2882 2810

Unit H2, 17/F, MG Tower, 133 Hoi Bun Road,
Kwun Tong, Kowloon, Hong Kong

Street, Hung Hom, Kowloon, Hong Kong

Tel: (852) 2882 3183 Fax: (852) 2882 2810 Email: mail@assl.com.hk

VALUERS, ESTATE AGENTS, PLANNING & DEVELOPMENT CONSULTANTS Managing Director: ALBERT SO BSC, MBA, FRICS, FHKIS.

**REPRESENTATION RELATING TO
DRAFT PLAN UNDER SECTION 6(1) OF
THE TOWN PLANNING ORDINANCE (CAP. 131)**

根據《城市規劃條例》（第 131 章）
第 6(1) 條就草圖作出申述

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	
	Date Received 收到日期	

- The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出。填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.info.gov.hk/tph/>.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：<http://www.info.gov.hk/tph/>）。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.
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1. Person Making This Representation (known as "Representer" hereafter) 提出此宗申述的人士（下稱「申述人」）
Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*)
1. TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED 2. UNI-CREATION INVESTMENTS LIMITED

2. Authorized Agent (if applicable) 獲授權代理人 (如適用)
Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*)
ALBERT SO SURVEYORS LIMITED

3. Details of the Representation 申述詳情	
Draft plan to which the representation relates 與申述相關的草圖	S/I-TCV/1

* Delete as appropriate * 請刪去不適用者
Please fill "NA" for Inapplicable item 請在不適用的項目填寫「不適用」

3. Details of the Representation (Continued) (use separate sheet if necessary) 申述詳情(續)(如有需要,請另頁說明)		
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
Zoning of Nim Yuen Village	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the attached letter.
Zoning of Existing Nim Yuen Columbarium	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the attached letter.
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂? 如有的話, 請註明詳情。		
Please refer to the attached letter.		

[@] 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 Amendments.
請形容圖則內與申述相關的指定事項, 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 fill "NA" for inapplicable 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

Part 3 (Continued) 第3部分(續)

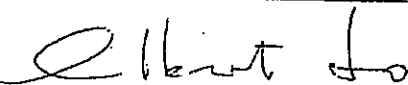
4. Plans, Drawings and Documents 圖則、繪圖及文件

Please list location plans, sites plans, other relevant plans, drawings and other documents submitted with the representation. For coloured drawings/plans or plans/drawings larger than A3 size, 90 copies each should be provided. For other supplementary documents, e.g. reports on impact assessment, 90 copies each should be submitted.

請列明連同申述一併遞交的位圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有圖則/繪圖為彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

5. Signature 簽署

Signature
簽署



SO CHUN HIN, ALBERT

Name in Block Letters 姓名（以正楷填寫）

~~Representer~~ / Authorized Agent*

「申述人」/ 獲授權代理人*

Managing Director

Position (if applicable) 職位（如適用）

Professional

Qualification(s) 專業資格

~~Member~~ 會員 / Fellow 資深會員* of

☐ HKIP ☐ HKIA ☒ HKIS ☐ HKIE ☐ HKILA

Others 其他

FRICS, MRTPI

on behalf of
代表

ALBERT SO SUVEYORS LIMITED

Company/Organization Name and Address (if applicable)

公司/機構名稱及蓋章（如適用）

Date

8 March 2016

日期

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this representation will be used by the Secretary of the Board and Government departments for the following purposes:

- the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and
- facilitating communication between the "representer" and the Secretary of the Board/Government departments

in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.

委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：

- 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及
- 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the "representer" in this representation may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

「申述人」就這宗申述提供的個人資料，或亦會向其他人士披露，以作上述第1段提及的用途。

3. A "representer" has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.

根據《個人資料（私隱）條例》（第486章）的規定，「申述人」有權查閱及更正其個人資料，如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道333號北角政府合署15樓。

* Delete as appropriate

Please fill "NA" for inapplicable item

「✓」 at the appropriate box

* 請刪去不適用者

請在不適用的項目填寫「不適用」

請在適當的方格內加上「✓」號

Parts 4 and 5 第4及第5部分

Your Ref. : TPB/R/DPA/I-TCV/1-R644
Our Ref. : BOD/OC/TPB/08032016/AC

Secretary, Town Planning Board
15/F., North Point Government Offices
333 Java Road, North Point
Hong Kong

By Email and Hand

8 March 2016

Dear Sir/Madam,

**Tung Chung Nim Yuen (東涌念園)
Representation on draft Tung Chung Valley
Outline Zoning Plan No. S/I-CV/1 (the Plan)**

We are the registered land owner (Uni-Creation Investments Limited) and current manager (Tung Chung Nim Yuen Cultural Institution Limited) of Tung Chung Nim Yuen, a columbarium consisting of eight 3-storey NTEHs, (the Columbarium) in operation on Lot Nos. 2754, 2755, 2756, 2757, 2758, 2760 & 2761 in D.D. 1 Tung Chung (the Lots).

The Columbarium has started operation in May 2015 prior to the gazette of the draft Tung Chung Valley Development Permission Area Plan No.DPA/I-TCV/1 (the DPA Plan) on 22nd August 2015 and the gazette of the Plan on 8th January 2016. A letter has been sent to the Development Bureau on 6th May 2015 notifying them of the operation of the Columbarium and for inclusion in Part A of the Information on Private Columbaria (the List). The Columbarium is thus an "existing use" in existence prior to the publication of the first statutory plan.

We have previously submitted our representations on the DPA Plan on 22nd October 2015 (Annex A) ("Previous Representations"). We would like to reiterate our stance that the rural characteristics of the area are suitable for columbarium use. It would not affect the rural characteristics as the Columbarium is a low-rise development and its use is quiet and tranquil. There should be no adverse impact on the ecology, natural environment and rural character of the area.

As mentioned in our Previous Representations, the slope behind Nim Yuen Village is historically, traditionally and currently used for storing and placing of bone pots / "kam taps" for over a hundred years. There have all along been a considerable number of graves and burial grounds in the area as well as very old religious institutions including Lo Hon Monastery and Prajna Dhyana Temple, both near Mok Ka and Shek Mun Kap villages. Lo Hon Monastery and Prajna Dhyana Temple both have columbaria facilities. Our Columbarium therefore is entirely compatible with the land use of the area. The Town Planning Board should take those existing uses and conditions of the area into account and include the said uses in the draft Plan so that the Plan can accommodate and be consistent with the existing uses in

the area. It is clear that the existing burial area together with the existing columbarium at Nim Yuen should be regarded as a site suitable for existing burial use. The graves and "kam taps" within the said site could not be removed and should be preserved to provide a resting place for the deceased in the long term planning.

The planning intention of "Village Type Development" is to designate for development of village houses. It should be stressed this proposal does not reflect the true circumstances as there is currently (i) no outstanding Small House application for erecting New Territories Exempt Houses/Small Houses in Nim Yuen Village and (ii) no private land nor Government land is available for any Small House development in Nim Yuen Village.

All in all having due regard to the existing burial grounds and graveyards, including our development, in Nim Yuen Village, it is considered inappropriate to zone it for "Village Type Development". Instead, a zoning of "Institution or Community" is a better alternative in consideration of existing use of the Columbarium in Nim Yuen Village. It matches perfectly with the planning intention of serving the needs of local residents and/or the local community. Other uses serving the community such as elderly home and religious institution should also be always permitted.

Meanwhile, we reserve our rights to take further legal actions if the Government deprives our rights and interests in Nim Yuen Village.

Yours faithfully,
For and on behalf of
UNI-CREATION INVESTMENTS
LIMITED

For and on behalf of
UNI-CREATION INVESTMENTS LIMITED
建世投资有限公司


.....
Authorized Signature(s)

Yours faithfully,
For and on behalf of
TUNG CHUNG NIM YUEN
CULTURAL INSTITUTION
LIMITED

For and on behalf of
TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
東涌念園文化機構有限公司


.....
Authorized Signature(s)



(Est. 1995)

ALBERT SO SURVEYORS LTD.

Our Ref. : AS017/13/Rede/II/75

22nd October 2015

Secretary, Town Planning Board
15/F., North Point Government Offices,
333 Java Road,
North Point,
Hong Kong

By Fax (2877 0245) and Email

Tung Chung Nim Yuen (東涌念園)
Representation on draft Tung Chung Valley
Development Permission Area Plan No. DPA/I-TCV/1

Dear Sir/Madam,

We refer to captioned representation.

We attach herewith the Form No. S6 and a letter from the representers for your further actions.

Yours faithfully,
For and on behalf of
ALBERT SO SURVEYORS LTD.

Albert So
Managing Director

encl

c.c. Clients, KLY

AS/dt

\\Dickson\2013\AS017'13'Rede\AS017'13'Rede'II'75

P. 1 of 1

Regulated by RICS

估價、拍賣、規劃及發展顧問 城市總管理 商業地產 地產代理 (公司牌照號碼: C-007868)

Unit H2, 17/F, MG Tower, 133 Hoi Bun Road,
Kwun Tong, Kowloon, Hong Kong

電話: (852) 2882 3183 傳真: (852) 2882 2810

Room 1302, Chung King Plaza

Tel: (852) 2882 3183 Fax: (852) 2882 2810 Email: mail@assl.com.hk

VALUERS, ESTATE AGENTS, PLANNING & DEVELOPMENT CONSULTANTS, Managing Director: ALBERT SO BSC, MBA, FRICS, FHKIS, FHKSI

**REPRESENTATION RELATING TO
DRAFT PLAN UNDER SECTION 6(1) OF
THE TOWN PLANNING ORDINANCE (CAP. 131)**

根據《城市規劃條例》（第131章）
第6(1)條就草圖作出申述

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	
	Date Received 收到日期	

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申述必須於指定的圖則展示期屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
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- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.
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1. Person Making This Representation (known as "Representer" hereafter) 提出此宗申述的人士（下稱「申述人」）
Name 姓名 / 名稱 (Mr/Mrs/Ms/Ms/Company/Organization* 先生 / 夫人 / 小姐 / 女士 / 公司 / 機構*) (1) UNI-CREATION INVESTMENTS LIMITED (2) TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED

2. Authorized Agent (if applicable) 獲授權代理人 (如適用)
Name 姓名 / 名稱 (Mr/Mrs/Ms/Ms/Company/Organization* 先生 / 夫人 / 小姐 / 女士 / 公司 / 機構*) ALBERT SO SURVEYORS LIMITED

3. Details of the Representation 申述詳情
Draft plan to which the representation relates 與申述相關的草圖 DPA/I-TCV/1

* Delete as appropriate * 請刪去不適用者
Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

3. Details of the Representation (Continued) (use separate sheet if necessary) 申述詳情 (續) (如有需要, 請另頁說明)		
Nature of and reasons for the representation 申述的性質及理由		
Subject matters ^② 有關事項 ^②	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由
1. Paragraph 6.1 and 7.4 of Explanatory Statement 2. Annex A of the Notes of the Plan	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the attached letter.
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂? 如有的話, 請註明詳情。 Please refer to the attached letter.		

② 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 Amendments.
請形容圖則內與申述相關的指定事項。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 fill "NA" for inapplicable 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

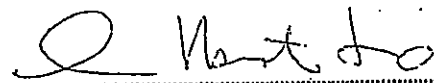
4. Plans, Drawings and Documents 圖則、繪圖及文件

Please list location plans, sites plans, other relevant plans, drawings and other documents submitted with the representation. For coloured drawings/plans or plans/drawings larger than A3 size, 90 copies each should be provided. For other supplementary documents, e.g. reports on impact assessment, 90 copies each should be submitted.

請列明連同申述一併遞交的位置圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有圖則/繪圖為彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

N/A

5. Signature 簽署

Signature
簽署


SO CHUN HIN, ALBERT

Name in Block Letters 姓名（以正楷填寫）

"Representer" / Authorized Agent*

「申述人」/ 獲授權代理人*

Managing Director

Position (if applicable) 職位（如適用）

Professional

Qualification(s) 專業資格

Member 會員 / Fellow 資深會員* of

☐ HKIP ☐ HKIA ☒ HKIS ☐ HKIE ☐ HKILA

Others 其他 FRICS, MRTPI

on behalf of
代表

ALBERT SO SURVEYORS LIMITED

Company/Organization Name and Chop (if applicable)
公司/機構名稱及蓋章（如適用）Date
日期

22-October-2015

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this representation will be used by the Secretary of the Board and Government departments for the following purposes:

- (a) the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and
- (b) facilitating communication between the "representer" and the Secretary of the Board/Government departments

in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.

委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：

- (a) 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及
- (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the "representer" in this representation may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

「申述人」就這宗申述提供的個人資料，或亦會向其他人士披露，以作上述第 1 段提及的用途。

3. A "representer" has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/E, North Point Government Offices, 333 Java Road, North Point, Hong Kong.

根據《個人資料（私隱）條例》（第 486 章）的規定，「申述人」有權查閱及更正其個人資料，如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道 333 號北角政府合署 15 樓。

* Delete as appropriate

Please fill "NA" for inapplicable item

「✓」 at the appropriate box

* 請刪去不適用者

請在不適用的項目填寫「不適用」

請在適當的方格內加上「✓」號

Parts 4 and 5 第 4 及第 5 部分

22nd October 2015

Secretary, Town Planning Board
15/F., North Point Government Offices,
333 Java Road,
North Point,
Hong Kong

By Fax (2877 0245) and Email

Tung Chung Nim Yuen (東涌念園)
Representation on draft Tung Chung Valley
Development Permission Area Plan No.DPA/L-TCV/1 (the Plan)

Dear Sir/Madam,

We are the former registered land owner (Uni-Creation Investments Limited) and current manager (Tung Chung Nim Yuen Cultural Institution Limited) of Tung Chung Nim Yuen, a columbarium (the Columbarium) in operation at Lot Nos. 2754, 2755, 2756, 2757, 2758, 2760 & 2761 in D.D.1 Tung Chung (the Lots).

The Columbarium has started operation in May 2015, before the gazette of the Plan. A letter has been sent to the Development Bureau (Annex A) on 6th May 2015 for inclusion in Part A of the Information on Private Columbaria. On 29th June 2015 and 21st August 2015, officers of Planning Department have visited the Lots. They have recorded the number of niches and taken photographs of the Columbarium.

In paragraph 7.4 (a) of the explanatory statement of the Plan, it states that 'conversion of New Territories Exempted Houses into columbarium are found in the Area resulting in adverse impact on the ecology, natural environment and rural character of the Area...' However, we cannot find any evidence or expert reports to support the above statement.

In fact, the rural characteristics of the area are appropriate for columbarium use. It would not diminish the rural characteristics as the Columbarium would not be used as commercial or high-rise development. Furthermore, although there is no reference to Nim Yuen in the explanatory statement, we wish to point out that our Columbarium is accommodated in redeveloped old schedule house lots and therefore not developed on a

green field site. . The land in front of the Columbarium is private agricultural land and will soon be developed into a garden. There should be no adverse impact on the ecology, natural environment and rural character of the Area.

On the historical and current land use of the area, there were and are quite a number of graves, burial grounds and "kam taps" as well as very old religious institutions including the Hau Wong Temple and Lo Hon Monastery mentioned in paragraph 5.3 of the explanatory statement. The Lo Hon Monastery also has a columbarium and is in Part A of the Private Columbaria List. Tung Chung Nim Yuen therefore is entirely compatible with the land use of the area. The Town Planning Board should take those existing uses and conditions of the area into account and amend and include the said uses in the draft Plan so that the Plan can accommodate and be consistent with the existing uses in the area. In the circumstances, we propose that the Town Planning Board to include columbarium use in Annex A as "Use always permitted".

Recently Government has, against our objection and legal representation, taken re-entry action against the Lots resulting in legal ownership of the Lots being temporarily removed from us. However, we have initiated legal actions against such unlawful re-entry. Up to now, the Columbarium is still in our physical possession and management pending a Court hearing on our case. In the event that the Court agrees with our legal representation, our ownership will be reinstated and Government's re-entry action will be unlawful. In view of the above circumstances, we consider that there has not been a material change of use under Notes (3) of the Plan.

We also wish to point out that Tung Chung Nim Yuen is not indicated on the Plan. In the latest survey sheet (Annex B) issued by DLO/Islands dated 9th June 2015, the Columbarium is already shown there. Grateful if you could update your Plan accordingly.

Meanwhile, we reserve our rights to submit further representations in the future if necessary.

Yours faithfully,
For and on behalf of
UNI-CREATION INVESTMENTS
LIMITED

For and on behalf of
UNI-CREATION INVESTMENTS LIMITED
連世投資有限公司

abraham

.....
Authorized Signature(s)

Yours faithfully,
For and on behalf of
TUNG CHUNG NIM YUEN
CULTURAL INSTITUTION LIMITED

For and on behalf of
TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
東涌念園文化機構有限公司

DS
.....
Authorized Signature(s)

ALBERT SO SURVEYORS LTD.

6th May 2015

By fax (2868 4530) and post

東涌念園



ALBERT SO SURVEYORS LTD.

construction. There is no user restriction for the completed buildings under the Block Government Lease.

Secondly, the columbarium is currently not covered by any statutory town plan. Therefore there is no contravention of any town planning requirements, same situation as the Lo Hon Monastery at Shek Mun Kap which is also in Part A.

Thirdly, all eight houses are built within their respective lot boundaries certified by a Registered Land Surveyor and there is no encroachment on Government land.

As the columbarium fulfills all criteria for inclusion of Part A: Private Columbaria, our clients request that the columbarium 東涌念園 be included in the said Part A accordingly. We attach herewith the following information.

1. Land Searches and Block Government Lease of the Lots (Annex A)
2. Outline Zoning Plan (Annex B)
3. A master location Plan of the eight houses (Annex C)
4. Approval letters for Site Formation Works issued by Buildings Department. (Annex D)
5. Certificates of Exemption issued by District Lands Office/Islands (Annex E)
6. Certificate of Incorporation of the land owner and operator of the columbarium (Annex F)
7. Copies of duly completed and signed Form CE/4 and The Sewage Disposal System Completion Report of the eight houses (Annex G)
8. Setting out Plans prepared by a Registered Land Surveyor. (Annex H)
9. Clients' Authorization Letter (Annex I)

Grateful if you could include the above columbarium 東涌念園 in Part A: Private Columbaria for the information of the public.

Should you require further information, would you please contact the undersigned at 2882 3183.



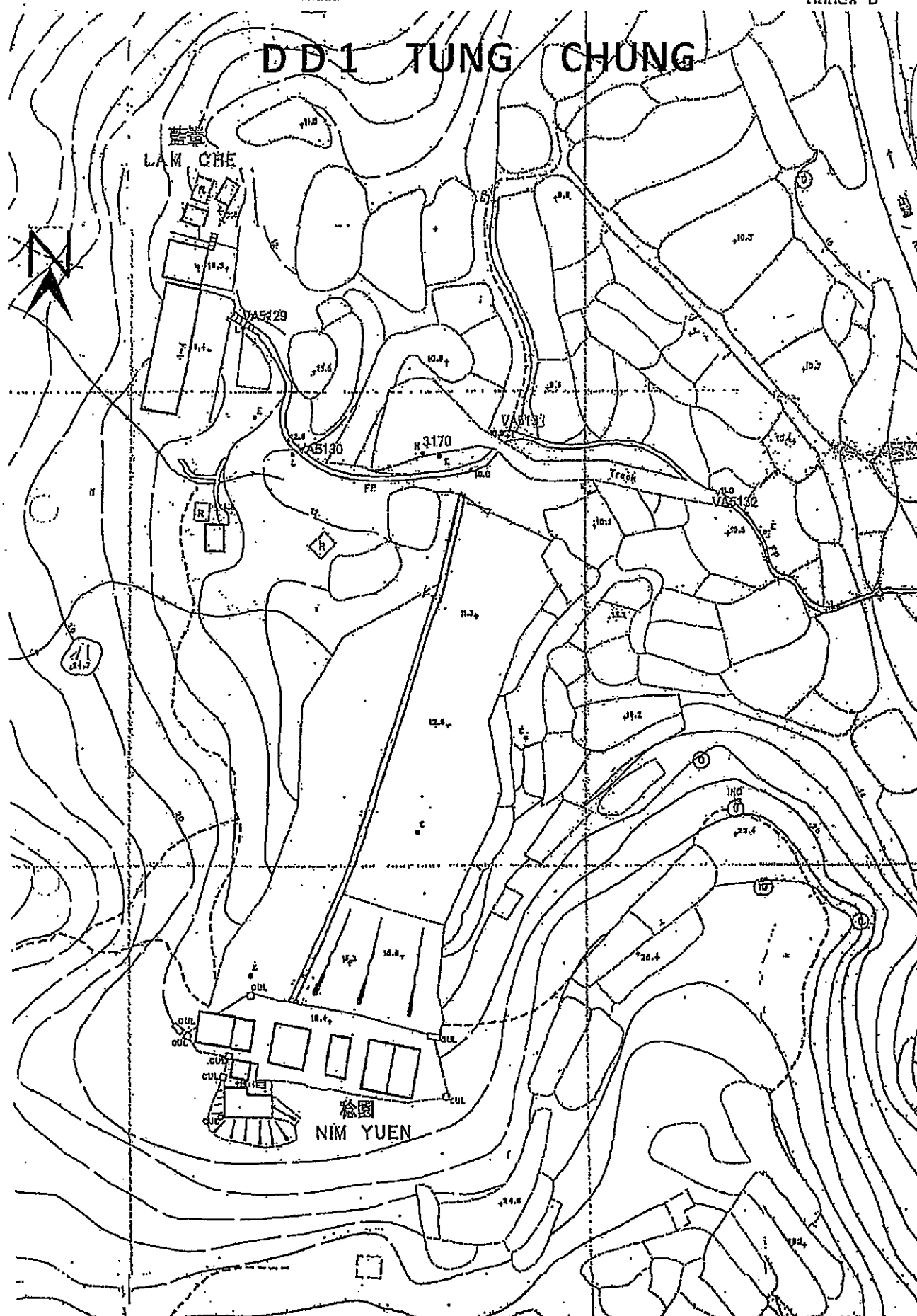
ALBERT SO SURVEYORS LTD.

Yours faithfully,
For and on behalf of
ALBERT SO SURVEYORS LTD.

Albert So
Managing Director

Encl.
c.c. Client
Planning Department
District Land Office, Islands

AS/dt
\\Dickson\2013\13039\13\Col\12



For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	
	Date Received 收到日期	

- The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.info.gov.hk/tpb/>.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835）及規劃署的規劃資料查詢熱線（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：<http://www.info.gov.hk/tpb/>）。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出申述的人士須以打印方式或以正楷填寫表格，填寫的資料宜中英文兼備。倘若未能提供所需資料，則委員會可把有關申述視為不會提出論。

1. Person Making This Representation (known as "Representer" hereafter) 提出此宗申述的人士（下稱「申述人」）
Name 姓名 / 名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*) 1. TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED 2. UNI-CREATION INVESTMENTS LIMITED

2. Authorized Agent (if applicable) 獲授權代理人 (如適用)
Name 姓名 / 名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*) ALBERT SO SURVEYORS LIMITED

3. Details of the Representation 申述詳情	
Draft plan to which the representation relates 與申述相關的草圖	S/I-TCV/I

* Delete as appropriate * 請刪去不適用者
 Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

3. Details of the Representation (Continued) (use separate sheet if necessary) 申述詳情(續)(如有需要,請另頁說明)		
Nature of and reasons for the representation 申述的性質及理由		
Subject matters ^a 有關事項 ^a	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由
Zoning of Nim Yuen Village	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the attached letter.
Zoning of Existing Nim Yuen Columbarium	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the attached letter.
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂? 如有的話, 請註明詳情。		
Please refer to the attached letter.		

^a 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 Amendments.
 請形容圖則內與申述相關的指定事項, 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 fill "NA" for inapplicable 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

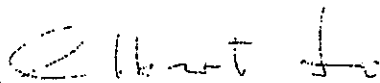
4. Plans, Drawings and Documents 圖則、繪圖及文件

Please list location plans, sites plans, other relevant plans, drawings and other documents submitted with the representation. For coloured drawings/plans or plans/drawings larger than A3 size, 90 copies each should be provided. For other supplementary documents, e.g. reports on impact assessment, 90 copies each should be submitted.

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5. Signature 簽署

Signature
簽署



SO CHUN HIN, ALBERT

Name in Block Letters 姓名（以正楷填寫）

~~Representer~~ / Authorized Agent*

「申述人」/ 獲授權代理人*

Managing Director

Position (if applicable) 職位（如適用）

Professional

Qualification(s) 專業資格

~~Member~~ 會員 / Fellow 資深會員* of

☐ HKIP ☐ HKIA ☒ HKIS ☐ HKIE ☐ HKILA

Others 其他 FRICS, MRTPI

on behalf of
代表

ALBERT SO SUVEYORS LIMITED

Company/Organization Name and Shop (if applicable)

公司/機構名稱及蓋章（如適用）

Date

8 March 2016

日期

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this representation will be used by the Secretary of the Board and Government departments for the following purposes:

- (a) the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and
- (b) facilitating communication between the "representer" and the Secretary of the Board/Government departments

in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.

委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：

- (a) 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及
- (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the "representer" in this representation may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

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* Delete as appropriate

Please fill "NA" for inapplicable item

「✓」 at the appropriate box

* 請刪去不適用者

請在不適用的項目填寫「不適用」

請在適當的方格內加上「✓」號

Parts 4 and 5 第4及第5部分

Your Ref. : TPB/R/DPA/I-TCV/1-R644
Our Ref. : BOD/OC/TPB/08032016/AC

Secretary, Town Planning Board
15/F., North Point Government Offices
333 Java Road, North Point
Hong Kong

By Email and Hand

8 March 2016

Dear Sir/Madam,

Tung Chung Nim Yuen (東涌念園)
Representation on draft Tung Chung Valley
Outline Zoning Plan No. S/I-CV/1 (the Plan)

We are the registered land owner (Uni-Creation Investments Limited) and current manager (Tung Chung Nim Yuen Cultural Institution Limited) of Tung Chung Nim Yuen, a columbarium consisting of eight 3-storey NTEHs, (the Columbarium) in operation on Lot Nos. 2754, 2755, 2756, 2757, 2758, 2760 & 2761 in D.D. 1 Tung Chung (the Lots).

The Columbarium has started operation in May 2015 prior to the gazette of the draft Tung Chung Valley Development Permission Area Plan No.DPA/I-TCV/1 (the DPA Plan) on 22nd August 2015 and the gazette of the Plan on 8th January 2016. A letter has been sent to the Development Bureau on 6th May 2015 notifying them of the operation of the Columbarium and for inclusion in Part A of the Information on Private Columbaria (the List). The Columbarium is thus an "existing use" in existence prior to the publication of the first statutory plan.

We have previously submitted our representations on the DPA Plan on 22nd October 2015 (Annex A) ("Previous Representations"). We would like to reiterate our stance that the rural characteristics of the area are suitable for columbarium use. It would not affect the rural characteristics as the Columbarium is a low-rise development and its use is quiet and tranquil. There should be no adverse impact on the ecology, natural environment and rural character of the area.

As mentioned in our Previous Representations, the slope behind Nim Yuen Village is historically, traditionally and currently used for storing and placing of bone pots / "kam taps" for over a hundred years. There have all along been a considerable number of graves and burial grounds in the area as well as very old religious institutions including Lo Hon Monastery and Prajna Dhyana Temple, both near Mok Ka and Shek Mun Kap villages. Lo Hon Monastery and Prajna Dhyana Temple both have columbaria facilities. Our Columbarium therefore is entirely compatible with the land use of the area. The Town Planning Board should take those existing uses and conditions of the area into account and include the said uses in the draft Plan so that the Plan can accommodate and be consistent with the existing uses in

the area. It is clear that the existing burial area together with the existing columbarium at Nim Yuen should be regarded as a site suitable for existing burial use. The graves and "kam taps" within the said site could not be removed and should be preserved to provide a resting place for the deceased in the long term planning.

The planning intention of "Village Type Development" is to designate for development of village houses. It should be stressed this proposal does not reflect the true circumstances as there is currently (i) no outstanding Small House application for erecting New Territories Exempt Houses/Small Houses in Nim Yuen Village and (ii) no private land nor Government land is available for any Small House development in Nim Yuen Village.

All in all having due regard to the existing burial grounds and graveyards, including our development, in Nim Yuen Village, it is considered inappropriate to zone it for "Village Type Development". Instead, a zoning of "Institution or Community" is a better alternative in consideration of existing use of the Columbarium in Nim Yuen Village. It matches perfectly with the planning intention of serving the needs of local residents and/or the local community. Other uses serving the community such as elderly home and religious institution should also be always permitted.

Meanwhile, we reserve our rights to take further legal actions if the Government deprives our rights and interests in Nim Yuen Village.

Yours faithfully,
For and on behalf of
UNI-CREATION INVESTMENTS
LIMITED

For and on behalf of
UNI-CREATION INVESTMENTS LIMITED
建世投资有限公司


.....
Authorized Signature(s)

Yours faithfully,
For and on behalf of
TUNG CHUNG NIM YUEN
CULTURAL INSTITUTION
LIMITED

For and on behalf of
TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
東涌念園文化機構有限公司


.....
Authorized Signature(s)



(Est. 1995)

ALBERT SO SURVEYORS LTD

Our Ref. : AS017/13/Rede/II/75

22nd October 2015

Secretary, Town Planning Board
15/F., North Point Government Offices,
333 Java Road,
North Point,
Hong Kong

By Fax (2877 0245) and Email

Tung Chung Nim Yuen (東涌念園)
Representation on draft Tung Chung Valley
Development Permission Area Plan No. DPA/I-TCV/1

Dear Sir/Madam,

We refer to captioned representation.

We attach herewith the Form No. S6 and a letter from the representers for your further actions.

Yours faithfully,
For and on behalf of
ALBERT SO SURVEYORS LTD.

Albert So
Managing Director

encl
c.c. Clients, KLY
AS/dt
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P. 1 of 1

**REPRESENTATION RELATING TO
DRAFT PLAN UNDER SECTION 6(1) OF
THE TOWN PLANNING ORDINANCE (CAP. 131)**

根據《城市規劃條例》（第 131 章）
第 6(1) 條就草圖作出申述

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	
	Date Received 收到日期	

- The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/E, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/E, North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/E, North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/E, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.info.gov.hk/tpb/>.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引，這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：<http://www.info.gov.hk/tpb/>）。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出申述的人士須以打印方式或以正楷填寫表格，填寫的資料宜中英文兼備。倘若未能提供所需資料，則委員會可把有關申述視為不曾提出論。

1. Person Making This Representation (known as "Representer" hereafter) 提出此宗申述的人士（下稱「申述人」）
Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*) (1) UNI-CREATION INVESTMENTS LIMITED (2) TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED

2. Authorized Agent (if applicable) 獲授權代理人 (如適用)
Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*) ALBERT SO SURVEYORS LIMITED

3. Details of the Representation 申述詳情	
Draft plan to which the representation relates. 與申述相關的草圖	DPA/I-TCV/1

* Delete as appropriate * 請刪去不適用者
 Please fill "NA" for inapplicable item. 請在不適用的項目填寫「不適用」

3. Details of the Representation (Continued) (use separate sheet if necessary) 申述詳情(續)(如有需要,請另頁說明)		
Nature of and reasons for the representation 申述的性質及理由		
Subject matters^② 有關事項^②	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由
1. Paragraph 6.1 and 7.4 of Explanatory Statement 2. Annex A of the Notes of the Plan	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the attached letter.
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂? 如有的話, 請註明詳情。 Please refer to the attached letter.		

② 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 Amendments.
 請形容圖則內與申述相關的指定事項。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 fill "NA" for inapplicable 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

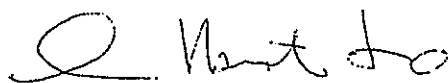
4. Plans, Drawings and Documents 圖則、繪圖及文件

Please list location plans, sites plans, other relevant plans, drawings and other documents submitted with the representation. For coloured drawings/plans or plans/drawings larger than A3 size, 90 copies each should be provided. For other supplementary documents, e.g. reports on impact assessment, 90 copies each should be submitted.

請列明連同申述一併遞交的位置圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有圖則/繪圖為彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

N/A

5. Signature 簽署

Signature
簽署

SO CHUN HIN, ALBERT

Name in Block Letters 姓名（以正楷填寫）

"Representer"/Authorized Agent*

「申述人」/獲授權代理人*

Managing Director

Position (if applicable) 職位（如適用）

Professional

Qualification(s) 專業資格

Member 會員 / Fellow 資深會員* of

☐ HKIP ☐ HKIA ☒ HKIS ☐ HKIE ☐ HKILA

Others 其他 FRICS, MRTPI

on behalf of
代表

ALBERT SO SURVEYORS LIMITED

Company/Organization Name and Chop (if applicable)

公司/機構名稱及蓋章（如適用）

Date
日期 22-October-2015

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this representation will be used by the Secretary of the Board and Government departments for the following purposes:

- (a) the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and
- (b) facilitating communication between the "representer" and the Secretary of the Board/Government departments in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.

委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：

- (a) 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及
- (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the "representer" in this representation may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

「申述人」就這宗申述提供的個人資料，或亦會向其他人士披露，以作上述第1段提及的用途。

3. A "representer" has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/E, North Point Government Offices, 333 Java Road, North Point, Hong Kong.

根據《個人資料（私隱）條例》（第486章）的規定，「申述人」有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道333號北角政府合署15樓。

* Delete as appropriate

Please fill "NA" for inapplicable item

「✓」 at the appropriate box

* 請刪去不適用者

請在不適用的項目填寫「不適用」

請在適當的方格內加上「✓」號

Parts 4 and 5 第4及第5部分

22nd October 2015

Secretary, Town Planning Board
15/F, North Point Government Offices,
333 Java Road,
North Point,
Hong Kong.

By Fax (2877 0245) and Email

Tung Chung Nim Yuen (東涌念園)
Representation on draft Tung Chung Valley
Development Permission Area Plan No. DPA/I-TCV/1 (the Plan)

Dear Sir/Madam,

We are the former registered land owner (Uni-Creation Investments Limited) and current manager (Tung Chung Nim Yuen Cultural Institution Limited) of Tung Chung Nim Yuen, a columbarium (the Columbarium) in operation at Lot Nos. 2754, 2755, 2756, 2757, 2758, 2760 & 2761 in D.D.1 Tung Chung (the Lots).

The Columbarium has started operation in May 2015, before the gazette of the Plan. A letter has been sent to the Development Bureau (Annex A) on 6th May 2015 for inclusion in Part A of the Information on Private Columbaria. On 29th June 2015 and 21st August 2015, officers of Planning Department have visited the Lots. They have recorded the number of niches and taken photographs of the Columbarium.

In paragraph 7.4 (a) of the explanatory statement of the Plan, it states that 'conversion of New Territories Exempted Houses into columbarium are found in the Area resulting in adverse impact on the ecology, natural environment and rural character of the Area...' However, we cannot find any evidence or expert reports to support the above statement.

In fact, the rural characteristics of the area are appropriate for columbarium use. It would not diminish the rural characteristics as the Columbarium would not be used as commercial or high-rise development. Furthermore, although there is no reference to Nim Yuen in the explanatory statement, we wish to point out that our Columbarium is accommodated in redeveloped old schedule house lots and therefore not developed on a

green field site. The land in front of the Columbarium is private agricultural land and will soon be developed into a garden. There should be no adverse impact on the ecology, natural environment and rural character of the Area.

On the historical and current land use of the area, there were and are quite a number of graves, burial grounds and "kam taps" as well as very old religious institutions including the Hau Wong Temple and Lo Hon Monastery mentioned in paragraph 5.3 of the explanatory statement. The Lo Hon Monastery also has a columbarium and is in Part A of the Private Columbaria List. Tung Chung Nim Yuen therefore is entirely compatible with the land use of the area. The Town Planning Board should take those existing uses and conditions of the area into account and amend and include the said uses in the draft Plan so that the Plan can accommodate and be consistent with the existing uses in the area. In the circumstances, we propose that the Town Planning Board to include columbarium use in Annex A as "Use always permitted".

Recently Government has, against our objection and legal representation, taken re-entry action against the Lots resulting in legal ownership of the Lots being temporarily removed from us. However, we have initiated legal actions against such unlawful re-entry. Up to now, the Columbarium is still in our physical possession and management pending a Court hearing on our case. In the event that the Court agrees with our legal representation, our ownership will be reinstated and Government's re-entry action will be unlawful. In view of the above circumstances, we consider that there has not been a material change of use under Notes (3) of the Plan.

We also wish to point out that Tung Chung Nim Yuen is not indicated on the Plan. In the latest survey sheet (**Annex B**) issued by DLO/Islands dated 9th June 2015, the Columbarium is already shown there. Grateful if you could update your Plan accordingly.

Meanwhile, we reserve our rights to submit further representations in the future if necessary.

Yours faithfully,
For and on behalf of
UNI-CREATION INVESTMENTS
LIMITED

For and on behalf of
UNI-CREATION INVESTMENTS LIMITED
建世投資有限公司

alban cheng

.....
Authorized Signature(s)

Yours faithfully,
For and on behalf of
TUNG CHUNG NIM YUEN
CULTURAL INSTITUTION LIMITED

For and on behalf of
TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
東涌念園文化機構有限公司

[Signature]

.....
Authorized Signature(s)



(Est. 1995)

ALBERT SO SURVEYORS LTD.

Our Ref. : AS017/13/Col/12

6th May 2015

Development Bureau
17/F., West Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar,
Hong Kong

By fax (2868 4530) and post

Dear Sir/Madam,

東涌念園

Inclusion in Part A: Private Columbaria
Lot Nos. 2754, 2755, 2756, 2757, 2758, 2760 & 2761
in D.D. 1 Tung Chung (the Lots)
Tung Chung, Lantau Island

We are appointed by Uni-Creation Investments Limited, the registered land owner of the Lots, as the Land Consultant to handle the captioned case.

The above columbarium (the columbarium) consists of 8 NT exempt houses situated at the Lots. These 8 houses are completed at the beginning of this year and now occupied for the above use. DLO/Islands has been informed of their completion. Details of the columbarium are as follows:

Name of Columbarium : Tung Chung Nim Yuen (東涌念園)

Location: Lot Nos. 2754, 2755, 2756, 2757, 2758, 2760 & 2761 in D.D.1 at Nim Yuen,
Tung Chung, Lantau Island

Land Owner: Uni-Creation Investments Limited

Columbarium Operator: Tung Chung Nim Yuen Cultural Institution Limited

It is understood from the information published by your office that for inclusion in Part A: Private Columbaria, the criteria are compliance with the land leases and statutory town planning requirements, and not illegally occupying Government land. The columbarium fully fulfills all these three criteria as explained below.

Firstly, the above lots are old schedule house lots held under Block Government Lease and Certificates of Exemption have been issued by DLO/Island to allow their



ALBERT SO SURVEYORS LTD.

construction. There is no user restriction for the completed buildings under the Block Government Lease.

Secondly, the columbarium is currently not covered by any statutory town plan. Therefore there is no contravention of any town planning requirements, same situation as the Lo Hon Monastery at Shek Mun Kap which is also in Part A.

Thirdly, all eight houses are built within their respective lot boundaries certified by a Registered Land Surveyor and there is no encroachment on Government land.

As the columbarium fulfills all criteria for inclusion of Part A: Private Columbaria, our clients request that the columbarium 東涌念園 be included in the said Part A accordingly. We attach herewith the following information.

1. Land Searches and Block Government Lease of the Lots (Annex A)
2. Outline Zoning Plan (Annex B)
3. A master location Plan of the eight houses (Annex C)
4. Approval letters for Site Formation Works issued by Buildings Department. (Annex D)
5. Certificates of Exemption issued by District Lands Office/Islands (Annex E)
6. Certificate of Incorporation of the land owner and operator of the columbarium (Annex F)
7. Copies of duly completed and signed Form CE/4 and The Sewage Disposal System Completion Report of the eight houses (Annex G)
8. Setting out Plans prepared by a Registered Land Surveyor (Annex H)
9. Clients' Authorization Letter (Annex I)

Grateful if you could include the above columbarium 東涌念園 in Part A: Private Columbaria for the information of the public.

Should you require further information, would you please contact the undersigned at 2882 3183.



ALBERT SO SURVEYORS LTD.

Yours faithfully,
For and on behalf of
ALBERT SO SURVEYORS LTD.

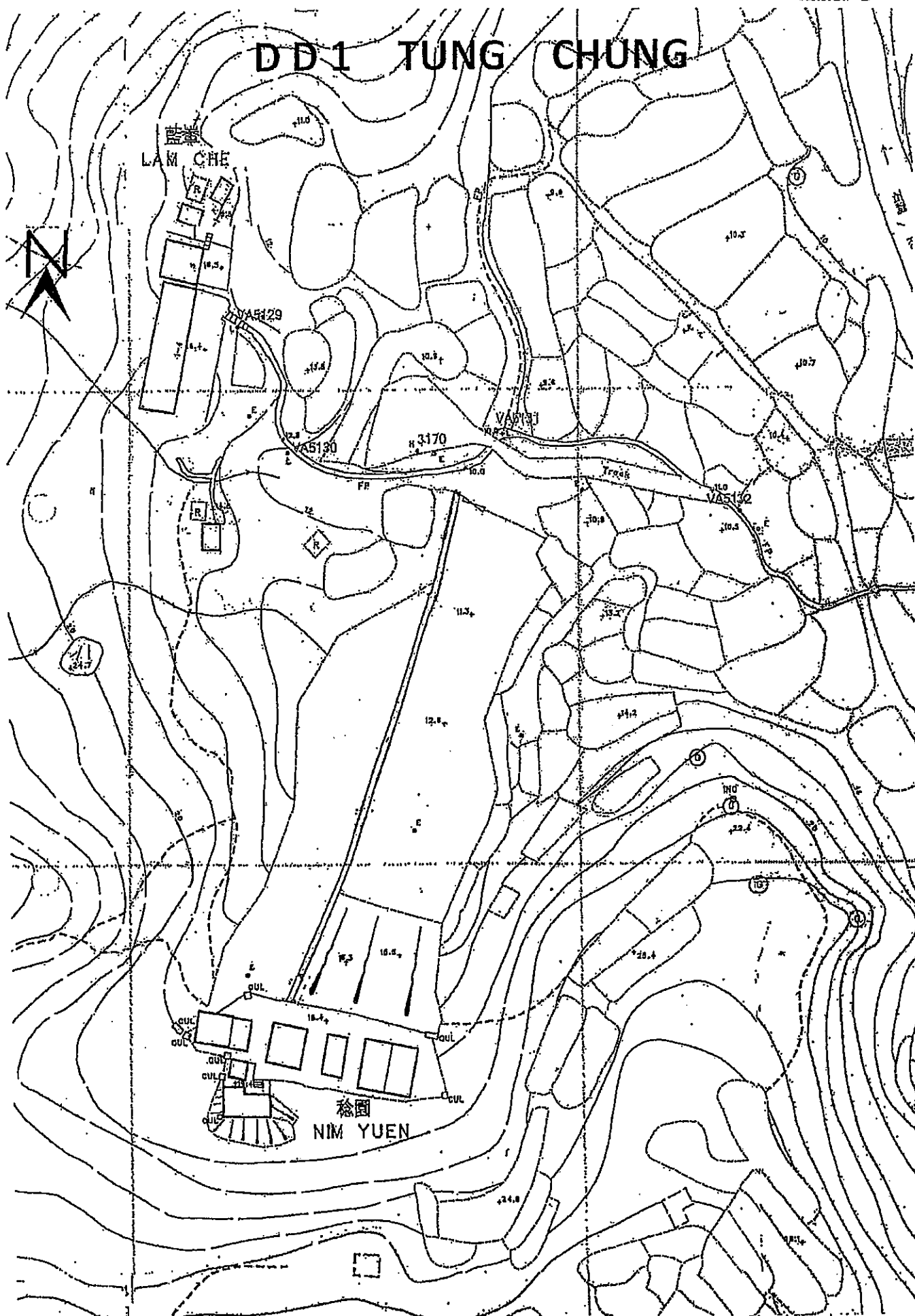
A handwritten signature in cursive script, appearing to read 'Albert So'.

Albert So
Managing Director

Encl.
c.c. Client
Planning Department
District Land Office, Islands

AS/ds
\\Dickson\2013\15039\13\Col\12

DD 1 TUNG CHUNG





Your Ref.: TPB/R/OZP/I-TCV/1

Our Ref.: UCH/08032016/TC

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

By Fax and Hand

8 March 2016

Dear Sir,

**Representation on Draft Tung Chung Valley
Outline Zoning Plan No. S/I-TCV/1**

We are the landowner of Lot Nos. 1868, 1872 and 1874 in D.D. 1 Tung Chung, Lantau Island, which location fall within Area 67, the R (C) 2 zone (Low Density Residential Development) as shown on the captioned Outline Zoning Plan (OZP). The location of this area is at a quiet corner of the Tung Chung Valley and at the end of a village road (enclosed extract of the OZP refers).

In view of the population of elderly people in the territory is soaring and care and support services for them are mostly inadequate, we would be grateful if you would consider to change the zoning of Area 67 from R (C) 2 to "Institution or Community" use. Such a rezoning would encourage participation in the development of community care and support services for the elderly, including:

- Elderly Community Centre
- Social Centre for the Elderly
- Day Care Centre
- Nursing Home
- Home for the Aged, etc.

031

香港新界荃灣海濱路11號One MidTown19樓1901-2室
Unit 1901-2, 19/F, One MidTown, 11 Hoi Shing Road, Tsuen Wan, N.T., HK.
Tel: (852) 2154 6788 Fax: (852) 2154 6799




建世控股有限公司
UNI-CREATION Holdings Limited

As set out in the Explanatory Statement attached to the abovementioned OZP, the needs of the community should also be accommodated through thoughtful town planning strategies. Hence, we firmly believe that landowners of the lots within Area 67 and the local community share the same expectation for enhanced development of community care and support services for the elderly in the territory

Yours faithfully,
For and on behalf of
Uni - Creation Holdings Ltd.

For and on behalf of
UNI-CREATION HOLDINGS LIMITED
建世控股有限公司


.....
Authorized Signature(s)

Authorised Signatory

Encl.

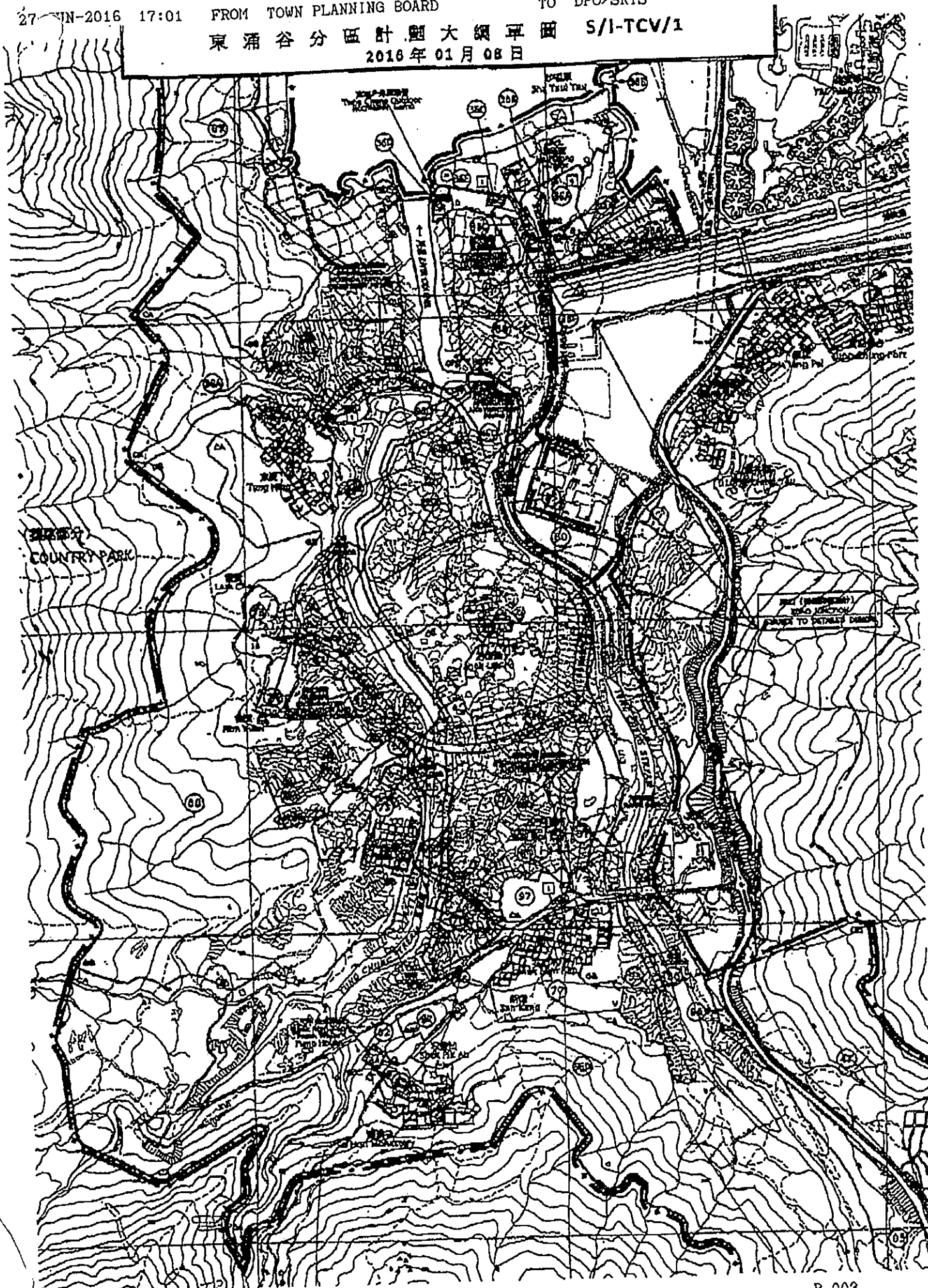
香港新界荃灣海濱路11號 One MidTown 19樓 1901-2室
Unit 1901-2, 19/F, One MidTown, 11 Hoi Shing Road, Tsuen Wan, N.T., HK.
Tel: (852) 2154 6788 Fax: (852) 2154 6799

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27-JUN-2016 17:03

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P.002



08-MAR-2016 13:26

+ 852 2522 8426

96%

96%

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 TOTAL P.003
 P.003

Partner Solicitor

Alan P.W. Ho **
何伯華律師 B.A., LL.B
(Hons)

Farah F.C. Poon
潘鳳芝律師 B.A. (Hons),
J.D. (C.U.)

** Civil Celebrant of
Marriages
婚姻監禮人

ALAN HO & CO.,
Solicitors
何伯華律師行

YAU MA TEI BRANCH

Rooms 1002-3, 10th Floor, Kowloon Building,
555 Nathan Road, Kowloon.
九龍油麻地彌敦道 555 號九龍行 10 樓 1002-3 室
Tel: 2345 3388 Fax: 2907 1616

Consultant

Cheng Tze Kui
鄭子駒律師 LLB (Hons)
Chung Sze Yuen**
鍾思遠律師 M.B.A., LLB
(Hons), M.A., LL.M., ACIS
Chan Yuk Ying
陳玉英律師
Cheung Yick Hung**
張翼雄律師
Ng Kam Cheung**
吳錦祥律師

Our Ref. : KC/24388/16/MISC/YMT
Your Ref. : S/I-TCV/1

Date : 8th March 2016
Please reply to : Mr. K. Chan - Ext: 110

Planning Department / *The Secretary*
Town Planning Board
15th Floor, North Point Government Offices
No. 333 Java Road, North Point,
Hong Kong

URGENT**BY FAX (2877 0245) & BY HAND**

Dear Sirs,

Re: Draft Tung Chung Valley
Outline Zoning Plan No. S/I-TCV/1 ("the Plan")



We act for Vast Pine Limited, a registered owner of Lot Nos. 2902, 2903, 2904, 2905, 2906 and 2908 all in Demarcation District 1 (collectively called "the Lands").

After perusal of the Plan, we discover the Plan is propose zoning/vary the Lands purpose under a Village Type Development. We are instructed by our client that the Lands are fall within the boundaries under the Plan and propose to vary the zoning area of the Lands to the effect that the Lands be classified as "Village Type Development" area, we take the view that our client has substantive position to make representation of indicating their objection to the Plan development as it may affect our client's beneficial interest on the Lands.

We are further instructed by our client to make an objection by the following reasons:-

1. Our client owned the Lands are not intended to develop and/or to build any structural, residential Property and/or any permitted use/ may be permitted use categories under a class of Village type Development on the Lands;
2. The Lands is currently use for a purpose of sincerity park and columbarium was built for more than decades; no residential building is/are within the Lands;
3. To protect and conserve the buildings built on the Lands; and

029

In association with Messrs. Daniel K.C. Ng & Co., Solicitors

Sheung Shui Office : Room 1323A, 13th Floor, Landmark North, 39 Lung Sun Avenue, Sheung Shui, New Territories.
上水辦事處 : 新界上水龍環路 39 號上水廣場 13 樓 1323A 室
Tsim Sha Tsui Office : Room 807, 8th Floor, Wing On Plaza, No. 62 Mody Road, Tsim Sha Tsui, Kowloon
尖沙咀辦事處 : 九龍尖沙咀麼地道 62 號永安廣場 8 樓 7 室
Tsuen Wan Office : Room 821, 8th Floor, Nan Fung Centre, 264-269 Castle Peak Road, Tsuen Wan, New Territories.
荃灣辦事處 : 新界荃灣青山公路 264-269 號南豐中心 8 樓 821 室

Tel : 2639 9798 Fax : 2639 2730
電話: 2639 9798 傳真: 2639 2730
Tel : 2317 8881 Fax : 2317 6622
電話: 2317 8881 傳真: 2317 6622
Tel : 2562 0001 Fax : 2562 0003
電話: 2562 0001 傳真: 2562 0003

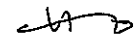
4. The Plan may cause many animals and habitats face increasing threats surrounding the area.

Should your Department would consider our client's reason for objection, we are instructed that our client is capable and willing to provide more evidences and reasons for supporting the above allegation. Further, we are also hereby reserve our client's right to raise further objection reason and proposal of zoning over the Lands in due cause.

In these circumstance, should your Department think fit of further action for submitting an objection reason, kindly enlighten us the proceeding and contact our Mr. K. Chan at 2345 3388 at your earliest convenience.

All of our client's rights on this matter are hereby be reserved.

Yours Faithfully,



Alan Ho & Co.,

AH/kc

c.c. Lands Department (by fax (2850 5104) only)

Ref: (13) in L DLO/IS 18/LMLC/2007 Pt.3

MASTERPLAN LIMITED

Planning and Development Advisors

領賢規劃顧問有限公司

TPB/R/S/I-TCV/1-10

7 March 2016
Our Ref. MP/TCV/2

RECEIVED

By Hand

2016 MAR -7 P 2:32

The Secretary,
Town Planning Board
15/F, North Point Government Offices,
333 Java Road,
North Point.

TOWN PLANNING BOARD

Dear Sir,

**Representation under Section 6 of the Town Planning Ordinance
Draft Tung Chung Valley Outline Zoning Plan
Number S/I-TCV/1**

We are authorised by Forestside Limited to submit this representation which relates to the Draft Tung Chung Valley Outline Zoning (OZP) No. S/I-TCV/1.

This submission is intended to provide planning inputs to contribute to the good planning and design of the Tung Chung Valley which will be served by a railway terminus station. Transport Oriented Development concept has been demonstrated very successful in Hong Kong and overseas should be adopted for the planning of the area.

Huge investment in infrastructure is needed for the engineering works for the development of Tung Chung Valley. While the preservation of heritage and conservation of the natural environment are respected, a reasonable level of development should be pursued, and optimal production of flats achieved.

An ecological survey has been undertaken; the proposals put forwarded in this representation have been carefully considered to balance the good planning practice of benefiting more people in terms of increasing accessibility to public transport and community facilities and conservation concerns. In this representation, more land within 500m from the future railway terminus is identified for development.

Enclosed with this letter are an authorisation letter from the Representor and 90 copies of Planning Statement which provides more details of this representation.

Yours faithfully,



I. T. Brownlee,
For and on behalf of
Masterplan Limited

Cc Client

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**Representation in Relation to
Draft Tung Chung Valley Outline Zoning Plan
Number S/I-TCV/1**

Forestside Limited

March 2016

**Representation in Relation to
Draft Tung Chung Valley Outline Zoning Plan
Number S/I-TCV/I**

Executive Summary

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Appendix A: Ecological Survey and Assessment Report

CONSULTANTS

AEC Limited

Masterplan Limited

Executive Summary

- S.1. This representation is submitted in relation to the Draft Tung Chung Valley (TCV) Outline Zoning Plan (OZP) No. S/I-TCV/1. This submission is intended to provide planning inputs to contribute to the good planning and design of the Tung Chung Valley.
- S.2. This representation proposes a minor change to rationalise OZP boundary to follow private lot boundary and to include the mangrove area so that the coastal land is under protection by appropriate planning controls. It also proposes to adopt the TOD planning concept by slightly increasing the development land area within 500m from the future railway station.
- S.3. Huge investment in infrastructure is needed for the engineering works for the development of TCV. While the preservation of heritage and conservation of the natural environment are respected, a reasonable level of development should be pursued.
- S.4. An ecological survey has been undertaken, the proposals put forwarded in this representation have been carefully considered to balance the good planning practice of benefiting more people in terms of increasing accessibility to public transport and community facilities, while observing conservation concerns.
- S.5. This representation proposes to enlarge the G/IC sites at Sha Tsui Tau. This would help create a community focal point for the Tung Chung Valley community. The new G/IC site is proposed with two Non-building areas to preserve the view of Hau Wong Temple and better protect the mangrove area. A consistent approach of including "Flat" as a Column 2 use of the G/IC zones as in the other two Tung Chung OZPs should be adopted. This will provide more land use flexibility, but the ultimate control is still with the TPB.
- S.6. This representation also proposes to relocate a stormwater attenuation and treatment pond to free the land for residential development. This is in line with government policy to increase land supply for housing. Putting the pond underneath an open space site which lies adjacent to the River Park is considered feasible. This is a sensible way to optimise the use of valuable land.

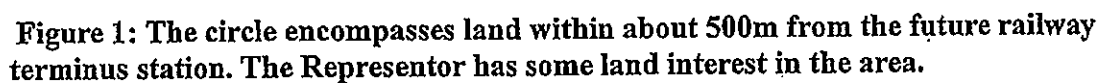
行政摘要

- 一、 本申述書是關於東涌谷分區計劃大綱草圖編號 S/I-TCV/1。它的目的是提供規劃觀點及意見以促進東涌谷的規劃和設計。
- 二、 這申述書提出一個小的改動，以糾正大綱圖的邊界，使其遵循私人地段的邊界及涵蓋紅樹林區域，令沿海土地得到適當的規劃限制的保護。它還建議採用交通導向規劃理念，輕微增加未來的火車站 500 米之內的開發用地。
- 三、 東涌谷的發展工程需要巨額基礎設施的投資。在尊重文化遺產和保護自然環境的情況下，應該追求一個合理的發展水平。
- 四、 申述人已進行生態調查，這申述書提出的建議的規劃方案都是經過精心考慮，在使更多人得到方便的公共交通和社區服務以及保育自然環境兩方面，取得平衡。
- 五、 這申述書建議擴大在沙咀頭的「政府、機構或社區」(G / IC) 地盤，將有助於創造東涌谷一個社區焦點。而 G/ IC 用地內包含了兩個非建築用地，以尊重及保護侯王古廟的視野，並更好地保護紅樹林區域。東涌另外兩幅大綱圖的 G / IC 用地將「樓宇」置於第 2 欄用途，東涌谷的大綱圖應採納一致的做法。這將提供更多利用土地的靈活性，但城規會仍有最終控制權。
- 六、 申述書建議釋放一個雨水滯留和處理池作住宅用地，這符合政府政策以增加對住房的土地供應。把該池置於毗鄰河公園的休憩用地之下是可行的。這是優化利用寶貴土地明智的方法。

1 Introduction

1.2 This representation is made under Section 6 of the Town Planning Ordinance.

2.1 This representation is lodged on behalf of Forestside Limited (the Representer). This Representation objects to the land uses proposed to some sites within 500m from the future railway station. **Figure 1** which shows the land within about 500m from the future railway station. Some of the land parcels within the circle are owned by the Representer.



3 Representation Sites

- 3.1 Two Representation Sites covering part of the Representor's land and within 500m from the future terminus are identified suitable for development. They are shown in **Figure 2**. Site A is located in Sha Tsui Tau and is presently covered by Government/Institution/Community (G/IC), Open Space ("O") and Coastal Protection Area (CPA) zones. Site B is located near the junction of Chung Yat Road and Chung Mun Road. It is covered by CPA and OU (Stormwater Attenuation and Treatment Ponds) zones.

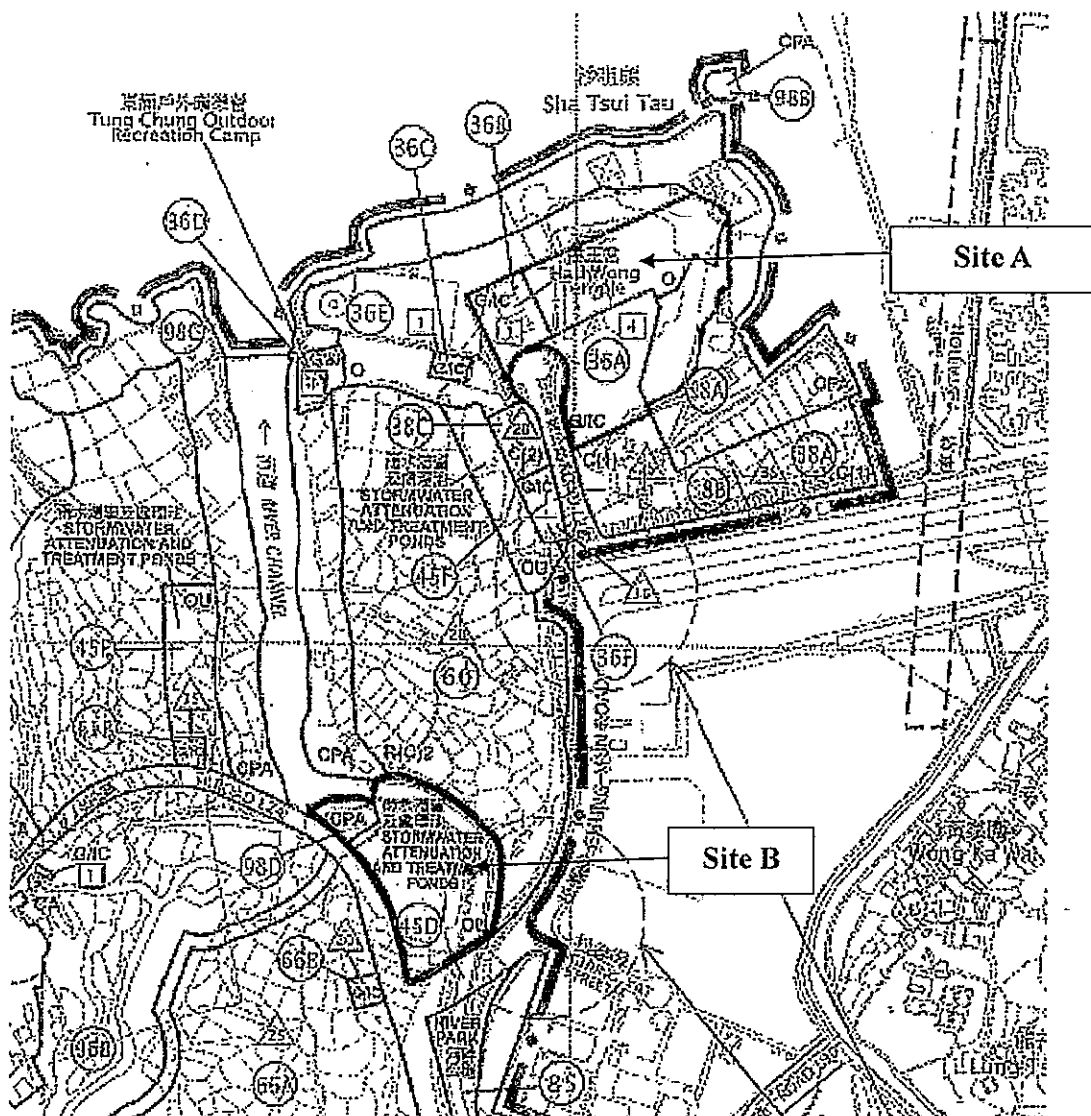


Figure 2: The Representation Sites, Site A and Site B (in red) shown on the Tung Chung Valley OZP No. S/I-TCV/1

4 Background

Planning Area of Tung Chung Valley Outline Zoning Plan

- 4.1 The TCV OZP is a newly gazetted statutory land use zoning plan. Its Planning Area covers Tung Chung Valley which lies to the west of Yat Tung Estate, stretching from the seafront southwards uphill beyond Shek Mun Kep. The same Planning Area was covered by a Development Permission Area Plan (DPA Plan) which has ceased to be effective on gazettal of the TCV OZP, except for the provisions related to the existing use and unauthorised development.

Tung Chung New Town Extension Study

- 4.1 In early 2012, the government commissioned the Tung Chung New Town Extension Study (TC Study). It is a planning and engineering study which covers a substantial part of the area of the DPA Plan. The TC Study covers two major areas, namely Tung Chung East (TCE) and Tung Chung West (TCW). The Study was completed in December 2015.

- 4.3 On 8 January 2016, the Town Planning Board (TPB) gazetted three OZPs related to Tung Chung:

- 1) draft Tung Chung Extension Area OZP No. S/I-TCE/1 (TCE OZP);
- 2) draft Tung Chung Town Centre Area OZP No. S/I-TCTC/21 (TCTC OZP); and
- 3) draft Tung Chung Valley OZP No. S/I-TCV/1

The recommendations for TCW under the TC Study are incorporated into the latter two OZPs.

5 Government Housing Policies

5.1 Recent Policy Addresses

- 5.1.1 The 2013 Policy Address has put forward various measures to increase supply of land for housing. There has been substantial coverage on the same topic in Policy Addresses of the following years. Some of the measures are as follows:
- rezoning Government, Institution or Community (G/IC) sites for housing development;
 - rezoning Green Belt areas which are devegetated, deserted or formed to residential use;
 - reviewing industrial land to residential use;
 - increase the development density of unleased or unallocated residential sites;
 - convert the land for housing development or other uses where the original intended use is no longer required
 - a general increase of the maximum domestic plot ratio currently permitted for the other "density zones" in the territory by around 20% as appropriate, except for the north of Hong Kong Island and Kowloon Peninsula, which are more densely populated.
 - investigate development at quarry sites;
 - housing provision from planning and engineering studies, including Hung Shui Kiu New Development Area (about 60,000 units), Fanling North and Kwu Tung North New Development Area (about 60,000 units), and Tung Chung Extension (about 48,000 units); and
 - housing provision from urban renewal as well as planning and engineering studies being undertaking in other parts of the New Territories.

5.1.2 Despite the 2016 Policy Address being announced at the time when the housing market started to fall, it reiterates the Government's courage and determination to tackle the housing issue. The document has a substantial coverage to report the progress or achievements of the different ways of increasing housing supply put forward in the past few years. It also names a number of additional measures to increase the supply of land, such as a review of the land uses of Tseung Kwan O Area 137, cavern development, underground space development and reclamation outside the Victoria Harbour. In addition, it mentions further development of North shore of Lantau as well as the possibility of developing a metropolis at East Lantau by constructing an artificial island near Kau Yi Chau. The metropolis is targeted to have a population of 400,000 to 700,000.

5.1.3 The above Policy Addresses have demonstrated the lack of land in the territory and the government's commitment to tackle the acute housing issue. They have set the clear direction and ways for multi-pronged approaches to increase housing/land supply.

5.2 Long Term Housing Strategy

5.2.1 The Long Term Housing Strategy (LTHS), issued in December 2014, identifies an annual housing supply target of 48,000 units for the coming 10 years.

5.2.2 As stated by the Secretary for Transport and Housing (Secretary for THB) in the Forward of the LTHS, "setting a production target is the easier part" and "delivering the target requires the adequate and timely supply of land". It is clear that the LTHS Committee understands the challenge of meeting the target. The Secretary for THB also states that "if we lack the determination to accept a trade-off between housing development and keeping lands untouched, then we are doomed to be failure".

5.2.3 It is clear that land is extremely limited and valuable, so land identified for development should be well utilized by appropriate zoning and development restrictions which optimise the potential development.

6 Planning Principles and Practices

6.1 General Planning Principles for Tung Chung West/Tung Chung Valley

6.1.1 In the planning of the Tung Chung West/ Tung Chung Valley, a number of planning principles should be adhered to:

1. adopt appropriate plot ratio restrictions to avoid under-utilization of land
2. make the best of Hong Kong's proven record of successful high density Transport Orientated Development (TOD); and
3. achieve a balanced social mix: the proportion of private units produced should be increased to balance the large number of public flats in Yat Tung Estate and Area 39.

6.2 Appropriate Development Density

6.2.1 Land is a very valuable resource in Hong Kong. To enable development on a planning area, huge investment on various types of infrastructure is required. As such the serviced land should be properly utilized for development. Development sites should be suitably identified and permitted an appropriate development density.

- 6.2.2 Tung Chung Valley will be served by MTR through the construction of the new Tung Chung West terminus station. The area will no longer be a remote rural area, but an urban area. The development densities should therefore be set to reflect this.

6.3 Transport Orientated Development

- 6.3.1 TOD is a prevailing international design concept which has been successfully adopted in Hong Kong. It promotes high density development within about 500m from major public transport nodes to enable a higher level of accessibility and convenience be provided to more people. Hong Kong has a proven record of achieving internationally recognised TOD around many MTR stations, where intense development is built above and around the stations.
- 6.3.2 Very often, TOD helps create a focal point or activity node to provide vitality, vibrancy and diversity to an area. This will help create character and identity for the community.

REASONS FOR REPRESENTATION

7 Tung Chung New Town Extension Study (TC Study)

The formulation of the TCV OZP is based on the findings of the TC Study. However, it is noted that there are a number of deficiencies of the study which lead to the undesirable features of the OZP. These are elaborated below.

7.1 Arbitrary OZP boundary

- 7.1.1 The boundary of the Draft OZP does not follow the coastline at Sha Tsui Tau and some coastal area is not included. This will lead to the area not being protected by proper planning controls. Figures 3 and 4 provide a comparison of aerial photo and TCV OZP, both showing the estuary of Tung Chung River. There is a Mangrove colony in the indented area not covered by the OZP. Some of the area is under private ownership. From land administration, ecological protection and planning points of views, the private land and the mangrove area should be included within the OZP boundary.

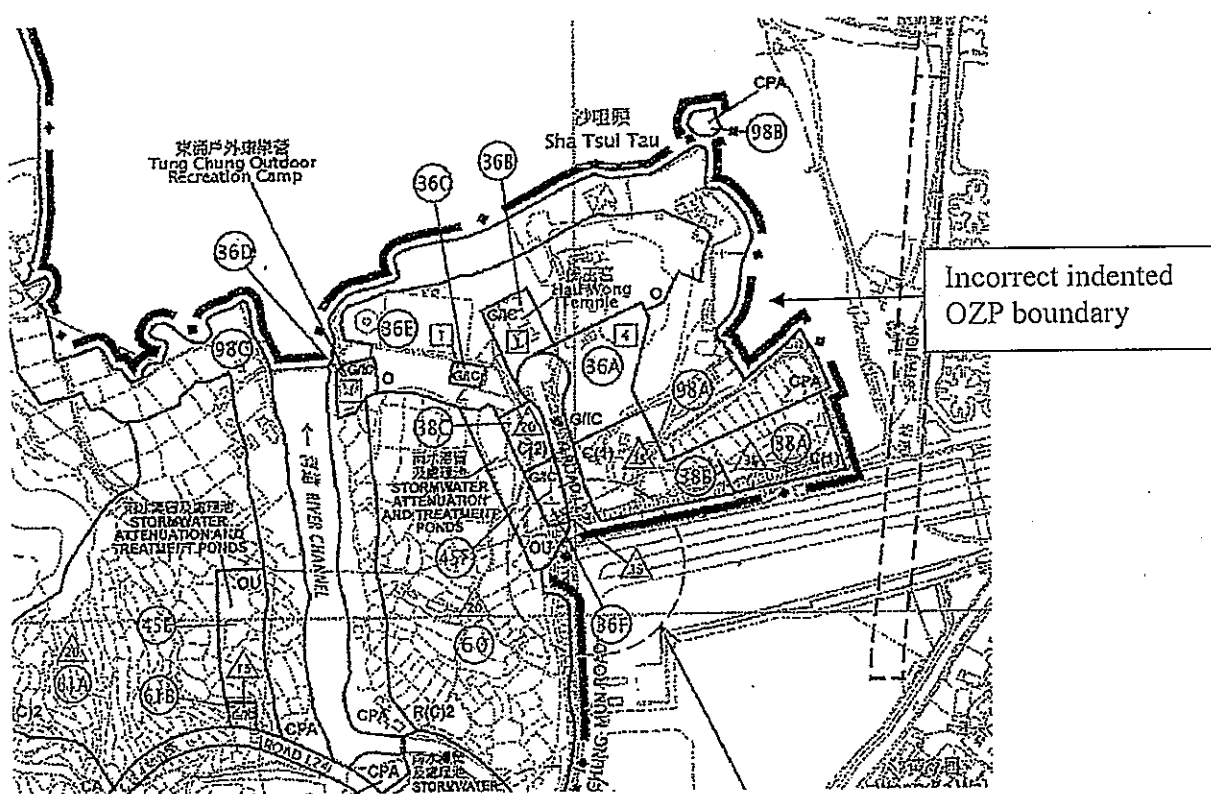
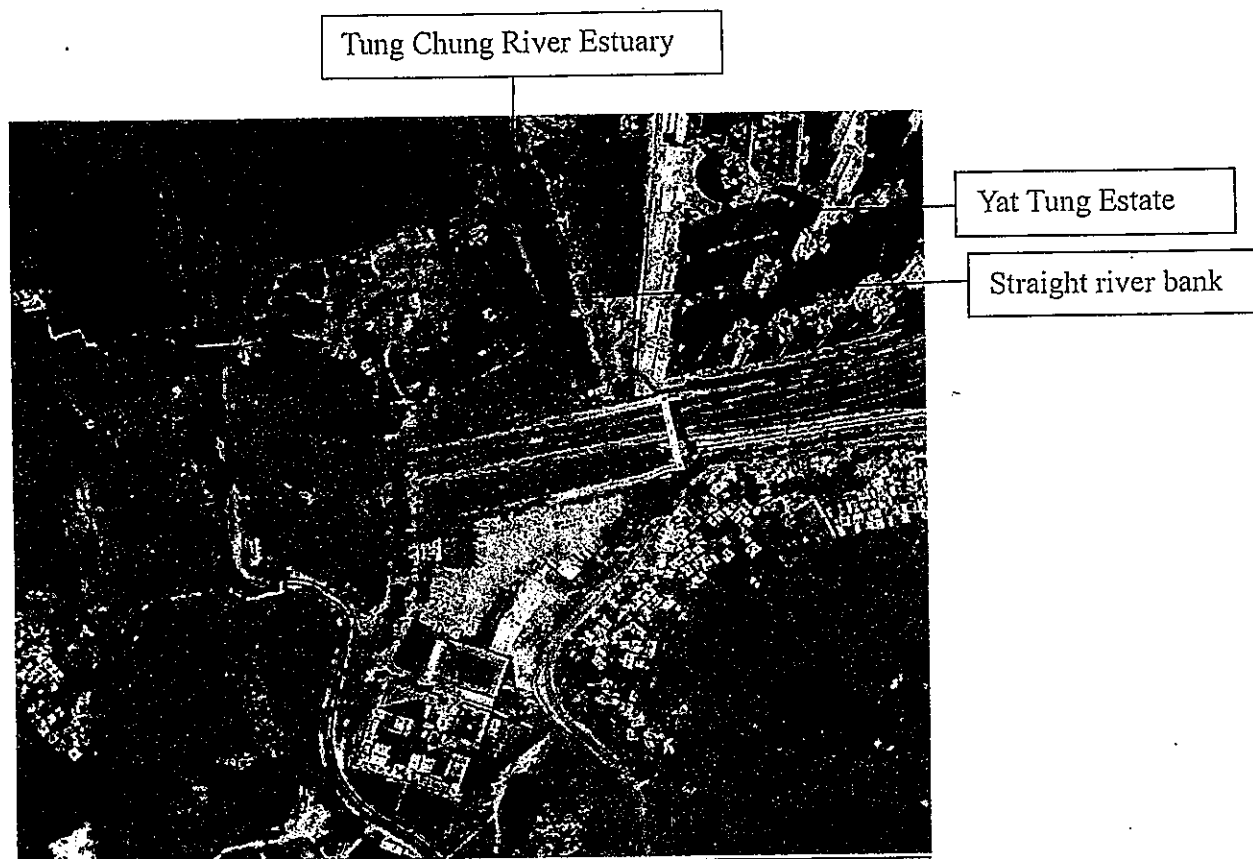


Figure 4: An incorrect indentation on the western bank of estuary of Tung Chung River (Extracts of TCV OZP)

7.2 Development Densities too Low

- 7.2.1 The development densities proposed for housing sites are generally too low. The plot ratio (PR) of all the housing sites now covered by the TCV OZP are either 1 or 1.5. Two other sites proposed in the TC Study are now covered by the TCTC OZP, and are plot ratio 6.4 (Area 42) and 5.4 (Area 46).
- 7.2.2 According to the Island District Council Paper No. 74/2015 (IDC Paper), prepared in September 2015, which reports on the progress of the TC Study, the total flat production of TCE and TCW is 49,400, only slightly higher than the annual supply of 48,000 set by the LTHS. The TC Study took four years to complete. The study process is long; the implementation will be even longer. However, the flat production is so low.
- 7.2.3 The Government is making every effort to find land for housing development as stated in Paras 5.1 and 5.2 above, yet the above development densities are generally very low, especially when TCW will be served by a terminus railway station. This low density of development is under-utilization of scarce land resources which will be serviced by all relevant services and transport infrastructure.

7.3 Transport Oriented Development Not Followed

- 7.3.1 The Tung Chung Line will be extended with the terminus station located to the west of Yat Tung Estate and in the vicinity of Yu Tung Road. No doubt, this station will provide much convenience to the existing and future residents of Yat Tung Estate, Area 39 and those residents of Tung Chung West. However, under the TC Study, most of the highest density TCW development sites are located in the far south of the planning area which are more than 500m away from the station. Please see Figure 1 for the 500m catchment of the proposed railway station. Land close to the station is of very low population density or no residential development at all. As such, the TCW is planned in a way that most of the future population will be deprived of easy access to the convenient public mass transit facility.
- 7.3.2 Para 7.11 of the Explanatory Statement attached to the TCV OZP states that
- "To capitalize on the enhanced accessibility to mass public transport, the sites near the proposed railway station and along Tung Chung Road will have higher PRs which are in line with the TOD concept"*
- 7.3.3 Firstly, the two representation sites shown in Figure 2 are located within 500m from the future railway station. Part of Site A is for G/IC use and the rest is non-development land use. Site B is for non-development land use. These violate the TOD concept. Secondly, the TOD concept relates to transport nodes rather than a road. As such, the above statement is an incorrect application of this planning principle.

7.4 Opportunity of Creating a Vibrant Focal Point for the Community not Seized

- 7.4.1 The proposed land use under the Study fails to adopt the TOD and high density development concept. Taking account of locational and site characteristics, it is considered that medium density development comprising residential and/or commercial development at the only undeveloped land to the west of the future terminus station will create a vibrant activity node that would contribute to the character for TCW.

7.5 Imbalance Housing Mix

- 7.5.1 The total flat production of TCW proposed under the TC Study is only 8,600 units, comprising 5,200 subsidized and 3,400 private ones. The public to private housing mix of the new flat production is about 60% to 40%. But these figures do not reflect the real future social situation of the western part of Tung Chung.
- 7.5.2 Even though the boundary of the OZPs has been demarcated so that Yat Tung Estate, Area 39, Area 42 and Area 46 are included in the TCTC OZP, there is no doubt that residents of these developments will use the terminus station instead of the present Tung Chung Station, upon completion of the new station.
- 7.5.3 From the socio-economic consideration, the TCW community would comprise residents of these four public housing estates and those of the private residential developments in TCV. The Executive Summary of TC Study estimates the public to private housing mix of the TCW area to be 87% to 13%.
- 7.5.4 The TC Study has not taken the opportunities to address the over-concentration of public housing due to the large Yat Tung Estate and committed public housing development at Area 39, but perpetuates it.

7.6 Disparity of Development Densities assigned to Public and Private Housing Sites

- 7.6.1 In TCW, it is noted that there is disparity of development densities assigned to public and private housing sites. The two public housing sites at Area 42 and Area 46 (on the new Tung Chung Town Centre (TCTC) OZP but located within the Tung Chung Valley) are proposed with PR of 6.4 and 5.4, respectively whereas those of private housing sites are either at 1 or 1.5. There is no reason provided to justify such disparity.

7.7 Undesirable Development Profile of Tung Chung West

- 7.7.1 The TC Study claims that the urban design concept of TCW is to adopt a stepped development profile. However, this will not be realized, instead an asymmetric built form will result. Located to the east of the boundary of TCV OZP (in the TCTC OZP) are three public housing sites from the north to south are Area 39, Area 42 and Area 46, their BHR are 130mPD, 130mPD and 140mPD, respectively. The housing sites covered by the TCVOZP are of BHRs from about 25mPD to 55mPD. The asymmetric built form is shown in **Figure 5**.

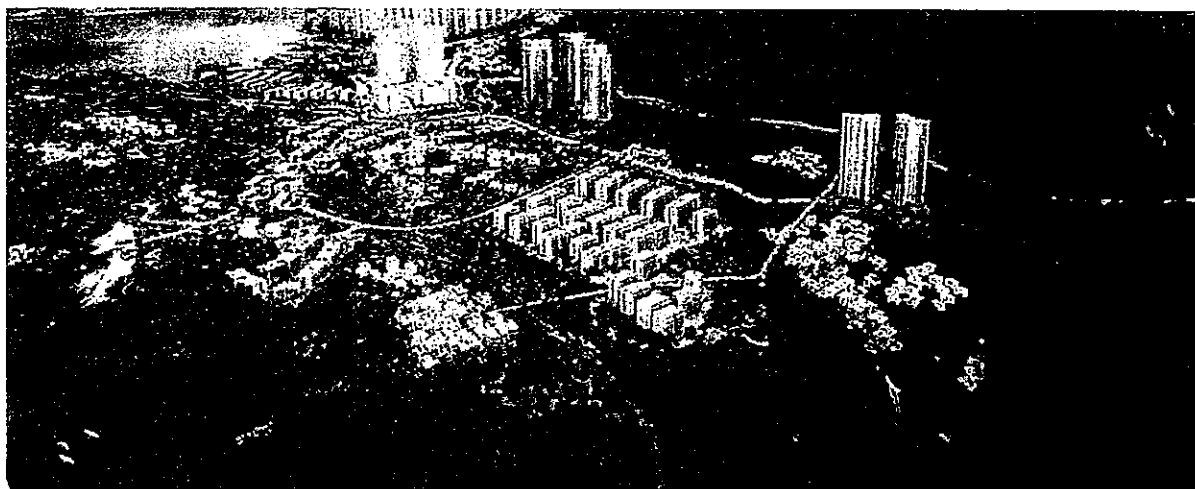


Figure 5: Asymmetric Development Profile: The foreground low rise development lies on the western part of the valley while high rise public housing development in Area 39, Area 42 and Area 46 are on the eastern side.

(Extracts of the Stage 3 Public Engagement Consultation Document of TC Study)

7.8 Good Planning Practices Ignored

- 7.8.1 Whether it is stepped height profile or asymmetric is not important, the key point is that good planning should provide convenience to the large number of people, such as to enable people to have higher accessibility to public transport and community facilities. Designating taller and higher density developments further away from the railway station fails to achieve the good planning practices.

7.9 Land Extensive Drainage System

- 7.9.1 The proposed drainage system with open attenuation and treatment ponds is very land extensive and has not been well justified. The system proposed only relates to the private development areas, and it will be expensive to install and operate. A complex system is proposed of drainage conveyance, diversion storage and pumping stations, yet achieves minimal, if any additional ecological value over the 'normal' approach to managing stormwater. It is noted that in the Environmental Impact Assessment Report the sites for 'Subsidised Housing' will be raised by 1m to 1.5m by "platform grading... in lieu of polder scheme to elevate both the land parcels above the 200-year flood level." The proposed Stream Buffer Zone and Riverside Park are positive measures which provide great scope for protecting the river and providing storage during flooding. Should additional flood storage be required, then it should be incorporated into attenuation tanks built under open space areas, to optimize residential development areas.

PROPOSALS TO MEET THE REPRESENTATION

8 Ecological Values of the Representation Sites and their Vicinity

- 8.1 An ecological survey has been undertaken for area around the Representor's land. With some buffer area, Representation Sites A and B (shown in Figure 2) were considered suitable for development.
- 8.2 Significant area of the CPA and "O" zones within Site A is *Lucaena leucocephala* woodland which is of Very Low Ecological Value. *Lucaena leucocephala* is an exotic and invasive woody tree species that has the potential to pose a long-term threat to natural habitats (by invasion) and poses a long-term maintenance liability (leaving aside its ecologically invasive nature), it is highly prone to typhoon damage, hence may present a hazard to adjacent public areas. It is sensible to extend the GIC zone to cover this area.
- 8.3 Site A has avoided the ecologically sensitive area with mangrove and mangrove mix vegetation. With some buffer for the ecologically sensitive area, the site is generally suitable for development.
- 8.4 Regarding Site B, the Tung Chung Stream passes through its eastern and northern sides. The rest of the site is an orchard and the fruit trees have little ecological value. With some buffer area from the river bank, the site is suitable for development.
- 8.5 A habitat map of Sha Tsui Tau is shown in Figure 6. It shows there is a large mangrove colony in the indented area not covered by OZP. Please refer to the full Ecological Survey and Assessment Report in Appendix A.

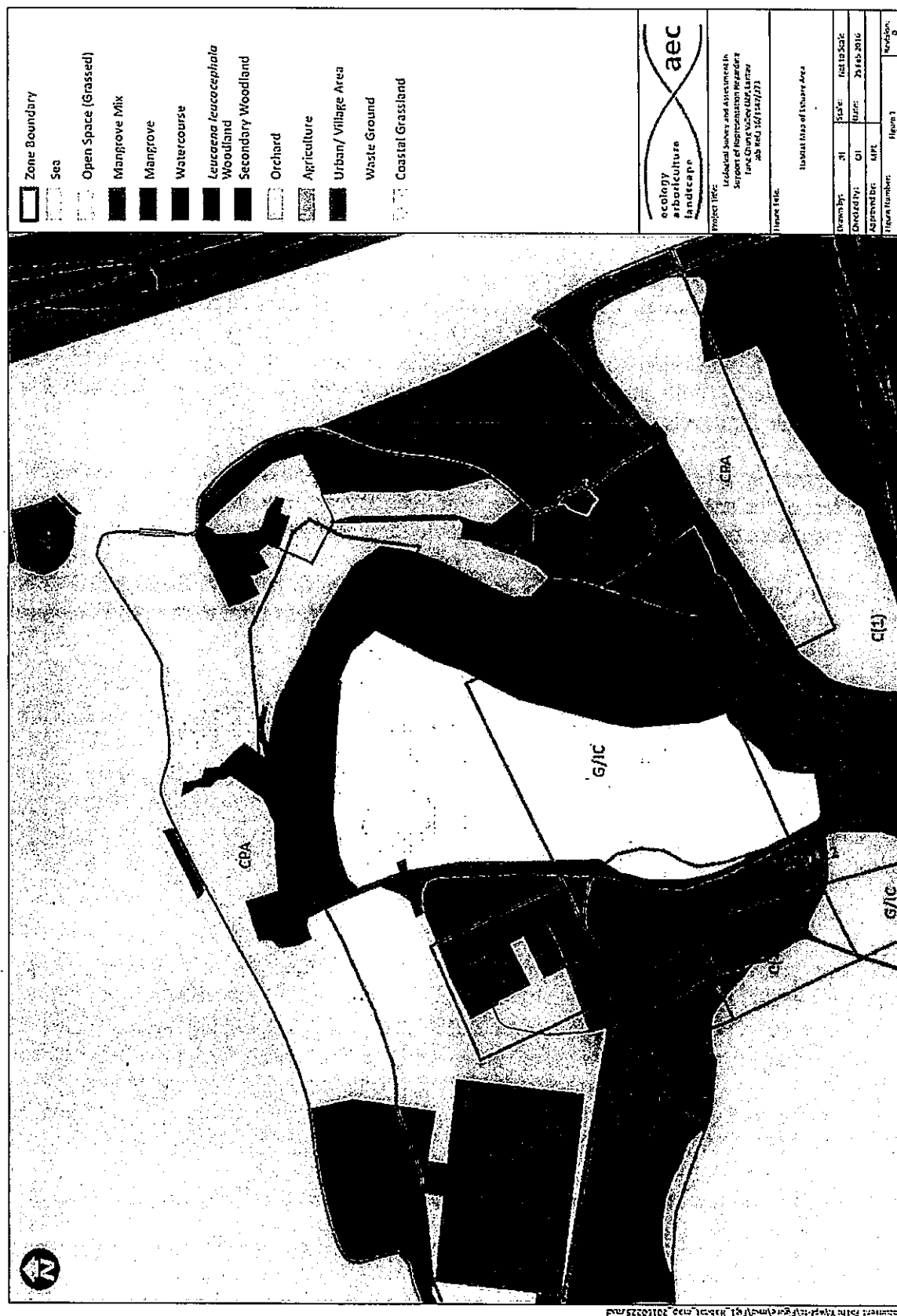


Figure 6: Habitat Map of Sha Tsui Tau

9 Realignment of OZP Boundary

- 9.1 The TCV OZP boundary is set in an awkward manner with some coastal land at Sha Tsui Tau not covered by the OZP. As no planning control is imposed on the land, the land can be used as a dumping ground thereby threatening the mangrove area and the river estuary. It is therefore proposed that OZP boundary be rectified to cover the private lot area which is densely covered by mangroves. Please see **Figure 7** for the proposed OZP boundary for the western bank of the Tung Chung Estuary.

10 Proposed G/IC Zoning for Site A

Proposed Changes to the G/IC Zone Boundary

- 10.1 It is proposed the G/IC zoning that covered part of Site A be extended to the whole site. That is to adjust the boundary of "O" and CPA land to G/IC to reflect the existing ecological condition of this area. To safeguard the scenic view from Hau Wong Temple towards Tung Chung Bay, a strip of land (about 10m in width), along the northern boundary of the proposed G/IC zone is designated as "Non-building area" (NBA).
- 10.2 Another NBA of width approximately 10m is also proposed to act as buffer to protect the mangrove/mangrove mix area and streamcourse from the future development on the G/IC site. Within this NBA the establishment of a shelterbelt of appropriate native tree and shrub species, forming an ecological and visual barrier between the developed area and the habitats in the CPA zone, should be required.
- 10.3 The enlarged G/IC zone will exclude the woodland of *Lucaena leucocephala* which is an exotic and invasive woody tree species that has the potential to pose a long-term threat to natural habitats and safety issue to adjacent public area from the CPA zone. This woodland is also considered of low ecological value and suitable for development. The proposed NBA adjacent to the CPA zone in fact will better protect the coastal area. **Figure 7** shows the proposed new zoning boundary for Site A and the NBAs on the OZP with the new boundary.

Proposed Changes to the Notes of G/IC Zone

- 10.4 It is proposed that "Flat" be added to the Column 2 use of the G/IC zone. Such addition is consistent with the Notes of the other two Tung Chung OZPs. "Flat" is a Column 2 use of G/IC zone in the TCTC OZP. For the TCE OZP, "flat (government staff quarters only on land designated G/IC(1) only) is under Column 1 use, and "Flat (not elsewhere specified)" is a Column 2 use of G/IC zone. Therefore, it is reasonable that "Flat" be added to Column 2 use of the G/IC zone of TCV OZP. The proposed change to the Notes of the G/IC zone is attached as **Figure 8**.
- 10.5 Flat development at G/IC sites will still require application to the TPB. As such, the TPB will have the ultimate control on the actual use of the G/IC sites on the TCV OZP.

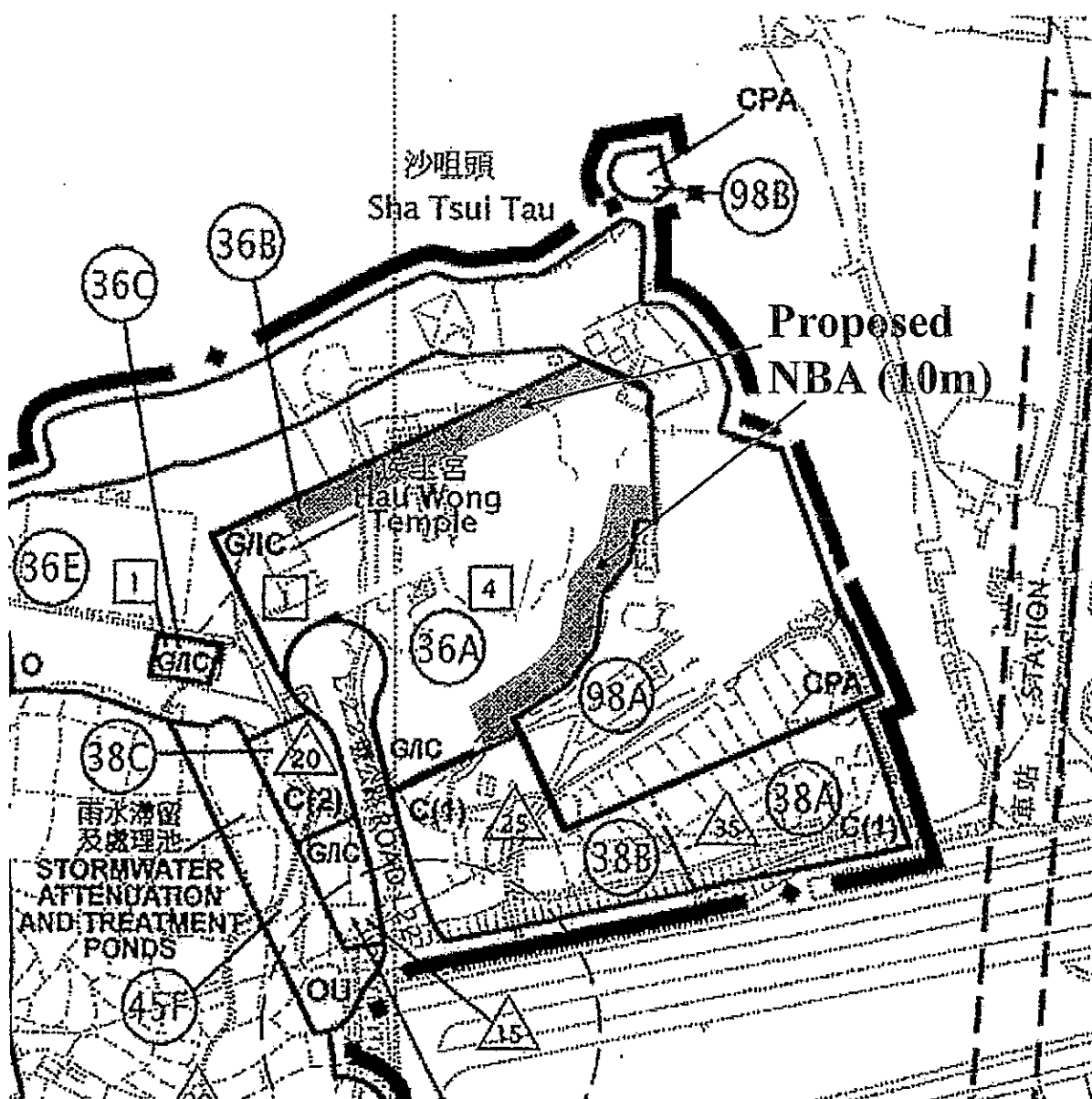


Figure 7: Proposed new OZP boundary of the western bank of the Tung Chung Estuary and G/IC zoning for Site A. The Site has two NBAs to protect the views of Hau Wong Temple towards the sea and act as buffer of the CPA.

GOVERNMENT, INSTITUTION OR COMMUNITY

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Ambulance Depot Animal Quarantine Centre (in Government building only) Broadcasting, Television and/or Film Studio Eating Place (Canteen, Cooked Food Centre only) Educational Institution Field Study/Education/Visitor Centre Government Refuse Collection Point Government Use (not elsewhere specified) Institutional Use (not elsewhere specified) Library Market Place of Recreation, Sports or Culture Public Clinic Public Convenience Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (excluding container vehicle) Recyclable Collection Centre Religious Institution Research, Design and Development Centre Rural Committee/Village Office School Service Reservoir Social Welfare Facility Training Centre Wholesale Trade	Animal Boarding Establishment Animal Quarantine Centre (not elsewhere specified) Columbarium Correctional Institution Crematorium Eating Place (not elsewhere specified) <i>Flat</i> Funeral Facility Holiday Camp Mass Transit Railway Vent Shaft and/or Other Structure above Ground Level other than Entrances Off-course Betting Centre Office Petrol Filling Station Place of Entertainment Private Club Radar, Telecommunications Electronic Microwave Repeater, Television and/or Radio Transmitter Installation Residential Institution Sewage Treatment/Screening Plant Shop and Services Utility Installation for Private Project

Planning Intention

This zone is intended primarily for the provision of Government, institution or community facilities serving the needs of the local residents and/or a wider district, region or the territory. It is also intended to provide land for uses directly related to or in support of the work of the Government, organizations providing social services to meet community needs, and other institutional establishments.

(Please see next page)

Figure 8: The proposed change (Bold and Italic) to the Notes of the G/IC zone of the TCV OZP. (Extracts of Notes to TCV OZP)

- 10.6 The following regarding NBAs is proposed to add to the Remarks of the Notes of G/IC zone:

"Two NBAs are proposed within the big G/IC zone at Sha Tsui Tau; one along the zoning boundary with "O" and the other with CPA as shown in the large scale Plan. Minor relaxation may be permitted on application to the Town Planning Board."

Proposed Changes to the Explanatory Statement

- 10.7 As it is difficult to show the proposed NBAs on the Plan of the OZP, a larger scale map should be prepared, similar to Figure 8, for attachment to the Explanatory Statement of the OZP. A new Para 9.4.5 related to the NBA should be also be added as follow:

"The G/IC site at Sha Tsui Tau lies adjacent to Hau Wong Temple and a stand of mangroves. Two strips of Non-building Area (NBA) are proposed for the site. One NBA is intended to protect the scenic view of the temple towards Tung Chung Bay. Its demarcation is designated by extending from the frontage of the temple. The other NBA is approximately 10m wide serving as a buffer between the development of the G/IC zone and the CPA zone. The establishment of a shelterbelt of appropriate native tree and shrub species, forming an ecological and visual barrier between the developed area and the habitats in the CPA zone, should be required in this NBA."

Sha Tsui Tau as a Community Focal Point

- 10.8 The extended G/IC site with the slightly more flexible land use at Site A will better utilise the valuable land which is very close to the future railway terminus. Together with the adjacent commercial sites, the development sites would bring more vibrancy to the neighbourhood thereby creating a focal point of the Tung Chung Valley community.

11 Proposed Changes related to Site B

Site B for Residential Development

- 11.1 Site B is located in Area 45D and within 500m from the future railway station. Under the TOD concept, the site should be planned for high density development. The site is presently zoned CPA and OU(Stormwater Attenuation and Treatment Ponds). The site should be planned for residential development so that more people can enjoy the good accessibility to the future MTR station, and the stormwater attenuation ponds can be relocated to another suitable site.
- 11.2 Balancing the TOD concept and the conservation approach adopted for the development of TCV, it is considered that excluding the stream and some buffer areas along the banks, the rest of Site B is suitable for residential development. It is proposed that Site B be partly zoned as OU(River Park) and partly zoned as Residential Group (C)2 [R(C)2] with PR at 1. Please refer to Figure 9.
- 11.3 The minor changes will slightly increase the provision of private housing in the TCW which is currently dominated by public housing development including Yat Tung Estate and developments in Area 39, Area 42 and Area 46. This will help alleviate the social imbalance, albeit to a very limited extent.

Underground Attenuation Pond underneath Open Space Site

- 11.4 The attenuation and treatment ponds function of Site B can be performed underground within non-development sites such as site zoned as Open Space ("O") in Area 80 located to the east of the River Park. This site is proposed to be zoned as Open Space (1) ["O(1)"] with "Stormwater Attenuation and Treatment Ponds" as a Column 1 Use for "O(1)" only. The proposed new zonings of Site B as well as the open space are shown in **Figure 9**.

Minor changes to the Notes of the OZP

- 11.5 Minor changes to the Notes for "O" is sufficient to cater for the "Stormwater Attenuation and Treatment Ponds" use and is shown in **Figure 10**. This arrangement will respect the character of TCV and better utilise the valuable land which is well served by infrastructure.
- 11.6 Regarding the Building Height Restrictions (BHRs) for Site B, it is proposed that the BHR be set at 20mPD which is identical to the residential site to its north and south.

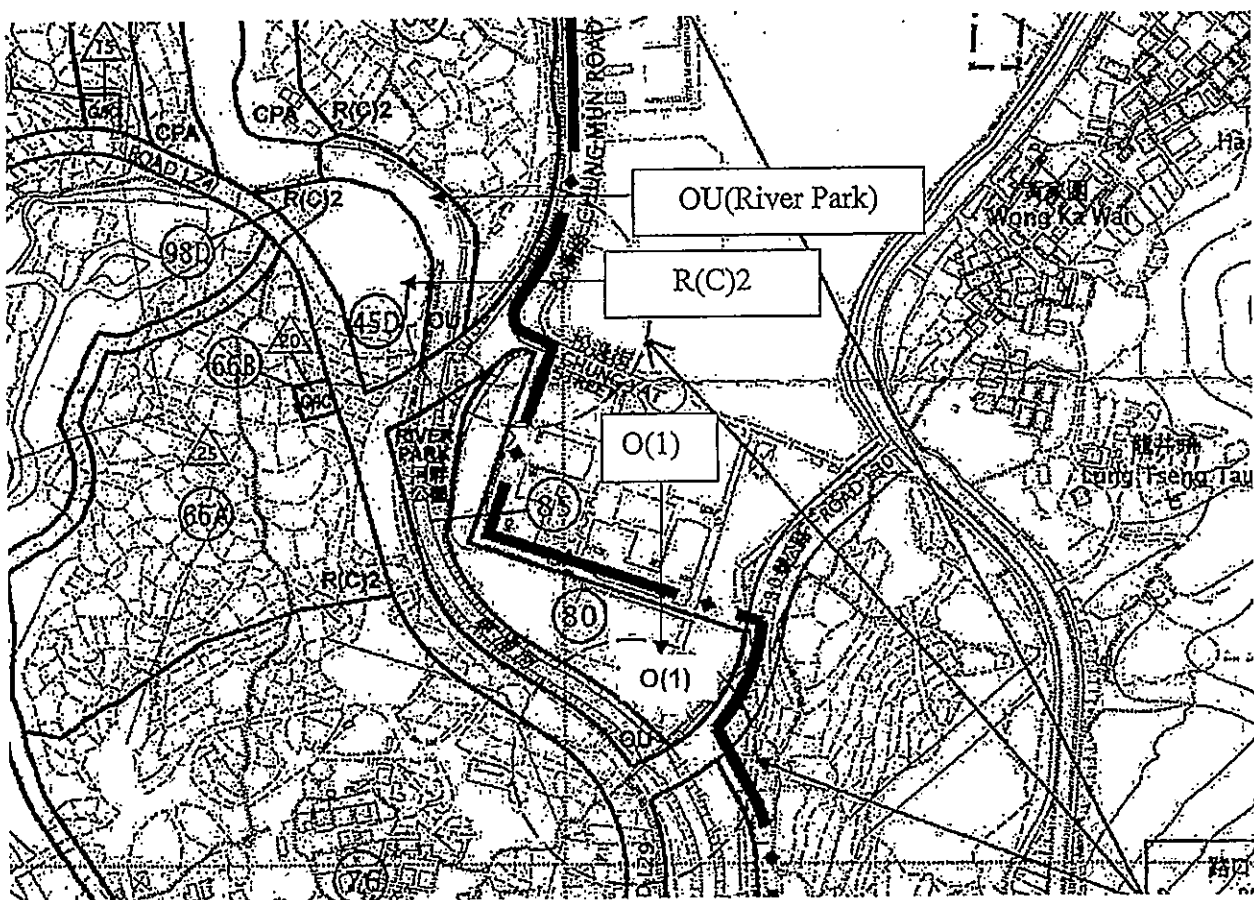


Figure 9: Proposed New Zonings of Site B and the Open Space on the east bank of Tung Chung Stream

OPEN SPACE

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Aviary Barbecue Spot Field Study/Education/Visitor Centre Park and Garden Pavilion Pedestrian Area Picnic Area Playground/Playing Field Promenade Public Convenience Public Vehicle Park (for cycles only) Sitting Out Area <i>Stormwater Attenuation and Treatment Pond (for "O(1)" only)</i>	Cable Car Route and Terminal Building Bating Place Government Refuse Collection Point Government Use (not elsewhere specified) Holiday Camp Mass Transit Railway Vent Shaft and/or Other Structure above Ground Level other than Entrances Place of Entertainment Place of Recreation, Sports or Culture Private Club Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (not elsewhere specified, excluding container vehicle) Religious Institution Service Reservoir Shop and Services Tent Camping Ground Utility Installation for Private Project

Planning Intention

This zone is intended primarily for the provision of outdoor open-air public space for active and/or passive recreational uses serving the needs of local residents as well as the general public.

Figure 10: Minor Changes (Bold and Italic) made to "O" zone to accommodate "Stormwater Attenuation and Treatment Ponds" as a Column 1 Use allowed under "O(1)"
 (Extracts of Notes to TCV OZP)

Minor changes to the Explanatory Statement of the OZP

- 11.7 The Explanatory Statement (ES) of the OZP will need to be changed accordingly. These include:

a) For R(C) zone, to include Area 45D in the zone.

para 9.2.1, the 2nd sentence is proposed to be changed to "Eight sites are zoned "R(C)" including Areas 45D, 60, 61A, 66A, 67, 68A/68B, 71A and 71B."

b) For "O" Zone, amend Para 9.5.2 and add a new paragraph for "O(1)"

Para 9.5.2, delete the last sentence, "Area 80 is also under this zone to reflect the existing temporary soccer field and plant nursery. Subject to further study, there may be scope to develop this area as part of the river park together with the adjoining man-made section of Tung Chung Stream to be de-channelized."

Add Para 9.5.3 "A sub-zone of "O(1)" is proposed for Area 80 for an open space with underground stormwater attenuation and treatment pond. Subject to further study, there may be scope to develop this area as part of river park together with the adjoining man-made section of Tung Chung Stream to be de-channelized."

c) For OU(Stormwater Attenuation and Treatment Pond) zone, delete Area 45D in Para 9.6.1(b)

The 2nd sentence of the Paragraph is changed to "In addition to the underground stormwater attenuation and treatment pond in Area 80, there are four other sites (i.e. Areas 45B, 45C, ~~45D~~, 45E and 45F) in the Area ..."

12 Overall Summary of Changes to the Plan and Notes

- 12.1 The proposed changes related to the Plan mentioned in Paras 9, 10 and 11 are as follows:

- a) adjustment of the OZP boundary covering the western bank of the estuary;
- b) Site A: rearrangement of boundary of G/IC, O and CPA zones at Sha Tsui Tau;
- c) Site B: rezone from OU (Stormwater Attenuation and Treatment Pond) to R(C)2 and OU(River Park);
- d) Rezone from the "O" site in Area 80 to "O(1)"; and
- e) Two NBAs are proposed for Site A.

A comparison of the Draft TCV OZP and the above proposed changes (a) to (d) are consolidated in **Figure 11**. For the two NBAs under item (e), please refer to **Figure 7** above.

- 12.2 There are minor changes to the Notes:

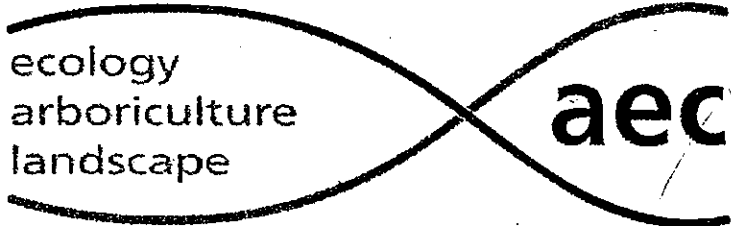
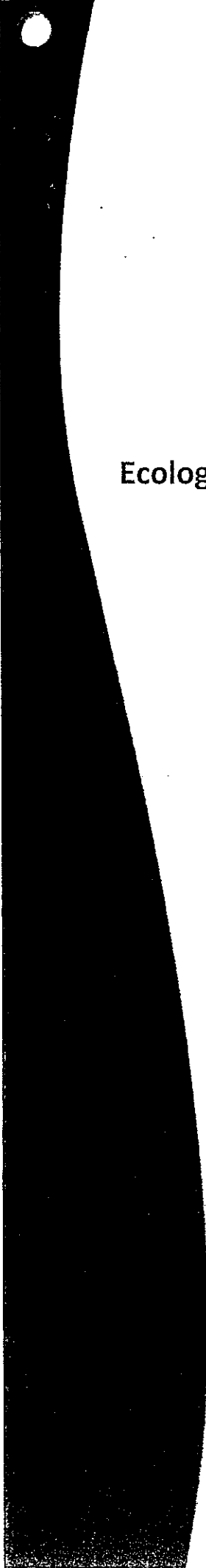
- "Flat" is proposed to be added to the Column 2 Use of G/IC zones;
- A Remark regarding the two NBAs for the G/IC zone at Sha Tsui Tau; and
- "Stormwater Retention and Attenuation Pond" is proposed to be added to Column 1 Use for the "O(1)" zone only.

13 Conclusions

- 13.1 Huge investment in infrastructure is needed for the engineering works for the development of TCV. While the preservation of heritage and conservation of the natural environment are respected, a reasonable level of development should be pursued.
- 13.2 This representation proposes a minor change to rectify the awkward OZP boundary to include a private lot and the coastal mangrove area. The minor change is to ensure the coastal land is under protection by appropriate planning controls. It also proposes to adopt the TOD planning concept by slightly increasing the development land area within 500m from the future railway station.
- 13.3 An ecological survey has been undertaken, the proposals put forward in this representation have been carefully considered to balance the good planning practice of benefiting more people in terms of increasing accessibility to public transport and community facilities and conservation concerns.
- 13.4 The extended G/IC site at Sha Tsui Tau would help create a community focal point for the Tung Chung Valley community. A consistent approach of including "Flat" as a Column 2 Use as in the other two Tung Chung OZPs should be adopted. This will provide more land use flexibility, but the ultimate control on the use of G/IC sites is still with the TPB. Two NBAs are proposed for the site to respect heritage and nature conservation.
- 13.5 Relocating an attenuation and treatment pond to free the land for residential development is in line with government policy to increase land supply for housing. Putting the pond underneath an open space site which lies adjacent to the River Park is considered feasible. This is a sensible way to optimise the use of valuable land.
- 13.6 The changes proposed in this representation are minor, but would significantly enhance the planning of TCV and optimise the land use of the serviced land. The TPB is requested to give favourable consideration to the proposals.

Masterplan Limited
March 2016

Appendix A
Ecological Survey and Assessment Report



ecology
arboriculture
landscape

aec

**Ecological Survey and Assessment in Support of Representation
Regarding Tung Chung Valley OZP, Lantau**

Ecological Survey and Assessment Report

Job Ref.: 16/1147/373

Date: February 2016

Ecological Survey and Assessment in Support of Representation Regarding Tung Chung Valley OZP, Lantau

Ecological Survey and Assessment Report

(Issue 1)

	Name	Signature
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Date:	25 th February 2016	

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1 INTRODUCTION

1.1 Background

1.1.1 AEC Limited has been appointed by Forestside Ltd. to undertake a rapid ecological baseline survey and prepare an ecological assessment report covering two areas in the Tung Chung Valley that are covered by the Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1.

1.1.2 This Ecological Survey and Assessment Report presents the baseline ecological condition of these areas and includes recommendations for potential amendments to the Draft Outline Zoning Plan to better accord with current ecological conditions and biodiversity objectives for the areas and their environs, taking into account the planning intentions for the Tung Chung Valley.

1.2 The Study Area

1.2.1 The Study Area is in two parts: at the mouth of the Tung Chung Estuary (including much of Planning Areas 36, 38 and 98) (henceforth referred to as 'the Estuary Area') and upstream on the west bank of the Tung Chung River Channel (Planning Areas 45D and 98D) (henceforth referred to as 'The Riverside Area').

1.3 Field Survey Methodology

1.3.1 For the Estuary Area a walk-through ecological survey for flora and key groups of fauna (including birds, butterflies, dragonflies, herpetofauna and stream fauna) was conducted in the Study Area on 15th February 2016. Observations of flora and herpetofauna were made unaided, while bird, dragonfly and butterfly surveys employed 10 x 42 magnification binoculars. The stream survey within the watercourse was conducted primarily by direct observation, active searching and sweep sampling techniques.

1.3.2 The Riverside Area was inaccessible; however observations from outside the site confirmed aerial photograph indications that it entirely comprised an orchard (longan trees) with a few native tree specimens.

1.3.3 Findings from surveys of the areas are detailed below.

2 ESTUARY AREA

Habitat and Flora

2.1.1 The area is located at Sha Tsui Tau, Tung Chung. It is located east of Hau Wong Temple and west of Yat Tung Estate, as displayed in Figure 1. It covers approximately 7.75 ha of flat terrain adjoining the coast of Tung Chung Wan.

2.1.2 A total of 12 habitats, namely agriculture, coastal grassland, *Leucaena leucocephala* woodland, mangrove, mangrove mix, open space (Grassed), orchard, sea, secondary woodland, urban/village area, watercourse and waste ground, were identified within the Study Area. Figure 1 provides a habitat map of the Study Area and Appendix A shows photographs of the site and habitats identified within the Area. A total of 131 plant species were recorded within the Study Area, while Appendix B shows the full plant list recorded in the surveyed habitats. Neither rare nor protected plant species were recorded within the Study Area during the survey, and all species recorded are common and widespread in Hong Kong in appropriate habitats.

Agriculture

- 2.1.3 A small area at the east of the study area is occupied by a vegetable crop. This vegetable plot approximately 2m by 2m is primarily planted with *Ipomoea batatas*.

Coastal grassland

- 2.1.4 A semi-natural coastal grassland is located at the north of the study area. The shore was highly disturbed and partly paved with gravel. Natural succession and regeneration of coastal vegetation was observed. The dominant species include herb of *Sesuvium portulacastrum*, *Paspalum distichum* and *Fimbristylis* sp., creeper of *Wedelia trilobata* and young tree of *Thespesia populnea*. Seedlings of mangrove species (including *Bruguiera gymnorhiza* and *Excoecaria agallocha*) were also recorded.

Leucaena leucocephala woodland

- 2.1.5 An area of wooded area dominated by the exotic invasive tree species *Leucaena leucocephala* was identified within the study area and surrounding waste ground. The understory is dominated by a range of exotic plants including creeper of *Wedelia trilobata*, herbs *Bidens alba* and *Melinis repens* and shrub *Lantana camara*. Part of this *Leucaena leucocephala* woodland was found falling within the CPA boundary.

Mangrove

- 2.1.6 A mangrove community is located in the eastern part of the study area adjacent to the tidal stream connecting with the sea. The mangrove community is dominated by *Kandelia obovata*, *Excoecaria agallocha*, *Aegiceras corniculatum*, *Bruguiera gymnorhiza* and *Acanthus ilicifolius* and the vegetation composition is controlled by the tidal channel which flows through the area. Part of this channel is open, but much is entirely overgrown with mangroves. The appearance of this area is typical of naturally established mangal in Hong Kong.

Mangrove Mix

- 2.1.7 A tidal stream running from the southern part of the study area connects with the sea and mangrove at the east. Mangroves (including *Kandelia obovata*, *Excoecaria agallocha*, *Aegiceras corniculatum* and *Acanthus ilicifolius*) mixed with associated vegetation (including trees of *Pandanus tectorius* and *Thespesia populnea*, and climber *Derris trifoliata* and *Gymnanthera oblonga*) were observed along the tidal stream.

Open space (Grassed)

- 2.1.8 An area of hydroseeded open space was identified at the northwest of the study area and next to a temple. Routine mowing at this area is expected to take place. The area is mainly dominated by the herb species *Cynodon dactylon*, *Bidens alba* and *Imperata cylindrica* var. *major*. Shrub species such as *Aster baccharoides* and *Crotalaria pallida* var. *obovata* were also commonly recorded.

Orchard

- 2.1.9 Three main area of orchard were identified at the northeast, southeast and southwest. The orchards are densely planted with fruit tree species of *Dimocarpus longan*, *Litchi chinensis* and *Clausena lansium*. The fruit trees are densely planted with an average spacing of 1 - 2m. This spacing is less than is typical in longan orchards (typical spacing in productive orchards is 3 - 5m). Due to the dense canopy of the fruiting trees, vegetation underneath was found largely

shaded. The vegetation underneath is mainly dominated by herbs *Bidens alba* and *Cyrtococcum patens*, and creeper *Wedelia trilobata*.

- 2.1.10 A few planted fruit trees were also recorded around the occupied village house at the eastern part of the study area. These are mainly *Musa x paradisiaca* and *Dimocarpus longan*, and a few individuals of *Eriobotrya japonica*.

Secondary woodland

- 2.1.11 Several fragmented secondary woodlands were identified around the study area. The woodlands are mainly developed from abandoned farmland and of a young age. The canopy mainly consists of tree species such as *Hibiscus tiliaceus*, *Celtis sinensis*, *Leucaena leucocephala* and *Macaranga tanarius* var. *tomentosa*; while the understory is dominated by herbs *Bidens alba* and *Panicum brevifolium*, creeper *Wedelia trilobata* and shrub *Bridelia tomentosa*.

- 2.1.12 A wooded area mixed with a few fruit trees (*Litchi chinensis*, *Musa x paradisiaca* and *Dimocarpus longan*) and self-seeded native trees (*Macaranga tanarius* var. *tomentosa*, *Mallotus paniculatus* and *Sterculia lanceolata*) is located close to waste ground. This area is gradually succeeding from abandoned farmland to a young secondary woodland.

Urban / Village Area

- 2.1.13 The urban and village area mainly included the occupied houses located at the east, the village at the south and the playground at the west of the study area. Fruit trees such as *Dimocarpus longan*, *Musa x paradisiaca* and *Dracaena sanderiana* were found planted around the house and weedy species *Wedelia trilobata*, *Bidens alba* and *Leucaena leucocephala* were also commonly recorded.

Watercourse

- 2.1.14 A tidal stream is located at the south of the study area. Limited water flow was observed during the survey. Seedlings of mangrove species (such as *Kandelia obovata* and *Acanthus ilicifolius*), herb and creeper *Commelina diffusa* and *Wedelia trilobata* were observed along the stream.

Waste ground

- 2.1.15 An area of waste ground was identified at the middle of the study area. It is a previous war games field with all the building and artificial obstacles and barriers cleared. The area is abandoned and mainly covered by the herbs *Cynodon dactylon* and *Melinis repens*, climber *Ipomoea cairica*, and creeper *Wedelia trilobata*. A few isolated fruit trees of *Artocarpus heterophyllus* were still recorded at the site.
- 2.1.16 An extensive, grassy area dominated by weedy creeper *Wedelia trilobata* with some saplings of *Dimocarpus longan* was also identified at the south within the waste ground.

Table 1 Habitats present within the Estuary Area shown in Figure 1

Habitat	ha	%
Agriculture	0.01	0.1
Coastal Grassland	0.21	2.7
<i>Lucaena leucocephala</i> woodland	0.61	7.9
Mangrove	0.47	6.1
Mangrove mix	0.08	1.0
Open space (grassed)	0.53	6.8
Orchard	2.01	25.9
Secondary woodland	1.71	22.1
Urban / village area	1.25	16.1
Watercourse	0.03	0.4
Waste ground	0.84	10.8
Total	7.75	100

Key Faunal Observations

- 2.1.17 Within the Estuary Area, 16 bird species were recorded, as summarized in Table 1 in Appendix C. Of these, three are wetland-dependent species, including Grey Heron, Great Egret and Little Egret. Five species of conservation interest were recorded, including Grey Heron, Great Egret, Little Egret, Black Kite and Red-billed Starling. Black Kite was recorded flying overhead, while other four species of conservation interest were recorded in the Area. Small numbers of all of these species is not unusual in a natural or semi-natural estuarine area in Hong Kong and all bird species found are common and widespread in such habitat.

Table 2 Summary of bird species of conservation interest recorded in Estuary Area

Species	Scientific Name	Conservation Status	Number
Grey Heron	<i>Ardea cinerea</i>	PRC	1
Great Egret	<i>Ardea alba</i>	PRC (RC)	10
Little Egret	<i>Egretta garzetta</i>	PRC (RC)	22
Black Kite	<i>Milvus migrans</i>	(RC)	1
Red-billed Starling	<i>Spodiopsar sericeus</i>	GC	13

Conservation status refers to Fellowes *et al.* (2002)¹. PRC = Potential Regional Concern, RC = Regional Concern, GC = Global Concern. Those in parentheses indicate that the assessment is on the basis of restrictedness in breeding and/or roosting rather than general occurrence.

- 2.1.18 No herpetofauna species was recorded within the Estuary Area.
- 2.1.19 One butterfly species were recorded within the Estuary Area: Indian Cabbage White *Pieris canidia* (Table 2 of Appendix C). It is assessed as Very Common in Hong Kong (Chan *et al.* 2011).
- 2.1.20 No dragonfly or aquatic fauna species were recorded.
- 2.1.21 No aquatic fauna species was recorded within the study area.

¹ Fellowes, J.R., M.W.N. Lau, D. Dudgeon, G.T. Reels, G.W.I. Ades, G.J. Carey, B.P.L. Chan, R.C. Kendrick, K.S. Lee, M.R. Leven, K.D.P. Wilson & Y.T. Yu, 2002. *Wild animals to watch: Terrestrial and freshwater fauna of conservation concern in Hong Kong*. *Memoirs Hong Kong Natural History Society* 25: 123-160

2.2 Evaluation of Baseline Ecological Value of the Estuary Area

2.2.1 Tables 3 – 13 detail the ecological evaluation of the habitats present.

Table 3 Ecological Evaluation of Agriculture

Criteria	Evaluation
Naturalness	Man-made habitat of planted vegetable crop with active maintenance.
Size	0.01 ha
Diversity	Low floral and faunal species diversity. Mainly dominated by vegetable crop.
Rarity	Common habitat in village areas.
Re-creatability	Readily re-creatable.
Fragmentation	Not fragmented.
Ecological Linkage	No significant ecological linkages.
Potential Value	Limited due to the small size and active management.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Unknown.
Wildlife Abundance/ Richness	Low floral and faunal diversity and abundance.
Ecological Value	Low

Table 4 Ecological Evaluation of Coastal grassland

Criteria	Evaluation
Naturalness	Semi-natural, re-generated from highly disturbed seashore.
Size	0.21 ha
Diversity	Low floral and faunal species diversity.
Rarity	A common habitat in the seashore area.
Re-creatability	Readily re-created.
Fragmentation	Contiguous with the nearby seashore area and not fragmented.
Ecological Linkage	Linked with the nearby seashore
Potential Value	Value would be improved if protected and managed for wildlife.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Aerial photographs suggest that current shoreline was formed about 20 years ago.
Wildlife Abundance/ Richness	Low floral and faunal diversity and abundance; small numbers of Ardeid species of conservation significance.
Ecological Value	Low to Moderate

Table 5 Ecological Evaluation of *Leucaena leucocephala* woodland

Criteria	Evaluation
Naturalness	Originally a waste ground and becoming a low value woodland due to the invasion of exotic tree species <i>Leucaena leucocephala</i> .
Size	0.61 ha
Diversity	Low floral and faunal species diversity
Rarity	A common habitat in HK not supporting species of conservation significance to any significant degree.
Re-creatability	Readily re-created.
Fragmentation	Not fragmented.
Ecological Linkage	Ecologically linked to the nearby orchard and woodland.
Potential Value	Very little potential for increase in value without re-habilitation.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Aerial photographs and age of trees suggest c. 10 – 15 years in age.
Wildlife Abundance/ Richness	Low floral and faunal diversity and abundance.
Ecological Value	Very Low

Table 6 Ecological Evaluation of Mangrove

Criteria	Evaluation
Naturalness	Naturally established by succession from mudflat.
Size	Small (0.47ha) in a Hong Kong context.
Diversity	Poor plant species diversity and structural complexity.
Rarity	A restricted habitat in Hong Kong.
Re-creatability	Readily re-created but several years required for establishment.
Fragmentation	Some fragmentation.
Ecological Linkage	Linkages to watercourse and open water habitats for aquatic fauna.
Potential Value	Value will appreciate with time, albeit constrained by small area.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Aerial photographs suggest aged 10 – 30 years.
Wildlife Abundance/ Richness	Low abundance and diversity of wildlife, but including small numbers of Ardeid species of conservation significance.
Ecological Value	Low to Moderate

Table 7 Ecological Evaluation of Mangrove Mix

Criteria	Evaluation
Naturalness	Largely naturally established.
Size	0.08ha.
Diversity	Very low habitat complexity. Poor species diversity and structural complexity.
Rarity	A restricted habitat in Hong Kong.
Re-creatability	Readily re-created.
Fragmentation	Some fragmentation.
Ecological Linkage	Linkages with adjacent mangrove and watercourse.
Potential Value	Low, but will improve over time.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Aerial photographs suggest 10 – 20 years.
Wildlife Abundance/ Richness	Low abundance and diversity of wildlife.
Ecological Value	Low

Table 8 Ecological Evaluation of Open space (Grassed)

Criteria	Evaluation
Naturalness	Entirely man-made, a hydroseeded open space maintained by routine mowing.
Size	0.53 ha.
Diversity	Low faunal and floral diversity.
Rarity	A common habitat in the urban area.
Re-creatability	Readily re-created.
Fragmentation	Not fragmented
Ecological Linkage	No significant linkages.
Potential Value	Low potential value due to the routine mowing.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Unknown.
Wildlife Abundance/ Richness	Low floral and faunal diversity and abundance.
Ecological Value	Low

Table 9 Ecological Evaluation of Orchard

Criteria	Evaluation
Naturalness	Man-made habitat of planted fruit trees.
Size	2.01 ha.
Diversity	Low faunal and floral diversity.
Rarity	A common habitat in the New Territories.
Re-creatability	Readily re-created.
Fragmentation	Not fragmented as they are located adjacent to or near other semi-natural woodland.
Ecological Linkage	Ecologically linked to the nearby woodland.
Potential Value	Limited due to the low complexity of the habitat and active management.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Unknown.
Wildlife Abundance/ Richness	Low floral and faunal diversity and abundance.
Ecological Value	Low

Table 10 Ecological Evaluation of Secondary woodland

Criteria	Evaluation
Naturalness	Derived from natural vegetation succession from abandoned farmland.
Size	1.71 ha.
Diversity	Low faunal and floral diversity.
Rarity	A common habitat in the New Territories.
Re-creatability	Readily re-created due to the young age of the woodland.
Fragmentation	Not fragmented as they are located adjacent to or near other semi-natural woodland.
Ecological Linkage	Ecologically linked to the nearby woodland.
Potential Value	With potential to increase if a longer time is allowed for the trees to reach maturity.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Aerial photographs suggest 10 – 20 years in age.
Wildlife Abundance/ Richness	Low floral and faunal diversity and abundance.
Ecological Value	Low to moderate.

Table 11 Ecological Evaluation of Urban/Village Area

Criteria	Evaluation
Naturalness	Entirely man-made.
Size	1.25 ha.
Diversity	Very low habitat complexity. Poor species diversity and structural complexity.
Rarity	Very common habitat in Hong Kong.
Re-creatability	Readily re-created.
Fragmentation	Some fragmentation.
Ecological Linkage	No significant ecological linkages.
Potential Value	Low.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Variable.
Wildlife Abundance/ Richness	Low abundance and diversity of wildlife.
Ecological Value	Very Low

Table 12 Ecological Evaluation of Watercourse

Criteria	Evaluation
Naturalness	Natural tidal stream with some disturbance from the village nearby
Size	0.03 ha.
Diversity	Low faunal and floral diversity.
Rarity	Common habitat.
Re-creatability	Readily re-created.
Fragmentation	Not fragmented.
Ecological Linkage	Hydrologically linked with the sea and mangrove.
Potential Value	Higher potential if the human disturbance from the surrounding developed area could be controlled.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Unknown
Wildlife Abundance/ Richness	Low floral and faunal diversity and abundance including small numbers of Red-billed Starling.
Ecological Value	Low to moderate

Table 13 Ecological Evaluation of Waste Ground

Criteria	Evaluation
Naturalness	Man-made habitat but can exhibit semi-natural features over time as native species colonise and regenerate.
Size	0.84 ha.
Diversity	Low faunal and floral diversity.
Rarity	A common habitat in Hong Kong.
Re-creatability	Readily re-created.
Fragmentation	Not fragmented.
Ecological Linkage	No significant linkages.
Potential Value	Some potential if colonising species are left undisturbed and succession to grassland, shrubland and woodland is allowed.
Nursery/ Breeding Ground	No known significant nursery or breeding grounds.
Age	Site has been cleared within 5 years.
Wildlife Abundance/ Richness	Low abundance and diversity of wildlife.
Ecological Value	Low

3 RIVERSIDE AREA

- 3.1.1 The entire riverside area comprises a poorly-maintained longan orchard approximately 15 – 20 years of age, together with a few (presumably self-seeded) native trees. This orchard habitat is of Low Ecological Value. However, it is adjacent to the Tung Chung River which is an important habitat for fish including rare species of conservation significance.

4 CONCLUSIONS AND RECOMMENDATIONS

- 4.1.1 The Estuary Area includes three habitat areas of Low to Moderate Ecological Value; mangrove, secondary woodland and coastal grassland. In addition, a further habitat area, currently classed as mangrove mix, has the potential to develop into a habitat area of similar Low to Moderate Ecological Value if this is undisturbed. Zoning of these areas as Coastal Protection Area (CPA) is supported from an ecological perspective and accords with the objective of maintaining and conserving biodiversity where this is feasible and in accordance with the overall planning intention.
- 4.1.2 However, the proposed CPA zone does not accord well with the actual location of the mangrove habitat. A significant area of mangrove (c. 0.34 ha) is located outside the CPA zone and is not covered by the Draft OZP (hence leaving it vulnerable to damage), whilst the proposed CPA zone also includes a significant area of *Lucaena leucocephala* woodland (c. 0.27 ha) of Very Low Ecological Value.
- 4.1.3 *Lucaena leucocephala* is an exotic and invasive woody tree species that has the potential to pose a long-term threat to natural habitats (by invasion) and poses a long-term maintenance liability (leaving aside its ecologically invasive nature, it is highly prone to typhoon damage, hence may present a hazard when adjacent to public areas).
- 4.1.4 Accordingly, it is recommended that the CPA zone be adjusted to include the mangrove area in the east and to exclude the *Lucaena leucocephala* area in the west. It would be appropriate for this area excluded in the west to be incorporated in the adjoining G/IC zone.
- 4.1.5 Further, it is recommended that in order to protect the integrity of the coastal grassland and mangrove areas as well as the streamcourse in the revised G/IC zone an approximately 10m wide strip should be designated as a Non-building Area (NBA) within which the future development of the G/IC zone should be required to establish a shelterbelt of appropriate native tree and shrub species, forming an ecological and visual barrier between the developed area and the habitats in the CPA zone.
- 4.1.6 The Riverside Area entirely comprises orchard of Low Ecological Value. There are no ecological constraints to its redevelopment so long as appropriate measures are taken to ensure that there are no direct or indirect impacts on the Tung Chung River or its fauna.

Figure 1 Habitat Map

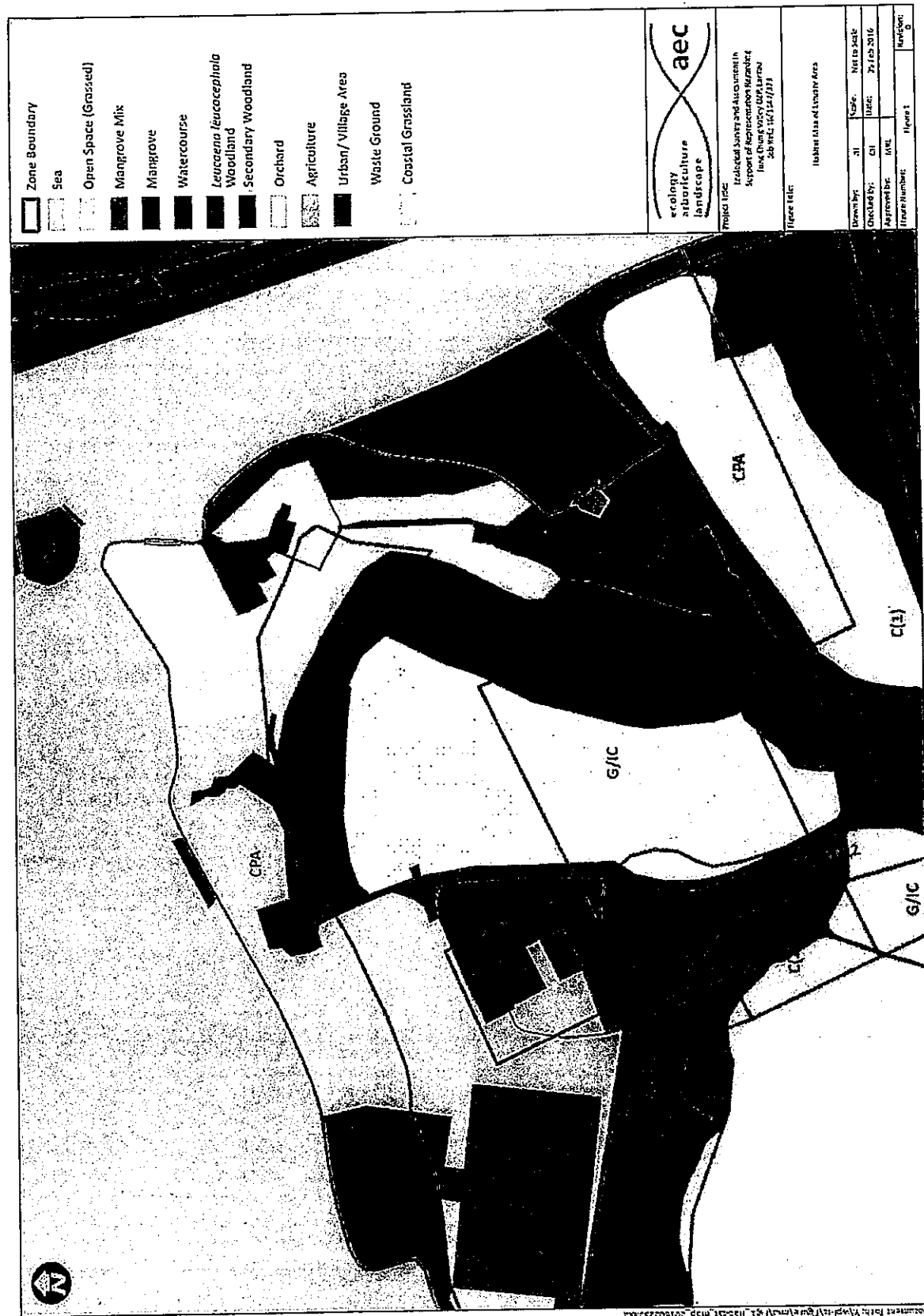
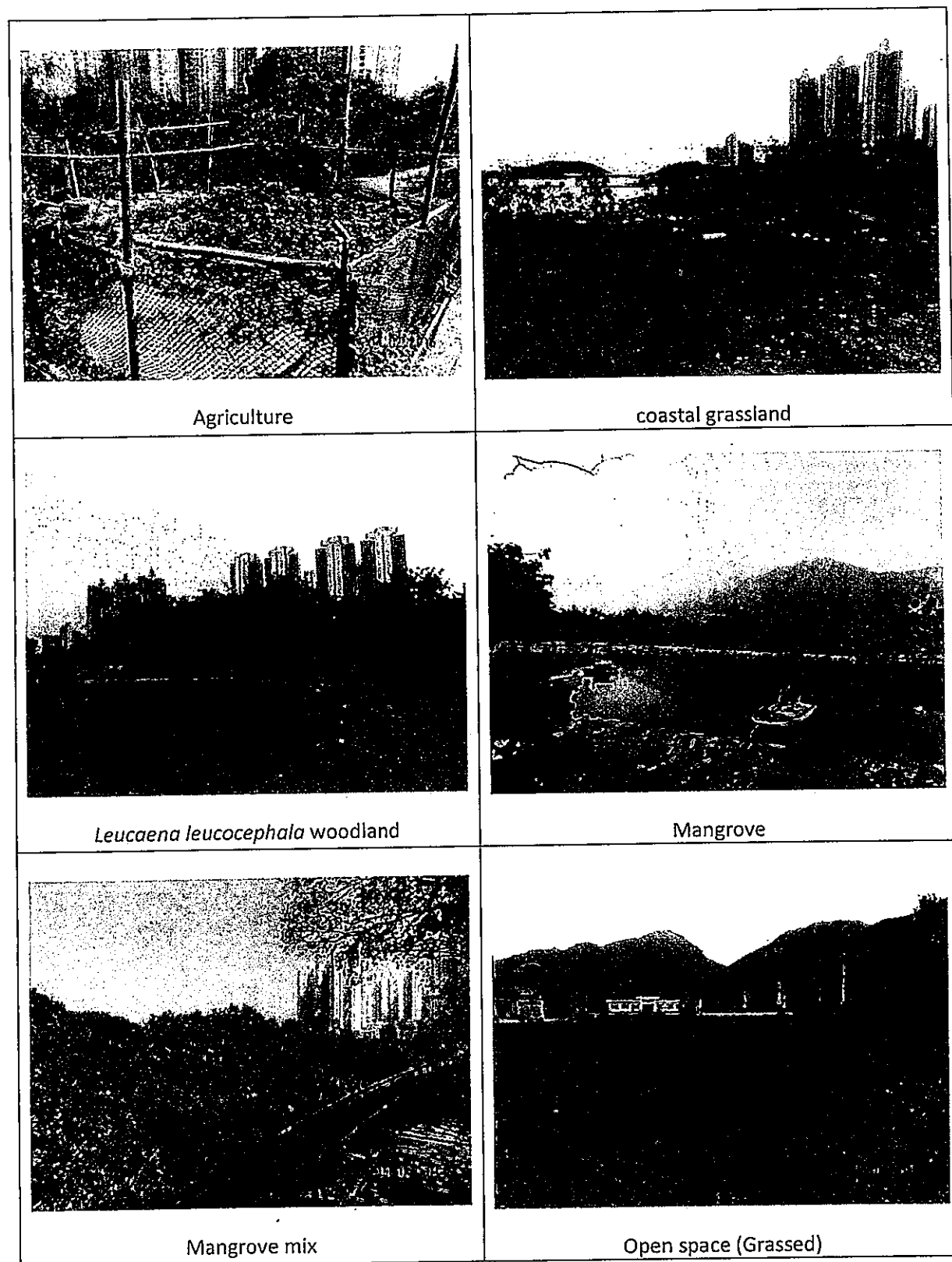


Figure 1

Appendix A

Study Area and Habitat Photographs





Orchard



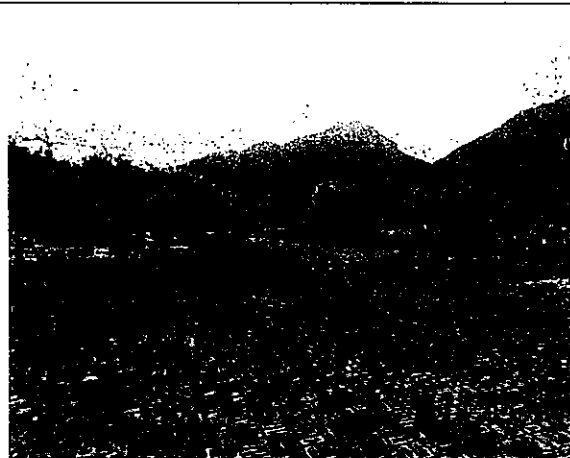
Secondary woodland



Urban/village area



Watercourse



Waste ground

Appendix B

List of Plant Species Recorded within the Study Area

Appendix B List of Plant Species Recorded within the Study Area:

Scientific name	Chinese name	Origin	Growth Form	Status in HK	Habitat										
					Agriculture	Coastal Grassland	Leucaena leucocephala woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Urban/Village Area	Waste ground	Watercourse
<i>Abutilon indicum</i>	磨盤草	Native	Herb	Restricted							*				
<i>Acacia auriculiformis</i>	耳果相思	Exotic	Tree	Widely cultivated		*	*	*	*			**		*	
<i>Acanthus ilicifolius</i>	老鼠筋	Native	Shrub	Common				***	***						*
<i>Achyranthes aspera</i>	土牛膝	Native	Herb	Common								*			
<i>Aegiceras corniculatum</i>	桐花樹	Native	Shrub/Tree	Common				**	***						
<i>Ageratum conyzoides</i>	藜香薷	Exotic	Herb	Common										*	
<i>Alocasia macrorrhizos</i>	海芋	Native	Herb	Very common								*			
<i>Alysicarpus vaginalis</i>	鏈莢豆	Native	Herb	Very common										*	
<i>Amaranthus viridis</i>	野苋	Native	Herb	Very common						*				*	
<i>Aporosa dioica</i>	銀柴	Native	Tree	Very common								*			
<i>Artocarpus heterophyllus</i>	菠蘿蜜	Exotic	Tree	Commonly planted for fruit			*					*		**	
<i>Aster baccharoides</i>	白舌紫菀	Native	Herb/Shrub	Very common		**	*			**					
<i>Bambusa</i> sp.	竹屬	-	Bamboo	-								***			
<i>Bauhinia</i> sp.	羊蹄甲屬	-	Tree	-								*			*
<i>Bidens alba</i>	白花鬼針草	Exotic	Herb	Very common	*	**	**	*	*	**		***	**	**	*
<i>Bombax ceiba</i>	木棉	Exotic	Tree	Cultivated										*	
<i>Bothriochloa bladhii</i>	臭根子草	Native	Herb	Very common						*				*	
<i>Brachiaria mutica</i>	巴拉草	Exotic	Herb	Very common			*							*	
<i>Bridelia tomentosa</i>	土蜜樹	Native	Shrub/Tree	Very common		*			*			*	*		
<i>Brugulera gymnorhiza</i>	木欖	Native	Tree	Restricted		*		**	*						
<i>Caesalpinia vernalis</i>	春雲實	Native	Climber	Common								**			

Scientific name	Chinese name	Origin	Growth Form	Status in HK	Habitat										
					Agriculture	Coastal grassland	Leucaena leucocephala woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Urban / Village Area	Waste ground	Watercourse
<i>Cajanus scarabaeoides</i>	蔓草蠶豆	Native	Climber	Common										**	
<i>Callistemon viminalis</i>	串錢柳	Exotic	Tree	Cultivated										**	
<i>Canavalia maritima</i>	海刀豆	Native	Climber	Common								*			
<i>Cardamine flexuosa</i>	碎米薺	Native	Herb	Common											*
<i>Carica papaya</i>	番木瓜	Exotic	Tree	Cultivated			*					*		*	
<i>Casuarina equisetifolia</i>	木麻黃	Exotic	Tree	Cultivated								*			
<i>Catharanthus roseus</i>	長春花	Exotic	Herb/Shrub	Common						*				*	
<i>Celosia argentea</i>	青葙	Native	Herb	Very common										**	
<i>Celtis sinensis</i>	朴	Native	Tree	Common and widely planted							*	**		*	
<i>Celtis timorensis</i>	樟葉朴	Native	Tree	Restricted			*				*				
<i>Cerbera manghas</i>	海芒果	Native	Tree	Common		*		*	*			*			*
<i>Chloris barbata</i>	孟仁草	Native	Herb	Very common		*				*				*	
<i>Cinnamomum burmannii</i>	陰香	Native	Tree	Common, also cultivated							*	*			
<i>Citrus reticulata</i>	桔	Exotic	Tree	Cultivated							*	*			
<i>Clausena lansium</i>	黃皮	Exotic	Tree	Cultivated				*			**	*	*		
<i>Cleistocalyx nervosum</i>	水翁	Native	Tree	Common				*	*					*	
<i>Clerodendrum inerme</i>	苦郎樹	Native	Climber/Shrub	Common				*				*			
<i>Cocculus orbiculatus</i>	木防己	Native	Climber	Common	*			**			*	**		*	*
<i>Commelina diffusa</i>	節節草	Native	Herb	Common								*		**	**
<i>Conyza sumatrensis</i>	蘇門白酒草	Exotic	Herb	Common							*			*	
<i>Crotalaria pallida</i> var. <i>obovata</i>	豬屎豆	Exotic	Herb/Shrub	Common						*				*	
<i>Cynodon dactylon</i>	狗牙根	Native	Herb	Very common						****				****	
<i>Cyrtococcum patens</i>	弓果黍	Native	Herb	Very common										**	

Scientific name	Chinese name	Origin	Growth Form	Status in HK	Habitat										
					Agriculture	Coastal grassland	Leucaena leucocephala woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary Woodland	Urban / Village Area	Waste ground	Watercourse
<i>Dactyloctenium aegyptium</i>	龍爪茅	Native	Herb	Common						*		*			*
<i>Dalbergia benthamii</i>	兩廣黃檀	Native	Climber	Common								*			
<i>Derris trifoliata</i>	魚藤	Native	Climber/Shrub	Common				*	**						
<i>Dimocarpus longan</i>	龍眼	Exotic	Tree	Restricted, but widely cultivated and semi-naturalised								****	**	**	*
<i>Dracaena sanderiana</i>	富貴竹	Exotic	Shrub	Planted or naturalized									**		
<i>Eclipta prostrata</i>	鱧腸	Native	Herb	Common											*
<i>Eleusine indica</i>	牛筋草	Native	Herb	Very common										*	
<i>Eriobotrya japonica</i>	枇杷	Exotic	Tree	Cultivated							*				
<i>Euphorbia hirta</i>	大飛揚草	Exotic	Herb	Very common										*	
<i>Euphorbia hypericifolia</i>	通奶草	Native	Herb	Common										*	
<i>Euphorbia thymifolia</i>	小飛揚	Native	Herb	Very common										*	
<i>Excoecaria agallocha</i>	海漆	Native	Tree	Common		*		**	**						
<i>Ficus elastica</i>	印度榕	Exotic	Tree	Cultivated							*				
<i>Ficus microcarpa</i>	細葉榕	Native	Tree	Common and widely cultivated		*	*				*	*		*	
<i>Ficus subpisocarpa</i>	筆管榕	Native	Tree	Common								*			
<i>Fimbristylis</i> sp.	飄拂草屬	-	Herb	-		**									
<i>Gymnanthera oblonga</i>	海島藤	Native	Climber	Very rare				*	**						
<i>Hibiscus tiliaceus</i>	黃槿	Native	Tree	Very common			*	**	**	*	*	***			
<i>Imperata cylindrica</i> var. <i>major</i>	絲茅	Native	Herb	Very common						**				*	
<i>Ipomoea batatas</i>	番薯	Exotic	Herb	Cultivated	***										

Scientific name	Chinese name	Origin	Growth Form	Status in HK	Habitat										
					Agriculture	Coastal grassland	Leucaena leucocephala woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Urban / Village Area	Waste ground	Watercourse
<i>Ipomoea cairica</i>	五爪金龍	Exotic	Herb	Very common			**				*			****	
<i>Ipomoea triloba</i>	三裂葉薯	Exotic	Herb	Common										**	
<i>Kandelia obovata</i>	水筆仔	Native	Tree	Very common				****	**						*
<i>Kyllinga brevifolia</i>	短葉水蜈蚣	Native	Herb	Common						*					
<i>Kyllinga nemoralis</i>	草穗水蜈蚣	Native	Herb	Very common							*		*		*
<i>Lactuca sativa</i>	生菜	Exotic	Herb	Cultivated										*	
<i>Lantana camara</i>	馬纓丹	Exotic	Shrub	Very common		*	**	*			*	*		*	
<i>Leucaena leucocephala</i>	銀合歡	Exotic	Shrub/Tree	Cultivated or naturalized	*	*	****				*	**	**	**	*
<i>Ligustrum sinense</i>	山指甲	Exotic	Shrub/Tree	Common, also widely cultivated							*				
<i>Limonium sinense</i>	補血草	Native	Herb	Common		*									
<i>Litchi chinensis</i>	荔枝	Exotic	Tree	Regarded as Restricted in Xing et al. (2000), widely cultivated for fruits, also planted in fung shui wood							***	*	*		
<i>Litsea glutinosa</i>	潺槁	Native	Tree	Very common		*					*	*		*	
<i>Litsea rotundifolia</i> var. <i>oblongifolia</i>	豺皮樟	Native	Shrub/Tree	Very common							*				
<i>Macaranga tanarius</i> var. <i>tomentosa</i>	血桐	Native	Tree	Common		*	**	*			*	**	*	*	
<i>Macroptilium lathyroides</i>	大翼豆	Exotic	Herb	Common										*	
<i>Mallotus paniculatus</i>	白楸	Native	Shrub/Tree	Very common						*	*	*	*	*	
<i>Malvastrum coromandelianum</i>	葵葵	Native	Herb/Shrub	Common						*		*	*	*	
<i>Mangifera indica</i>	芒果	Exotic	Tree	Cultivated			*				*				

Scientific name	Chinese name	Origin	Growth form	Status in HK	Habitat										
					Agriculture	Coastal grassland	Leucaena leucocephala woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Urban / Village Area	Waste ground	Watercourse
Melia azedarach	苦楝	Exotic	Tree	Cultivated or naturalized				*			*	*	*		
Melinis repens	紅毛草	Exotic	Herb	Very common		*	**			*				***	
Microcos nervosa	布渣菜	Native	Shrub/Tree	Common							*	*			
Microstegium ciliatum	剛莠竹	Native	Herb	Very common				*			*				
Mikania micrantha	薇甘菊	Exotic	Climber/Herb	Very common			**	*	*		*	**	*	**	*
Mimosa pudica	含羞草	Exotic	Herb	Very common						**				**	
Morinda parvifolia	雞眼藤	Native	Climber/Shrub	Very common							*	*	*		
Morus alba	桑	Native	Shrub/Tree	Common and cultivated							**	*	*		
Musa x paradisiaca	大蕉	Exotic	Herb	Cultivated			*				**	*	*	*	
Neyraudia reynaudiana	類蘆	Native	Herb	Very common			*		*	*		*	*	**	
Oxalis corniculata	酢醬草	Native	Herb	Very common	*					**	*		**	**	*
Oxalis debilis subsp. Corymbosa	紅花酢醬草	Exotic	Herb	Common							*		*	*	*
Paederia scandens	雞矢藤	Native	Herb	Very common	*				*		**	*		*	
Pandanus tectorius	露兜樹	Native	Shrub/Tree	Very common				*	**						
Panicum brevifolium	短葉黍	Native	Herb	Very common							*	**			
Panicum dichotomiflorum	水生黍	Native	Herb	Common										*	
Panicum maximum	大黍	Exotic	Herb	Very common								*			
Paspalum distichum	雙穗雀稗	Native	Herb	Common		***		**		**					
Phyllanthus reticulatus	小果桑下珠	Native	Shrub	Common										*	
Pluchea indica	闊苞菊, 煙茜	Native	Shrub	Common				*							
Plumbago zeylanica	白花丹	Native	Climber/Shrub	Restricted								*			
Polygonum chinense	火炭母	Native	Herb	Very common						*	*				

Scientific name	Chinese name	Origin	Growth Form	Status in HK	Habitat										
					Agriculture	Coastal grassland	Leucaena leucocephala Woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Urban / Village Area	Waste ground	Watercourse
<i>Pongamia pinnata</i>	水黃皮	Native	Tree	Common				*	*			*			
<i>Portulaca pilosa</i>	毛馬齒莧	Native	Herb	Common		**									
<i>Praxelis clematidea</i>	假臭草	Exotic	Herb	Very common								*			
<i>Psidium guajava</i>	番石榴	Exotic	Tree	Common and often planted									*		*
<i>Pteris vittata</i>	蜈蚣草	Native	Herb	Very common								*	*		
<i>Pueraria lobata</i>	野葛	Native	Climber	Very common			**					***		**	
<i>Sageretia thea</i>	雀梅藤	Native	Climber/Shrub	Very common							*				
<i>Sapium sebiferum</i>	烏桕	Native	Tree	Common				*						*	
<i>Senecio scandens</i>	千里光	Native	Herb	Common								*			
<i>Sesbania cannabina</i>	田菁	Exotic	Herb	Common		*	*		*						
<i>Sesuvium portulacastrum</i>	海馬齒	Native	Herb	Common		***		*				*			
<i>Siegesbeckia orientalis</i>	豨薟	Native	Herb	Common						*	**				
<i>Solanum americanum</i>	少花龍葵	Exotic	Herb	Very common							**			*	
<i>Sonchus arvensis</i>	苣荬菜	Native	Herb	Very common										*	
<i>Sonchus oleraceus</i>	苦苣菜	Exotic	Herb	Very common		*								*	*
<i>Spermiacoe stricta</i>	豐花草	Native	Herb	Restricted						**		*		**	
<i>Sporobolus fertilis</i>	鼠尾粟	Native	Herb	Very common						*				**	
<i>Stephania longa</i>	葉實蕨	Native	Climber	Common						*	*	*			
<i>Sterculita lanceolata</i>	假蒺藜	Native	Tree	Very common		*			*		*	*			
<i>Syzygium jambos</i>	蒲桃	Exotic	Tree	Cultivated and naturalized							*	*			
<i>Thespesia populnea</i>	恒春黃槿	Native	Tree	Restricted		**	*	**	**	*					
<i>Tridax procumbens</i>	羽芒菊	Exotic	Herb	Very common										*	
<i>Vitex negundo</i> var.	牡荊	Native	Shrub/Tree	Restricted								*			

Scientific name	Chinese name	Origin	Growth form	Status in HK	Habitat										
					Agriculture	Coastal grassland	Leucaena leucocephala woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Urban / Village Area	Waste ground	Watercourse
<i>cannabifolia</i>															
<i>Vitex rotundifolia</i>	白背茛荊	Native	Shrub	Common						*					
<i>Wedelia trilobata</i>	三裂葉蟛蜞菊	Exotic	Herb	Common, also widely cultivated		**	****	*	*	**	**	***	**	****	**
<i>Youngia japonica</i>	黃楊菜	Native	Herb	Very common	*					*			*	*	*
<i>Zanthoxylum nitidum</i>	兩面針	Native	Climber/Shrub	Very common							*	*			
Total number of species recorded				131	7	24	22	27	22	29	54	51	20	59	19

Note:

1. Origin of plant species refer to AFCD (2012). Check List of Hong Kong Plants 2012. Agriculture, Fisheries and Conservation Department, HKSAR, Hong Kong.
 2. Status follows Xing, F.W., Ng, S.C., Chau, L.K.C. 2000. Gymnosperms and angiosperms of Hong Kong. Memoirs of the Hong Kong Natural History Society 23: 21-136.
- AFCD. 2003. Rare and Precious Plants of Hong Kong. Agriculture, Fisheries and Conservation Department, HKSAR, Hong Kong. 234pp
- AFCD. 2007. Flora of Hong Kong Vol. 1. Edited by Hong Kong Herbarium, Agriculture, Fisheries and Conservation Department & South China Botanical Garden, Chinese Academy of Sciences. 329pp
- AFCD. 2008. Flora of Hong Kong Vol. 2. Edited by Hong Kong Herbarium, Agriculture, Fisheries and Conservation Department & South China Botanical Garden, Chinese Academy of Sciences. 352pp
- AFCD. 2009. Flora of Hong Kong Vol. 3. Edited by Hong Kong Herbarium, Agriculture, Fisheries and Conservation Department & South China Botanical Garden, Chinese Academy of Sciences. 352pp
- AFCD. 2011. Flora of Hong Kong Vol. 4. Edited by Hong Kong Herbarium, Agriculture, Fisheries and Conservation Department & South China Botanical Garden, Chinese Academy of Sciences. 379pp

Appendix C

Tables of Summaries of Fauna species Recorded in Study Area

Table 1 Total number of Bird Species Recorded in Study Area.

Species	Scientific Name	Conservation Status ¹	Coastal Grassland	Leucaena leucocephala Woodland	Mangrove	Open Space (Grassland)	Orchard	Waste Ground	Watercourse
Grey Heron	<i>Ardea cinerea</i>	PRC	1						
Great Egret	<i>Ardea alba</i>	PRC (RC)	7		3				
Little Egret	<i>Egretta garzetta</i>	PRC (RC)	20		2				
Black Kite	<i>Milvus migrans</i>	(RC)						1	
Spotted Dove	<i>Spilopelia chinensis</i>	-		3			1	2	
Eurasian Magpie	<i>Pica pica</i>	-					1	1	
Large-billed Crow	<i>Corvus macrorhynchos</i>	-			2				
Cinereous Tit	<i>Parus cinereus</i>	-		1					
Red-whiskered Bulbul	<i>Pycnonotus jocosus</i>	-		18		6			1
Chinese Bulbul	<i>Pycnonotus sinensis</i>	-		20		2			
Yellow-browed Warbler	<i>Phylloscopus inornatus</i>	-		1					
Masked Laughingthrush	<i>Garrulax perspicillatus</i>	-					5		
Japanese White-eye	<i>Zosterops japonicus</i>	-		3		1			
Crested Myna	<i>Acridotheres cristatellus</i>	-		10		2	2	3	3
Red-billed Starling	<i>Spodiopsar sericeus</i>	GC				2	5		6
Oriental Magpie Robin	<i>Copsychus saularis</i>	-					1		

¹Conservation status refers to Fellowes et al. 2002. Those in parenthesis indicate that the assessment is on the basis of restrictedness in breeding and/or roosting rather than general occurrence.

Table 2 Total number of Butterfly Species Recorded in Study Area.

Species	Scientific Name	Conservation Status	Wasteland
Indian Cabbage White	<i>Pieris canidia</i>	-	1

¹Conservation status refers to Fellowes et al. 2002.



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MCIREA ACTAB RPS (GP)
英國特許測量師學會資深會員
香港測量師學會資深會員
英國特許測量師學會會員
中國房地產估價師學會會員
香港估價師學會會員
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香港測量師學會會員
註冊專業測量師(測量學)
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建築學士

Ng Hang Kwong, BBS

吳恆廣

FRICS FHKIS MCIREA RPS (GP)
英國特許測量師學會資深會員
香港測量師學會資深會員
中國房地產估價師學會會員
註冊專業測量師(測量學)

Wong Chi Wai

黃志偉

MRICS MHKIS MCIREA RPS (GP)
英國特許測量師學會會員
香港測量師學會會員
中國房地產估價師學會會員
註冊專業測量師(測量學)

Pun How Wai

潘孝維

MRIBA
英國皇家測量師學會會員

By Hand

Date : 8 March 2016
Our Ref : LDS/PLAN/5347(2)

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



Dear Sir/Madam,

**Representation to the Draft Tung Chung Valley Outline Zoning Plan
No. S/I-TCV/1 under Section 6(1) of the Town Planning Ordinance**

We are instructed by the Representer, *Coral Ching Limited*, to submit this representation under Section 6(1) of the Town Planning Ordinance in relation to the Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 gazetted on 8 January, 2016. A copy of authorization letter issued by the Representer is attached for your reference.

Please find enclosed a copy of the duly signed Form No. S6 and 90 copies of the written representation for your consideration.

Thank you very much for your kind attention. Should you have any queries with regard to this representation submission, please do not hesitate to contact our Miss Cannis Lee or Ketty Chan at 2877 1636.

Yours faithfully,
For and on behalf of
Lawson David & Sung Surveyors Limited

Lawson David & Sung



Encl.

c.c. Client

033

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	Date Received 收到日期	

- The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出。填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.info.gov.hk/tpb/>.
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- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.
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1. Person Making This Representation (known as "Representer" hereafter) 提出此宗申述的人士（下稱「申述人」）
Name 姓名/名稱 (Mr/Mrs/Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*) Coral Ching Limited

2. Authorized Agent (if applicable) 獲授權代理人 (如適用)
Name 姓名/名稱 (Mr/Mrs/Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*) Lawson David & Sung Surveyors Ltd.

3. Details of the Representation 申述詳情	
Draft plan to which the representation relates 與申述相關的草圖	Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1

* Delete as appropriate * 請刪去不適用者
Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

**REPRESENTATION RELATING TO
DRAFT PLAN UNDER SECTION 6(1) OF
THE TOWN PLANNING ORDINANCE (CAP. 131)**

根據《城市規劃條例》（第131章）
第6(1)條就草圖作出申述

3. Details of the Representation (Continued) (use separate sheet if necessary)
申述詳情 (續) (如有需要, 請另頁說明)

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
Please refer to the attached written representation	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂? 如有的話, 請註明詳情。		
Please refer to the attached written representation		

@ 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 Amendments.
 請形容圖則內與申述相關的指定事項。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 fill "NA" for inapplicable 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。

4. Plans, Drawings and Documents 圖則、繪圖及文件

Please list location plans, sites plans, other relevant plans, drawings and other documents submitted with the representation. For coloured drawings/plans or plans/drawings larger than A3 size, 90 copies each should be provided. For other supplementary documents, e.g. reports on impact assessment, 90 copies each should be submitted.

請列明連同申述一併遞交的位置圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有圖則/繪圖為彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

90 copies of written representation

5. Signature 簽署

Signature
簽署

Cannis Lee

"Representer"/Authorized Agent*

「申述人」/獲授權代理人*

Cannis Lee

Senior Town Planner

Name in Block Letters 姓名（以正楷填寫）

Position (if applicable) 職位（如適用）

Professional

Qualification(s) 專業資格

Member 會員 / Fellow 資深會員 * of

☐ HKIP ☐ HKIA ☐ HKIS ☐ HKIE ☐ HKILA

Others 其他 MPA, RPP

on behalf of
代表

Lawson David & Sung Surveyors Ltd.

Company/Organization Name and Chop (if applicable)

公司/機構名稱及蓋章（如適用）



Date

日期 8.3.2016

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this representation will be used by the Secretary of the Board and Government departments for the following purposes:

- (a) the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and
- (b) facilitating communication between the "representer" and the Secretary of the Board/Government departments in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.

委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：

- (a) 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及
- (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the "representer" in this representation may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

「申述人」就這宗申述提供的個人資料，或亦會向其他人士披露，以作上述第1段提及的用途。

3. A "representer" has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.

根據《個人資料（私隱）條例》（第486章）的規定，「申述人」有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道333號北角政府合署15樓。

* Delete as appropriate

* 請刪去不適用者

Please fill "NA" for inapplicable 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

Representation to the Draft Tung Chung Valley OZP No. S/I-TCV/1

1. Introduction

This representation is prepared and submitted on behalf of Coral Ching Limited ("the Representer"), the registered owner of various lots in DDTC1, DDTC2, DDTC3 and DDTC5 under Section 6(1) of the Town Planning Ordinance (the "TPO") in response to the Draft Tung Chung Valley (TCV) OZP No. S/I-TCV/1 which was published on 8 January, 2016 for public inspection. The draft TCV OZP replaces the draft TCV Development Permission Area (DPA) Plan published on 21 August, 2015 and takes forward the recommendations of the Tung Chung Study. Our previous comments submitted in response to the draft TCV DPA Plan are still valid.

This submission is generally in support of the OZP while recommendations are being made on parcels of land to allow better utilization of land resource, increasing housing supply and community services/facilities, strengthening transport connectivity, as well as respecting both nature conservation and environmental protection. The objective of this written representation is to encourage a more comprehensive plan in terms of potential and possible future landuse.

2. Representation to the Draft Tung Chung Valley OZP No. S/I-TCV/1

2.1 Designation of higher density residential development within 500m radius from the Tung Chung West (TCW) Railway Station in Area 60

With the extension of Tung Chung MTR Station to TCW and construction of infrastructure in the Area, it is proposed to rezone Area 60 from "R(C)2" to "R(C)1" with corresponding increase in building height (see Figure 1). This proposal is in line with the Policy Address 2013 to meet housing needs and the Transport Oriented Development (TOD) concept that the sites near the proposed railway station will have higher plot ratio. The TOD has worked well in Hong Kong as it brings economic and social benefit and sustains property development nearby. With reference to adjoining land use, Area 39 on the Draft Tung Chung Town Centre Area OZP No. S/I-TCTC/21, located to the immediate east of Area 60 across Chung Mun Road, is zoned "R(A)". In terms of land use compatibility, scope for some high density development in Area 60 is worthy of consideration by the Town Planning Board.

According to the statistics provided by the Legislative Council Panel on Transport Subcommittee on Matters Relating to Railways in "Capacity and Loading of MTR Trains" (Paper No. CB(1)980/13-14(03)), the signaling system will be upgraded and made available to provide additional train trips of a maximum of 45,000 passengers per hour per direction during the peak hours. Given that the planned population in the Area is about 9,600, Area 60 is proposed to rezone from "R(C)2" to "R(C)1" so as to support the proposed TCW railway station, thereby reinforcing the role of the region to support the commercial hub and activity node adjacent to the proposed TCW MTR Station. In view of

the fact that Area 60 is located within 500m radius from the TCW Railway Station and compatibility of higher density land use, it has potential to be rezoned from "R(C)2" to "R(C)1" with corresponding increase in the maximum plot ratio and building height restriction.

2.2 Support the designation of "R(C)2" zone for Area 61A

The Representer supports the designation of "R(C)2" zone for Area 61A to meet the demand for housing supply. Taking into consideration Area 61A, located at the fringe of 500m radius from the TCW MTR Station and to be served with a proposed road (Road L24), the proposed "R(C)2" zone, with a plot ratio of 1 and a maximum building height of 20mPD, is considered appropriate at such location.

2.3 Designation of area for more efficient use

The Representer generally appreciates the need for flood control/prevention system on Tung Chung Stream. However, there is concern about the five sites (i.e. Areas 45B, 45C, 45D, 45E and 45F) designated for "OU" annotated "Stormwater Attenuation and Treatment Ponds" with a total area of about 2.64ha (see Figure 1). As a preventative measure to flooding and preservation of the natural environment of Tung Chung River, it is questionable that over 2ha of land is reserved for stormwater attenuation and treatment ponds within TCV. Hence, we call for further explanation on the extensive area reserved for Stormwater Attenuation and Treatment Ponds. On top of that, we suggest areas that are unnecessarily for "OU" annotated "Stormwater Attenuation and Treatment Ponds" should be rezoned to other appropriate land use zones for better utilization of scarce land resource.

2.4 Appreciate the establishment of a River Park at the eastern section of Tung Chung Stream

The proposed establishment of a River Park along the eastern section of Tung Chung Stream is generally appreciated, as it would preserve the natural environment and ecology of TCV. To meet the ultimate aims of nature conservation and environmental protection, the Government should acquire the land zoned for "(OU)River Park" and "CA", taking up the ownership for management responsibility. While considering a comprehensive design of the Park, landscape enhancement, cross-river linkage and walking trails for environmental education should be taken into account. The potential to develop eco-tourism at Tung Chung River should also be explored.

It is noted that both the planning intentions of "CA" and "River Park" are similar which is to protect the stream from adverse impact of human activities and to retain the existing ecological and topographic features of Tung Chung Stream. It is suggested that land designated for "CA", i.e. along the western section of Tung Chung Stream, can be linked up with the proposed river park as the river park extension for long term conservation of the Tung Chung Stream, which could be a prime destination as an eco-park for local residents and tourists.

2.5 Enhance internal and external connectivity

The road system proposal for TCV has been minimized in order to conserve and protect the ecological value, natural landscape and environment in TCV, however, there is a lack of connectivity within the region which is critical for any future rise in population and growth of the region. In view of having a total 20% of land designated for residential and village type developments in TCV with a planned population of about 9,600, the proposed road system should be reviewed taking into consideration that the distance between two proposed public transport interchanges (PTIs) of more than 1km. More public transport services and linkages between the two proposed PTIs should be provided for internal connectivity within TCV. There is a planned PTI at Shek Mun Kap Road, together with the proposed road widening works, the capacity and scale of the PTI should be explored in detail to improve accessibility and public transport services. Options for transport modes should be allowed for higher accessibility and external connectivity, i.e. connections between TCV, Tung Chung East Extension and other parts of the Territory.

2.6 To provide more facilities and services to meet demands of local community

On the draft TCV OZP, commercial activities are concentrated within 500m radius of TCW MTR Station, yet it is generally considered that there will be inadequate commercial facilities to serve the future residents in view of shop and services use within "R(C)" zones requires planning permission from the TPB.

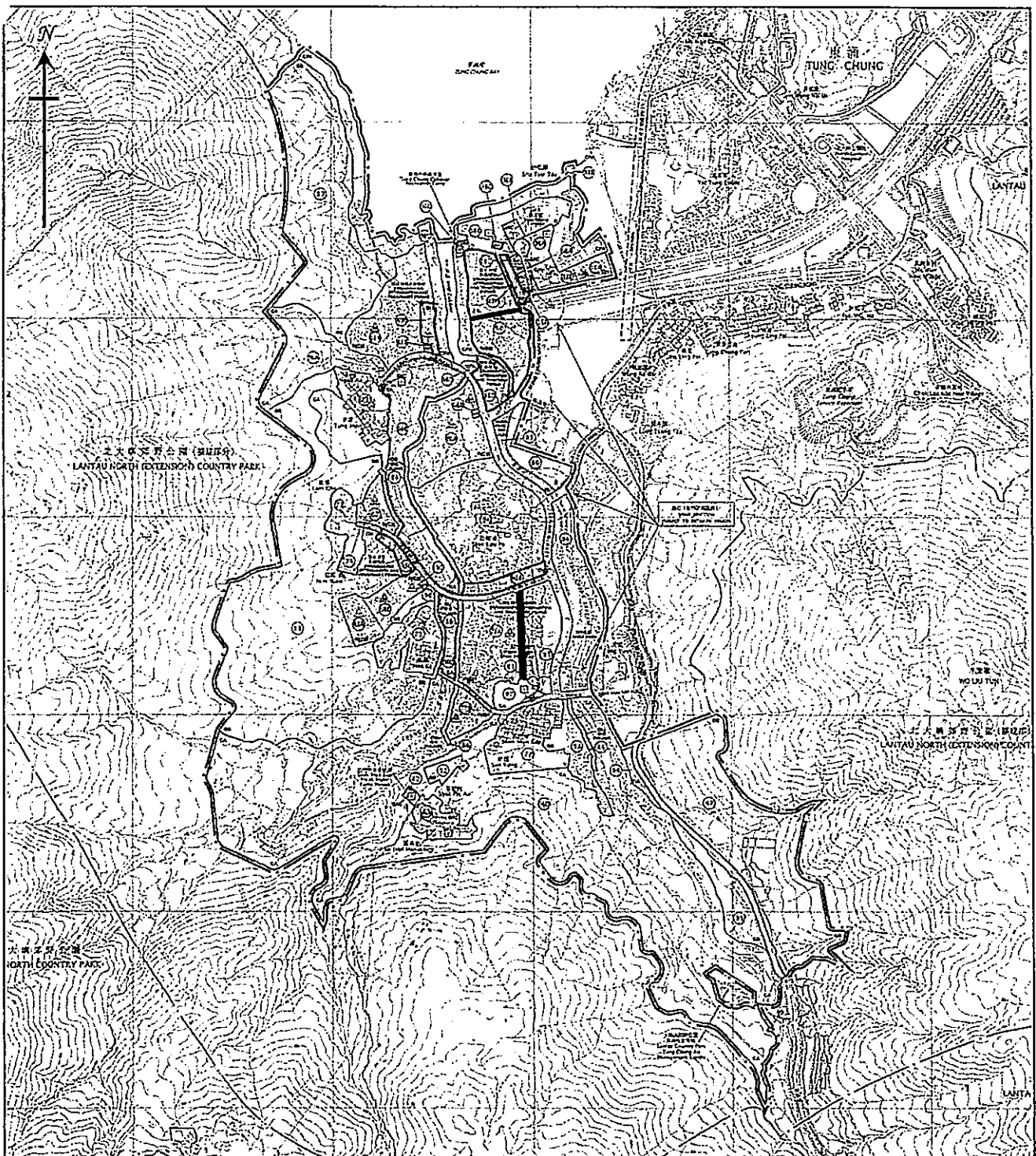
Since the proposed commercial nodes within 500m radius of the TCW MTR Station are not located within walking distance of most of the residential zones, residents will rely on local transportation to access the commercial nodes and Tung Chung Town Centre for their shopping needs. In line with the self-sustainable concept for new town development, flexibility should be allowed for the provision of shops and services use within the "R(C)" zone. Accordingly, commercial activities and community facilities should be more evenly distributed in the area to serve the district needs. Careful design and development of local/small scale retail opportunities should be explored to provide more convenient places for the local residents to shop and enjoy related employment opportunities.

2.7 Remove the non-building areas in Areas 60 and 71A

Two non-building areas (NBAs) of 20m and 30m wide are proposed at the middle of the Sites in Areas 60 and 71A respectively (see Figure 1) as breezeway to promote better air ventilation and to enhance visual permeability in the Area. This will impose serious constraints on the design of residential developments at the sites which might result in higher construction costs and a lack of coherence neighbourhood. In view of the fact that TCV has adopted a stepped height design profile and buffer zones such as "CPA", "CA", "GIC", "GB" can be identified around Areas 60 and 71A and the north-east/south-west local roads also serve as important breezeways/air paths for the area, the rationale for NBAs, its size and disposition are debatable. As such, the NBAs are considered unnecessary and should be removed.

3. Conclusion

The newly published draft Tung Chung Valley OZP has provided a good framework in bringing the Recommended Outline Development Plan formulated under the Tung Chung Study forward. In the effort of making the most of the opportunity that Tung Chung New Town has presented, this representation provides the insights and concerns as a stakeholder while also considering Hong Kong's economic and social needs in response to the draft OZP. It is also hope that the housing provision can be provided in a timely manner in order to meet the housing demand.



Legend:

- ☐ Area 60: Proposed to be rezoned from "R(C)2" to "R(C)1"
- ☐ Review the necessity of "OU (Stormwater Attenuation and Treatment Ponds)" zones
- ☐ Extension of the proposed river park to the western section of Tung Chung Stream
- ☐ Non-building areas proposed to be removed

Location Plan

(Extracted from Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1) (For Reference Only)

Figure 1

Not to Scale



羅迅測計師行
Lawson David & Sung
 Surveyors, Planners, Engineers, Architects
 License No. C-000121

TPB/R/S/I-TCV/1-12

Form No. S6 表格第 S 6 號

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1. Person Making This Representation (known as "Representer" hereafter)
提出此宗申述的人士（下稱「申述人」）

Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*)

牛凹村居民代表 楊志豪
牛凹村居民代表 羅志剛

2. Authorized Agent (if applicable) 獲授權代理人（如適用）

Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*)

不適用

3. Details of the Representation
申述詳情

Draft plan to which the representation relates
與申述相關的草圖

不適用

* Delete as appropriate * 請刪去不適用者
Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

Parts 1, 2 and 3 第 1、第 2 及第 3 部分

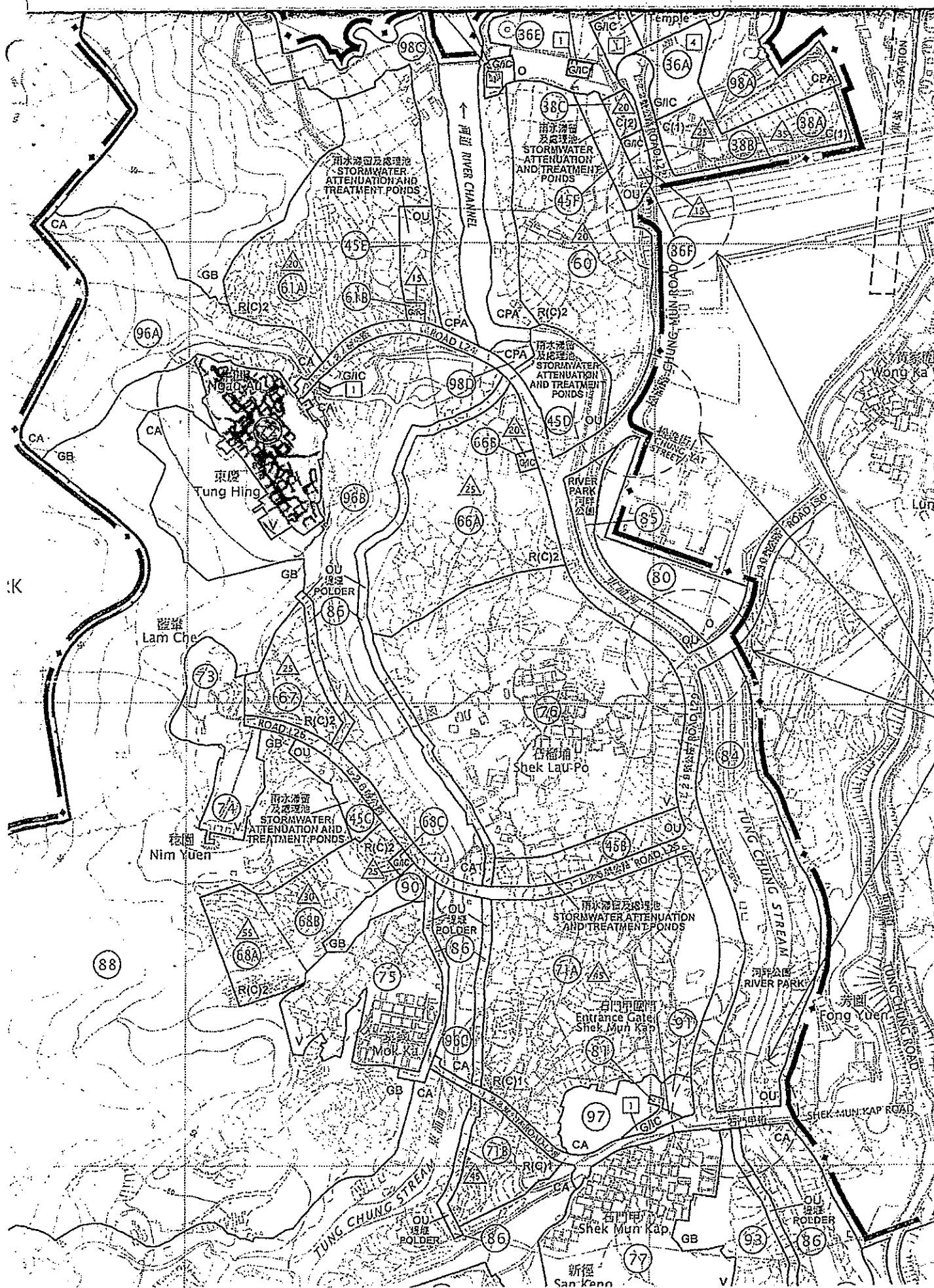
Form No. S6 表格第S 6號

3. Details of the Representation (Continued) (use separate sheet if necessary) 申述詳情(續)(如有需要,請另頁說明)		
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
5.9 自然保育區	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	有部份私人土地,被納入自然保育區內。
5.4 鄉村式發展 (牛凹村)	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	牛凹村原有可建屋範圍,被納入自然保育區內,導致沒有空間發展,扼殺原居民應有權利。
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂? 如有的話,請註明詳情。		
擴闊牛凹村村界 另重紅線		

* 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 Amendments.
請形容圖則內與申述相關的指定事項。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 fill "NA" for inapplicable 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

Part 3 (Continued) 第3部分(續)



Form No. S6 表格第 S 6 號

4. Plans, Drawings and Documents 圖則、繪圖及文件

Please list location plans, sites plans, other relevant plans, drawings and other documents submitted with the representation. For coloured drawings/plans or plans/drawings larger than A3 size, 90 copies each should be provided. For other supplementary documents, e.g. reports on impact assessment, 90 copies each should be submitted.

請列明連同申述一併遞交的位置圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有圖則/繪圖為彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

5. Signature 簽署

Signature
簽署

楊志豪 羅志剛
楊志豪 羅志剛

"Representer"/Authorized Agent*
「申述人」/獲授權代理人*

Name in Block Letters 姓名（以正楷填寫）

Position (if applicable) 職位（如適用）

Professional

Qualification(s) 專業資格

Member 會員 / Fellow 資深會員* of

☐ HKIP ☐ HKJA ☐ HKIS ☐ HKIE ☐ HKILA

Others 其他

on behalf of

代表

Company/Organization Name and Chop (if applicable)

公司/機構名稱及蓋章（如適用）

Date

日期

4 / 3 / 2016

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this representation will be used by the Secretary of the Board and Government departments for the following purposes:

- (a) the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and
- (b) facilitating communication between the "representer" and the Secretary of the Board/Government departments in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.

委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城規會規劃指引的規定作以下用途：

- (a) 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及
- (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the "representer" in this representation may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

「申述人」就這宗申述提供的個人資料，或亦會向其他人士披露，以作上述第1段提及的用途。

3. A "representer" has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.

根據《個人資料（私隱）條例》（第486章）的規定，「申述人」有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣甸道333號北角政府合署15樓。

* Delete as appropriate

* 請刪去不適用者

Please fill "NA" for inapplicable 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

Parts 4 and 5 第4及第5部分

寄:
發件日期:
作者:
主旨:
附件:

Yam Paggie [REDACTED]
08日03月2016年星期二 13:30
tpbpd@pland.gov.hk
Re : S/I-TCTO/21
Appendix A - D.pdf

TPB/R/S/I-TCV/1-13

Re : S/I-TCTO/21

致: 城市規劃委員會秘書處

由於東涌為香港政府發展重點項目之一，本人黃樹有對東涌新發展有以下意見：

1. 黃泥屋村Zone V 擴大。（見附件A）
2. 候王宮擴大。（見附件B）
3. 東涌急速發展底下，土地之調配及原居民丁權問題仍未得到妥善解決，土地未盡其用，有見及此，本人提議擴大土地面積，以達致東涌居民之需求。（見附件C 及 D）

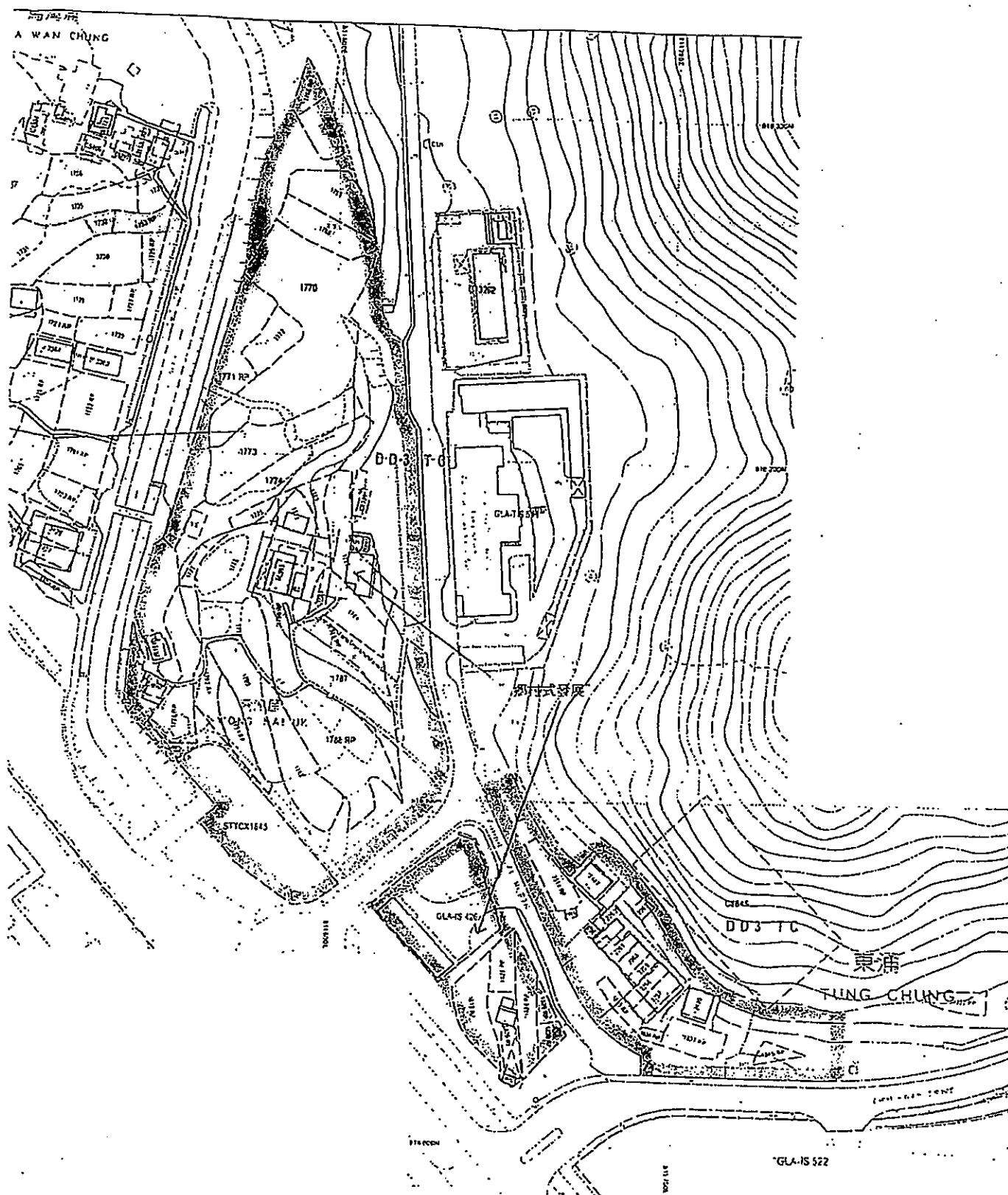
謝謝聽取意見!

黃樹有
(聯絡電話: [REDACTED])

08-Mar-2016

025

38



LOT INDEX PLAN

本國南方土地政策引致的結果，如東亞地區外債的大增等，包括其被破壞的開墾地、都市發展用地、城鎮開墾及政府土地開墾等問題而暫時使用土地的情況可透過學習開墾的資料而獲得解決。本國所指示的資料必須逐項予以核實，並有更佳或新的世界紀錄時，應重新訂定開墾地用途並重新打訂而重新開墾。

This plan is a copy of the lot index plan showing the approximate location of lot boundaries, including the temporary occupation of land under Government Land Allotments, Temporary Government, Land Allotments, Short Term Tenancies and Government Land Licenses. The temporary occupation of land may be created or terminated at short notice and should be confirmed with the District Lands Officer. The information shown on this plan **MUST** be verified by field survey. The lot index plan may be revised without prior notification as better or new boundary evidence becomes available.

四

地政總署測繪處
Survey and Mapping Of
Lands Department

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Locality: LANTAU

Lol Index Plan No. : IS0691042014

District Survey Office : Islands

Date: 16-Apr-2014

Reference No.: 95-0C.9, SE.13A

地段索引圖

LOT INDEX PLAN

免責聲明

本圖乃為地段索引圖，顯示地界線的大致位置，包括根據政府地籍圖、臨時政府地籍圖及政府土地租約而繪出。由於地籍圖及政府土地租約的性質，本圖所顯示的地界線，可能與實際的地界線有所出入。本圖所顯示的地界線，僅供參考之用，不得作為任何法律上的根據。如欲知地界線的詳細情況，請向地籍處查詢。

Disclaimer

This plan is a copy of the lot index plan showing the approximate location of lot boundaries, including the temporary occupation of land under Government Land Allocations, Temporary Government Land Allocations, Short Term Tenancies and Government Land Licences. The temporary occupation of land may be created or terminated at short notice and should be confirmed with the District Lands Officer. The information shown on this plan MUST be verified by field survey. The lot index plan may be revised without prior notification as better or new boundary evidence becomes available.

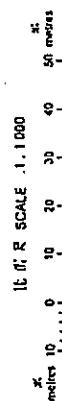


地政總署測繪處

Survey and Mapping Office
Lands Department

香港特別行政區政府 版權所有

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Locality: LANTAU

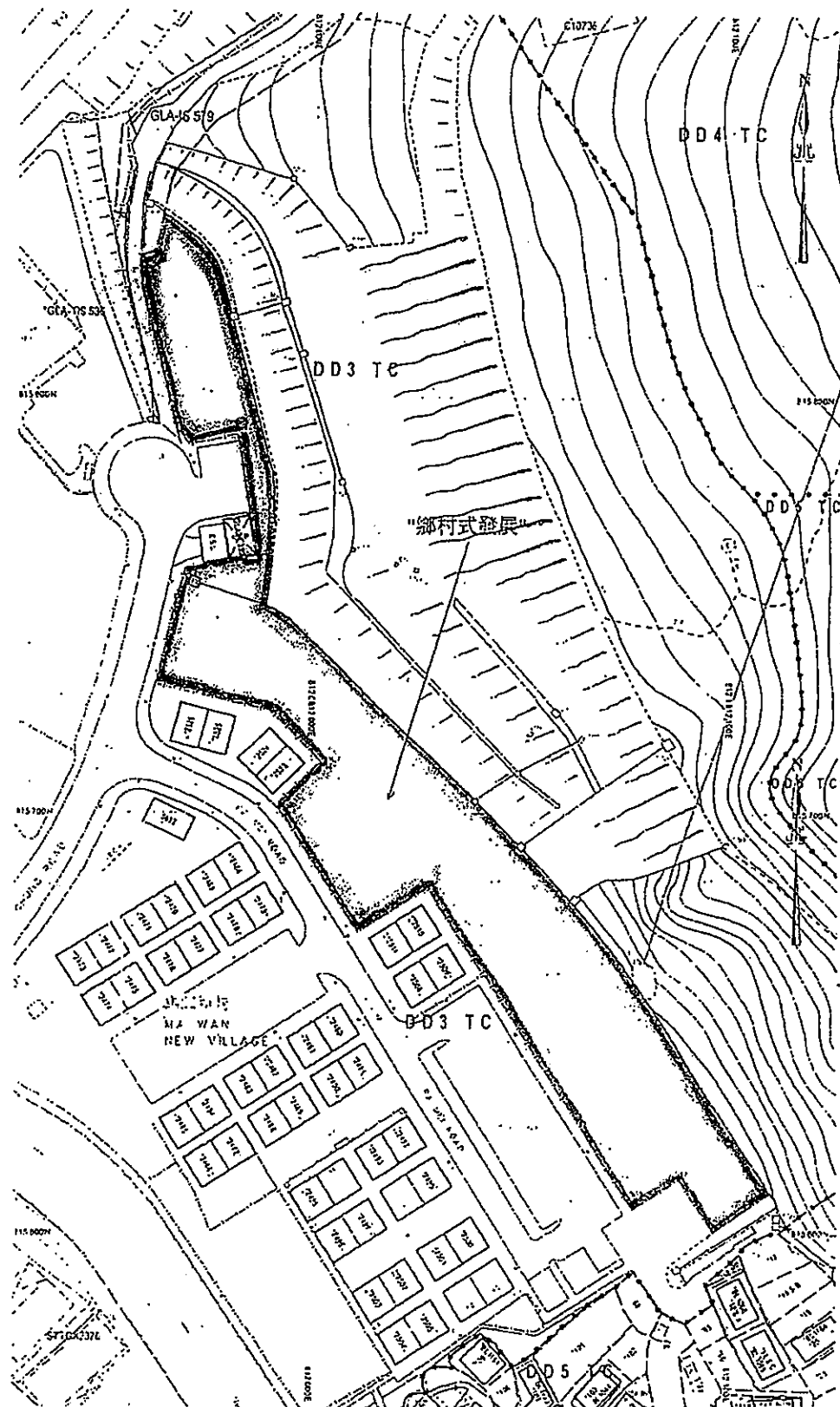
Lot Index Plan No.: IS0225102014

District Survey Office: Islands

Date: 21-Oct-2014

Reference No.: S-SE-13D, P-25-44A





就草圖作出申述

TPB/R/S/I-TCV/1-14

Representation Relating to Draft Plan

參考編號

Reference Number:

160307-174623-48444

提交限期

Deadline for submission:

08/03/2016

提交日期及時間

Date and time of submission:

07/03/2016 17:46:23

提出此宗申述的人士

Person Making This Representation:

先生 Mr. 謝擎天(頭村原居民代表)

申述詳情

Details of the Representation :

與申述相關的草圖

Draft plan to which the representation relates:

S/I-TCTC/21

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
A1項	反對 Oppose	因該地區有一少部份為大澳 頭村的葬區(金塔地)，若成綠化地區，本村的安葬地會受到影響。

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

--

008

456 36

寄件者:
收件者:
主旨:
附件:

Yin Siu [REDACTED]
07日03月2016年星期一 22:58
tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk
東涌新市鎮擴展意見
反對東涌市中心發展-馮小燕.docx; 反對東涌東填海_馮小燕.docx; 東涌河 馮小燕.docx

TPB/R/S/I-TCV/1-15

城市規劃委員會主席及委員、規劃署署長、土木工程拓展署署長及渠務署署長，

你們好，本人就對東涌谷分區計劃大綱草圖編號 S/I-TCV/1、東涌市中心分區計劃大綱草圖編號 S/I-TCTC/21，東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 及工務計劃項目第 7786CL 號地政總署工務計劃項目第 7786CL 號東涌新市鎮擴展提出意見，見附件。

東涌居民

馮小燕

馮小燕 東涌逸東邨居民

Email:

Phone:

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

不宜建低密度私人住宅

無助本區市民就業

(B) 該申述的性質及理由

東涌低技術勞工人口不少, 尤其鄰近的逸東村

東涌河的新發展無助低下階層經濟

(C) 建議對有關草圖作出的修訂

-發展有機農業

-如塋原般, 政府出錢買地讓市民發展農業

-農耕涉及低技術勞工, 讓居民不再需要跨區工作, 可照顧兒女

-在東涌當區及機場等地預留地方收集廚餘, 減低購買肥料的成本

-若成功建立本地有機商品品牌，可以借鄰近香港國際機場上的優勢以較短時間

將香港本地有機商品運到海外出售，以爭取更佳的保鮮期。

-減低本港依賴入口食物狀況及支持本地農業

寄者:
牛日期:
收件者:
副本:
主旨:
附件:

Yin Siu

08日03月2016年星期二 12:11

k; enquiry@cedd.gov.hk; DSD HKSARG

TPB/R/S/I-TCV/1-16

就東涌新市鎮擴展的意見

東涌市中心發展-CHAN SHUN LEUNG.docx; 東涌谷-CHAN SHUN LEUNG.docx; 東涌東填海-CHAN SHUN LEUNG.docx

就東涌新市鎮擴展的意見

城市規劃委員會主席及委員、規劃署署長、土木工程拓展署署長及渠務署署長，

你們好，本人就對東涌谷分區計劃大綱草圖編號 S/I-TCV/1、東涌市中心分區計劃大綱草圖編號 S/I-TCTC/21，東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 及工務計劃項目第 7786CL 號地政總署工務計劃項目第 7786CL 號東涌新市鎮擴展提出意見，見附件。

CHAN SHUN LEUNG

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

不宜建低密度私人住宅

無助本區市民就業

(B) 該申述的性質及理由

東涌低技術勞工人口不少, 尤其鄰近的逸東村

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-農耕涉及低技術勞工, 讓居民不再需要跨區工作, 可照顧兒女

-在東涌當區及機場等地預留地方收集廚餘, 減低購買肥料的成本

將香港本地有機商品運到海外出售

-減低本港依賴入口食物狀況及支持本地農業

寄件者: Yin Siu
寄件日期: 08日03月2016年星期二 12:08
收件者: [REDACTED]; enquiry@cedd.gov.hk; DSD HKSARG
副本: [REDACTED]
主旨: 就東涌新市鎮擴展的意見
附件: 反對東涌東填海_TSE sai kit.docx; 東涌市中心發展_TSE sai kit.docx; 東涌谷_TSE sai kit.docx

就東涌新市鎮擴展的意見

城市規劃委員會主席及委員、規劃署署長、土木工程拓展署署長及渠務署署長，

你們好，本人就對東涌谷分區計劃大綱草圖編號 S/I-TCV/1、東涌市中心分區計劃大綱草圖編號 S/I-TCTC/21，東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 及工務計劃項目第 7786CL 號地政總署工務計劃項目第 7786CL 號東涌新市鎮擴展提出意見，見附件。

TSE sai kit

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

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-減低本港依賴入口食物狀況及支持本地農業

者:
件日期:
卡者:
主旨:

Hin tung Chan

07日03月2016年星期一 22:43

tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk

就東涌谷分區計劃大綱草圖編號S/I-TCV/1、東涌市中心分區計劃大綱草圖編號S/I-TCTC/21、東涌擴展區分區計劃大綱草圖編號S/I-TCE/1及工務計劃項目第7786CL號地政總署工務計劃項目第7786CL號東涌新市鎮擴展提出意見。

附件:

東涌河 陳衍彤.docx; 反對東涌東填海_陳衍彤.docx; 東涌中發展-陳衍彤.docx

本人欲就東涌谷分區計劃大綱草圖編號S/I-TCV/1、東涌市中心分區計劃大綱草圖編號S/I-TCTC/21、東涌擴展區分區計劃大綱草圖編號S/I-TCE/1及工務計劃項目第7786CL號地政總署工務計劃項目第7786CL號東涌新市鎮擴展提出意見。
謝謝。

東涌富東邨市民：陳衍彤

電話：

電郵：

一、東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

1.1 在東涌河兩邊的區域劃作低密度私人住宅；

1.2 雖有海岸保護區(CPA)，但東涌河的生態和價值應該從整個河流系統(由上游至下；游及兩岸的整個河谷)看，只是在河口沿河劃出 CPA 對保育作用不大。

(B) 該申述的性質及理由

2.1 東涌谷是香港僅有的自然河谷，有原整的河，數以千計的果樹及樹木、大大小小的農場、濕地、紅樹林、多樣性的生物等等，若河谷的上游及中游開發建樓宇會直接影響下游生態的多樣性及東涌谷村民的生活質素，請問有否就最新的東涌谷分區計劃大綱草圖作環境評估報告，施工方法管制；

2.2 東涌谷是街坊及市民常去的地方，市民經東涌谷上昂坪、大澳，對東涌社區而言更是街坊可以在閒時可以換一換氣的晨運好去處，故不應將東涌谷的社區破壞，及把高生態價值地方發展成私人物業；

2.3 在香港，東涌河谷此類的自然景觀所餘無幾，而且是市民，不論東涌或市區港人遠離繁囂、鬆弛神經的地方，不少專家報告指出，回到大自然是減低都市人精神病的方法，為了市民的健康和減低本港庫房的醫療開支，政府應保留自然河谷面貌及鼓勵市民前往東涌河此類自然環境地方，尤其東涌河地理位置不遠，由東涌港鐵站行十五分鐘便可到達；

2.4 低密度私人住宅不能為香港帶來很大的經濟收益，而且是一筆過利益，非長遠及可持續；

2.5 低密度私人住宅的落成意味着私家車的數量上升，會造成環境污染或催化自然；

2.6 地貌被改建為停車場土地用途，是不合理的安排；

2.7 若河岸保育區會變為消費的河谷，對河的環境污染造成很壞的影響；

2.8 石榴埔村附近的叢林在夏天可見四至五十隻螢火蟲，雖然石榴埔村被劃為 V，即留作村落發展，但若日後村民要建丁屋或出讓了丁權與地產商，仍會開墾螢火蟲的棲息地，破壞了寶貴的自然生態。

(C) 建議對有關草圖作出的修訂

3.1 發展有機農業區及成為香港第一個無廢新市鎮

3.1.1 在早前的港台節目中，一個在荃灣舉行的小型有機小攤在短時間內將有機農產品售罄，證明本土有機農作物有價有市；而且中國內地毒菜等問題，一直令港人憂心入口農產品的安全性。有見及此，支持發展一套安全及有保障的本土有機農業是一門符合長遠利益的產業；

3.1.2 近年來政府積極推廣【源頭減廢】，而東涌區正正有大量廚餘可為本土有機

農業提供有機肥料。比如：逸東邨、富東邨、裕東苑、映灣園、海堤灣畔及機場等地區均設有林林總總的食肆，當中更以機場和酒店以廚餘過剩聞名；

3.1.3 鄰近東涌住宅區的可機商品能以便捷及快速運送到區內的不同屋苑販賣，當中包括私人住宅區如映灣園，東堤灣畔，以及日後的東涌東填海區，符合區內原經濟發展。

總括而言

1. 在東涌當區及機場等地預留地方收集廚餘，實踐源頭減廢；
2. 廚餘經處理後供東涌谷附近的有機農場；
3. 有機商品在東涌原區各地出售，生產本地食物、發展本地社區經濟及鼓勵本地就業。

根據此路線圖，首先達成源頭減廢，然後透過消化原區及機場廚餘，減少送往堆填區當中的運輸成本，最後藉以匯聚成一個嶄新的綠色社區經濟體。

3.2 建立本地有機商品品牌

東涌靠近機場，若成功建立本地有機商品品牌，可以借鄰近香港國際機場上的優勢以較短時間將香港本地有機商品運到海外出售，以爭取最佳的保鮮期。

3.3 本地經濟及原區就業

3.3.1 善用東涌谷的生態作教育、農地及果林生產本地農作物等本土經濟，這一些產業有助增加原區就業，非服務業等單一化及低技術產業能疑比；

3.3.2 減低本港依賴入口食物狀況及支持本地農業；

3.3.3 就業機會，上述的產業能夠產生大量高技術以及師徒式的優質職位。勞工處經常鼓勵原區工作，但現實是東涌居民當中包括高學歷及高技術居民需要到東涌外區工作，其中一個原因是大部分中老年的居民缺乏科技知識，如果東涌區內能容納有機產業，相信就能大大改善東涌居民跨區工作的問題，同時也可減少社署有關交通津貼方面支出；

3.3.4 東涌谷可以教育用途、生態教育營，訓練生態文化導賞員，教育大眾珍惜大自然的能源及資源。

3.4 建立低碳社區

3.4.1 東涌新市鎮發展應參考珀麗灣和愉景灣，不容駕駛私家車進入，必需要乘搭指定集體運輸工具。

3.4.2 作為一個支持綠色城市的規劃署可參考荷蘭和法國等西方先進國家，以東涌為起點建立一套公立租借單車服務，同時接駁在地鐵站和巴士站附近的單車停泊處，最後可以參考沙田及中文大學等香港著名地區完善東涌區內單車徑網絡，鼓勵市民單車轉乘集體運輸交通以進出市區工作，使東涌作為香港第一個綠色的智慧型的新市鎮。

城市規劃委員會主席及委員台鑒

一、東涌谷分區計畫大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎的在有關草圖內的特定事項

1.1 在東涌河兩邊的區域劃作低密度私人住宅；

1.2 雖有海岸保護區(CPA)，但東涌河的生態和價值應該從整個河流系統(由上游至下；游及兩岸的整個河谷看，只是在河口沿河劃出 CPA 對保育作用不大。

(B) 該申述的性質及理由

2.1 東涌谷是香港僅有的自然河谷，有原整的河，數以千計的果樹及樹木、大大小小的農場、濕地、紅樹林、多樣性的生物等等，若河谷的上游及中游開發建樓宇會直接影響下游生態的多樣性及東涌谷村民的生活質素，請問有否就最新的東涌谷分區計畫大綱草圖作環境評估報告，施工方法管制；

2.2 東涌谷是街坊及市民常去的地方，市民經東涌谷上昂坪、大澳，對東涌社區而言更是街坊可以在閒時可以換一換氣的晨運好去處，故不應將東涌谷的社區破壞，及把高生態價值地方發展成私人物業；

2.3 在香港，東涌河谷此類的自然景觀所餘無幾，而且是市民，不論東涌或市區港人遠離繁囂、鬆弛神經的地方，不少專家報告指出，回到大自然是減低都市人精神病的方法，為了市民的健康和減低本港庫房的醫療開支，政府應保留自然河谷面貌及鼓勵市民前往東涌河此類自然環境地方，尤其東涌河地理位置不遠，由東涌港鐵站行十五分鐘便可到達；

2.4 低密度私人住宅不能為香港帶來很大的經濟收益，而且是一筆過利益，非長遠及可持續；

低密度私人住宅的落成意味著私家車的數量上升，會造成環境污染或催化自然；

地貌被改建為停車場土地用途，是不合理的安排；

2.7 若河岸保育區會變為消費的河谷，對河的環境污染造成很壞的影響；

2.8 石榴埔村附近的叢林在夏天可見四至五十隻螢火蟲，雖然石榴埔村被劃為 V，即留作村落發展，但若日後村民要建丁屋或出讓了丁權與地產商，仍會開墾螢火蟲的棲息地，破壞了寶貴的自然生態。

(C) 建議對有關草圖作出的修訂

3.1 發展有機農業區及成為香港第一個無廢新市鎮

3.1.1 在早前的港台節目中，一個在荃灣舉行的小型有機小攤在短時間內將有機農產品售罄，證明本土有機農作物有價有市；而且中國內地毒菜等問題，一直令港人憂心入口農產品的安全性。有見及此，支持發展一套安全及有保障的本土有機農業是一門符合長遠利益的產業；

3.1.2 近年來政府積極推廣【源頭減廢】，而東涌區正正有大量廚餘可為本土有機農業提供有機肥料。比如逸東邨、富東邨、裕東苑、映灣園、海堤灣畔及機場等地區均設有林林總總的食肆，當中更以機場和酒店以廚餘過剩聞名；

3.1.3 鄰近東涌住宅區的有機商品能以便捷及快速運送到區內的不同屋苑販賣，當中包括私人住宅區如映灣園，東堤灣畔，以及日後的東涌東填海區，符合區內原經濟發展。

概括而言

在東涌當區及機場等地預留地方收集廚餘，實踐源頭減廢；

廚餘經處理後供東涌谷附近的有機農場；

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根據此路線圖，首先達成源頭減廢，然後透過消化原區及機場廚餘，減少送往堆填區當中的運輸成本，最後藉以匯聚成一個嶄新的綠色社區經濟體。

3.2 建立本地有機商品品牌

東涌靠近機場，若成功建立本地有機商品品牌，可以借鄰近香港國際機場上的優勢以較短時間將香港本地有機商品運到海外出售，以爭取最佳的保鮮期。

3.3 本地經濟及原區就業

3.3.1 善用東涌谷的生態作教育、農地及果林生產本地農作物等本土經濟，這一些產業有助增加原區就業，非服務業等單一化及低技術產業能擬比；

3.3.2 減低本港依賴入口食物狀況及支持本地農業，協助社區處理廚餘，減輕堆填區的負擔。鼓勵街坊及店鋪幫忙儲起廚餘，令鄉民或農民與附近公屋、私樓的街坊產生連結，重塑不同人與土地的關係，鄉郊農業在社會的重要角色及功能；

3.3.3 就業機會，上述的產業能夠產業大量高技術以及師徒式的優質職位。勞工處經常鼓勵原區工作，但現實是東涌居民當中包括高學歷及高技術居民需要到東涌外區工作，其中一個原因是大部分中老年的居民缺乏科技知識，如果東涌區內能容納有機產業，相信就能大大改善東涌居民跨區工作的問題，同時也可減少社署有關交通津貼方面支出；

3.3.4 東涌谷可以教育用途、生態教育營，訓練生態文化導賞員，教育大眾珍惜大自然的能源及資源。

3.4 建立低碳社區，友善單車政策

3.4.1 東涌新市鎮擴展應參考珀麗灣和愉景灣，不容駕駛私家車進入，必需要乘搭指定集體運輸工具。

3.4.2 作為一個支持綠色城市的規劃署可參考荷蘭和法國等西方先進國家，以東涌為起點建立一套公立租借單車服務，同時接駁在地鐵站和巴士站附近的單車停泊處，最後可以參考沙田及中文大學等香港著名地區完善東涌區內單車徑網絡，鼓勵市民單車轉乘集體運輸交通以進出市區工作，使東涌作為香港第一個綠色的智慧型的新市鎮。

二、東涌市中心地區分區計畫大綱核准編號 S/I - TCTC/20

A. 該申述所關乎的在有關草圖內的特定事項

1.1 東涌的空氣污染是全港最高之一，把把大量植有樹木的休憩用地改劃為私人住宅，不利居民的健康；

1.2 把把大量休憩用地改劃為私人住宅，是不公義的土地分配，若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

·B 及 C. 該甲述的性質及理由、對有關草圖作出的建議

希望政府能以「以人為本」地按居民的需要而規劃，不要只盲目增加人口而忽略人的真正需要。可惜此分區計畫大綱圖把東涌市中心的休憩地方劃成住宅或商業用途，把我們的休憩用地及公共空間消滅，令空氣污染問題惡化，直接損害我們的健康。因此，本人建議保留休憩地方及按居民的需要而規劃，例如推行單車友善的政策，源頭減廢，建立友善社區，令東涌居民擁有一個舒適的家。

2.1 反對 B2 項的改劃 - 把北大嶼山郊野公園(擴建部分)現時涵蓋的地方剔出規劃區

剔出規劃區的理據不明，會否將其地區納入其他計畫大綱仍為未知之數。

2.2 反對 C 項的改劃 - 劃作鄉村式發展、住宅

把教會、綜合服務設施大樓、農場、回收場都拆走，把大量樹木砍伐及山頭移平，改劃作建築丁屋及其他低密度住宅，只是短暫的利益，無助市民安居樂業，還會破壞當區的自然環境，令香港人失去了一大片綠色地帶，若建公營房屋則較為合理。

2.3 反對 D1 項的改劃 - 把東堤灣畔中間之寬大的行人區改建成私人屋苑

該行人區為東堤灣畔居民對外的主要行人道路，亦能提供充足的地方作為休憩區，若然將該區域改成私人屋苑，工程的污染將會對東堤灣畔的居民及出入市民的健康有非常壞的影響，亦令公共空間消失，那裡的兩排美麗的大樹，小孩子的自由遊樂場或成人的休憩地方都變成一個非常擠擁的區域。

2.4 反對 D2 項的改劃 - 把東堤灣畔停車場入口對開的單車停泊區改建成道路

該單車停泊區現正服務大量以車代步的居民，尤其在繁忙時間，數以百計的逸東和馬灣新村居民會利用單車到地鐵站上班上學，若果取消該單車停泊區而不在鄰近地方重建，居民將沒有地方停泊單車，建議保留單車停泊區。

2.5 反對 E1 項的改劃 - 把海堤灣畔鄰近的休憩用地改劃為住宅

此舉將進一步減少東涌居民的休憩用地，建議保留休憩用地並用作發展為公園。若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

2.6 反對 F1 項的改劃 - 把水藍天岸鄰近的休憩用地改劃為住宅

此舉將進一步減少東涌居民的休憩用地，建議保留休憩用地。若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

2.7 反對 F2 項的改劃 - 把水藍天岸鄰近的休憩用地(圓形廣場)改劃為道路

很多小孩子會在該大片平地遊玩，此舉會令他們失去大量活動空間，建議保留。若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

2.8 反對 G1 項的改劃 - 把映灣園與可譽中小學之間的休憩用地改劃為住宅

此舉將進一步減少東涌居民的休憩用地，建議保留休憩用地，工程亦會影響學校學生上課。若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

2.9 反對 H1 項的改劃 - 把東薈城及東薈城第一期所在的地方改劃作「商業(2)」地帶

此舉進一步把公共空間私有化，該地方是很低使用量的單車停泊處，明顯是政府的錯誤規劃。而該地方在道路的旁邊，亦有巴士站，建議減少部分單車停泊位，再種植大量植物以改善空氣質素及建坐椅以供市民使用。

2.10 反對 J 項的改劃 - 把東涌鐵路站所在的地方由「綜合發展區」「政府機構或社區」地帶及顯示為「道路」的地方改劃作「其他指定用途」註明為「鐵路站」地帶

一直以來，居民面對安全的單車停泊位不足，建議改劃作單車停泊位，以方便居民停泊單車，建立一個單車有善的社區。

2.11 反對 K 項的改劃 - 把東涌港鐵站 A 出口對開建成商業區

東涌港鐵站 A 出口對開服務大量映灣園居民，作為穿梭巴士轉車之用，對外道路亦可以作為其他私家車使用者作上落車用途，此舉將令道路變得擠擁，難以有充足的地方讓車輛上落客人。

2.12 反對 R3 項的改劃 - 把馬灣新村東北面的土地由綠化地帶改劃作鄉村式發展
有數以十多萬市民輪候公屋，政府一邊說是土地問題，一邊卻把珍貴的土地改劃作鄉村式發展，即建丁屋建議改劃改劃為小型的公共房屋或公營長者屋。

2.13 加強及善用東涌的渡海運輸交通。

三、東涌擴展區分區計畫大綱草圖編號 S/I-TCE/1

A. 該申述所關乎的在有關草圖內的特定事項

1.1 東涌的空氣污染是全港最高之一，而該計畫大綱草圖建議填海 120.5 公頃，興建 P1 道路的填海約 8.6 公頃，令東涌的霧霾情況惡化；

1.2 商業的總面積 7.38 公頃，卻沒有食環街市，不利民生；

1.3 住宅總面積約 59.03 公頃，卻大部分土地建私樓，以人均佔用土地面積計算，約 7 至 8 成為私樓；

1.4 海旁的休憩用地開闢設遊艇停泊處，明顯是私有化我們的公共空間。

B 及 C. 該申述的性質及理由、對有關草圖作出的建議

B. 對政府擬於東涌東北面約二百公頃的前濱及海床範圍內進行填海工程有以下的意見及建議:

1. 反對填海

東涌東擴展計畫的填海工程將填去 145 公頃海床，由於工程範圍鄰近即將興建的大小磨刀洲海岸公園。

- 施工期間進出填海範圍的工程躉船多達 42-56 架次，加上工程與機場第三條跑道部分施工重疊，若然兩項工程同時進行，每日將有多達二百艘高速船、工程船穿梭大嶼山東北部水域，產生巨大交通流量，嚴重干擾海岸公園內的海洋生物，特別是對聲音及水質敏感的中華白海豚。

大小磨刀洲海岸公園只是港珠澳大橋工程的附帶補償方案，若當局不加入緩解及補償措施，只會令海岸公園名存實亡。

2. 特殊教育

- 建議政府在東涌東填海項目中引入特殊學校，緩衝特殊學童長期要跨區上學的問題。

- 據社署資料顯示，東涌有 6 間針對弱能人士的服務中心，主要作為展能服務、嚴重弱智人士宿舍及特殊幼兒中心等，惟獨欠缺銜接中小學階段的特殊學校。

教育局於 2004 年曾表示有意於東涌興建特殊學校；而在 2011 年的立法會會議中，時任教育局局長孫明揚亦有回應訴求，表示「已初步揀選了適合的地點興建該特殊學校，正積極與各相關部門研究有關用地的可行性並進行各項技術研究。待有關研究完成後，我們會擬訂該特殊學校的細節安排，以便盡快落實有關的建校計畫。」但礙於社區阻力、擔心影響樓價等原因，至今仍未落實，不少學童長期要跨區上學。

3. 環島單車徑

- 要求增設連接東涌及機場的環島單車徑

在有關東涌東填海工程，擔心工程會影響翔東路路面平坦，筆直，加上鋪裝良好，而得以受到單車人士所歡迎，加上沿途均沒有任何單車徑設施，除了不少單車友都由此於東涌進出迪士尼，同時間十分適合公路車騎乘訓練。

政府有關當局聲稱把東涌發展成一個「低碳城市」，而踩單車能節能減碳，保護環境，市民又可得到更多運動的機會，既健康又減壓，亦可節省越來越昂貴的交通費用，如能有環島單車行更可為大嶼山增加旅遊特色。希望政府能認真改善路面設施。

4. 反對在海旁的休憩用地開闢設遊艇停泊處，把公共空間私有化。

總結：希望政府以「低碳城市」及「以人為本」作前提再思考東涌的擴展。

四、工務計畫項目第 7786CL 號 政總署工務計畫項目第 7786CL 號 東涌新市鎮擴展

意見：反對拆卸現有的白芒碼頭，因碼頭是原好的，是我們珍貴的公共空間，及應善用碼頭。

東涌居民
李立洲

寄件者:
收件日期:
寄件者:
主旨:
附件:

Chun Kei Lam
08日03月2016年星期二 2:35
tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk
對於大嶼山發展的意見
反對東涌東填海_Jackie.docx; 東涌中發展-林俊麒.docx; 東涌河 林俊麒.docx

TPB/R/S/I-TCV/1-20

Dear Sir/ Madam,

Here is the attached file of my opinion of the Lantau Island development. Pls kindly confirm when you need further information.

Tks & Regards
Lam Chun Kei Jackie

林俊麒

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

只是在河口沿河劃出 CPA 對保育作用不大。

(B) 該申述的性質及理由

東涌河的生態和價值應該考慮整個河流系統(由上游至下；游及兩岸的整個河谷)

若河岸保育區會變為消費的河谷，對河的環境污染造成很壞的影響；

(C) 建議對有關草圖作出的修訂

善用東涌谷的生態作教育、農地及果林生產本地農作物等本土經濟，這一些產業

有助增加原區就業，減低本港依賴入口食物狀況及支持本地農業，訓練生態文化

導賞員，教育大眾珍惜大自然的能源及資源。

寄件者: Yin Siu
 日期: 08日03月2016年星期二 12:06
 收件者: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; DSD HKSARG
 副本: haster wu
 主旨: 就東涌新市鎮擴展的意見
 附件: 反對東涌東填海_Haster.docx; 東涌中發展-Haster.docx; 東涌谷_Haster.docx

就東涌新市鎮擴展的意見

城市規劃委員會主席及委員、規劃署署長、土木工程拓展署署長及渠務署署長，

你們好，本人就對東涌谷分區計劃大綱草圖編號 S/I-TCV/1、東涌市中心分區計劃大綱草圖編號 S/I-TCTC/21，東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 及工務計劃項目第 7786CL 號地政總署工務計劃項目第 7786CL 號東涌新市鎮擴展提出意見，見附件。

Haster

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

只是在河口沿河劃出 CPA 對保育作用不大。

(B) 該申述的性質及理由

東涌河的生態和價值應該考慮整個河流系統(由上游至下：游及兩岸的整個河谷)

若河岸保育區會變為消費的河谷，對河的環境污染造成很壞的影響；

(C) 建議對有關草圖作出的修訂

善用東涌谷的生態作教育、農地及果林生產本地農作物等本土經濟，這一些產業

有助增加原區就業，減低本港依賴入口食物狀況及支持本地農業，訓練生態文化

導賞員，教育大眾珍惜大自然的能源及資源。

寄件者:
發件日期:
收件者:
主旨:
附件:

Kwok Yu Hang
07日03月2016年星期一 22:37
tpbpd@pland.gov.hk; ispd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk
Proposal for Tung Chung Development
反對東涌東填海_郭裕恒.docx; 東涌中發展-郭裕恒.docx; 東涌河-郭裕恒.docx

TPB/R/S/I-TCV/1-22

Dear Sirs / Madams,

I am one of the Hong Kong resident live in Tung Chung,
After studying the government plan for Tung Chung development,
I have some suggestions for our Tung Chung which I think it is reasonable for Hong Kong future.
Please consider my suggestion in the development plan.
Thank you very much for reading my email and proposal.

Regards,
Kwok Yu Hang

東涌富東市民 - 郭裕恒

一、東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項
在東涌河兩邊的區域劃作低密度私人住宅；

(B) 該申述的性質及理由

低密度私人住宅不能為香港帶來很大的經濟收益，而且是一筆過利益，非長遠及可持續，低密度私人住宅的落成意味着私家車的數量上升，會造成環境污染或催化自然。

(C) 建議對有關草圖作出的修訂

發展有機農業區

本土有機農作物有價有市；而且中國內地毒菜等問題，一直令港人憂心入口農產品的安全性。有見及此，支持發展一套安全及有保障的本土有機農業是一門符合長遠利益的產業；近年來政府積極推廣【源頭減廢】，而東涌區正正有大量廚餘可為本土有機農業提供有機肥料。比如：逸東邨、富東邨、裕東苑、映灣園、海堤灣畔及機場等地區均設有林林總總的食肆，當中更以機場和酒店以廚餘過剩聞名；

鄰近東涌住宅區的有機商品能以便捷及快速運送到區內的不同屋苑販賣，當中包括私人住宅區如映灣園，東堤灣畔，以及日後的東涌東填海區，符合區內原經濟發展。

寄件日期:
收件者:
主旨:

Alpha Wong

07日03月2016年星期一 20:47

tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk

就 東涌谷分區計劃大綱草圖編號S/I-TCV/1、東涌市中心分區計劃大綱草圖編號S/I-TCTC/21、東涌擴展區分區計劃大綱草圖編號S/I-TCE/1及工務計劃項目第7786CL號地政總署工務計劃項目第7786CL號東涌新市鎮擴展提出意見。

TPB/R/S/I-TCV/1-23

規劃委員會主席及委員
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土木工程拓展署署長
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土木工程拓展署大樓
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渠務署署長
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就東涌谷分區計劃大綱草圖編號 S/I-TCV/1、東涌市中心分區計劃大綱草圖編號 S/I-TCTC/21、東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 及工務計劃項目第 7786CL 號地政總署工務計劃項目第 7786CL 號東涌新市鎮擴展提出意見。

一、東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎的在有關草圖內的特定事項

1.1 在東涌河兩邊的區域劃作低密度私人住宅;

1.2 雖有海岸保護區(CPA), 但東涌河的生態和價值應該從整個河流系統(由上游至下; 游及兩岸的整個河谷看, 只是在河口沿河劃出 CPA 對保育作用不大。

(B) 該申述的性質及理由

2.1 東涌谷是香港僅有的自然河谷, 有原整的河, 數以千計的果樹及樹木、大大小小的農場、濕地、紅樹林、多樣性的生物等等, 若河谷的上游及中游開發建樓宇會直接影響下游生態的多樣性及東涌谷村民的生活質素, 請問有否就最新的東涌谷分區計劃大綱草圖作環境評估報告, 施工方法管制;

2.2 東涌谷是街坊及市民常去的地方, 市民經東涌谷上昂坪、大澳, 對東涌社區而言更是街坊可以在閒時可以換一換氣的晨運好去處, 故不應將東涌谷的社區破壞, 及把高生態價值地方發展成私人物業;

2.3 在香港, 東涌河谷此類的自然景觀所餘無幾, 而且是市民, 不論東涌或市區港人遠離繁囂、鬆馳神經

的地方,不少專家報告指出,回到大自然是減低都市人精神病的方法,為了市民的健康和減低本港庫房的醫療開支,政府應保留自然河谷面貌及鼓勵市民前往東涌河此類自然環境地方,尤其東涌河地理位置不

(1)東涌港鐵站行十五分鐘便可到達;

2.4 低密度私人住宅不能為香港帶來很大的經濟收益,而且是一筆過利益,非長遠及可持續;

2.5 低密度私人住宅的落成意味着私家車的數量上升,會造成環境污染或催化自然;

2.6 地貌被改建為停車場土地用途,是不合理的安排;

2.7 若河岸保育區會變為消費的河谷,對河的環境污染造成很壞的影響;

2.8 石榴埔村附近的叢林在夏天可見四至五十隻螢火蟲,雖然石榴埔村被劃為V,即留作村落發展,但若日後村民要建丁屋或出讓了丁權與地產商,仍會開墾螢火蟲的棲息地,破壞了寶貴的自然生態。

(C) 建議對有關草圖作出的修訂

3.1 發展有機農業區及成為香港第一個無廢新市鎮

3.1.1 在早前的港台節目中,一個在荃灣舉行的小型有機小攤在短時間內將有機農產品售罄,證明本土有機農作物有價有市;而且中國內地毒菜等問題,一直令港人憂心入口農產品的安全性。有見及此,支持發展一套安全及有保障的本土有機農業是一門符合長遠利益的產業;

3.1.2 近年來政府積極推廣【源頭減廢】,而東涌區正正有大量廚餘可為本土有機農業提供有機肥料。比如逸東邨、富東邨、裕東苑、映灣園、海堤灣畔及機場等地區勻設有林林總總的食肆,當中更以機場和酒店以廚餘過剩聞名;

3.1.3 鄰近東涌住宅區的有機商品能以便捷及快速運送到區內的不同屋苑販賣,當中包括私人住宅區如映灣園,東堤灣畔,以及日後的東涌東填海區,符合區內原經濟發展。

總括而言

1. 在東涌當區及機場等地預留地方收集廚餘,實踐源頭減廢;

2. 廚餘經處理後供東涌谷附近的有機農場;

3. 有機商品在東涌原區各地出售,生產本地食物、發展本地社區經濟及鼓勵本地就業。

根據此路線圖,首先達成源頭減廢,然後透過消化原區及機場廚餘,減少送往堆填區當中的運輸成本,最後藉以匯聚成一個嶄新的綠色社區經濟體。

3.2 建立本地有機商品品牌

東涌靠近機場,若成功建立本地有機商品品牌,可以借鄰近香港國際機場上的優勢以較短時間將香港本地有機商品運到海外出售,以爭取最佳的保鮮期。

3.3 本地經濟及原區就業

3.3.1 善用東涌谷的生態作教育、農地及果林生產本地農作物等本土經濟,這一些產業有助增加原區就業,非服務業等單一化及低技術產業能擬比;

3.3.2 減低本港依賴入口食物狀況及支持本地農業;

3.3.3 就業機會,上述的產業能夠產業大量高技術以及師徒式的優質職位。勞工處經常鼓勵原區工作,但現實是東涌居民當中包括高學歷及高技術居民需要到東涌外區工作,其中一個原因是大部分中老年的居民缺乏科技知識,如果東涌區內能容納有機產業,相信就能大大改善東涌居民跨區工作的問題,同時也可減少社署有關交通津貼方面支出;

3.3.4 東涌谷可以教育用途、生態教育營,訓練生態文化導賞員,教育大眾珍惜大自然的能源及資源。

3.4 建立低碳社區

3.4.1 東涌新市鎮撰展應參考珀麗灣和愉景灣,不容駕駛私家車進入,必需要乘搭指定集體運輸工具。

3.4.2 作為一個支持綠色城市的規劃署可參考荷蘭和法國等西方先進國家,以東涌為起點建立一套公立租借單車服務,同時接駁在地鐵站和巴士站附近的單車停泊處,最後可以參考沙田及中文大學等香港著名地區完善東涌區內單車徑網絡,鼓勵市民單車轉乘集體運輸交通以進出市區工作,使東涌作為香港第一個綠色的智慧型的新市鎮。

二、東涌市中心地區分區計劃大綱核准編號 S/I - TCTC/20

A. 該申述所關乎的在有關草圖內的特定事項

1.1 東涌的空氣污染是全港最高之一,把大量植有樹木的休憩用地改劃為私人住宅,不利居民的健康;

1.2 把大量休憩用地改劃為私人住宅,是不公義的土地分配,若政府堅持改劃,請改劃為小型的公共房屋或公營長者屋。

B及C. 該申述的性質及理由、對有關草圖作出的建議

政府能以「以人為本」地按居民的需要而規劃，不要只盲目增加人口而忽略人的真正需要。可惜此分計劃大綱圖把東涌市中心的休憩地方劃成住宅或商業用途，把我們的休憩用地及公共空間消滅，令空氣污染問題惡化，直接損害我們的健康。因此，本人建議保留休憩地方及按居民的需要而規劃，例如推行單車友善的政策，源頭減廢，建立友善社區，令東涌居民擁有一個舒適的家。

2.1 反對 B2 項的改劃 - 把北大嶼山郊野公園(擴建部分)現時涵蓋的地方剔出規劃區
剔出規劃區的理據不明，會否將其地區納入其他計畫大綱仍為未知之數。

2.2 反對 C 項的改劃 - 劃作鄉村式發展、住宅

把教會、綜合服務設施大樓、農場、回收場都拆走，把大量樹木砍伐及山頭移平，改劃作建築丁屋及其他低密度住宅，只是短暫的利益，無助市民安居樂業，還會破壞當區的自然環境，令香港人失去了一大片綠色地帶，若建公營房屋則較為合理。

2.3 反對 D1 項的改劃 - 把東堤灣畔中間之寬大的行人區改建成私人屋苑

該行人區為東堤灣畔居民對外的主要行人道路，亦能提供充足的地方作為休憩區，若然將該區域改成私人屋苑，工程的污染將會對東堤灣畔的居民及出入市民的健康有非常壞的影響，亦令公共空間消失，那裡的兩排美麗的大樹，小女=孩子的自由遊樂場或成人的休憩地方都變成一個非常擠擁的區域。

2.4 反對 D2 項的改劃 - 把東堤灣畔停車場入口對開的單車停泊區改建成道路

該單車停泊區現正服務大量以車代步的居民，尤其在繁忙時間，數以百計的逸東和馬灣新村居民會利用單車到地鐵站上班上學，若果取消該單車停泊區而不在鄰近地方重建，居民將沒有地方停泊單車，建議保留單車停泊區。

2.5 反對 E1 項的改劃 - 把海堤灣畔鄰近的休憩用地改劃為住宅

此舉將進一步減少東涌居民的休憩用地，建議保留休憩用地並用作發展為公園。若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

2.6 反對 F1 項的改劃 - 把水藍天岸鄰近的休憩用地改劃為住宅

此舉將進一步減少東涌居民的休憩用地，建議保留休憩用地。若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

2.7 反對 F2 項的改劃 - 把水藍天岸鄰近的休憩用地(圓形廣場)改劃為道路

很多小孩子會在該大片平地遊玩，此舉會令他們失去大量活動空間，建議保留。若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

2.8 反對 G1 項的改劃 - 把映灣園與可譽中小學之間的休憩用地改劃為住宅

此舉將進一步減少東涌居民的休憩用地，建議保留休憩用地，工程亦會影響學校學生上課。若政府堅持改劃，請改劃為小型的公共房屋或公營長者屋。

2.9 反對 H1 項的改劃 - 把東薈城及東薈城第一期所在的地方改劃作「商業(2)」地帶

此舉進一步把公共空間私有化，該地方是很低使用量的單車停泊處，明顯是政府的錯誤規劃。而該地方在道路的旁邊，亦有巴士站，建議減少部分單車停泊位，再種植大量植物以改善空氣質素及建坐椅以供候車市民使用。

2.10 反對 J 項的改劃 - 把東涌鐵路站所在的地方由「綜合發展區」「政府機構或社區」地帶及顯示為「道路」的地方改劃作「其他指定用途」註明為「鐵路站」地帶

一直以來，居民面對安全的單車停泊位不足，建議改劃作單車停泊位，以方便居民停泊單車，建立一個單車有善的社區。

2.11 反對 K 項的改劃 - 把東涌港鐵站 A 出口對開建成商業區

東涌港鐵站 A 出口對開服務大量映灣園居民，作為穿梭巴士轉車之用，對外道路亦可以作為其他私家車使用者作上落車用途，此舉將令道路變得擠擁，難以有充足的地方讓車輛上落客人。

2.12 反對 R3 項的改劃 - 把馬灣新村東北面的土地由綠化地帶改劃作鄉村式發展

有數以十萬市民輪候公屋，政府一邊說是土地問題，一邊卻把珍貴的土地改劃作鄉村式發展，即建「
(議改劃改劃為小型的公共房屋或公營長者屋。

2.13 加強及善用東涌的渡海運輸交通。

三、東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1

A. 該申述所關乎的在有關草圖內的特定事項

1.1 東涌的空氣污染是全港最高之一，而該計劃大綱草圖建議填海 120.5 公頃，興建 P1 道路的填海約 8.6 公頃，令東涌的霧霾情況惡化；

1.2 商業的總面積 7.38 公頃，卻沒有食環街市，不利民生；

1.3 住宅總面積約 59.03 公頃，卻大部分土地建私樓，以人均佔用土地面積計算，約 7 至 8 成為私樓；

1.4 海傍的休憩用地開闢設遊艇停泊處，明顯是私有化我們的公共空間。

B 及 C. 該申述的性質及理由、對有關草圖作出的建議

對政府擬於東涌東北面約二百公頃的前濱及海床範圍內進行填海工程有以下的意見及建議：

1. 反對填海

東涌東擴展計劃的填海工程將填去 145 公頃海床，由於工程範圍鄰近即將興建的大小磨刀洲海岸公園。

- 施工期間進出填海範圍的工程躉船多達 42-56 架次，加上工程與機場第三條跑道部分施工重疊，若然兩項工程同時進行，每日將有多達二百艘高速船、工程船穿梭大嶼山東北部水域，產生巨大交通流量，嚴重干擾海岸公園內的海洋生物，特別是對聲音及水質敏感的中華白海豚。

大小磨刀洲海岸公園只是港珠澳大橋工程的附帶補償方案，若當局不加入緩解及補償措施，只會令海岸公園名存實亡。

2. 特殊教育

- 建議政府在東涌東填海項目中引入特殊學校，緩衝特殊學童長期要跨區上學的問題。

據社署資料顯示，東涌有 6 間針對弱能人士的服務中心，主要作為展能服務、嚴重弱智人士宿舍及特殊幼兒中心等，惟獨欠缺銜接中小學階段的特殊學校。

教育局於 2004 年曾表示有意於東涌興建特殊學校；而在 2011 年的立法會會議中，時任教育局局長孫明揚亦有回應訴求，表示「已初步揀選了適合的地點興建該特殊學校，正積極與各相關部門研究有關用地的可行性並進行各項技術研究。待有關研究完成後，我們會擬訂該特殊學校的細節安排，以便盡快落實有關的建校計劃。」但礙於社區阻力、擔心影響樓價等原因，至今仍未落實，不少學童長期要跨區上學。

3. 環島單車徑

- 要求增設連接東涌及機場的環島單車徑

在有關東涌東填海工程，擔心工程會影響翔東路路面平坦，筆直，加上鋪裝良好，而得以受到單車人士所歡迎，加上沿途均沒有任何單車徑設施，除了不少單車友都由此於東涌進出迪士尼，同時間十分適合公路車騎乘訓練。

政府有關當局聲稱把東涌發展成一個「低碳城市」，而踩單車能節能減碳，保護環境，市民又可得到更多運動的機會，既健康又減壓，亦可節省越來越昂貴的交通費用，如能有環島單車行更可為大嶼山增加旅遊特色。希望政府能認真改善路面設施。

4. 反對在海傍的休憩用地開闢設遊艇停泊處，把公共空間私有化。

總結：希望政府以「低碳城市」及「以人為本」作前提再思考東涌的擴展。

四、工務計劃項目第 7786CL 號 政總署工務計劃項目第 7786CL 號 東涌新市鎮擴展

意見：反對拆卸現有的白芒碼頭，因碼頭是原好的，是我們珍貴的公共空間，及應善用碼頭。

參考資料

1. 東涌擴展文件

http://www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_TC.pdf

http://www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_P1_TC.pdf

2. 東涌擴展區(填海)

http://www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_A1P_TC.pdf

http://www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_A1_TC.pdf

3. 東涌市中心

[http://www.districtcouncils.gov.hk/island/doc/2016 2019/tc/dc meetings doc/9962/IS 2016 017 A3P TC.pdf](http://www.districtcouncils.gov.hk/island/doc/2016%202019/tc/dc%20meetings%20doc/9962/IS%202016%20017%20A3P%20TC.pdf)

[http://www.districtcouncils.gov.hk/island/doc/2016 2019/tc/dc meetings doc/9962/IS 2016 017 A3 TC.pdf](http://www.districtcouncils.gov.hk/island/doc/2016%202019/tc/dc%20meetings%20doc/9962/IS%202016%20017%20A3%20TC.pdf)

4. 東涌谷

[http://www.districtcouncils.gov.hk/island/doc/2016 2019/tc/dc meetings doc/9962/IS 2016 017 A2P TC.pdf](http://www.districtcouncils.gov.hk/island/doc/2016%202019/tc/dc%20meetings%20doc/9962/IS%202016%20017%20A2P%20TC.pdf)

[http://www.districtcouncils.gov.hk/island/doc/2016 2019/tc/dc meetings doc/9962/IS 2016 017 A2 TC.pdf](http://www.districtcouncils.gov.hk/island/doc/2016%202019/tc/dc%20meetings%20doc/9962/IS%202016%20017%20A2%20TC.pdf)

5. 工務計劃項目第 7786CL 號

地政總署 工務計劃項目第 7786CL 號 東涌新市鎮擴展 (填海、拆白芒碼頭)

http://www.landsd.gov.hk/tc/legco/acq_2016.htm

<http://www.landsd.gov.hk/en/legco/acq/plan/2016/ISM2583b.pdf>

<http://www.gld.gov.hk/egazette/pdf/20162001/cgn2016200185.pdf>

寄件者:
寄件日期:
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附件:

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東涌東填海, 東涌河
反對東涌東填海_王進洋.docx; 東涌河 王進洋.docx

TPB/R/S/I-TCV/1-24



東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

破壞東涌河自然生態, 無助香港人身心健康發展

(B) 該申述的性質及理由

東涌谷是街坊及市民常去的地方, 市民經東涌谷上昂坪、大澳, 對東涌社區而言更是街坊可以在閒時可以換一換氣的晨運好去處, 故不應將東涌谷的社區破壞; 東涌河谷此類的自然景觀所餘無幾, 而且是市民, 不論東涌或市區港人遠離繁囂、鬆弛神經的地方, 不少專家報告指出, 回到大自然是減低都市人精神病的方法, 為了市民的健康和減低本港庫房的醫療開支, 政府應保留自然河谷面貌及, 鼓勵市民前往東涌河此類自然環境地方, 尤其東涌河地理位置不遠, 由東涌港鐵站行十五分鐘便可到達; 而石榴埔村附近的叢林在夏天可見四至五十隻螢火蟲, 雖然石榴埔村被劃為 V, 即留作村落發展, 但若日後村民要建丁屋或出讓了丁權與地產商, 仍會開墾螢火蟲的棲息地, 破壞了寶貴的自然生態。

(C) 建議對有關草圖作出的修訂

善用東涌谷的生態作教育、農地及果林生產本地農作物等本土經濟，這一些產業有助增加原區就業，非服務業等單一化及低技術產業能疑比；東涌谷可以教育用途、生態教育營，訓練生態文化導賞員，教育大眾珍惜大自然的能源及資源。

建立低碳社區，作為一個支持綠色城市的規劃署可參考荷蘭和法國等西方先進國家，以東涌為起點建立一套公立租借單車服務，同時接駁在地鐵站和巴士站附近的單車停泊處，最後可以參考沙田及中文大學等香港著名地區完善東涌區內單車徑網絡，鼓勵市民單車轉乘集體運輸交通以進出市區工作，使東涌作為香港第一個綠色的智慧型的新市鎮

就草圖作出申述

Representation Relating to Draft Plan

TPB/R/S/I-TCV/1-25

參考編號

Reference Number:

160308-104417-28370

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Date and time of submission:

08/03/2016 10:44:17

提出此宗申述的人士

Person Making This Representation:

小姐 Miss Shirley Ko

申述詳情

Details of the Representation :

與申述相關的草圖

Draft plan to which the representation relates:

S/I-TCTC/21

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Tung Chung Extension Area	反對 Oppose	<p>This is an objection on the newly released planning for Tung Chung areas that is contained 92.93 hectares of land zoned for residential development. Tung Chung carries a lot of ecological value especially in Tin Sam, Tung Chung beach which is one of the most valuable and important seagrass bed in Hong Kong. In 1994, this has been listed as Sites of Special Scientific Interest (SSSI), for the seagrass and Baker Halophila grass, seaweed, and marine invertebrates.</p> <p>According to Green Power, Ecological Education and Resource Center survey last year, there are numbers of Dragon and the hippocampus in Tung Chung Bay. Hippocampus accustomed coral reefs or mangrove habitat, this provided a solid prove that Tung Chung Bay is excellent ecology, valuable ecologically.</p> <p>The Government Administration plans to develop Tung Chung River, this will further pollutants Tung Chung River which will bring the total number of hippocampal decline.</p>

457
27

		<p>In 1960s and 1970s, Tung Chung has carried a large number of the hippocampus, and later due to reclamation, overfishing, the number of seahorses decline. Hippocampus now infested about three varieties, there are around 12 species, distributed in more than 10 locations in Sai Kung and Lantau.</p> <p>For this high-value ecological land, we need to protect; however, Government do nothing to protect or even provide the green light for illegal dumping, shovel and other acts.</p> <p>Indeed, this is a strong opposition for further development in Tung Chung areas.</p>
Tung Chung Town Centre Area	反對 Oppose	<p>This is an objection on the newly released planning for Tung Chung areas that is contained 92.93 hectares of land zoned for residential development. Tung Chung carries a lot of ecological value especially in Tin Sam, Tung Chung beach which is one of the most valuable and important a seagrass bed in Hong Kong. In 1994, this has been listed as Sites of Special Scientific Interest (SSSI), for the seagrass and Baker Halophila grass, seaweed, and marine invertebrates.</p> <p>According to Green Power, Ecological Education and Resource Center survey last year, there are numbers of Dragon and the hippocampus in Tung Chung Bay. Hippocampus accustomed coral reefs or mangrove habitat, this provided a solid prove that Tung Chung Bay is excellent ecology, valuable ecologically.</p> <p>The Government Administration plans to develop Tung Chung River, this will further pollutants Tung Chung River which will bring the total number of hippocampus decline.</p> <p>In 1960s and 1970s, Tung Chung has carried a large number of the hippocampus, and later due to reclamation, overfishing, the number of seahorses decline. Hippocampus now infested about three varieties, there are around 12 species, distributed in more than 10 locations in Sai Kung and</p>

		<p>Lantau.</p> <p>For this high-value ecological land, we need to protect; however, Government do nothing to protect or even provide the green light for illegal dumping, shovel and other acts.</p> <p>Indeed, this is a strong opposition for further development in Tung Chung areas.</p>
Tung Chung Valley	反對 Oppose	<p>This is an objection on the newly released planning for Tung Chung areas that is contained 92.93 hectares of land zoned for residential development. Tung Chung carries a lot of ecological value especially in Tin Sam, Tung Chung beach which is one of the most valuable and important a seagrass bed in Hong Kong. In 1994, this has been listed as Sites of Special Scientific Interest (SSSI), for the seagrass and Baker Halophila grass, seaweed, and marine invertebrates.</p> <p>According to Green Power, Ecological Education and Resource Center survey last year, there are numbers of Dragon and the hippocampus in Tung Chung Bay. Hippocampus accustomed coral reefs or mangrove habitat, this provided a solid prove that Tung Chung Bay is excellent ecology, valuable ecologically.</p> <p>The Government Administration plans to develop Tung Chung River, this will further pollutants Tung Chung River which will bring the total number of hippocampal decline.</p> <p>In 1960s and 1970s, Tung Chung has carried a large number of the hippocampus, and later due to reclamation, overfishing, the number of seahorses decline. Hippocampus now infested about three varieties, there are around 12 species, distributed in more than 10 locations in Sai Kung and Lantau.</p> <p>For this high-value ecological land, we need to protect; however, Government do nothing to protect or even provide the green light for illegal dumping, shovel and other acts.</p>

Indeed, this is a strong opposition for further development in Tung Chung areas.

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

就草圖作出申述

Representation Relating to Draft Plan

TPB/R/S/I-TCV/1-26

參考編號

Reference Number:

160227-105703-84823

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提交日期及時間

Date and time of submission:

27/02/2016 10:57:03

提出此宗申述的人士

Person Making This Representation:

小姐 Miss Wong in ping

申述詳情

Details of the Representation :

與申述相關的草圖

Draft plan to which the representation relates: S/I-TCV/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
東涌谷	反對 Oppose	反對影響生態

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

003

tp

寄件者:
收件日期:
收件者:
主旨:

Tong Agnes [REDACTED]
08日03月2016年星期二 15:57
tpbpd@pland.gov.hk
請救救白海豚，停止開發東涌區計劃！

TPB/R/S/I-TCV/1-27

請救救白海豚，停止開發東涌區計劃！

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lkchepg [REDACTED]
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tpbpd@pland.gov.hk
sdev@devb.gov.hk; shoffice@ihb.gov.hk; sen@enb.gov.hk; kkling@pland.gov.hk; kclo@cedd.gov.hk; kklau@hyd.gov.hk; comr@td.gov.hk;
edwintong@dsd.gov.hk
主旨: S/I-TCV/1 & S/I-TCTC/21 Joint Green Groups Submission
附件: (App1)JGG Tung Chung DPA (ver Oct2015)(Low Res)v3.jpg; (App2)Joint Statement_TC Valley and Coast 20120618.pdf; (App3) Degraded sites v2.pdf; (App4) TCV Aerial Photo12Nov2007-16Apr2015.jpg; JGG TCV & TCTC OZP Response 8Mar2016.doc

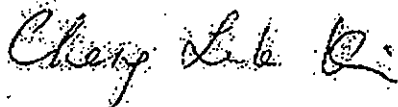
TPB/R/S/I-TCV/1-28

Dear Sir/Madam,

Please find the attached Green Group's Joint Submission in response to draft OZP No. S/I-TCV/1 and S/I-TCTC/21.
Please also note that NO appendices are attached in the fax submission.

Thank you for your kind attention.

Yours faithfully,



On behalf of
Designing Hong Kong
Eco-Education & Resources Centre
Green Lantau Association
Green Power
Hong Kong Bird Watching Society
Hong Kong Outdoors
Lantau Buffalo Association
The Conservancy Association
World Wide Fund For Nature Hong Kong



BY FAX AND BY EMAIL

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

8 March, 2016

Dear Sir/Madams,

**Green Groups' Joint Submission in Response to
Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1, and
Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21**

Support the Promulgation of a Statutory Land Use Plan

1. The undersigned green groups jointly welcome the draft Tung Chung Valley Outline Zoning Plan No. S/I-TVC/1 (TCVOZP) gazetted on 8 January 2016. This OZP will introduce statutory land use control in most part of Tung Chung River Valley and Bay and help protect the rich and diverse ecology against incompatible developments, environmental vandalism and degradation.
2. In order to effectively preserve and manage the biodiversity, natural landscape and hydrology of Tung Chung River, Valley and Coast, green groups call for, as shown in Appendix 1,
 - (a) Cover Tin Sam and Wong Lung Hang areas in new DPAs or Country Park extensions.
 - (b) Establishing a River Nature Park for proactive management of natural riverine and estuarine ecology and landscape, and for flood regulation.
 - (c) Early implementation of environmental protection and conservation landuses proposed in the TCVOZP in prior to other project works in Tung Chung area covering by OZP No. S/I-TCV/1, S/I-TCTC/21 and S/I-TCE/1.
 - (d) Traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery, immediately.

Rich, Unique and Intact Ecosystem of Tung Chung River, Valley and Bay

3. Tung Chung River is one of the few remaining major streams in Hong Kong with “Excellent” water quality (according to EPD’s monitoring results) and tranquil scenery. The Tung Chung River, which has not been overly affected by channelization, largely retains its natural state throughout from headwater to estuary. The Tung Chung River system is unique in the local context. Its headwaters flow from Hong Kong’s second and third highest peaks, all the way to the shallow Tung Chung Bay without interruptions.
4. The high connectivity and continuity of the river system from the montane area to the estuary make it exceptionally rich in its aquatic and coastal biodiversity, including many rare and endangered species, 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*) 中國蟹, Seaweed Pipefish (*Syngnathus schlegeli*) 舒氏海龍, Swinhoe’s Egret (*Egretta eulophotes*) 黃嘴白鷺. Diverse types of habitats are also found in the surrounding land area supporting many ecologically important animal and plant species in Hong Kong, including Common Birdwing (*Troides helenae*) 裳鳳蝶 and Eurasian Eagle Owl (*Bubo bubo*) 鵩鴞 (refer to Appendix 2).
5. Tung Chung River is the second richest in freshwater species of any in Hong Kong, with a total of 23 species recorded, and listed as an Ecologically Important Stream (EIS)(No. 27) by Agricultural, Fishery and Conservation Department (AFCD). The mangroves on the intertidal mudflats at the Tung Chung River estuary is the largest on Lantau which is one of highest plant diversity sites. Tung Chung Valley and coast is also a butterfly hotspot which nurtures 148 species which comprises about 60% of Hong Kong’s total, including two rare and two very rare species.

Green Groups’ Recommended Development Permission Area Plan

6. Green groups’ recommended Development Permission Area (DPA) Plan (version Oct 2015) for a sustainable planning for Tung Chung River, estuary, coastal areas and associated habitats is enclosed (Appendix 1).
7. Regarding the land use of Tung Chung Valley, we suggested in 2012 (Appendix 2):
 - (a) To protect and conserve high quality natural habitats which are of rich biodiversity and ecological value through conservation planning, management and monitoring. In particular, the Tung Chung River, estuary, woodlands and the coast should not be exploited for any development and protected statutorily as “SSSI”, “CA” and “CPA” zones as illustrated in our revised recommended DPA Plan (version Oct 2015) attached to this letter (Appendix 1).
 - (b) To promote compatible community uses and enjoyment of the Tung Chung River Valley and the estuary through environmental education and passive recreation activities.

Ecologically-friendly facilities which encourage the public to access Tung Chung River and the estuary can be considered, for example, eco-trails, a riverside park, a nature education centre, resting places and look-out towers.

- (c) To enhance the tourist appeal the river landscape and cultural heritage of the Tung Chung River Valley through improved linkage to existing Country Parks in Lantau. Tung Chung River Valley is located amongst existing tourist spots including Hong Kong International Airport, Ngong Ping Cable Car, Po Lin Monastery and the Tian Tan Buddha Statue.

- 8. Therefore, Green Groups proposed in our recommended DPA Plan (Appendix 1) an extensive **River Nature Park** to serve above-mentioned land use purposes and flood prevention.

Green Groups' General Response to the Draft TCVOZP

- 9. Green groups agree with *the general planning intention for the Area* (first part of Section 8.1 of EXPLANATORY STATEMENT, TCVOZP) 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*" and "*enforcement actions should be taken against any unauthorized development which would have impacts on the natural and rural character of the Area*".
- 10. In response to the PLANNING CONTROL (Section 17 of EXPLANATORY STATEMENT, TCVOZP), green groups are very concerned that the publication of the draft Recommended Outline Development Plan (RODP) of the future new town extension and associated increase in economic activities has allured incompatible and unauthorized land uses in Tung Chung Valley and Bay.
- 11. Over the past two decades green groups observed a proliferation of incompatible developments and vandalism in Tung Chung Valley. The ecologically degraded land areas increased from 4.8% in 2007 to approximately 13% in 2015 (Appendix 3 and 4). However, enforcement powers and protection were lacking due to the absence of a statutory land-use plan.
- 12. To address these problems, the Administration should commit, with the publication of TCVOZP for the Tung Chung River Valley and coast,
 - (a) to ensure the proposed land uses in the TCVOZP can be implemented,
 - (b) to ensure control over incompatible and/or unauthorized developments,
 - (c) to terminate existing vandalism and to stem potential vandalism in Tung Chung Valley and Coast; and
 - (d) to protect the ecology, hydrology and water quality of Tung Chung River and Bay, a major planning intention of the TCVOZP.

- 13. Regarding the draft TCVOZP, green groups welcome the zoning of Area 96D, south part of the planning scheme area, as "Conservation Area"("CA"). However, we insist that 30m on either side of river courses, banks and tributaries of Tung Chung River and Wong Lung Hang, Tung Chung River Estuary and Tung Chung Bay should be zoned as "Site of Special Scientific Interest"("SSSI")(Appendix 1)
14. We also welcome the existing *fung shui woods* in the Tung Chung Valley west to Ngau Au and north of Shek Mun Kap zoned as "CA" in the TCVOZP. However, we are disappointed that the remaining *fung shui woods* receive no proper zones against development and ecological vandalism. Therefore, we recommend that the remaining *fung shui woods* should also be zoned as "CA" for protection.
15. We advise that the tributaries of Tung Chung River flowing through Mok Ka, Lam Che and Nim Un should be protected by zoning its stream courses and banks as "SSSI".

Tin Sam and Wong Lung Hang Remained Unprotected

16. The signatory green groups urge the Government to cover Tin Sam and Wong Lung Hang areas in new DPAs (refer to Appendix 1) which otherwise will remain as enclaves or be without effective land use control.
17. The seagrass beds and nearby mangroves at San Tau (SSSI No.58) are one of only four sites where Dwarf Eel Grass (*Zostera japonica*) 矮大葉藻, and one of only five sites where Oval Halophila (*Halophila ovalis*) 喜鹽草 are recorded in Hong Kong. Both species are rare in Hong Kong and are listed as of Local Concern status in China. San Tau mangroves is of high conservation value due to rich floristic diversity. San Tau, which is nearby Tin Sam, is a butterfly hotspot and Wong Lung Hang is an EIS listed by AFCD. Both areas require the preservation of local habitats.
18. Although the eastern part of Tung Chung Valley and Wong Lung Hang areas are covered in the in Amendment A1 in Tung Chung Town Centre Area OZP No. S/I-TCTC-21 (TCTCOZP), these areas have never been covered by any DPAs, and thus any incompatible developments or environmental vandalisms, such as diversion of Wong Lung Hang EIS, filling of land/pond or excavation of land, cannot be effectively controlled or enforced.
19. Green groups consider Tin Sam, Wong Long Hang and eastern part of Tung Chung Valley are integral parts of the whole Tung Chung River-cum-Bay hydrological and ecological system, and should receive stricter and more effective land use control to ensure a comprehensive management of flood regulation, water quality and nature conservation.
20. The Government should proactively protect the ecologically important Wong Lung Hang and Tin Sam areas by adequate, effective and enforceable statutory measures. Such measures should

be consistent with those proposed for Tung Chung River-cum-Bay including land use planning and control. Failure to designate a DPA for Wong Lung Hang and Tin Sam areas would materially weaken the ability of the Administration to conduct effective enforcement of the OZP. Since the Administration is fully aware of difficulties of enforcing an OZP which has not been preceded by a DPA, failure to designate a DPA may be considered as maladministration and thereby arouse public and legal controversy.

Tung Chung Valley not Suitable for Residential Development

21. In view of the "Residential (Group C)" ("R(C)") zone (Section 9.2 of EXPLANATORY STATEMENT, TCVOZP) and the Area 42 and 46 zoned as "Residential(Group A)"("R(A)") (Section 7.2.6 and 7.2.7 of EXPLANATORY STATEMENT, TCTCOZP), we call for a reduction in development pressure and wide ranging measures to alleviate development impacts.
22. Much of Tung Chung Valley is allocated for residential development in above-mentioned OZPs. We consider that such planning is incompatible with the physical and ecological setting of Tung Chung Valley and the principles of the Convention on Biological Diversity. Under Article 8 of this Convention, each contracting party shall:
 - Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;
 - Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;
 - Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;
 - Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, *inter alia*, through the development and implementation of plans or other management strategies;
 - Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.
23. We are highly concerned that the residential development (plot ratio 1 near the Tung Chung River estuary and up to 6.4 to the east of the valley) would affect the natural landscape, hydrology and ecology of Tung Chung River, threaten the inhabited wildlife and impact the water quality of Tung Chung River.
24. From the Hong Kong Observatory's past observation on and prediction of Hong Kong's future precipitation pattern, the scale and frequency of river floods is expected to increase. Tung Chung River is comparatively short and steep with an overall slope of 1: 4.9, (compared to Lam Tsuen River 1: 14.5, Kam Tin River 1: 14.4, Shing Mun River 1: 17.7, Tuen Mun River 1: 17.9).

The average annual rainfall of its river basin reaches up to 2400 mm, which is one of the highest regions in Hong Kong. Therefore, hydraulic and geotechnical conditions in small and narrow area of Tung Chung River Valley are highly unfavourable for dense and high-rise development.

25. Thus, in the long run, the Government must make early precaution and preventive measures in river land use planning through OZPs for Tung Chung River Valley, to decrease the threat posed by river floods due to climate change:
 - (a) Governments should avoid developing residential and industrial areas in Tung Chung River Valley, which are highly prone to flooding and landslide, to prevent risking the lives of residents and their properties.
 - (b) The government should allocate sufficient “permeable land use” by conserving vegetation and avoid covering large surface areas with concrete in Tung Chung Valley which helps allowing rainwater to infiltrate through the soil and alleviate flooding.
 - (c) Government should strengthen law enforcement on dumping, unauthorized vehicle access and developments on both sides of Tung Chung River or other activities which may affect drainage capacity of the rivers.
26. The large areas of “R(A)”, “R(C)” and “Village Type Development”(“V”) zones in Tung Chung Valley also threaten the water quality, ecosystem and landscape of Tung Chung Valley, River and Bay area and violate the Convention on Biodiversity.
27. We agree *“to concentrate village type development within “V” zone for a more orderly development pattern, efficient use of land and provision of infrastructures and services”* (Section 9.3.1 of EXPLANATORY STATEMENT, TCVOZP).
28. We concur the *“general presumption against development”* for the planning intention in “Green Belt”(“GB”), “CA” and “Coastal Protection Area”(“CPA”) zone.

Threat to Species of Global Conservation Value

29. The “Commercial” (“C”) zone (Section 9.1 of EXPLANATORY STATEMENT, TCVOZP), especially Area 38A in which a public transport terminus and maximum building height of 35m is planned, is incompatible with the mangroves on the western bank of Wong Lung Hang estuary where a breeding population of dragonfly Mangrove Skimmer (*Orthetrum poecilops*) 斑灰蜻 was discovered in 2015 by local green group. Mangrove Skimmer is listed as “Vulnerable” by IUCN and locally rare.
30. We opine that these “C” zones in TCVOZP will threaten Mangrove Skimmer population and we recommend include its habitat in River Park or other proper conservation zoning are needed.

31. The public transport terminus should be relocated in Area 107("GI/C") or Area 39 ("R(A)1") in TCTCOZP to link more efficiently with the planned underground railway station to the west of Yat Tung Estate.

River Nature Park for Flood Control and Conservation as Public Interest

32. Section 18.3 of EXPLANATORY STATEMENT, TCVOZP mentions that "*the Government will resume and clear the private land for..... public developments.....and provide infrastructure.*" Therefore, we urge the Government to seriously consider the resumption of all private land lots in the Tung Chung River Valley to achieve a sustainable plan for public developments in Tung Chung Valley.
33. It is proposed that land is resumed to provide flood prevention, environmental and conservation infrastructure in the entire river valley, and estuary which is managed as a **River Nature Park** (separately or jointly by DSD, AFCD and/or LCSD), to safeguard and control the hydraulic, water quality and ecological properties of the river valley.
34. Designation of Tung Chung River Valley as a River Nature Park can be implemented by the Government as part of public developments in the Tung Chung New Town Extension (TCNTE).
35. Whereas the residential and road zones in the OZP will impose adverse and irreversible impacts on the ecology of Tung Chung River Valley and Bay, the proactive land use management by establishing a River Nature Park will help preserve natural resources for community use and enjoyment, habitat protection and fisheries intended under the RODP of TCNTE study and draft TCVOZP.
36. The resumption of land and the management as River Nature Park will make it possible to better conserve and enhance the ecological value and functions of Tung Chung River Valley. The park will provide a high quality nature experience for residents, improved flood control, and better conservation of the rich habitat of the river valley and estuary.
37. The estimated resumption cost for about 500 private land lots with a total area of 8.5 ha in green groups' proposed River Nature Park (Appendix1) is HK\$370 million.
38. The Government should explore and assess the feasibility and potential impacts of different alternative options for flood prevention such as resuming lands along the riparian zones of Tung Chung River so as to serve as natural floodplain to retain floodwater.

Conservation First Before Development

39. For Section 18 of EXPLANATORY STATEMENT, TCVOZP, we are disappointed that the "*phasing and packaging of works for the Tung Chung New Town Extension to achieve early*

delivery of land to meet the housing needs and ensure timely provision offacilities in tandem with population build-up” do not include the early implementation of environmental protection and conservation landuses proposed in the TCVOZP. We urge the Administration to adopt a “conservation first before development” strategy for the implementation of TCVOZP.

40. Most of Hong Kong’s major natural rivers are channelized and recipients of low quality water including run-off and effluent discharges from storm drain networks. These rivers often emit foul odour and are an urban blight degrading the living quality of Hong Kong, and impact our image as a well-developed and livable world class city. Tung Chung River must not follow the same fate of other channelized rivers of Hong Kong.
41. Once the TCNTE development commences according to the approved OZPs, the amount of construction waste generated according to the Environmental Impact Assessment Report could fill up the whole Tung Chung Valley and estuary. Unless dedicated efforts and proper phasing of works are made to protect the valley and bay, the invaluable river ecosystem and landscape will be irreversibly ruined. And this in turn, would jeopardize the government’s carefully crafted comprehensive plan for the area.
42. The construction, the increase in population and the new economic activities close to these ecologically valuable resources will inevitably lead to destruction unless very strong and specific protection and management measures as proposed in TCVOZP are put in place. Already we have witnessed a proliferation of dumping of massive amounts of debris and construction waste in Tung Chung Valley (Appendix 3 and 4). Increasingly typical ‘brown-field’ uses are covering more areas in the valley, uses which thrive on the growing population and economic activities in north Lantau.
43. Moreover, The Tung Chung River, Estuary and Bay are a great opportunity to implement the “Water-friendly Culture and Activities” policy adopted by the Government in 2015.
44. We invite the Administration to set a good model for “conservation first before development” and to protect this natural river resource, and to consider incorporating the following measures for implementation of TCVOZP:
 - (a) To first create the polders and to establish a River Nature Park covering the river, estuary and areas earmarked for conservation along the river well ahead of commencing the other infrastructure and development projects. By clearly demarcating the conservation areas as a park, and by ensuring management is in place, these areas designated for conservation can be protected from land filling, unauthorized dumping, destruction and other encroachment. At the same time this ensures that flood control and management measures are in place and the natural river courses can be protected from obstruction and diversion.

- (b) The Sustainable Urban Drainage System (SUDS), storm water retention ponds and pump stations must be built before the commencement of any other development projects to avoid polluted water generated by construction works are discharged into the natural river course, deteriorating the water quality and threatening the ecosystem and landscape of Tung Chung River and the estuary.
- (c) In order to protect the ecosystem and natural environment of the valley from air pollution and illegal dumping, large vehicles and construction trucks must be prohibited from entering the section of Tung Chung Road west of Ha Ling Pei. Vehicles that have sufficient reasons for entering need to seek formal approval from relevant authorities.
- (d) No construction and civil engineering works should be allowed in the riverbed, riparian zone and estuary of Tung Chung River. Storm water and sewage water should not be discharged into the river courses and estuary of Tung Chung River.

Prevention of Water Pollution and Habitat Damages

- 45. Green groups concur that “ *any diversion of streams, filling of land/pond or excavation of land, including that to effect a change of use to any of those specified in Column 1 and 2 above or the uses or developments always permitted under the covering NOTES....., shall not be undertaken or continued on or after the date of the first publication in the Gazette of the notice of the draft DPA plan without the permission from the TPB under section 16 of the Town Planning Ordinance*”, which is stipulated in Remarks under “GB”, Remarks (b) under “CA” and “CPA” in TCVOZP.
- 46. However, we opine that this planning measure should also stipulated other zones in TCVOZP, especially those the tributaries of Tung Chung River, whatever natural streams/rivers, irrigation or stormwater channels, flow through and waterways in mangroves, and including the tributaries flowing through Mok Ka, Lam Che and Nim Un. “*Filling of land/pond or excavation of land*” should be under the same planning control as “*diversion of streams*” and stipulated under Remarks (c) of “V” zones in TCVOZP.
- 47. For Section 17.2 of EXPLANATORY STATEMENT, TCVOZP, we opine that regarding “*uses or building which were in existence immediately before the first publication in the Gazette of the notice of the draft DPA Plan, any material change of such use or any other development” which may have adverse environment, drainage, traffic, ecology and hydrology of the Area should not be permitted. “*The alteration and/or modification works which may lead to an environmental and ecological improvement to the Area may be considered favourably by the Board.*”*
- 48. For Section (2) of NOTES, TCVOZP, in order to avoid water pollution to Tung Chung River and Bay, any use or development that does not conform to Water Pollution Control Ordinance (Cap.358) should be terminated despite being in existence immediately before the first

publication in the Gazette of the notice of the draft DPA Plan No. DPA/I-TCV/1.

49. For section (8)(b), (9)(a)(i) and 9(b) of NOTES, TCVOZP, "refreshment kiosk" should not be permitted on ecologically important areas, within 30 metres on either side of river/stream, which have been mostly zoned as "CA" and "CPA" and agricultural lands because it may generate wastewater and garbage that pollute the water bodies and degrade the habitats.
50. For section (8)(c) and (d), and (9)(a)(ii) of NOTES, TCVOZP, in order to avoid alteration of physical setting and damage to ecology of the natural streams and rivers (including its tributaries flowing through or by agricultural lands), diversion, excavation, shotcreting and paving of beds and banks should not be allowed for "*maintenance or repair ofwatercourse.....*" and "*.....drainage works.....*" without the permission of the relevant government authorities in charge of environmental protection and nature conservation.
51. For section (8)(e) of the NOTES, TCVOZP, the septic tanks of rebuilt New Territories Exemption Houses should not be constructed within 30 metres of either side of watercourse to avoid pollution of river water by the sewage.
52. For Section (11)(a) of the NOTES, TCVOZP, we concur that "*temporary use or development of any land or building*" should not be permitted in areas zoned "CA" and "CPA".
53. For Section (11)(b) of the NOTES, TCVOZP, we strongly urge that open storage and port back-up landuses must be prohibited in the Planning Scheme Area because these landuses
 - (a) are not compatible with the environmental setting and landscape of Tung Chung River Valley,
 - (b) breaches the planning intention of TCVOZP,
 - (c) will encroach and interrupt the Tung Chung River which is designated as EIS, proposed River Park and SUDS,
 - (d) will disturb and cause permanent and irreversible loss of habitats, such as river beds and banks, freshwater marsh, farmlands, by land filling, dumping of wastes and soil debris,
 - (e) will cause land contamination with toxic substances, air and water pollution,
 - (f) will trigger opening of private vehicular access and additional heavy-vehicle traffic that further disturb and destroy the habitats in Tung Chung River Valley and Bay.
 - (g) are difficult to be reinstates to the origin habitats through planning measures.

Adverse Impacts of Road Network

54. Green groups would like to stress the adverse impacts of road network (Section 10.1 of EXPLANATORY STATEMENT, TCVOZP) on the environment and ecology of Tung Chung River, Valley and Bay. Road access will promote development, air and noise pollution, and facilitate illegal dumping and landfilling on farmlands and riverbanks.

55. In order to prevent uncontrollable and unenforceable vandalism in Tung Chung Valley and other potential adverse impacts of road access, we urge the Administration to review the proposed road network in the OZP and to impose traffic restriction in Tung Chung West, especially for construction trucks and machinery.
56. We insist that all non-essential roads access to ecologically sensitive areas such as natural coastlines, river banks, fung shui woods and other ecologically important sites is eliminated.
57. In the Section 7.1.7 and Figure 2 of EXPLANATORY STATEMENT, TCVOZP, *"two Non-Building Areas (NBA) of 20m and 30m wide are proposed in Area 60 and 71A respectively as breezeway to promote better air ventilation and to enhance visual permeability"* and not shown in the draft TCVOZP, i.e.
- (a) an extension of Yu Tung Road through "R(C)2"(Area 60) to "CPA" on the eastern bank of Tung Chung River,
 - (b) an "NBA" zone connecting "CA" with Road L25 through "R(C)1"(Planning Area No.71A) to the north of Shek Mun Kap,
- However, we worry that these NBAs will become road access that facilitate flytipping and threaten the adjoining "CPA" and "CA". Moreover, road access will generate air pollution from vehicles that contradicts the design concept of these NBAs.
58. We are highly concerned about the Road L28 connecting existing Shek Mun Kap Road to Mok Ka, which runs across an EIS designated by AFCD.
59. Also, the existing illegal road access across Tung Chung River in Area 84 must be removed because it is not compatible with the planned River Park. Moreover, such illegal structure threatening the water quality and ecology of Tung Chung River should not be accepted and rationalized in the statutory land-use plan.
60. We are also concerned that road access will initiate and ecological vandalism activities in ecologically important areas, e.g. the "CA" zone adjoining Ngau Au, and the "CA" zone between Shek Mun Kap Road and Area 71A.

-Thank you very much for your kind attention. We look forward to your favourable decision.

Yours faithfully,



CHENG Luk-ki (Division head, Scientific Research & Conservation, Green Power)

On behalf of

Designing Hong Kong

Eco-Education & Resources Centre

Green Lantau Association

Green Power

Hong Kong Bird Watching Society

Hong Kong Outdoors

Lantau Buffalo Association

The Conservancy Association

World Wide Fund For Nature Hong Kong

Encl.

Appendix 1. Green Groups' recommended DPA Plan (version Oct 2015)

Appendix 2. Joint green groups' recommended DPA Plan for Tung Chung River, estuary, coastal areas and associated habitats (version Jun 2012)

Appendix 3. Map illustrating degraded site complaints and photos by green groups.

Appendix 4. Aerial photos of Tung Chung Valley taken in November 2007 and April 2015.

c.c.

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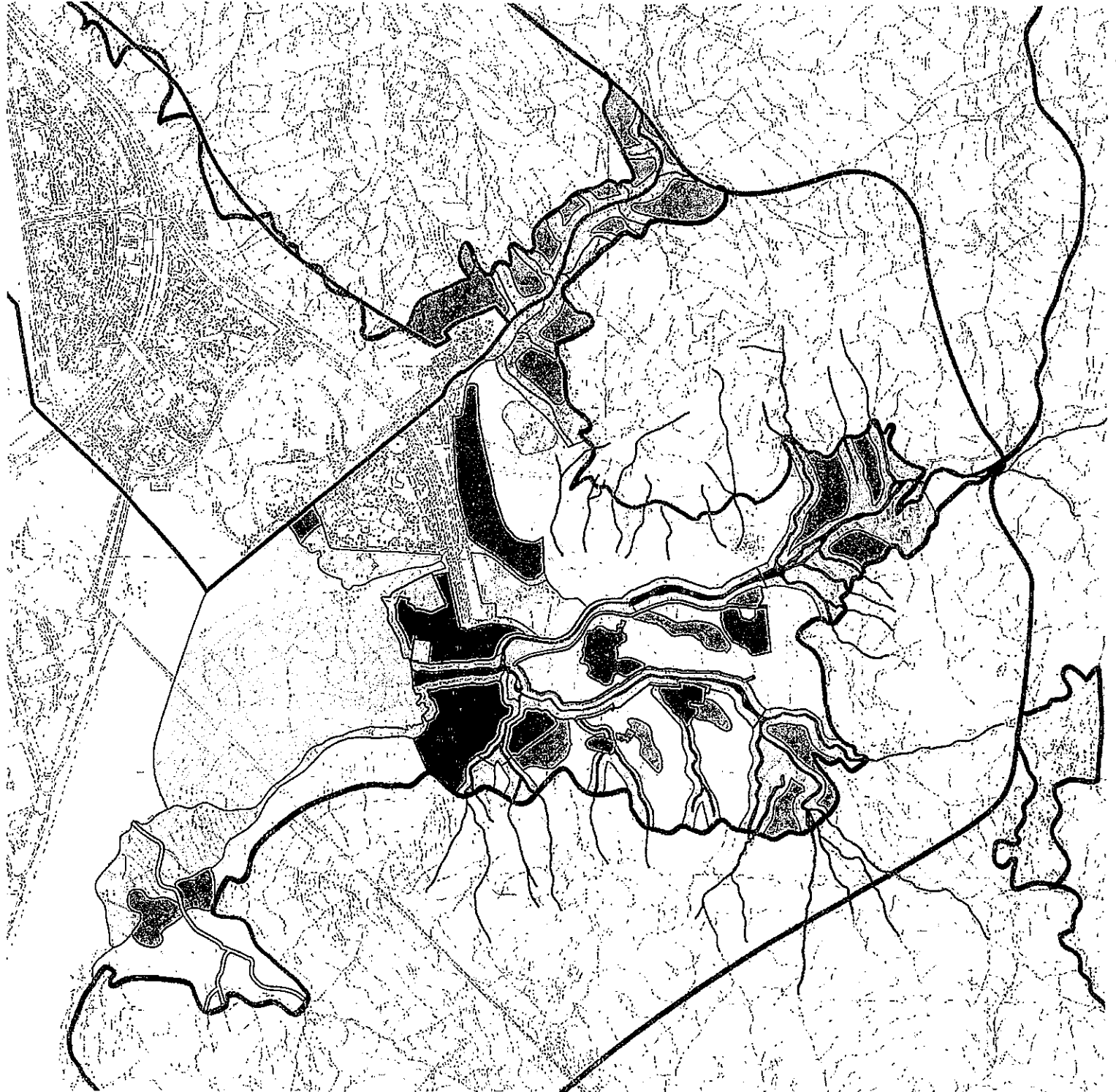
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Appendix 1



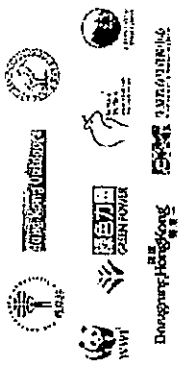
圖例 Legend

- 河溪自然公園 (包括老及濕地處理濕地)
River Nature Park (including stormwater treatment wetlands)
- 河
River
- 防洪堤壩
Polder
- 具特殊科學價值地點 (SSSI)
Site of Special Scientific Interest
- 自然保育區 (CA)
Conservation Area
- 海岸保護區 (CPA)
Coastal Protection Area
- 其他指定用途 (包括生態保育、生態旅遊、生態教育)
Other Specified Uses (Conservation, ecotourism & ecological education)
- 綠化地帶 (包括老及濕地處理濕地)
Green Belt (including stormwater treatment wetlands)
- 鄉村發展 (V)
Village Type Development
- 政府、機構或社區 (GOC)
Government, Institute & Community

圖則 Note

- 「貝特萊科學價值地點」覆蓋東涌河河道、河濱及河道每邊各30米、支流每邊各10米、河口和支流
SSSI covers Tung Chung River courses, banks (30 metres on either side of major courses and 20 metres for tributaries), estuary and Tung Chung Bay.
- 「自然保育區」覆蓋生態價值高的林地和濕地、森林、草地及東涌河濕地河生範圍
CA covers ecologically important woodlands and Tung shui woods, Nel Lak Stream and upland catchment of Tung Chung River.
- 「海岸保護區」覆蓋東涌河灣和沿岸後灘
CPA covers mudflat and backshore of Tung Chung Bay.

2015年10月 October 2015



各環保團體聯合建議東涌河、河口、海岸及相關生態環境的發展審批地區圖
Joint green groups' recommended Development Permission Area (DPA) Plan for Tung Chung River, estuary, coastal areas and associated habitats

Appendix 2 (Oct 2015)



19 June 2012

Joint Green Groups' Statement on Protection and Conservation of Tung Chung River, Estuary, Coastal Areas and Associated Habitats

1. The undersigned groups are deeply concerned about the Government's plan to reclaim the Tung Chung River Valley and coastal areas for development under the "Planning and Engineering Study on the Remaining Development in Tung Chung", which will destroy Tung Chung River Valley's intact and integrated stream, riparian, estuarine and coastal ecosystems. These habitats support outstanding biodiversity. Tung Chung River is one of the few remaining major streams in Hong Kong which has not been overly affected by channelization or water pollution, and largely retains its natural state throughout the whole river course from headwater to estuary. The Tung Chung River system is unique in the local context. Its headwaters flow down from Hong Kong's second and third highest peaks, and run uninterrupted all the way to the shallow Tung Chung Bay. The high connectivity and continuity along its whole length from the montane area to estuary make it exceptionally rich in its aquatic and coastal biodiversity, including many rare and endangered species. The surrounding land area also contains diverse habitat types, supporting many ecologically important animal and plant species in Hong Kong.
2. We urge the Government to protect the Tung Chung River (both channelized and natural sections, and its tributaries), its estuary, the entire Tung Chung Bay and other remaining natural habitats within Tung Chung Valley, which are of high ecological, landscape, hydrological and cultural values, so as to preserve natural resources for nature conservation, community use and enjoyment, and fisheries. In addition, we have prepared a recommended Development Permission Area (DPA) plan incorporating our vision for a sustainable future for Tung Chung's remaining natural areas for Government's consideration.

3. Tung Chung has a special history and a unique setting. It has been settled since the fall of the Southern Sung Dynasty in 1279. The bay was the setting for a huge naval battle in 1810 when the Qing navy defeated the notorious pirate Cheung Po Tsai. The Tung Chung Fort and Tung Chung Battery dated from these times and are listed monuments. Lying between the forested slopes of Lantau Peak and Nei Lek Shan, the bay with the immensely photogenic fishing village on Ma Wan Chung, the historic Hau Wong Temple in its coastal setting, and the sea grass and mangrove stands, offers a unique panorama and insight for visitors and locals alike. These aspects would disappear if Tung Chung is further developed.
4. We would also note that the Convention on Biological Diversity was extended to Hong Kong with effect from 9 May 2011. The implication of the extension is a commitment to develop and implement best international practices for the conservation and sustainable use of biodiversity. There are now further obligations for our future development plans to effectively manage and protect our valuable ecological diversity within or outside the protected areas and ensure their conservation and sustainable use. Under Article 8 of this Convention, each contracting party shall:
 - Establish a system of protected areas or areas where special measures need to be taken to conserve biological diversity;
 - Develop, where necessary, guidelines for the selection, establishment and management of protected areas or areas where special measures need to be taken to conserve biological diversity;
 - Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;
 - Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;
 - Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;
 - Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, inter alia, through the development and implementation of plans or other management strategies;
 - Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.
5. Therefore, compatible landuse should be extended to Tung Chung River, estuary, coastal areas and associated habitats which can serve as a green lung for the existing residents of Tung Chung. Our vision for the Tung Chung's remaining natural areas is as follows:
 - a. Protect and conserve high quality natural habitats which are of rich biodiversity and ecological value through conservation planning, management and monitoring. In particular, Tung Chung River, estuary, woodlands and the coast should not be exploited for any development and protected statutorily as "Site of Special Scientific Interest", "Conservation Area" and "Coastal

Protection Area” zones as illustrated in our recommended DPA plan for Tung Chung remaining natural areas. (See Appendix 1 regarding green groups’ recommended DPA plan for Tung Chung’s remaining natural areas.)

- b. Promote compatible community use and enjoyment in the Tung Chung River Valley and the estuary through environmental education and passive recreation activities. Ecologically-friendly facilities which encourage the public to assess Tung Chung River and the estuary can be considered, for example, eco-trails, a riverside park, a nature education centre, resting places and look-out towers.
 - c. Enhance the tourist appeal of Tung Chung River Valley based on its river landscape and cultural heritage through improved linkage to existing Country Parks in Lantau, as Tung Chung River Valley is located amongst existing tourist spots including Hong Kong International Airport, Ngong Ping Cable Car, Po Lin Monastery and the Tian Tan Buddha Statue.
6. In order to further support the ecological value of Tung Chung River, estuary, coastal areas and associated habitats, a number of conservation groups have commenced ecological surveys in these areas. The results will be released and submitted to the Government to facilitate environmentally and socially sound planning for Tung Chung’s remaining natural areas. The surveys cover a wide range of taxa groups and a summary of the results is presented below.

7. Tung Chung River and riparian zones

The preliminary results show that Tung Chung River is rich in freshwater fish species. Over 20 freshwater fish species (11% of total number of freshwater species) can be found in the Tung Chung River and five of them (including Beijiang Thick-lipped Barb (*Acrossocheilus beijiangensis*) and Giant Mottled Eel (*Anguilla marmorata*)) are considered to be of high conservation importance. In fact, Tung Chung River is one of the last local streams which still has a natural estuary. Tung Chung River and its riparian zones are also ecologically important for 25 amphibian and reptile species (22% of total number of amphibian and reptile species) including the endemic Romer’s Tree Frog (*Liuixalus romeri*) and Hong Kong Newt (*Paramesotriton hongkongensis*) which are protected by law. At least 48 butterfly species (18% of total number of butterfly species) can be found in Tung Chung’s remaining natural habitat, and a population of one rare butterfly species, Jhora Scrub Hopper (*Aeromachus jhora*) can be found within the marsh inside Tung Chung River.

8. Tung Chung Estuary and Tung Chung Bay

Tung Chung Estuary is characterised by mudflat, mangrove, saltmarsh and seagrass habitats and the San Tau seagrass bed SSSI is located on its western side. The estuary is home to various mangrove plant and animal species and is also the breeding and nursery ground for two horseshoe crab species, Chinese Horseshoe Crab (*Tachypileus tridentatus*) and Mangrove Horseshoe Crab (*Carcinoscorpius rotundicauda*) and one pipefish species, Seaweed Pipefish (*Syngnathus schlegeli*), demonstrating its high ecological value and importance in local context. Tung Chung

Bay is also exceptional in terms of economically important juvenile fish and crustacean species, which shows that Tung Chung Bay is an important nursery area of commercial fisheries resources. The bay is also an important foraging ground for some important wetland bird species like Swinhoe's Egret (*Egretta eulophotes*) and Pacific Reef Egret (*Egretta sacra*).

9. Tung Chung Valley

Tung Chung Valley is largely covered with wooded areas and several Fung Shui Woodlands are identified. The secondary woodlands surrounding Tung Chung Valley are good in quality and are used by many fauna species. These woodlands also contain protected plant species like Incense Tree (*Aquilaria sinensis*) which are of conservation importance. Four butterfly species of conservation importance are recorded near the Tung Chung woodlands, including Oriental Striped Blue (*Leptotes plinius*), Peacock Royal (*Tajuria cippus*), Golden Birdwing (*Troides aeacus*) and Common Birdwing (*Troides helena*). (See Appendix 2 for some highlighted key ecologically important species recorded in the Tung Chung River, valley, estuary and bay.). Part of Tung Chung River, its riparian habitats and its estuarine habitats have been severely damaged by haphazard development over the last decade and it is time to provide appropriate planning and protection to the remaining key sites.

10. In view of the intactness, uniqueness and intricate ecology of Tung Chung River Valley, estuary and coastal areas and the social benefits of conserving these areas for public use and tourist attraction, any adverse impacts of development or incompatible uses in these areas must be avoided. Therefore, we strongly urge the government to:
- Prohibit civil engineering work, channelization and reclamation in Tung Chung River courses and banks, estuary and the entire Tung Chung Bay.
 - Prohibit any discharge of effluents and connection of outfalls to Tung Chung River channels and estuary. Any landuse and activity that brings about water pollution must be removed from Tung Chung River banks and the shores of Tung Chung Bay.
 - Rehabilitate the channelized/ damaged artificial river sections.
 - Adopt our recommended DPA plan to guide a sustainable planning and development in Tung Chung.
 - Terminate the present planning and engineering study on the remaining development in Tung Chung and not to fast-track the landuse planning, engineering feasibility and EIA study processes. We consider that the present proposed plan to reclaim Tung Chung Bay, with new town development as the decided objective, pre-empt the landuse planning and EIA process.

Co-signed Groups

Designing Hong Kong
Eco-Education & Resources Centre
Green Lantau Association
Green Power

Hong Kong Bird Watching Society
The Conservancy Association
WWF-Hong Kong

Appendix 2: List of some highlighted key ecologically important species recorded in Tung Chung River, Valley, estuary and bay.

English Name	Scientific Name	中文名稱 Chinese Name	Rarity	Conservation Status	Required Habitats
Tung Chung River and Riparian Zone					
Romer's Tree Frog	<i>Lituixalus romeri</i>	盧氏小樹蛙	Endemic to Hong Kong	Protected under Cap. 170 IUCN: Endangered ¹ Fellowes et al. (2002): Potential Global Concern ²	Riparian zones (woodlands/ vegetated areas; but also see below)
Hong Kong Newt	<i>Paramesotriton hongkongensis</i>	香港瘰螈	Restricted to coastal South China but fairly widespread locally	Protected under Cap. 170 IUCN: Near Threatened ¹ Fellowes et al. (2002): Potential Global Concern ²	Found in the main stream and tributaries of Tung Chung River System
Short-legged Toad	<i>Xenophrys brachykolos</i>	短腳角蟾	All confirmed records are from Hong Kong.	AFCD: Species of Conservation Concern ³ IUCN: Endangered ¹ Fellowes et al. (2002): Potential Global Concern ²	Small hill streams and wooded riparian zones; small tributaries associated with Tung Chung River provide suitable breeding habitats for this species.
Beijing Thick-lipped Barb	<i>Acrossocheilus beijiangensis</i>	北江光唇魚	Populations considered to be native appear in only Hong Kong Island and Lantau; distribution highly	AFCD: Species of Conservation Concern ⁴ Fellowes et al. (2002): Global Concern ²	Streams with natural bottom (gravel and sand); found in the main stream and tributaries of Tung Chung River System.

English Name	Scientific Name	中文名稱 Chinese Name	Rarity	Conservation Status	Required Habitats
Giant Mottled Eel	<i>Anguilla marmorata</i>	花鰻鯉	restricted. Rather restricted in distribution and population size very small; threatened by over-harvesting and population trend is likely to be decreasing	AFCD: Species of Conservation Concern ⁵ China Red Data Book: Endangered ⁵ China Species Red List: Endangered ⁶ Class II State Protected Species in China ⁶ Fellows et al. (2002): Global Concern ²	Diadromous species; inhabits streams with natural stream bed (gravel and sand); the stream-ocean corridor should not be blocked (i.e. channelization at certain section, culverted); stream flow and stream bed should remain natural (stream flow should not be further reduced); simply speaking, the whole stream should be preserved for protecting this species
Jhora Scrub Hopper	<i>Aeromachus jhora</i>	寬額弄蝶	Rare ⁷	AFCD: Rare ⁷	A population was found within the marsh inside Tung Chung River.
Hong Kong Spiranthus	<i>Spiranthus hongkongensis</i>	香港綫草	Threatened by overharvesting	Protected under Cap. 96 and 586.	Stream and riparian zone.
Pitcher Plant	<i>Nepenthes mirabilis</i>	豬籠草	Threatened by overharvesting	Protected under Cap. 96 and 586.	Riparian zone.
Tung Chung Estuary and Tung Chung Bay					
Burmese Python	<i>Python molurus</i>	蟒蛇	Widespread in Hong Kong but rare in South China	Protected under Cap 170 and 586 IUCN: Near Threatened ¹ China Species Red List: Critically Endangered ⁸	Woodlands, mangrove, saltmarsh, stream courses and vegetated riparian zone

English Name	Scientific Name	中文名稱 Chinese Name	Rarity	Conservation Status	Required Habitats
				China Red Data Book: Critically Endangered ⁶ Class I State Protected Species in China ⁶ Fellowes et al. (2002): Potential Regional Concern ²	
Chinese Horseshoe Crab	<i>Tachypleus tridentatus</i>	中國蟹	Restricted mostly to the Deep Bay and rare in other parts of Hong Kong ¹⁰	IUCN - Data Deficient China Species Red List: Endangered Their abundance has declined substantially with low density on local shores in Hong Kong ¹⁰	Coastal bays, Intertidal soft shore, and the bottom of open sea
Mangrove Horseshoe Crab	<i>Carcinoscorpius rotundicauda</i>	圓尾蟹	Mainly in Deep Bay and Lantau Island. Also recorded in Luk Keng and Lai Chi Wo ¹⁰	IUCN - Data Deficient China Species Red List: Vulnerable Their abundance has declined substantially with low density on local shores in Hong Kong ¹⁰	Coastal bays, Intertidal soft shore, and the bottom of open sea
Seaweed Pipefish	<i>Syngnathus schlegelii</i>	舒氏海龍	Juveniles were	IUCN – Not Assessed	Coastal bays, Intertidal soft shore, and the bottom of

English Name	Scientific Name	中文名稱 Chinese Name	Rarity	Conservation Status	Required Habitats
			discovered in Sha Lo Wan and Tung Chung bays	Mainly distributed in northern part of Lantau coastal waters, also known from Tung Ping Chau ¹⁸	open sea.
Alligator Pipefish	<i>Syngnathoides biaculeatus</i>	棘海龍	Adults were discovered in Sunny Bay, Tung Chung Bay, Hau Hok Wan and Sha Lo Wan	IUCN – Not Assessed Mainly distributed in northern part of Lantau coastal waters	
Swinhoe's Egret	<i>Egretta eulophotes</i>	黃咀白鷺	scarce spring passage migrant	IUCN Vulnerable Class II State Protected Species in China Fellowes et al. (2002): Global Concern	mainly intertidal mudflats and marshes
Collared Crow	<i>Corvus torquatus</i>	白頸鴉	Uncommon and localised resident	IUCN Near Threatened Fellowes et al. (2002): Local Concern	wetlands
Pacific Reef Egret	<i>Egretta sacra</i>	岩鷺	Uncommon resident	China Red Data Book: rare Class II State Protected Species in China	Coastal areas

English Name	Scientific Name	中文名稱 Chinese Name	Rarity	Conservation Status	Required Habitats
No common name (A rare shrub species)	<i>Ligustrum punctifolium</i>	斑葉女貞	Very rare; found only at several sites in Hong Kong and has not been recorded from Mainland China; the other population was found in Vietnam.	Fellowes et al. (2002): Local Concern Listed under "Rare and Precious Plants of Hong Kong" ¹³	Mangrove area; it should be noted that although the Tung Chung population is small, it is very far away from the one at NE New Territories, so it should be a distinct population requiring special attention.
Other key records: Fish larvae from 8 families including Callionymidae, Clupeidae, Engraulidae, Gobiidae, Lutjanidae, Sillaginidae, Sciaenidae and Syngnathidae and one crustacean larvae from Portunidae family are also recorded. Most of these families have species which are economically important fisheries resources.					
Tung Chung Valley					
Tokay Gecko	<i>Gekko gecko</i>	大壁虎	Uncommon and restricted in distribution ¹⁵	China Red Data Book: Endangered ¹⁵ China Species Red List: Endangered ⁴ Class II State Protected Species in China ⁴ Fellowes et al. (2002): Regional Concern ²	Cliffs or boulder piles surrounded by thick brush/ woodland.
Chinese Bull Frog	<i>Hoplobatrachus</i>	虎紋蛙	Uncommon	China Species Red List:	Active and abandoned agricultural lands; the riparian

English Name	Scientific Name	中文名稱 Chinese Name	Rarity	Conservation Status	Required Habitats
	<i>chinensis</i>			Vulnerable ⁴ Class II State Protected Species in China ⁴ Fellowes et al. (2002): Potential Regional Concern ²	zones along Tung Chung River system also provide suitable habitats.
Romer's Tree Frog	<i>Liuxalus romeri</i>	盧氏小樹蛙	Endemic to Hong Kong	Protected under Cap. 170. IUCN: Endangered ¹ Fellowes et al. (2002): Potential Global Concern ²	Woodlands, orchards, abandoned agricultural lands and even roadside plantation areas.
Emerald Dove	<i>Chalcophaps indica</i>	綠翅金鳩	China Species Red List: Near Threatened China Red Data Book: Vulnerable	CRDB vulnerable	Wooded areas
Eurasian Eagle Owl	<i>Bubo bubo</i>	鵂鶒	China Red Data Book: Rare Class II State Protected Species in China Fellowes et al. (2002): Regional Concern ²	CRDB rare; PRC grade II protected animal	Hillisides with grassy/ shrubby vegetation
Golden Birdwing	<i>Troides aeacus</i>	金裝鳳蝶	Rare ¹⁶	Protected under Cap. 586	

English Name	Scientific Name	中文名稱 Chinese Name	Rarity	Conservation Status	Required Habitats
				AFCD: Species of Conservation Concern ¹⁶ Fellowes et al. (2002): Local Concern ²	
Common Birdwing	<i>Troides helena</i>	紫鳳蝶	Uncommon ¹⁶	Protected under Cap. 170 and 586 AFCD: Species of Conservation Concern ¹⁶ China Species Red List: Near-threatened ⁴	Regularly recorded from one Fung Shui Woodland at Tung Chung
Oriental Striped Blue	<i>Leptotes plinius</i>	細灰蝶	Very rare ¹⁷	AFCD: Species of Conservation Concern ¹⁷ Fellowes et al. (2002): Local Concern ²	A population was found in Tung Chung Valley
Peacock Royal	<i>Tajuria cippus</i>	雙尾灰蝶	Rare	Local Concern ²	Wooded areas
Incense Tree	<i>Aquilaria sinensis</i>	土沉香	Used to be widespread in Hong Kong but many mature trees have been cut for the agar wood in recent years	Protected under Cap. 586 Listed under "Rare and Precious Plants of Hong Kong" ¹³ Near-threatened in China ¹³ China Species Red List: Vulnerable ⁴ Class II State Protected Species in China ¹³	Lowland woodland

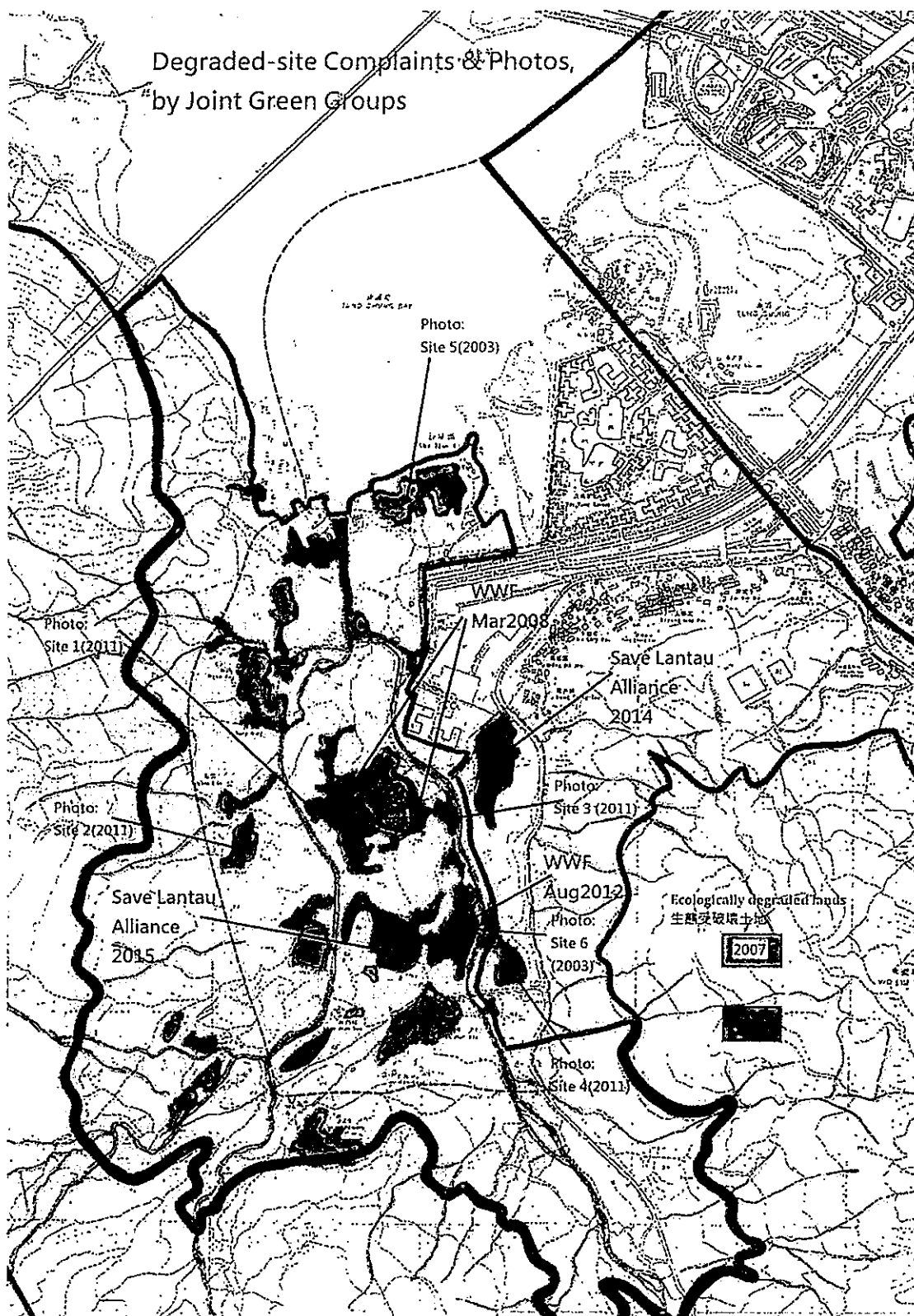
English Name	Scientific Name	中文名稱 Chinese Name	Rarity	Conservation Status	Required Habitats
Little-leaved Rourea	<i>Gmelina chinensis</i>	石梓	Common	Listed under "Rare and Precious Plants of Hong Kong" ¹³ Vulnerable in China ¹³ Considered to be rare and endangered in Guangdong ¹³	Lowland woodland
White Yam	<i>Dioscorea hispida</i>	白薯莨	Rare	Nil	Lowland woodland
Toothed Black Tree-fern	<i>Gymnosphaera hancockii</i>	細齒黑杉蕨	Very rare	Protected under Cap. 96 and 586 Listed under "Rare and Precious Plants of Hong Kong" ¹³ Vulnerable in China ¹³ Class II State Protected Species in China ¹³	Has been recorded in Tung Chung; inhabits thick forest of valleys and stream sides.

References:

- 1 www.iucnredlist.org
- 2 Fellow, J. R. et al. (2002). Wild animals to watch: terrestrial and freshwater fauna of conservation concern in Hong Kong. In Hodgkiss, I.J. (ed.). *Memoirs of the Hong Kong Natural History Society*, No. 19, Hong Kong. pp.123-159.
- 3 http://www.afcd.gov.hk/tc_chi/conservation/hkbiodiversity/database/popup_record.asp?id=2986&lang=tc
- 4 http://www.afcd.gov.hk/tc_chi/conservation/hkbiodiversity/database/popup_record.asp?id=2984&lang=tc
- 5 http://www.afcd.gov.hk/english/conservation/hkbiodiversity/database/popup_record.asp?id=2975&lang=tc

- 6 www.baohu.org
- 7 http://www.afcd.gov.hk/tc_chi/conservation/hkbiodiversity/database/popup_record.asp?id=3982&lang=tc
- 8 Tse, P. Nip, T.H.M. and Wong, C.K. 2008. Nursery function of mangrove: a comparison within mudflat in terms of fish species composition and fish diet. *Estuarine, Coastal and Shelf Science* 80, 235-242.
- 9 Nip, T.H.M. and Wong, C.K. 2010. Juvenile fish assemblages in mangrove and non-mangrove soft-shore habitats in Eastern Hong Kong. *Zoological Studies* 49, 760-778.
- 10 Li H.Y. 2008. The Conservation of Horseshoe Crabs in Hong Kong. MPhil. Thesis, City University of Hong Kong, 250 pp.
- 11 http://www.afcd.gov.hk/english/conservation/con_mar/con_mar_hor/con_mar_hor.html
- 12 http://www.afcd.gov.hk/english/conservation/con_wet/con_wet_sea/con_wet_sea.html
- 13 Hu, Q.-m., Wu, T.-l., Xia, N.-h., Xing, F.-w., Lai, P.C.C. and Yip, K.-l. 2003. *Rare and Precious Plants of Hong Kong*. Agriculture, Fisheries and Conservation Department, Hong Kong Government, Hong Kong.
- 14 Karsen, S.J., Lau, M.W.-n. and Bogadek, A. 1998. *Hong Kong Amphibians and Reptiles*. Provisional Urban Council, Hong Kong.
- 15 http://www.afcd.gov.hk/english/conservation/hkbiodiversity/database/popup_record.asp?id=3150&lang=en
- 16 http://www.afcd.gov.hk/english/conservation/hkbiodiversity/database/popup_record.asp?id=2725&lang=en
- 17 http://www.afcd.gov.hk/english/conservation/hkbiodiversity/database/popup_record.asp?id=2487&lang=en
- 18 Yvonne Sadovy and Andrew Cornish. 2000. *Reef Fishes of Hong Kong*. Hong Kong University Press.

Appendix 3 (Oct 2015)





Degraded site_1_Shek Lau Po 石榴埔
(5May2011_綠色力量攝)



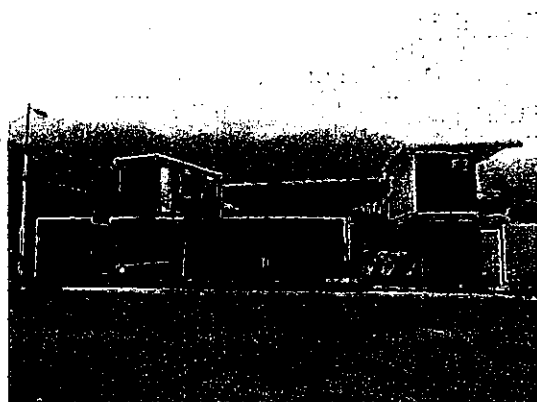
Degraded site_4_Shek Mum Kap 石門甲
(Nov2011_綠色力量攝)



Degraded site_2
(5May2011_綠色力量攝)



Degraded site_5_Hau Wong Temple 侯王宮
(Dec2003_綠色力量攝)



Degraded site_3_Shek Lau Po 石榴埔
(5May2011_綠色力量攝)



Degraded site_6_Tung Chung River 東涌河
(Dec2003_綠色力量攝)



Lung Tseng Tau 龍井頭_2014
(Credit to Save Lantau Alliance)



Shek Lau Po 石榴埔_2008_2
(Credit to WWF)

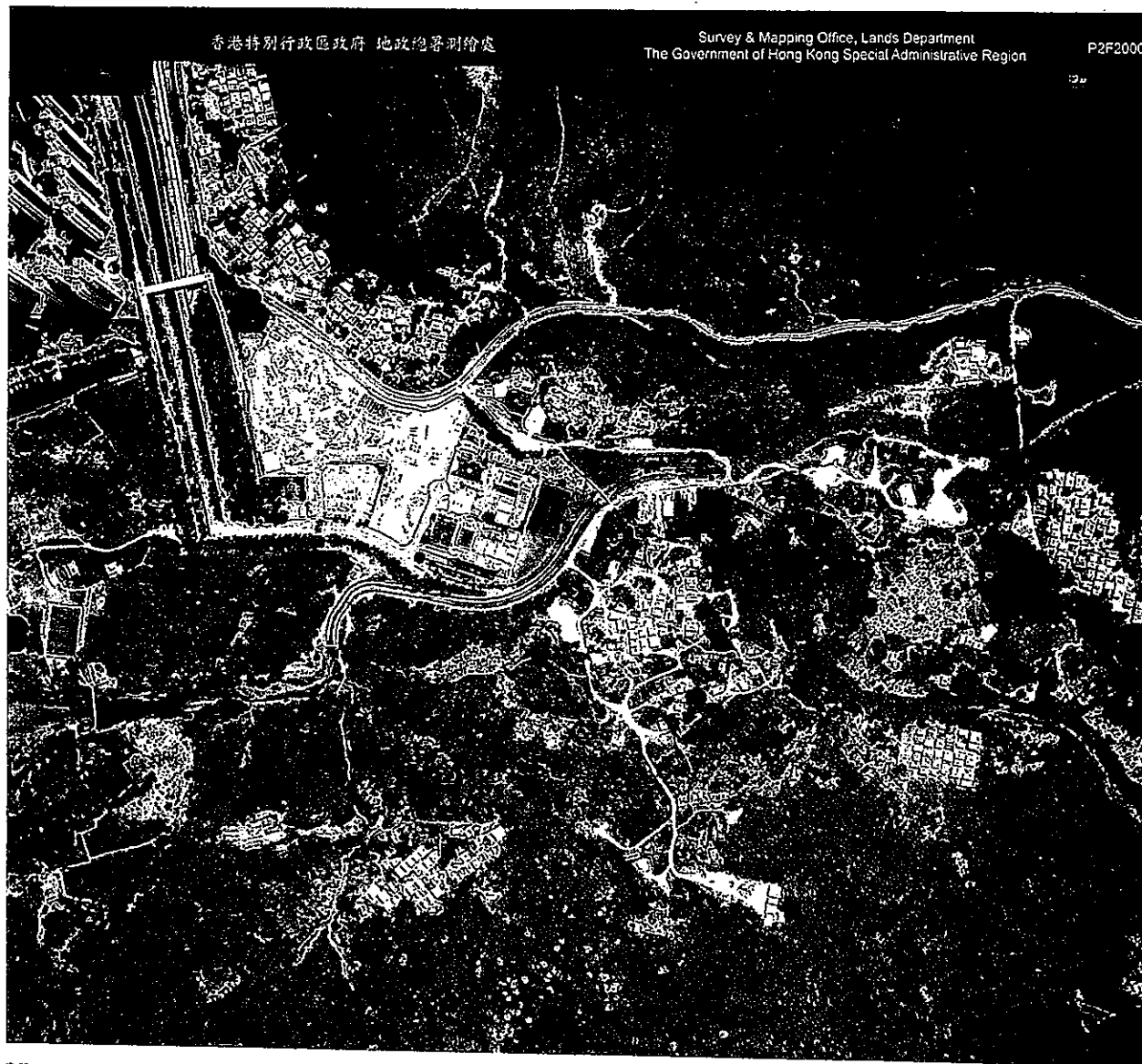
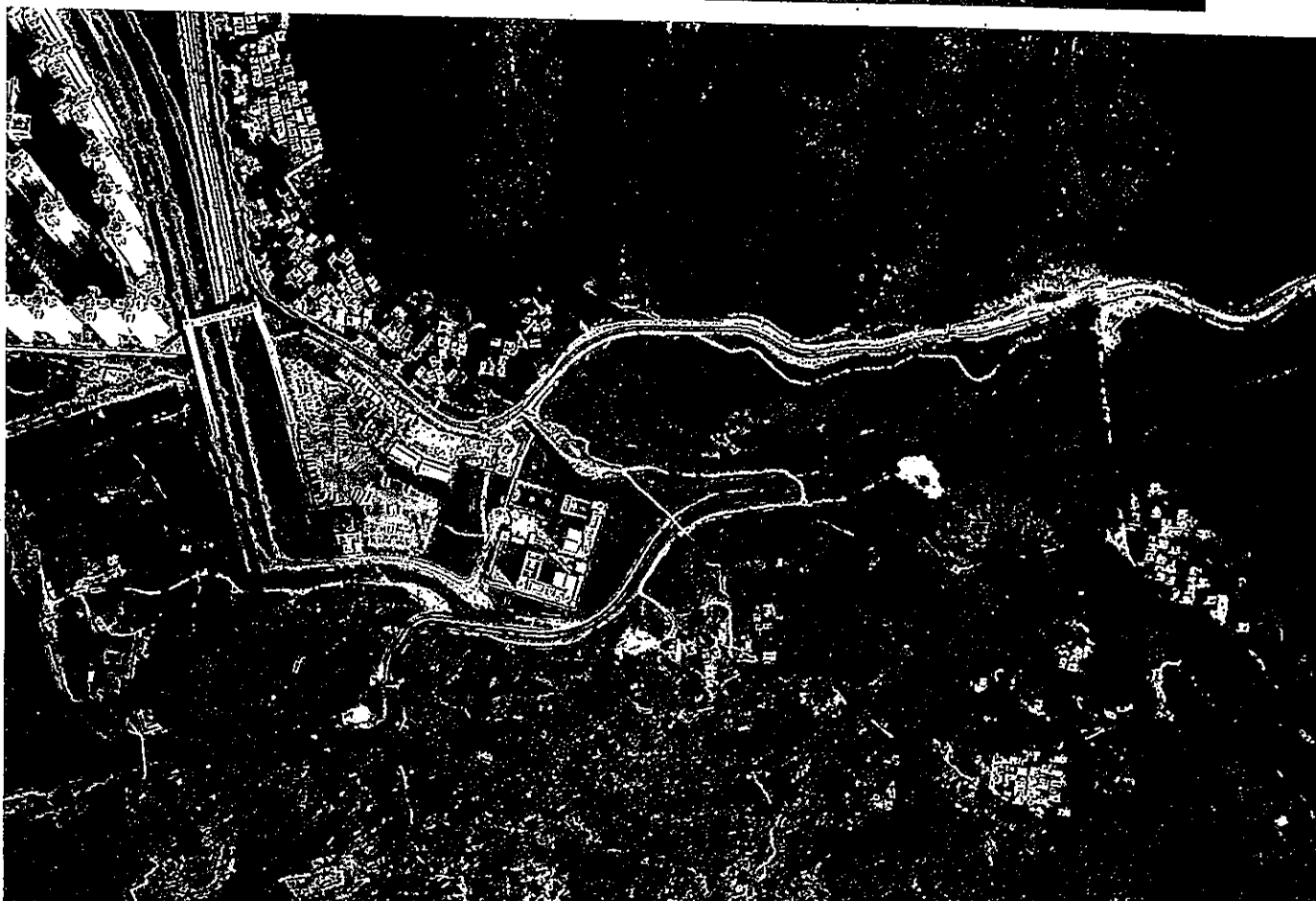


Shek Lau Po 石榴埔_2008_1
(Credit to WWF)



Shek Mun Kap 石門甲_2015
(Credit to Save Lantau Alliance)

Appendix 4. Aerial photos of Tung Chung Valley taken in November 2007 and April 2015



香港特別行政區政府 地政總署測繪處

Survey & Mapping Office, Lands Department
The Government of Hong Kong Special Administrative Region

P2F2000

tpbpd

寄:
日期:
收件者:
主旨:
附件:

Miffy Ng [REDACTED]

08日03月2016年星期二 23:55

tpbpd@pland.gov.hk

DHK comment on Draft Tung Chung Outline Zoning Plans No. S/I-TCV/1, S/I-TCE/1 and S/I-TCTC/21
20160308 DHK Tung Chung New Town Extension OZP.pdf

TPB/R/S/I-TCV/1-29

Dear sirs,

Attached please find our comment on the captioned.

Miffy

Designing Hong Kong Limited

Tel: [REDACTED]

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Unit 7, 5/F, Eastern Harbour Centre, 28 Hoi Chak Street, Quarry Bay, Hong Kong

Website: <http://www.designinghongkong.com/>

Facebook Page: <https://www.facebook.com/DesigningHongKong>

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Hong Kong, 8 March 2016

Chairman and Members
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245
Email: tpbpd@pland.gov.hk

Dear Sirs,

**Re: Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1,
Draft Tung Chung Extension Area S/I-TCE/1, and
Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21**

Designing Hong Kong Limited is concerned over the captioned draft Outline Zoning Plans:

- We are concerned with the overall capacity of Tung Chung area, and the planned increase from 82,000 to a population of 220,000. The area is facing a lot of development constraints including poor air quality and the increase in population and economic activities in close proximity to valuable natural resources may result in irreversible impacts.
- The expansion of Tung Chung Town can't be judged as an isolated event, in addition to the residential community there is a need for economic developments providing the necessary job opportunities. The Lantau Development Advisory Board has proposed a range of such developments, and the proposal is under public consultation. The government should provide a comprehensive plan for Lantau development, including Tung Chung new town extension instead of the current piecemeal approach.
- The terrestrial and marine baseline studies should cover the whole Lantau Island, including the Tung Chung New Town and Lantau South, and identify the habitats and ecology we can't lose. Proposed developments and other projects outside the extension area should also be considered. Coordination with other proposed projects in/around Tung Chung is missing.
- The Convention on Biological Diversity (CBD) has been extended to Hong Kong since May 2011. Projects which impact the environment should be in line with the CBD principle. Tung Chung River, Valley and estuary's ecosystem should be regarded as a whole and be evaluated in the assessment. The Tung Chung River includes several Ecological Important Streams (EIS) namely Wong Lung Hang and Tung Chung (Mok Ka and Shek Mun Kap). It forms an estuary with a rich ecology and diversity of species.
- Tung Chung is facing lots of development constraints including poor air quality. Any additional development will intensify the air pollution in the area. As we have mentioned in the comment of EIA report, the project should adopt the new Air Quality Guidelines (AQG) by the World Health Organization (WHO) to evaluate the cumulative impacts towards the existing and future residents in Tung Chung. Measures should be suggested to improve the air quality in town for the growing population.

Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1

- We are concerned over to the development plan for Tung Chung West. Detailed comments have been included in the "Green Groups' Joint Submission in Response to "Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 and Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21" which have yet to be addressed (see Annex I).

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- We call for a new Development Permission Area Plan or Country Park extensions to include *Tin Sam* and *Wong Lung Hang* which otherwise will remain as enclaves without effective land use control.
- Tung Chung River has been recognized as an Ecologically Important Stream (No. 27) by Agricultural, Fishery and Conservation Department (AFCD). Spill over in various forms from the proposed development will impact the ecology of Tung Chung River and estuary.
- To ensure adequate management, the areas identified for conservation and hydraulic (flooding) uses along the Tung Chung River and streams, and estuary, should be resumed and managed as a park. Private and unallocated government land zoned for conservation and left without management in close proximity to significant development is unsustainable given current enforcement capabilities as can be witnessed throughout Hong Kong.
- Town Planning Board should recognize the proposal submitted by a coalition of green groups to Government to establish a River Nature Park and to protect the Tung Chung River and estuary by resuming private land lots in the proposed park. Simply zoning land for conservation uses is not enough. The landowners should be compensated and the land should be managed by Government as a River Nature Park. The resumption of land and the management as a park will make it possible to better conserve and enhance the ecological value and functions of the area. The park will provide a high quality nature experience for residents and improve flood control. Our proposal on land resumption has attached.
- We have serious concerns over incompatible developments and vandalism in Tung Chung River Valley. Over the past decades, green groups have observed a proliferation of these cases along the Valley. In 2015 approximately 13% of the land has been filled with waste and covered with unauthorized structures. With the proposed increase on construction waste disposal charges, the vandalism situation may get more serious. In the EIA report and Outline Zoning Plan, the road has been proposed to extend to Lam Che and Nam Yuen, which will certainly create more opportunities for vandalism.
- Some local organizations have found out new and extended dumping along Shek Mun Kap, which should be zoned as "Other Specified Uses (For "River Park" Only), and the previous land state of these lands before the gazettal of OZP should be active farmland or abandoned farmland.¹ The government should ensure the control over the existing and potential unauthorized uses and vandalism in the area. We urge the government to provide an early implementation of environmental protection and conservation land uses proposed in the TCVOZP in prior to other project works in Tung Chung area and implement traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery immediately which are proposed by the joint green groups.
- The human disturbance and development threat brought from the "Residential" zonings will impact the natural and rural landscape, hydrology and ecology of Tung Chung Valley. In addition, the Area 42 and 46 zoned as "Residential (Group A)" ("R (A)") in Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21 will block the breezeway and view corridor at Northeastern part of Tung Chung Valley. (Figure 2)
- The "V Zone" in Shek Lau Po has been extended and covered the surrounded "Agriculture" zones. This has not been justified in the EIA report. (Figure 1) According to the OZP paper No. 10045, there are active farmlands along Shek Lau Po and Shek Mun Kap. The "Agriculture" zones could serve as a buffer between the Tung Chung Valley and V zone to avoid pollutants from reaching the river and estuary and provide a better enhancement and management on flood control.

¹ <http://hk.apple.nextmedia.com/realtime/news/20160121/54672593>

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- Besides, the local groups are calling for waste recycling system, which is a system to collect the food waste from airport and Tung Chung Town to provide organic fertilizer to surrounded farmlands. A new policy has been proposed to ensure sustainable development of agriculture in Hong Kong. The Board should reserve quality farmland to support the policy and the potential sustainable local economy.

Draft Tung Chung Extension Area S/I-TCE/1

- The proposed land reclamation at the east of Tung Chung will cause the permanent loss of 145 hectares of sea area that could potentially be an important dolphin habitat at night-time according to the acoustic monitoring study at Siu Ho Wan. In the EIA report, the study conducted at Sunny Bay is much further from the proposed site, and the baseline information of dolphin usage conducted in 2013 and 2014 was affected by the HZMB construction. The EIA report failed to provide a proper assessment, which is not proper to process the Outline Zoning Plan.
- The proposed reclamation would take place less than 2km away from the proposed The Brothers Marine Park. According to the EIA report, during its peak construction period between mid-2018 and late-2019, 42 to 56 construction barges would cross over The Brothers Marine Park daily. Moreover, the construction of the Tung Chung New Town Development Extension will partially overlap with that of the Third Runway, increasing daily marine traffic to as much as 200 vessels within and around the Marine Park. This huge volume of marine traffic would severely disturb marine life and discourage the Chinese white dolphins from returning to this once important habitat.
- The proposed ecological coastline is not only an untried measure, it does little good in mitigating the impacts on the dolphin habitat and Marine Park during construction. We urge the government to follow the two measures suggested by WWF-Hong Kong and green groups to minimize the development's impact to marine life.

(1) "The project's construction barges should be barred from the proposed The Brothers Marine Park."

(2) "Designate waters off Tai O in west Lantau as a Marine Park by 2019 to make up for reclamation-induced habitat loss since recent research has revealed that's the prime dolphin habitat now. This new Marine Park can connect four others – Sha Chau and Lung Kwu Chau, The Brothers, SW Lantau and the vicinity of Third Runway – creating a marine protected area network for the dolphins."

- We object to private marina, but support public typhoon shelter for small vessels and water sports activities. The pier at the northeastern part of reclamation area will be privatized by private marina club under the zoning of 'proposed "OU" annotated "Marina Club, Boat Repairing and Commercial facilities associated with Marina Development" zone covers two linked sites in Area 143 and 144.' (See appendix I).
- We suspect that the proposed "Residential (Group A)" and "Residential (Group B)" with maximum BHs ranging from 45 mPD to 140 mPD will worsen the air quality of existing Tung Chung Town and the proposed schools which will be located at "GIC" zones.

Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21

- The proposed amendments, including amendment C, D1, D2, E1, F1, F2, G1 and R3 will cause the loss of large area of vegetation and numbers of trees in the existing community and surrounded "Green Belt". The open space and recreational space serving the existing residents will also be removed. The compensation of trees and re-allocation of open space should be identified in the plan during and after the construction of project. For example, the existing open spaces are connected with the residential buildings. How the future Town Park could serve the need of existing and future residents? The proposed recreational place,

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such as sport centre located at the reclamation area will be too far for Tung Chung Town residents. A more detailed plan should be provided.

- We are concerned with amendment C and object to amendment R3, the areas zoned for small houses development should be limit to previous "V-zone" plus a reserve for approved small house applications only.
- What is the carry capacity of Tung Chung MTR line? How to minimize the impact of pollution and construction trucks to residents? A compressive traffic plan and detailed traffic impact assessment should be provided during and after the construction of project.
- The local market suggested by local groups should be considered. We are concerned over the proposal of local retail uses along the Linear Parks and the main streets forming key pedestrian spines and activities corridors which aims to "provide opportunities for local residents to open up small business" in the draft Tung Chung Extension Area Outline Zoning Plan S/I-TCE/1. We support the planning intention, but the plan could not ensure the retail shops are opened up or rented by local residents. A local market with authorized hawkers at existing Town Chung Town will be more suitable for local residents.
- In addition, the existing bike parks are removed and covered with residential buildings. An overall plan for cycling path, including the relocation of bike parks should be provided.

Here we submit for your consideration.

Designing Hong Kong Limited

March 2016

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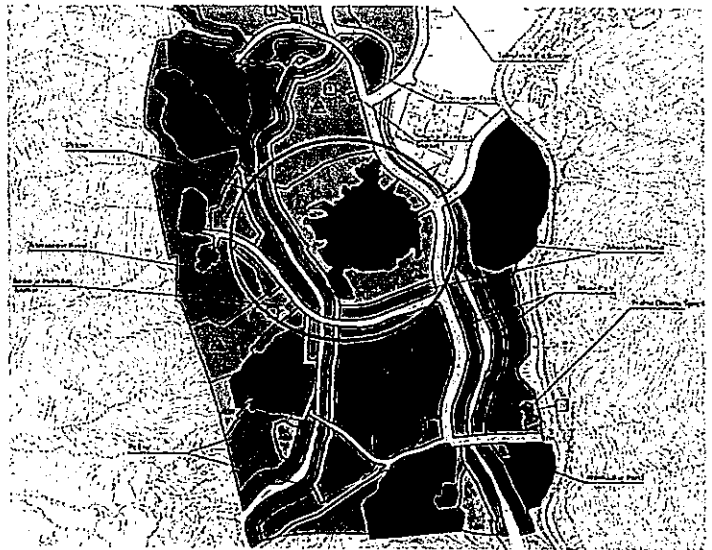
Figure 1

The Draft Tung Chung Valley Outline Zoning Plan
No. S/I-TCE/1

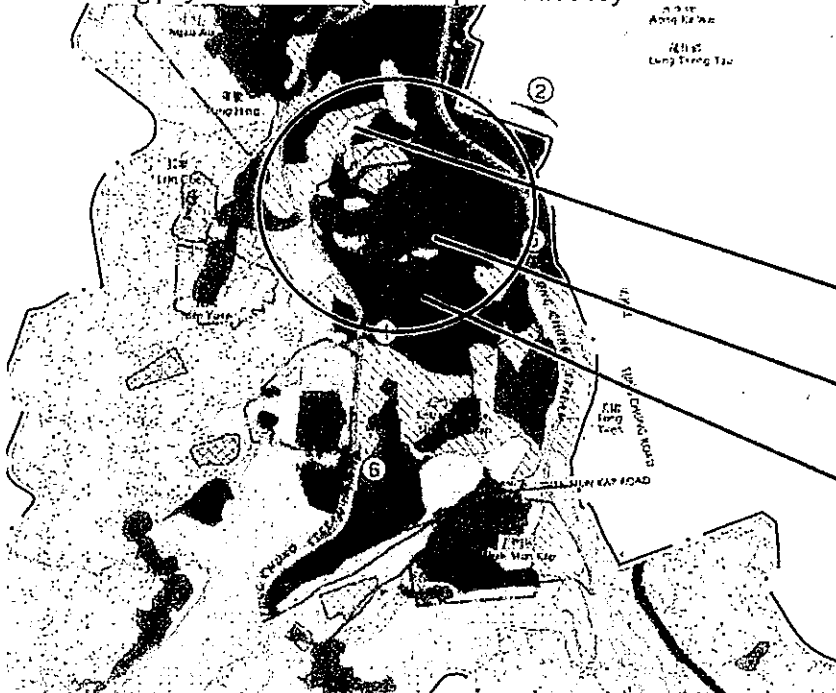
The EIA Report: Revised Recommended Outline
Development Plan-TCW



Extended V zone



OZP existing physical features (TPB Paper No.10045)



The "V zone" in Shek Lau Po has been extended and covered the surrounded "Agriculture" zones in OZP. This has not been justified in the EIA report.

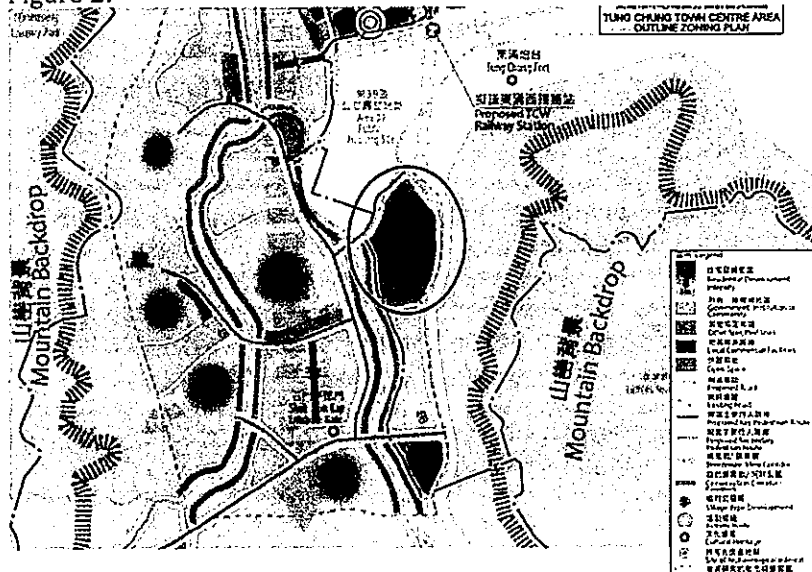
Agricultural land (Active, Dry)

Agricultural land (Abounded, Dry)

Agricultural land (Orchard)

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Figure 2:



The Area 42 and 46 zoned as "Residential (Group A)" ("R (A)") in Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21 will block the breezeway and view corridor at Northeastern part of Tung Chung Valley.

Appendix I

From: Paul Zimmerman

Sent: Saturday, January 03, 2015 12:34 AM

To: 'eiaocomment@epd.gov.hk'

Subject: Tung Chung Extension

Dear Director

Although past the deadline for comments, we learned of a number of concerns over the "marina".

I have worked on marine and planning issues since 2003. I object to a private marina, but support a public typhoon shelter for small vessels and water sports activities. Here is why and how.

We have more sea than land, we have 800km of shoreline, a rich opportunity for recreation.

We have 12000 small vessels incl pleasure craft and sampans (the poor mans yacht). And this number continues to grow at double digits.

However, we only have 3200 berths in sheltered water (safe and secure, and where insurance is applicable during typhoons).

Unless you are a rich person who can afford clubs, boat users are forced to keep their boats on beaches tied under trees, pulled up on the rocks, or at anchor or at unauthorized moorings. This shortfall of safe and affordable public facilities excludes a very large part of the community from enjoying our marine resources. It stops kids from learning and enjoying water sports activities. We have fewer and fewer people who know the water and wind.

We need to create areas of sheltered water throughout the territory to address the shortfall.

ABERDEEN harbour and Stanley beach at the southside, and port shelter and sai kung harbour in sai kung, are full with long waiting lists.

Unit 7, 5/F, Eastern Harbour Centre, 28 Hoi Chak Street, Quarry Bay.

Tel: +852 3104 3107 Fax: +852 2187 2305

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With reclamation we can at low cost create sheltered water by lengthening the new shoreline without any additional impact on natural shorelines.

Where there is an existing man made shoreline impacts are limited. Examples of recent proposals at man-made shorelines include a typhoon shelter for a public marine center outside science park. Sa Mun Tsai is insufficient in tolo harbour.

The other proposal is at ex Lamma quarry. It is opposed by local fishermen and fish farmers who are holding out for higher compensation payments from a future private developer. But why disallow new residents the use of vessels other than the ferry to travel to ABERDEEN, or to go sailing, fishing or other recreation? There are also existing small vessels around Lamma need safe shelter. Berthing at a ferry pier within typhoon shelter at ex Lamma quarry allows safe operation under a greater range of weather conditions. Or do we deny this right to people and end up with people forced to keep boats tied onto rocks and under trees?

The Baroque on Lamma is a bad marina proposal. Not only is it a private facility unaffordable by normal people, it would impact a natural shoreline (and it is close to the shipping lane, etc etc). It simply is an excuse for property development by the owner of local lots of Agr land.

TKO also needs a typhoon shelter for public use. The eastern channel at TKO is now the defacto local public marine center providing some but insufficient shelter. You can find 100plus small vessels of local residents moored there tolerated by MarDep.

As for the demand for private marina spaces for large yachts of residents and visitors - the MarDep / THB is currently conducting a berthing review. Expanding ABERDEEN typhoon shelter or better use of existing typhoon shelters in Kwun tong and to Kwa wan could help.

A close up on google earth of the tung Chung river estuary and nearby villages shows over a 100 small vessels without a safe mooring. A typhoon shelter for public mooring (not a private marina) nearby will help resolve this. It also offers a safe basin from which residents can enjoy water sports including sailing, rowing, etc. and a possible take off point for dolphin tours, AFCD marine park control vessels and base, etc.

Note that boats registered in hk are generally not fast and don't travel very far. Typhoon shelters for public use are thus required throughout hk and near residential communities (much in the same way bicycle parking spaces are required near homes and various nodes).

There are concerns over marine protection and enforcement.

Protecting the CWD requires exclusion zones, speed control zones, etc for all vessels not just the ones using a new typhoon shelter at tung chung.

From issues associated with marine based recreation around sai kung we know that there are enforcement issues which need to be addressed. But lack of enforcement (regulation and resources) should not be an excuse for failing to resolve the shortfall in typhoon shelters especially near where vessels are and will be used.

Paul
District Councillor, Pokfulam
CEO, Designing Hong Kong
507, Eastern Harbour Centre
28 Hoi Chak Street
Quarry Bay, Hong Kong

ph-4

寄件者:
寄件日期:
收件者:
副本:
主旨:
附件:

lkcheng [REDACTED]
08日03月2016年星期二 15:19
tpbpd@pland.gov.hk
ken@erc.org.hk; Michelle Cheung
Re: Green Powr & ERC submission re TCV DPA
GP ERC TCV OZP comments 8Mar2016 draft.doc

TPB/R/S/I-TCV/1-30

Dear Sir/ Madam,

Pls find the attached self-explanatory letter.

Thanks,

Yours faithfully,

CHENG Luk-ki

On behalf of GREEN POWER, ECO-EDUCATION & RESOURCES CENTRE



綠色力量
GREEN POWER



生態教育及資源中心
Eco-Education & Resources Centre

BY EMAIL ONLY

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

8 March, 2016

Dear Sir/Madams,

**Green Power and Eco-Education & Resources Centre's Joint Comments on
Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1, and
Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21**

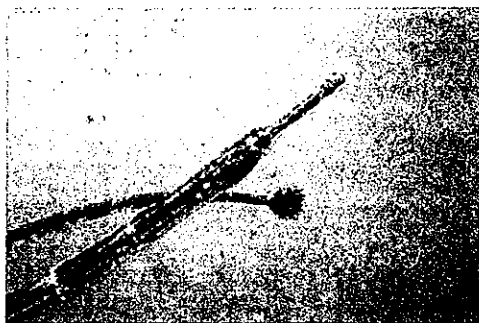
Long-term Preservation of Tung Chung River-cum-Bay

1. Green Power and Eco-Education & Resources Centre jointly welcome the draft Tung Chung Valley Outline Zoning Plan (TCVOZP) gazetted on 8 January 2016. However, we consider that the present draft TCVOZP is deficient for the long-term conservation of Tung Chung River-cum-Bay system which is one of few natural rivers remaining in the territory, particularly with undisturbed estuaries (Appendix A).
2. We, as co-signed groups, concur to the joint letter date 8 March 2016 submitted to Town Planning Board regarding the above-captioned draft TCVOZP.
3. In order to effectively preserve and manage the biodiversity, natural landscape and hydrology of Tung Chung River, Valley and Coast, we call for
 - (a) Cover Tin Sam and Wong Lung Hang areas with a new Development Permission Area (DPA) plan or Country Park extensions.
 - (b) Establishing a River Nature Park for proactive management of natural riverine and estuarine ecology and landscape, and for flood regulation.
 - (c) Zoning Tung Chung Bay as SSSI, as recommended by Green Groups' recommended DPA.
 - (d) Early implementation of environmental protection and conservation landuses proposed in the TCVOZP in prior to other project works in Tung Chung area covered by OZP No. S/I-TCV/1, S/I-TCTC/21 and S/I-TCE/1.
 - (e) Traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery, immediately.

Fishery and Ecological Value of Tung Chung Bay

4. Green Power and the Eco-Education & Resources Centre conducted survey in Tung Chung Bay in 2012 and found that Tung Chung Bay is of high ecological importance for pipefish. Also, larvae of economic species were found including family Callionymidae, Clupeidae, Engraulidae, Gobiidae, Sciaenidae, Sillaginidae, Lutjanidae.

5. The Administration's ecological and fisheries survey findings also confirm that Tung Chung Bay is an important spawning and nursery ground for sea horses and other marine life, and a rich fisheries resources site.
6. Thus, the entire Tung Chung Bay is a significant spawning and nursery ground for economically valuable fishes and crustaceans, and diverse marine life that are supported by the intact Tung Chung River and undisturbed Tung Chung River estuary, Tung Chung Bay, mangroves and intertidal mudflat.
7. We are highly concerned about the impacts of any proposed Residential and Village Type Development zones in TCVOZP on the water quality and ecology of Tung Chung Bay.



Pipefish 海龍

Preservation of Wong Lung Hang Mangroves

8. The "Commercial" ("C") zones in TCVOZP, especially Area 38A, in which a public transport terminus is planned, encroaches the mangroves on the western bank of Wong Lung Hang estuary where a breeding population of dragonfly Mangrove Skimmer (*Orthetrum poecilops*) 斑灰蜻 was discovered in 2015 by Green Power. Mangrove Skimmer is listed as "Vulnerable" by IUCN and locally rare.
9. We urge that these "C" zones in TCVOZP will threaten Mangrove Skimmer population and we recommend include its habitat in River Park or other proper conservation zoning are needed.
10. The public transport terminus should be relocated in Area 107("GI/C") or Area 39 ("R(A)1") in S/I-TCTC/21 to link more efficiently with the planned underground railway station to the west of Yat Tung Estate.



Mangrove Skimmer 斑灰蜻

Ecological Value of Tin Sam and Wong Lung Hang

11. Seventy butterfly species are recorded in the Tung Chung Valley and San Tau (nearby Tin Sam), four of them are of conservation importance including Oriental Striped Blue (*Leptotes plinius*) 細灰蝶, Peacock Royal (*Tajuria cippus*) 雙尾灰蝶, Golden Birdwing (*Troides aeacus*) 金裳鳳蝶 and Common Birdwing (*Troides helena*) 裳鳳蝶.
12. Thirty-four species of dragonflies and damselflies, which comprise 27% of total species number of Hong Kong, were recorded in Wong Lung Hang by Green Power in 2015.



Common Birdwing 裳鳳蝶



Chinese Greenwing 華豔色蟌

13. According to HKPSG, the principle of “retain significant landscapes, ecological and geological attributes and heritage features as conservation zones” (Sec. 2.2, Ch. 10) should be adopted to preserve the ecologically important and biologically diverse San Tau, Tung Chung Bay and Wong Lung Hang, which should be implemented through coverage of these areas with a statutory DPA Plan.

The Basic Principles to Preserve Tung Chung River-cum-Bay System

14. Regarding the preservation of Tung Chung River and Tung Chung Bay, Green Power submitted a letter to the former Chief Executive of HKSAR, Mr. Donald Tsang Yam Kuen, on 21 September 2010 and the current Chief Executive, Mr. C. Y. Leung, on 8 January 2013, and Green Power and Eco-education & Resources Centre would like to reiterate that:
 - (a) river works should be avoided as far as possible, the natural river courses and estuary should not be altered in any scale;
 - (b) land-use planning for Tung Chung River basin and estuary should take into account of its permeability, natural landscape and ecology;
 - (c) sufficient vegetation cover should be maintained in the basin; and
 - (d) no sewage or stormwater of developed areas should be drained into Tung Chung River channel and Tung Chung Bay.

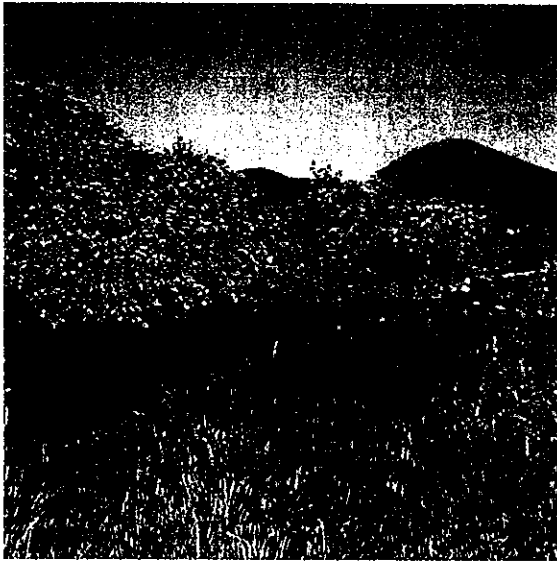
Wise and Sustainable Landuse for Tung Chung River Valley and Tung Chung Bay

15. The government should protect and conserve the natural resources in Tung Chung River Valley for compatible community use and enjoyment. Compatible landuse should also be recommended in TCVOZP and Tung Chung New Town Extension (TCNTE) Study for further enhancement of the ecological and cultural value of Tung Chung Valley and Tung Chung Bay such as:
- (a) an eco-tourist hub acting as an interchange and interconnection to connect different hiking and ancient trails in the area
 - (b) an stream trekking base for stream trekkers to explore the scenic spots along Tung Chung River
 - (c) open space and greening areas integrating original natural features such as river courses, estuary, mangrove and *fung shui woods*
 - (d) provision of educational facilities such as museums with the theme of fishery, river, aquatic life and fish, natural history of Lantau, incense industry at Sha Lo Wan, Tung Chung's history, etc
 - (e) a visitor centre can be provided in the non-sensitive part of Tung Chung Valley to help the public to admire the ecological importance of Tung Chung River-cum-Bay system, and facilitate hikers and stream trekkers
 - (f) facilitating visitors to visit various tourist spots in the area, including: Ngong Ping Cable Car, Tian Tan Buddha Statue, Chek Lap Kok International Airport, Tung Chung Fort and etc, in an environmental-friendly way
 - (g) making use of the existing Tung Chung River landscape and cultural heritage to enhance the tourist appeals of Tung Chung River Valley and promote passive recreational activities (e.g., eco-trails linking to the surrounding country parks, biking, leisure fishing, etc.)
 - (h) Scientific research and education
16. However, such land uses have not proactively incorporated in the proposed River Park and other zonings in TCVOZP.

Foreseeable non-enforceable vandalism

17. Tung Chung West will be highly vulnerable to dumping of construction and demolition (C&D) waste generated in future development in Tung Chung because of the long transport distance to waste facilities such as landfills, and the charging for vehicles travelling through North Lantau Highway.
18. Filling of the river banks and wetlands with wastes and/or soil debris are continually reported in Tung Chung West, particularly Shek Lau Po and Shek Mun Kap. Such activities would destroy the natural habitats in Tung Chung River Valley and threaten the ecology and water quality of Tung Chung River.
19. We are particularly concerned about the following foreseeable environmental vandalism which, according to current judicial and enforcement framework, are extremely difficult to prevent, enforce and reinstate:
- (a) Discharge of domestic wastewater through stormwater drainage system to Tung Chung River-cum-Bay,
 - (b) Connection of outfall of stormwater drainage system to Tung Chung River-cum-Bay,
 - (c) Dumping, reclamation, eradication of vegetation in Tung Chung River-cum-Bay,
 - (d) Incompatible developments in Tung Chung West

20. In addition to the draft TCVOZP which is preceded by the draft TCVDPA, feasible measures to prevent uncontrollable vandalism and incompatible land use activities from encroaching Tung Chung West and damaging Tung Chung-cum-Bay include
- (a) restriction of construction trucks and similar machineries access to sections of Tung Chung Road and Yu Tung Road to the west of Chung Yan Road,
 - (b) mandatory collection of C&D wastes and provision of transportation of C&D wastes to other proper locations & facilities,



Tranquil Tung Chung River Valley



Illegal dumping near Wetland Park, Tin Shui Wai (Newspaper clipping)

Preservation of Hydrology

21. In order to preserve the water quality of Tung Chung River and Bay, land uses leading to direct discharge of stormwater drainage, treated or untreated sewage should not be allowed upstream or within the courses of "Ecologically Important Streams" in Tung Chung designated by AFCD¹.
22. A long-term, innovative and comprehensive drainage strategy and system should be formulated for Tung Chung West which must preserve the Tung Chung River intact. Completion of the construction of the "Sustainable Urban Drainage System" should be in prior to commencement of any other works.

Air Pollution

23. Ozone is the major air pollutant affecting Tung Chung's air quality which had the longest hours of Air Pollution Index reaching of exceeding 101 during 1999 to 2013, and Air Quality and Health Index reaching 10 or 10+ in 2014 and 2015 (Table 1 below). EPD also admitted in the media in February 2015 that Tung Chung is one of districts with highest health risk in terms of air quality².
24. We opine that land use zoning should not lead to deterioration of air quality of Tung Chung or expose the residents under air quality of high health risk.

¹ Ecologically Important Streams, AFCD, HKSAR:

https://www.afcd.gov.hk/english/conservation/con_wet/streams_rivers_hk/Con_NSR/Tung%20Chung%20Stream.pdf

² 「臭氣濃度新高 屯門元朗東涌重災」:明報 A14, 2015 年 2 月 25 日

Table 1: The number of days with Air Quality & Health Index = 10 or 10+ for General Air Monitoring Stations.

Year	Central/ Western	Eastern District	Kwun Tong	Sham Shui Po	Kwai Chung	Tsuen Wan	Yuen Long	Tuen Mun	Tung Chung	Tai Po	Sha Tin	Tap Mun
2014	5	2	5	7	8	7	13	16		3	5	3
2015	9	6	10	6	5	6	8	9		5	4	3

Figures in , and box are the first, second and third highest across the row.

Geotechnical Risks

25. We have grave concerns about the geotechnical aspects of the proposed high-rise residential development in Area 42 and 46 in Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21. In particular, the eastern slope of Nei Lak Shan to the west of Tung Chung River Valley is composed of the extensive mantle of colluviums. Major destructive landslide incidents occurred in Tung Chung area on 17 July 1992, 5 November 1993 and 7 June 2008. Therefore, land use planning in Tung Chung West must take into account of the geotechnical stability.

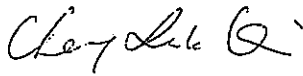


A Large-scale debris flow occurred in Tung Chung Valley in 2008

26. Green Power and Eco-Education & Resource Centre hope that Town Planning Board could address our environmental concerns stated above and should not compromise the remaining valuable natural Tung Chung River and Bay recklessly to ill-planned new town development. We recommends that the government should take a novel and environmental-friendly approach for TCVOZP and Outline Zoning Plan No. S/I-TCTC/21 to demonstrate how natural heritage and development can coexist in Hong Kong, as an advanced and green city.

For any enquiries and questions, please do not hesitate to contact me at Green Power (T: 3961 0223; F: 2314 2661; E-mail: lkcheng@greenpower.org.hk).

For and on behalf of
**Green Power and
Eco-Education & Resources Centre,**



Dr. Cheng Luk-ki
Division Head,
Scientific Research and Conservation
Green Power

Attachment:
Appendix A - Evaluation of Tung Chung River-cum-Bay ecosystem

Appendix A - Evaluation of Tung Chung River-cum-Bay ecosystem

Tung Chung River-cum-Bay is important habitat in the territory because it contains

1. mature native woodland larger than one hectare
2. undisturbed natural coastal area larger than one hectare or longer than 500 metres in linear measurement
3. intertidal mudflats larger than one hectare
4. established mangrove stands of any size
5. brackish or freshwater marshes larger than one hectare
6. established seagrass bed of any size
7. natural stream courses and rivers longer than 500 metres

Table A.1 Evaluating Tung Chung River-cum-Bay

Criteria	Remarks
Naturalness	Tung Chung River and Bay are highly valued because they are either truly natural habitats (e.g. Most segments of Tung Chung River courses and the entire intertidal mudflat and mangroves in Tung Chung Bay)
Size	The area of Tung Chung River Basin and Bay are significantly large which are 11.0 and 1.2 square kilometre respectively.
Diversity	The species assemblages and communities are diverse and of high conservation value.
Rarity	Natural undisturbed estuary of Tung Chung River is rare. (Refer to Table A2 below) Rare species are also present.
Re-creatability	Natural river courses, estuaries and intertidal mudflat are extremely difficult to be re-created artificially.
Fragmentation	High connectivity and continuity along Tung Chung River's whole length from the montane area to estuary and Tung Chung Bay.
Ecological linkage	Tung Chung River-cum-Bay ecosystem includes physically and functionally interrelated and interconnected habitats: River courses, estuary, intertidal mudflat, seagrass bed, woodlands and etc.

Potential value	With proper landuse planning and effective preservation measures, the ecological values of Tung Chung River-cum-Bay ecosystem will be further enhanced and so is its fishery resources.
Nursery/breeding ground	Tung Chung River-cum-Bay ecosystem is very important for the regeneration and long term survival of many organisms and their populations.
Age	Tung Chung River-cum-Bay ecosystem comprises ancient natural habitats.
Abundance/Richness of wildlife	Tung Chung River-cum-Bay ecosystem is rated high as it is supporting large variety and population of wildlife.

Therefore, Tung Chung River-cum-Bay ecosystem is of rare, unique and very high in ecological value.

Table A2

Stream Course	Natural Section in Lower Course	Naturalness of Estuary	Water Quality at Lower Course in 2014 - E. Coli (cfu/100ml) (River Quality Monitoring Station)	Accessibility
Tung Chung River	Small section - about 650m was channelised	Preserved (Tung Chung Bay)	48(TC1) 79(TC2)	Easy
Tuen Mun River	Completely channelised	Destroyed	2,400 (TN6)	N/A
Shan Pui River	Completely channelised; the estuary close to Ramsar Site still retain natural river bed	Preserved (Ramsar Site)	490,000(YL3)	Difficult
Kam Tin River			46,000(KT1) 200,000(KT2)	N/A
Lam Tsuen River	Completely channelised	Destroyed	33,000(TR12I)	N/A
Tai Po River	Completely channelised	Destroyed	12,000(TR13)	N/A
Shing Mun River	Completely channelised	Destroyed	1,300(TR19I)	N/A

tpb20

发 件 人: WOO Ming Chuan
寄件日期: 08日03月2016年星期二 23:54
收件者: Town Planning Board
主旨: HKBWS's comments on the draft Tung Chung Valley OZP
附件: 20160308_TCV_OZP_HKBWS.pdf; Attachment1_JGG TCV & TCTC OZP Response 8Mar2016.pdf

TPB/R/S/I-TCV/1-31

Dear Sir/Madam;

Our letter regarding the captioned is attached.

Best Regards,
WOO Ming Chuan (Ms)
Conservation Officer
The Hong Kong Bird Watching Society
7C, V Ga Building, 532 Castle Peak Road, Lai Chi Kok, Kowloon, Hong Kong

This email has been sent from a virus-free computer protected by Avast.
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Secretary, Town Planning Board
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By email only

香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立

8 March 2016

Dear Sir/Madam,

Comments on the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns regarding the draft Tung Chung Valley Outline Zoning Plan (OZP).

Comparing the current OZP with the habitat map provided in Plan TCV-2 of the Town Planning Board (TPB) Paper No. 10045, the "Village Type Development" (V) zones (i.e. Ngau Au, Lam Che, Nim Yuen, Mok Ka and Shek Mun Kap) encroach into woodlands and tributaries of the Tung Chung River. Tree felling and vegetation clearance would be required during village development. We are concerned further habitat loss would be caused and lead to adverse impacts on some woodland dependent bird species of conservation concern, such as the Crested Goshawk *Accipiter trivirgatus* (which is a Class 2 protected animal of China and is listed in Appendix II of CITES) and Common Emerald Dove *Chalcophaps indica* (which is listed as rare in China Red Data Book). Village development immediately adjacent to the tributaries would also lead to water pollution in the Tung Chung River and increase in human disturbances.



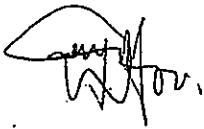
國際鳥盟成員

The HKBWS considers that an "Ecosystem Approach", which is the primary framework for action under the Convention on Biological Diversity¹, should be adopted to protect the various sensitive habitats in the Tung Chung Valley area. The Tung Chung River is one of the few natural rivers in Hong Kong that almost the entire watercourse is still pristine. The Tung Chung Valley, together with the Tung Chung River and Tung Chung Bay, is part of the river ecosystem and with high biological diversity. We consider that all natural streams (including all their tributaries) should be protected by "Conservation Area" zoning of 30 metres along both sides of the banks. This buffer zone would protect the riparian vegetation and would also prevent pollutants created by nearby developments from contaminating the stream, the intertidal mudflats and the sheltered Tung Chung Bay. Woodlands, streams and wetlands should also be excluded from the V zones in the Plan to avoid loss of natural habitats with high ecological value.

¹ <https://www.cbd.int/ecosystem/>

A joint letter representing views from 9 Green Groups was submitted on 8 March 2016 (Attachment 1). The HKBWS respectfully requests the TPB would also fully address the concerns stated in the joint letter as well as ours as stated above. Thank you for your kind attention.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Woo Ming Chuan', is written over a horizontal line.

Woo Ming Chuan
Conservation Officer
The Hong Kong Bird Watching Society

cc.

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



BY FAX AND BY EMAIL

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

8 March, 2016

Dear Sir/Madams,

**Green Groups' Joint Submission in Response to
Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1, and
Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21**

Support the Promulgation of a Statutory Land Use Plan

1. The undersigned green groups jointly welcome the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 (TCVOZP) gazetted on 8 January 2016. This OZP will introduce statutory land use control in most part of Tung Chung River Valley and Bay and help protect the rich and diverse ecology against incompatible developments, environmental vandalism and degradation.
2. In order to effectively preserve and manage the biodiversity, natural landscape and hydrology of Tung Chung River, Valley and Coast, green groups call for, as shown in Appendix 1,
 - (a) Cover Tin Sam and Wong Lung Hang areas in new DPAs or Country Park extensions.
 - (b) Establishing a River Nature Park for proactive management of natural riverine and estuarine ecology and landscape, and for flood regulation.
 - (c) Early implementation of environmental protection and conservation landuses proposed in the TCVOZP in prior to other project works in Tung Chung area covering by OZP No. S/I-TCV/1, S/I-TCTC/21 and S/I-TCE/1.
 - (d) Traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery, immediately.

Rich, Unique and Intact Ecosystem of Tung Chung River, Valley and Bay

3. Tung Chung River is one of the few remaining major streams in Hong Kong with "Excellent" water quality (according to EPD's monitoring results) and tranquil scenery. The Tung Chung River, which has not been overly affected by channelization, largely retains its natural state throughout from headwater to estuary. The Tung Chung River system is unique in the local context. Its headwaters flow from Hong Kong's second and third highest peaks, all the way to the shallow Tung Chung Bay without interruptions.
4. The high connectivity and continuity of the river system from the montane area to the estuary make it exceptionally rich in its aquatic and coastal biodiversity, including many rare and endangered species, 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*) 中國蟹, Seaweed Pipefish (*Syngnathus schlegeli*) 舒氏海龍, Swinhoe's Egret (*Egretta eulophotes*) 黃嘴白鷺. Diverse types of habitats are also found in the surrounding land area supporting many ecologically important animal and plant species in Hong Kong, including Common Birdwing (*Troides helena*) 裳鳳蝶 and Eurasian Eagle Owl (*Bubo bubo*) 鵰(refer to Appendix 2).
5. Tung Chung River is the second richest in freshwater species of any in Hong Kong, with a total of 23 species recorded, and listed as an Ecologically Important Stream (EIS)(No. 27) by Agricultural, Fishery and Conservation Department (AFCD). The mangroves on the intertidal mudflat at the Tung Chung River estuary is the largest on Lantau which is one of highest plant diversity sites. Tung Chung Valley and coast is also a butterfly hotspot which nurtures 148 species which comprises about 60% of Hong Kong's total, including two rare and two very rare species.

Green Groups' Recommended Development Permission Area Plan

6. Green groups' recommended Development Permission Area (DPA) Plan (version Oct 2015) for a sustainable planning for Tung Chung River, estuary, coastal areas and associated habitats is enclosed (Appendix 1).
7. Regarding the land use of Tung Chung Valley, we suggested in 2012 (Appendix 2):
 - (a) To protect and conserve high quality natural habitats which are of rich biodiversity and ecological value through conservation planning, management and monitoring. In particular, the Tung Chung River, estuary, woodlands and the coast should not be exploited for any development and protected statutorily as "SSSI", "CA" and "CPA" zones as illustrated in our revised recommended DPA Plan (version Oct 2015) attached to this letter (Appendix 1).
 - (b) To promote compatible community uses and enjoyment of the Tung Chung River Valley and the estuary through environmental education and passive recreation activities.

Ecologically-friendly facilities which encourage the public to access Tung Chung River and the estuary can be considered, for example, eco-trails, a riverside park, a nature education centre, resting places and look-out towers.

(c) To enhance the tourist appeal the river landscape and cultural heritage of the Tung Chung River Valley through improved linkage to existing Country Parks in Lantau. Tung Chung River Valley is located amongst existing tourist spots including Hong Kong International Airport, Ngong Ping Cable Car, Po Lin Monastery and the Tian Tan Buddha Statue.

8. Therefore, Green Groups proposed in our recommended DPA Plan (Appendix 1) an extensive River Nature Park to serve above-mentioned land use purposes and flood prevention.

Green Groups' General Response to the Draft TCVOZP

9. Green groups agree with *the general planning intention for the Area* (first part of Section 8.1 of EXPLANATORY STATEMENT, TCVOZP) 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"* and *"enforcement actions should be taken against any unauthorized development which would have impacts on the natural and rural character of the Area"*.
10. In response to the PLANNING CONTROL (Section 17 of EXPLANATORY STATEMENT, TCVOZP), green groups are very concerned that the publication of the draft Recommended Outline Development Plan (RODP) of the future new town extension and associated increase in economic activities has allured incompatible and unauthorized land uses in Tung Chung Valley and Bay.
11. Over the past two decades green groups observed a proliferation of incompatible developments and vandalism in Tung Chung Valley. The ecologically degraded land areas increased from 4.8% in 2007 to approximately 13% in 2015 (Appendix 3 and 4). However, enforcement powers and protection were lacking due to the absence of a statutory land-use plan.
12. To address these problems, the Administration should commit, with the publication of TCVOZP for the Tung Chung River Valley and coast,
 - (a) to ensure the proposed land uses in the TCVOZP can be implemented,
 - (b) to ensure control over incompatible and/or unauthorized developments,
 - (c) to terminate existing vandalism and to stem potential vandalism in Tung Chung Valley and Coast; and
 - (d) to protect the ecology, hydrology and water quality of Tung Chung River and Bay, a major planning intention of the TCVOZP.

13. Regarding the draft TCVOZP, green groups welcome the zoning of Area 96D, south part of the planning scheme area, as "Conservation Area" ("CA"). However, we insist that 30m on either side of river courses, banks and tributaries of Tung Chung River and Wong Lung Hang, Tung Chung River Estuary and Tung Chung Bay should be zoned as "Site of Special Scientific Interest" ("SSSI") (Appendix 1)
14. We also welcome the existing *fung shui woods* in the Tung Chung Valley west to Ngau Au and north of Shek Mun Kap zoned as "CA" in the TCVOZP. However, we are disappointed that the remaining *fung shui woods* receive no proper zones against development and ecological vandalism. Therefore, we recommend that the remaining *fung shui woods* should also be zoned as "CA" for protection.
15. We advise that the tributaries of Tung Chung River flowing through Mok Ka, Lam Che and Nim Un should be protected by zoning its stream courses and banks as "SSSI".

Tin Sam and Wong Lung Hang Remained Unprotected

16. The signatory green groups urge the Government to cover Tin Sam and Wong Lung Hang areas in new DPAs (refer to Appendix 1) which otherwise will remain as enclaves or be without effective land use control.
17. The seagrass beds and nearby mangroves at San Tau (SSSI No.58) are one of only four sites where Dwarf Eel Grass (*Zostera japonica*) 矮大葉藻, and one of only five sites where Oval Halophila (*Halophila ovalis*) 喜鹽草 are recorded in Hong Kong. Both species are rare in Hong Kong and are listed as of Local Concern status in China. San Tau mangroves is of high conservation value due to rich floristic diversity. San Tau, which is nearby Tin Sam, is a butterfly hotspot and Wong Lung Hang is an EIS listed by AFCD. Both areas require the preservation of local habitats.
18. Although the eastern part of Tung Chung Valley and Wong Lung Hang areas are covered in the in Amendment A1 in Tung Chung Town Centre Area OZP No. S/I-TCTC-21 (TCTCOZP), these areas have never been covered by any DPAs, and thus any incompatible developments or environmental vandalisms, such as diversion of Wong Lung Hang EIS, filling of land/pond or excavation of land, cannot be effectively controlled or enforced.
19. Green groups consider Tin Sam, Wong Long Hang and eastern part of Tung Chung Valley are integral parts of the whole Tung Chung River-cum-Bay hydrological and ecological system, and should receive stricter and more effective land use control to ensure a comprehensive management of flood regulation, water quality and nature conservation.
20. The Government should proactively protect the ecologically important Wong Lung Hang and Tin Sam areas by adequate, effective and enforceable statutory measures. Such measures should

be consistent with those proposed for Tung Chung River-cum-Bay including land use planning and control. Failure to designate a DPA for Wong Lung Hang and Tin Sam areas would materially weaken the ability of the Administration to conduct effective enforcement of the OZP. Since the Administration is fully aware of difficulties of enforcing an OZP which has not been preceded by a DPA, failure to designate a DPA may be considered as maladministration and thereby arouse public and legal controversy.

Tung Chung Valley not Suitable for Residential Development

21. In view of the "Residential (Group C)" ("R(C)") zone (Section 9.2 of EXPLANATORY STATEMENT, TCVOZP) and the Area 42 and 46 zoned as "Residential(Group A)"("R(A)") (Section 7.2.6 and 7.2.7 of EXPLANATORY STATEMENT, TCTCOZP), we call for a reduction in development pressure and wide ranging measures to alleviate development impacts.
22. Much of Tung Chung Valley is allocated for residential development in above-mentioned OZPs. We consider that such planning is incompatible with the physical and ecological setting of Tung Chung Valley and the principles of the Convention on Biological Diversity. Under Article 8 of this Convention, each contracting party shall:
 - Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;
 - Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;
 - Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;
 - Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, *inter alia*, through the development and implementation of plans or other management strategies;
 - Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.
23. We are highly concerned that the residential development (plot ratio 1 near the Tung Chung River estuary and up to 6.4 to the east of the valley) would affect the natural landscape, hydrology and ecology of Tung Chung River, threaten the inhabited wildlife and impact the water quality of Tung Chung River.
24. From the Hong Kong Observatory's past observation on and prediction of Hong Kong's future precipitation pattern, the scale and frequency of river floods is expected to increase. Tung Chung River is comparatively short and steep with an overall slope of 1: 4.9, (compared to Lam Tsuen River 1: 14.5, Kam Tin River 1: 14.4, Shing Mun River 1: 17.7, Tuen Mun River 1: 17.9).

The average annual rainfall of its river basin reaches up to 2400 mm, which is one of the highest regions in Hong Kong. Therefore, hydraulic and geotechnical conditions in small and narrow area of Tung Chung River Valley are highly unfavourable for dense and high-rise development.

25. Thus, in the long run, the Government must make early precaution and preventive measures in river land use planning through OZPs for Tung Chung River Valley, to decrease the threat posed by river floods due to climate change:
 - (a) Governments should avoid developing residential and industrial areas in Tung Chung River Valley, which are highly prone to flooding and landslide, to prevent risking the lives of residents and their properties.
 - (b) The government should allocate sufficient "permeable land use" by conserving vegetation and avoid covering large surface areas with concrete in Tung Chung Valley which helps allowing rainwater to infiltrate through the soil and alleviate flooding.
 - (c) Government should strengthen law enforcement on dumping, unauthorized vehicle access and developments on both sides of Tung Chung River or other activities which may affect drainage capacity of the rivers.
26. The large areas of "R(A)", "R(C)" and "Village Type Development"("V") zones in Tung Chung Valley also threaten the water quality, ecosystem and landscape of Tung Chung Valley, River and Bay area and violate the Convention on Biodiversity.
27. We agree "*to concentrate village-type development within "V" zone for a more orderly development pattern, efficient use of land and provision of infrastructures and services*" (Section 9.3.1 of EXPLANATORY STATEMENT, TCVOZP).
28. We concur the "*general presumption against development*" for the planning intention in "Green Belt"("GB"), "CA" and "Coastal Protection Area"("CPA") zone.

Threat to Species of Global Conservation Value

29. The "Commercial" ("C") zone (Section 9.1 of EXPLANATORY STATEMENT, TCVOZP), especially Area 38A in which a public transport terminus and maximum building height of 35m is planned, is incompatible with the mangroves on the western bank of Wong Lung Hang estuary where a breeding population of dragonfly Mangrove Skimmer (*Orthetrum poecilops*) 斑灰蜻 was discovered in 2015 by local green group. Mangrove Skimmer is listed as "Vulnerable" by IUCN and locally rare.
30. We opine that these "C" zones in TCVOZP will threaten Mangrove Skimmer population and we recommend include its habitat in River Park or other proper conservation zoning are needed.

31. The public transport terminus should be relocated in Area 107("GI/C") or Area 39 ("R(A)1") in TCTCOZP to link more efficiently with the planned underground railway station to the west of Yat Tung Estate.

River Nature Park for Flood Control and Conservation as Public Interest

32. Section 18.3 of EXPLANATORY STATEMENT, TCVOZP mentions that "*the Government will resume and clear the private land for public developments... ..and provide infrastructure.*" Therefore, we urge the Government to seriously consider the resumption of all private land lots in the Tung Chung River Valley to achieve a sustainable plan for public developments in Tung Chung Valley.
33. It is proposed that land is resumed to provide flood prevention, environmental and conservation infrastructure in the entire river valley, and estuary which is managed as a **River Nature Park** (separately or jointly by DSD, AFCD and/or LCSD), to safeguard and control the hydraulic, water quality and ecological properties of the river valley.
34. Designation of Tung Chung River Valley as a River Nature Park can be implemented by the Government as part of public developments in the Tung Chung New Town Extension (TCNTE).
35. Whereas the residential and road zones in the OZP will impose adverse and irreversible impacts on the ecology of Tung Chung River Valley and Bay, the proactive land use management by establishing a River Nature Park will help preserve natural resources for community use and enjoyment, habitat protection and fisheries intended under the RODP of TCNTE study and draft TCVOZP.
36. The resumption of land and the management as River Nature Park will make it possible to better conserve and enhance the ecological value and functions of Tung Chung River Valley. The park will provide a high quality nature experience for residents, improved flood control, and better conservation of the rich habitat of the river valley and estuary.
37. The estimated resumption cost for about 500 private land lots with a total area of 8.5 ha in green groups' proposed River Nature Park (Appendix1) is HK\$370 million.
38. The Government should explore and assess the feasibility and potential impacts of different alternative options for flood prevention such as resuming lands along the riparian zones of Tung Chung River so as to serve as natural floodplain to retain floodwater.

Conservation First Before Development

39. For Section 18 of EXPLANATORY STATEMENT, TCVOZP, we are disappointed that the "*phasing and packaging of works for the Tung Chung New Town Extension to achieve early*

delivery of land to meet the housing needs and ensure timely provision of ... facilities in tandem with population build-up" do not include the early implementation of environmental protection and conservation landuses proposed in the TCVOZP. We urge the Administration to adopt a "conservation first before development" strategy for the implementation of TCVOZP.

40. Most of Hong Kong's major natural rivers are channelized and recipients of low quality water including run-off and effluent discharges from storm drain networks. These rivers often emit foul odour and are an urban blight degrading the living quality of Hong Kong, and impact our image as a well-developed and livable world class city. Tung Chung River must not follow the same fate of other channelized rivers of Hong Kong.
41. Once the TCNTE development commences according to the approved OZPs, the amount of construction waste generated according to the Environmental Impact Assessment Report could fill up the whole Tung Chung Valley and estuary. Unless dedicated efforts and proper phasing of works are made to protect the valley and bay, the invaluable river ecosystem and landscape will be irreversibly ruined. And this in turn, would jeopardize the government's carefully crafted comprehensive plan for the area.
42. The construction, the increase in population and the new economic activities close to these ecologically valuable resources will inevitably lead to destruction unless very strong and specific protection and management measures as proposed in TCVOZP are put in place. Already we have witnessed a proliferation of dumping of massive amounts of debris and construction waste in Tung Chung Valley (Appendix 3 and 4). Increasingly typical 'brown-field' uses are covering more areas in the valley, uses which thrive on the growing population and economic activities in north Lantau.
43. Moreover, The Tung Chung River, Estuary and Bay are a great opportunity to implement the "Water-friendly Culture and Activities" policy adopted by the Government in 2015.
44. We invite the Administration to set a good model for "conservation first before development" and to protect this natural river resource, and to consider incorporating the following measures for implementation of TCVOZP:
 - (a) To first create the polders and to establish a River Nature Park covering the river, estuary and areas earmarked for conservation along the river well ahead of commencing the other infrastructure and development projects. By clearly demarcating the conservation areas as a park, and by ensuring management is in place, these areas designated for conservation can be protected from land filling, unauthorized dumping, destruction and other encroachment. At the same time this ensures that flood control and management measures are in place and the natural river courses can be protected from obstruction and diversion.

- (b) The Sustainable Urban Drainage System (SUDS), storm water retention ponds and pump stations must be built before the commencement of any other development projects to avoid polluted water generated by construction works are discharged into the natural river course, deteriorating the water quality and threatening the ecosystem and landscape of Tung Chung River and the estuary.
- (c) In order to protect the ecosystem and natural environment of the valley from air pollution and illegal dumping, large vehicles and construction trucks must be prohibited from entering the section of Tung Chung Road west of Ha Ling Pei. Vehicles that have sufficient reasons for entering need to seek formal approval from relevant authorities.
- (d) No construction and civil engineering works should be allowed in the riverbed, riparian zone and estuary of Tung Chung River. Storm water and sewage water should not be discharged into the river courses and estuary of Tung Chung River.

Prevention of Water Pollution and Habitat Damages

- 45. Green groups concur that *"any diversion of streams, filling of land/pond or excavation of land, including that to effect a change of use to any of those specified in Column 1 and 2 above or the uses or developments always permitted under the covering NOTES....., shall not be undertaken or continued on or after the date of the first publication in the Gazette of the notice of the draft DPA plan without the permission from the TPB under section 16 of the Town Planning Ordinance"*, which is stipulated in Remarks under "GB", Remarks (b) under "CA" and "CPA" in TCVOZP.
- 46. However, we opine that this planning measure should also stipulated other zones in TCVOZP, especially those the tributaries of Tung Chung River, whatever natural streams/streams, irrigation or stormwater channels, flow through and waterways in mangroves, and including the tributaries flowing through Mok Ka, Lam Che and Nim Un. *"Filling of land/pond or excavation of land"* should be under the same planning control as *"diversion of streams"* and stipulated under Remarks (c) of "V" zones in TCVOZP.
- 47. For Section 17.2 of EXPLANATORY STATEMENT, TCVOZP, we opine that regarding *"uses or building which were in existence immediately before the first publication in the Gazette of the notice of the draft DPA Plan, any material change of such use or any other development which may have adverse environment, drainage, traffic, ecology and hydrology of the Area should not be permitted. The alteration and/or modification works which may lead to an environmental and ecological improvement to the Area may be considered favourably by the Board."*
- 48. For Section (2) of NOTES, TCVOZP, in order to avoid water pollution to Tung Chung River and Bay, any use or development that does not conform to Water Pollution Control Ordinance (Cap.358) should be terminated despite being in existence immediately before the first

publication in the Gazette of the notice of the draft DPA Plan No. DPA/I-TCV/1.

49. For section (8)(b), (9)(a)(i) and 9(b) of NOTES, TCVOZP, "refreshment kiosk" should not be permitted on ecologically important areas, within 30 metres on either side of river/stream, which have been mostly zoned as "CA" and "CPA" and agricultural lands because it may generate wastewater and garbage that pollute the water bodies and degrade the habitats.
50. For section (8)(c) and (d), and (9)(a)(ii) of NOTES, TCVOZP, in order to avoid alteration of physical setting and damage to ecology of the natural streams and rivers (including its tributaries flowing through or by agricultural lands), diversion, excavation, shotcreting and paving of beds and banks should not be allowed for "*maintenance or repair of ... watercourse ...*" and "*... drainage works ...*" without the permission of the relevant government authorities in charge of environmental protection and nature conservation.
51. For section (8)(e) of the NOTES, TCVOZP, the septic tanks of rebuilt New Territories Exemption Houses should not be constructed within 30 metres of either side of watercourse to avoid pollution of river water by the sewage.
52. For Section (11)(a) of the NOTES, TCVOZP, we concur that "*temporary use or development of any land or building*" should not be permitted in areas zoned "CA" and "CPA".
53. For Section (11)(b) of the NOTES, TCVOZP, we strongly urge that open storage and port back-up landuses must be prohibited in the Planning Scheme Area because these landuses
 - (a) are not compatible with the environmental setting and landscape of Tung Chung River Valley,
 - (b) breaches the planning intention of TCVOZP,
 - (c) will encroach and interrupt the Tung Chung River which is designated as EIS, proposed River Park and SUDS,
 - (d) will disturb and cause permanent and irreversible loss of habitats, such as river beds and banks, freshwater marsh, farmlands, by land filling, dumping of wastes and soil debris,
 - (e) will cause land contamination with toxic substances, air and water pollution,
 - (f) will trigger opening of private vehicular access and additional heavy-vehicle traffic that further disturb and destroy the habitats in Tung Chung River Valley and Bay.
 - (g) are difficult to be reinstates to the origin habitats through planning measures.


Adverse Impacts of Road Network

54. Green groups would like to stress the adverse impacts of road network (Section 10.1 of EXPLANATORY STATEMENT, TCVOZP) on the environment and ecology of Tung Chung River, Valley and Bay. Road access will promote development, air and noise pollution, and facilitate illegal dumping and landfilling on farmlands and riverbanks.

55. In order to prevent uncontrollable and unenforceable vandalism in Tung Chung Valley and other potential adverse impacts of road access, we urge the Administration to review the proposed road network in the OZP and to impose traffic restriction in Tung Chung West, especially for construction trucks and machinery.
56. We insist that all non-essential roads access to ecologically sensitive areas such as natural coastlines, river banks, fung shui woods and other ecologically important sites is eliminated.
57. In the Section 7.1.7 and Figure 2 of EXPLANATORY STATEMENT, TCVOZP, "*two Non-Building Areas (NBA) of 20m and 30m wide are proposed in Area 60 and 71A respectively as breezeway to promote better air ventilation and to enhance visual permeability*" and not shown in the draft TCVOZP, i.e.
- (a) an extension of Yu Tung Road through "R(C)2"(Area 60) to "CPA" on the eastern bank of Tung Chung River,
 - (b) an "NBA" zone connecting "CA" with Road L25 through "R(C)1"(Planning Area No.71A) to the north of Shek Mun Kap,
- However, we worry that these NBAs will become road access that facilitate flytipping and threaten the adjoining "CPA" and "CA". Moreover, road access will generate air pollution from vehicles that contradicts the design concept of these NBAs.
58. We are highly concerned about the Road L28 connecting existing Shek Mun Kap Road to Mok Ka, which runs across an EIS designated by AFCD.
59. Also, the existing illegal road access across Tung Chung River in Area 84 must be removed because it is not compatible with the planned River Park. Moreover, such illegal structure threatening the water quality and ecology of Tung Chung River should not be accepted and rationalized in the statutory land-use plan.
60. We are also concerned that road access will initiate and ecological vandalism activities in ecologically important areas, e.g. the "CA" zone adjoining Ngau Au, and the "CA" zone between Shek Mun Kap Road and Area 71A.

Thank you very much for your kind attention. We look forward to your favourable decision.

Yours faithfully,



CHENG Luk-ki (Division head, Scientific Research & Conservation, Green Power)

On behalf of

Designing Hong Kong

Eco-Education & Resources Centre

Green Lantau Association

Green Power

Hong Kong Bird Watching Society

Hong Kong Outdoors

Lantau Buffalo Association

The Conservancy Association

World Wide Fund For Nature Hong Kong

Encl.

Appendix 1. Green Groups' recommended DPA Plan (version Oct 2015)

Appendix 2. Joint green groups' recommended DPA Plan for Tung Chung River, estuary, coastal areas and associated habitats (version Jun 2012)

Appendix 3. Map illustrating degraded site complaints and photos by green groups.

Appendix 4. Aerial photos of Tung Chung Valley taken in November 2007 and April 2015.

C.C.

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TPB/R/S/I-TCV/1-32

Dear Sir/Madam,

Please refer to the attachment for comment.

Best Regards,

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長春社 since 1968

The Conservancy Association

會址：香港九龍青山道 476 號 1 樓 102 室

Add.: Unit 102, 1/F, 476 Castle Peak Road, Kowloon, Hong Kong

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

8th March 2016

The Secretary

Town Planning Board

E-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Comments on Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1

The Conservancy Association (CA) opines that the proposed zoning of the joint green groups' recommended Development Permission Area(DPA) Plan for Tung Chung River, estuary, coastal areas and associated habitats should applied to the Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 because of the following reasons:

1. Extend the boundary of OU(River Park)

The concept of OU (River Park) is similar to the OU (River Nature Park) green groups proposed. Therefore, CA supports the designation of OU (River Park). However, since Tung Chung River and its riparian zone is of very high ecological value, the boundary of OU (River Park) should not cover a small area of Tung Chung River and its riparian zone only and should be extended appropriately for proper protection and serving the public interest (Figure 1).

River Park can be a biodiversity and tourist hotspot to promote Lantau tourism, provide ecological education and recreation for visitors. Meanwhile, the land near the Tung Chung River estuary should be designated as "Other Specified Uses (Conservation, ecotourism & ecological education)" to promote the above objectives.

2. Ecologically sensitive area should be covered with conservation zoning

Numerous ecologically sensitive sites and natural features should be covered by different zonings to ensure proper protection.

2a. Tung Chung bay, Tung Chung River and their riparian zones

Tung Chung River is listed as Ecologically Important Stream (EIS) which represents a

natural stream with important ecological functions such as providing habitat for diverse or rare animal or plant communities, designated by AFCD. Taking Tung Chung River as an example, it is the second richest in freshwater fish diversity with a total of at least 23 freshwater species in Hong Kong¹. Besides, many rare and endangered species such as Beijiang Thick-lipped Barb (*Acrossocheilus beijiangensis*, Fellowes et al. 2002: Global Concern), Romer's Tree Frog (*Philautus romeri*, IUCN: Endangered & Fellowes et al. 2002: Potential Global Concern), Hong Kong Newt (*Paramesotriton hongkongensis*, IUCN: Near Threatened & Fellowes et al. 2002: Potential Global Concern) and short-legged Toad (*Xenophrys brachykolos*, IUCN: Endangered & Fellowes et al. 2002: Potential Global Concern) are recorded in Tung Chung Stream and its riparian zone². The very high ecological value of Tung Chung River was also proved by an approved EIA report "Improvement to Tung Chung Road between Lung Tseng Tau and Cheung Sha", which the ecological value of Tung Chung River and its' riparian zone was listed as "Very High"³.

According to an annotated checklist⁴, there is a marked difference in species richness of two adjacent lowland streams (Tung Chung River and Tai Ho Stream) such that channelized Tung Chung Stream, despite greater flow volume and channel size, yields only about half of fish species compared with the smaller but unregulated Tai Ho Stream on Lantau. Chong and Dudgeon (ibid.) suspected that the reason for such difference was the channelization over much of Tung Chung River's lower reach. Since government is willing to restore the channelized part of Tung Chung River to its original natural condition⁵, the biodiversity of Tung Chung River and riparian zone is believed to have a great enhancement.

Tung Chung Bay has a good connection with Tung Chung River. Species with conservation interest such as Chinese Horseshoe Crab (*Tachypleus tridentatus*, China Species Red List: Endangered) and Mangrove Horseshoe Crab (*Carcinoscorpius rotundicauda*, China Species Red List: vulnerable) were found to be nurtured and breed in Tung Chung Bay⁶⁷. Besides, San Tau Beach, a designated SSSI, consists of area of

¹ Noffke, C. & Yip, P. 2014. *Lantau – Hong Kong's Jewel: A Biodiversity Study of Lantau*.

² Ades G., Lau M., Nip T., Yip P., Ng S. C., Gale S. and Woo M. C., 2013. *Ecological and Conservation Importance of Tung Chung, Lantau*

³ Approved EIA report of "Improvement to Tung Chung Road between Lung Tseng Tau and Cheung Sha". website: http://www.epd.gov.hk/eia/register/report/eiareport/eia_0752002/EIA%20Report/contents_with_hyperlink.htm

⁴ Chong, D. H and Dudgeon, D. 1992. Hong Kong Stream Fishes: an annotated checklist with remarks on conservation status. *Memoirs of the Hong Kong Natural History Society* 19: 79-112.

⁵ 《東涌明渠擬還原天然河道》，明報，14-9-2015

⁶ Arup. (2009). Hong Kong- Zhuhai- Macao Bridge, Hong Kong Boundary Crossing Facilities- Investigation. Agreement No. CE14/ 2008 (CE). EIA Report (EIA-173/2009).

⁷ Shin, P.K.S., Li, Y.H. and Cheung, S.G. (2009). Horseshoe Crabs in Hong Kong: Current population status and human exploitation. *Biology and Conservation of Horseshoe Crabs*: 347- 360.

mangroves including rare *Bruguiera gymnorhiza* and seagrass bed including *Zostera japonica*, which was found in only four sites of HK and *Halophila ovalis* which was found in only five sites in HK⁶⁸. These two seagrass species were listed as of Local Concern status⁹.

The above areas have very high ecological value. The mainstream of Tung Chung River and riparian zone should be designated with SSSI (Figure 1).

2b. Fung Shui woodland and mature woodland

Several Fung shui woodlands are found next to villages. They are native mature and large trees such as *Aquilaria sinensis*, *Pavetta hongkongensis*, *Adenanthera microsperma* and *Antidesma buniu*s. Native mature trees could also been found in the Tung Chung Valley and its riparian zone. These areas should not be developed and should be designated as "CA" (Figure 1). Therefore, CA objects to the designation of OU (polder) on the Fung Shui woodland. It should be noted that if the development intensity is reduced, fewer or no polders would be needed on the Tung Chung Valley.

2c. Coastline of Tung Chung Bay

Mudflat and mangroves are found along the coastline of Tung Chung Bay. Since mangroves and mudflat are known to be ecologically important habitat for many species, these areas should be designated as "Coastal Protection Area".

2d. Other vegetation cover

Orchards, natural vegetation, woodland, hillside shrubland and grassland could be found easily inside this OZP. In order to respect existing farming activities, maintain the tranquil environment, define the limits of development area and serve as a buffer to ecologically sensitive areas, they should be designated as GB.

Yours faithfully,

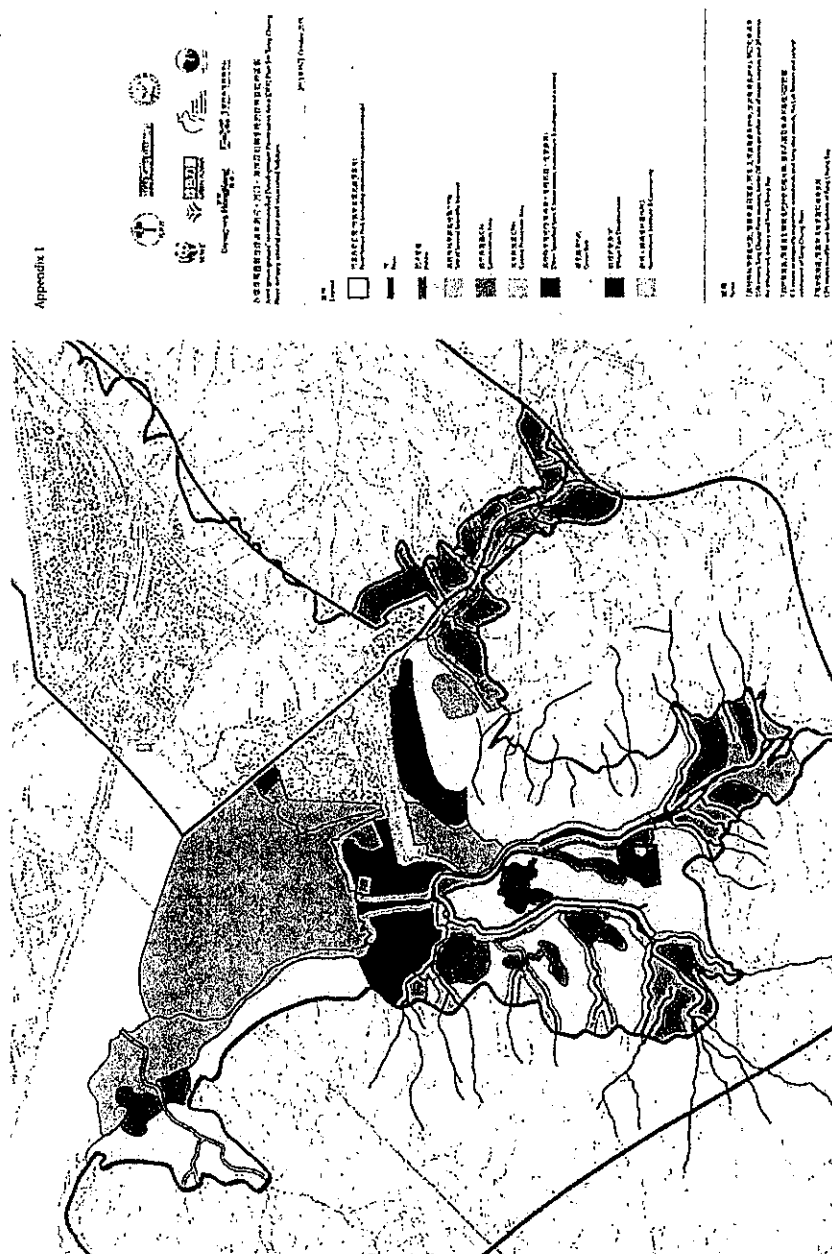
梁德明

Leung Tak Ming
Campaign Officer

⁸ AFCD. (2011b). Flora of Hong Kong. v.4, p.8 + 16. Agriculture, Fisheries and Conservation Department. Hong Kong.

⁹ AFCD. (2003). Rare and Precious Plant of Hong Kong. Agriculture, Fisheries and Conservation Department

Figure 1 Joint Green Groups' recommended Development Permission Area (DPA) Plan for Tung Chung River, estuary, coastal areas and associated habitats



寄件者:
寄件日期:
收件者:
主旨:
附件:

Andrew Chan (Local Biodiversity) [REDACTED]
08日03月2016年星期二 18:26
tpbpd@pland.gov.hk
S_I-TCV_1 & S_I-TCTC_20_WWF_Mar2016_WWF
S_I-TCV_1 & S_I-TCTC_20_WWF_Mar2016_WWF.pdf; (Appendix1)Joint Green Groups Tung Chung DPA proposal.jpg

TPB/R/S/I-TCV/1-33

Dear Sir/Madam,

Please find attached our submission and Appendix 1 on the captioned.

Thank you for your attention.

Yours faithfully,

Andrew Chan
Conservation Officer, Local Biodiversity
World Wide Fund For Nature Hong Kong
世界自然(香港)基金會
15/F, Manhattan Centre,
8 Kwai Cheong Road,
Kwai Chung, New Territories
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Website: www.wwf.org.hk

WWF Hong Kong works to ensure a better environment for present and future generations in Hong Kong (See attached: S_I-TCV_1 & S_I-TCTC_20_WWF_Mar2016_WWF)

Registered Name 註冊名稱: World Wide Fund For Nature Hong Kong 世界自然(香港)基金會 (Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)



WWF *for a living planet*®

世界自然基金會
香港分會

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Our Ref.: SHK/LDD 5/16
8 March 2016

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

By E-mail ONLY

Dear Sir/Madam,

Re: Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 & Proposed Amendments to the Approved Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/20

WWF welcome the gazettal of the draft Tung Chung Valley Outline Zoning Plan (OZP) which enables statutory planning enforcement action against eco-vandalism at the ecologically important Tung Chung Valley area. Nevertheless, we would like to raise our concern and submit herewith our comments and recommendations on the captioned draft Tung Chung Valley OZP and the proposed amendments to the Tung Chung Town Centre Area OZP as follow:

Tin Sam and Wong Lung Hang should be covered with DPA Plans

While the captioned OZPs cover most of the area of Tung Chung West, we view that the government should take this opportunity to cover Development Permission Area (DPA) Plans to Tin Sam area and Wong Lung Hang where both have ecological and conservation interest (Fig. 3). In Tin Sam area, apart from the San Tau seagrass bed "Site of Special Scientific Interest" ("SSSI"), Beijiang Thick-lipped Barb, a freshwater species of conservation concern by AFCD¹, can be found in the San Tau Stream². Wong Lung Hang Stream is one of the Ecologically Important Stream (EIS) listed by AFCD where two species of conservation concern have been recorded³, namely Beijiang Thick-lipped Barb and Hong Kong Newt⁴. Both areas are not covered by any DPA Plan and thus are vulnerable to environmental destructions and incompatible developments which cannot be stopped

¹ http://www.afcd.gov.hk/tc_chi/conservation/hkbiodiversity/database/popup_record.asp?id=2984

² Kadoorie Farm and Botanic Garden. 2013. *Ecological and Conservation Importance of Tung Chung, Lantau*. Kadoorie Farm and Botanic Garden, Hong Kong Special Administrative Region. 29 pp.

³ *Ibid*

⁴ http://www.afcd.gov.hk/english/conservation/hkbiodiversity/database/popup_record.asp?id=3100&lang=en

贊助人：香港特区政府
主席：梁振英先生, GBM, GBS, JP
副主席：何麗嫦女士

諮詢顧問：香港世界自然基金會有限公司
諮詢顧問：香港世界自然基金會有限公司
諮詢顧問：香港世界自然基金會有限公司
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Patron: The Honourable CY Leung, GBM, GBS, JP
Chief Executive of the HKSAR
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Honorary Solicitors: Mayer Brown JSM
Honorary Treasurer: HSBC
Registered Charity
(Incorporated With Limited Liability)

註冊名稱 Registered Name: 世界自然基金會 World Wide Fund For Nature Hong Kong
(世界自然基金會有限公司 Incorporated in Hong Kong with limited liability by guarantee)

and enforced by the planning authority, especially those happened on private lands. Therefore, green groups had jointly recommended the government to extend the boundary of the DPA Plan to cover Tin Sam and Wong Lung Hang in previous consultation of the Tung Chung Valley DPA Plan so that local habitats and species of conservation interests could be protected by effective land use control.

However, we are disappointed that the government did not include both Wong Lung Hang and Tin Sam into the Tung Chung Valley DPA Plan before the gazettal of the Tung Chung Valley OZP. We noted that Wong Lung Hang has now been zoned as "Conservation Area" ("CA") and the San Tau seagrass bed had already been registered as "SSSI" under AFCD in 1994. Nevertheless, if both areas are not covered by DPA Plan, they are still unprotected as the Planning Department cannot take enforcement actions against any incompatible development and environmental destruction activity on private lands in the future. In particular, we worry that the Tung Chung New Town Extension will increase development pressure and encourage the dumping of construction & demolition (C&D) waste and incompatible development at the nearby ecologically sensitive private lands, i.e. Wong Lung Hang and San Tau area. We worry that C&D waste will be washed down to Wong Lung Hang and San Tau SSSI during heavy rainstorm event. This will diminish the ecological and landscape value of these areas and result in the loss of important habitats and species of both places.

In fact, the lack of effective land use control has already resulted in irreversible ecological and landscape impacts to the South Lantau area. For example, frequent C&D waste dumping has seriously destroyed the ecologically important wetlands in Pui O (Fig. 1). Although these wetlands are "Coastal Protection Area" on the Approved South Lantau Coast OZP, no enforcement action could be taken by the planning authority to stop the dumping activities because Pui O has never been covered by a DPA Plan. In order not to recommit the same error, **we strongly request the members of the Town Planning Board to excise the Wong Lung Hang area from the Tung Chung Town Centre OZP and designate it into a separate DPA Plan while the San Tau / Tin Sam area should also be covered by a DPA Plan (Fig. 2).** The planning authority will then have the enforcement power against destruction activities to protect the sensitive habitats and species found in Wong Lung Hang and San Tau / Tin Sam area.

Fung Shui woods should be zoned as "CA"

According to the Environmental Impact Assessment Report of the Tung Chung New Town Extension (EIA-233/2015), the overall ecological value of *Fung Shui* woods in the Tung Chung Valley are

"Moderate to High" while their potential ecological value is evaluated as "high if protected from illegal harvesting and encroachment by farming and village expansion". These *Fung Shui* woods could provide breeding habitats for birds, reptiles and butterflies (Table 9.11 of EIA-233/2015). We appreciate that the *Fung Shui* woods of Ngau Au and north of Shek Lau Po are protected by "CA" zone in the captioned OZP. However, we found that the remaining *Fung Shui* woods fall within zonings that will be potentially affected by developments, e.g. "Village Type Development" and "Green Belt" zones (Fig. 3). We gravely concern that these remaining *Fung Shui* woods will be affected by tree removal due to future developments or village expansion if the current zoning plan proceeds. Therefore, **to prevent illegal harvesting and encroachment by farming and village expansion, we strongly recommend that all the *Fung Shui* woods of the Tung Chung Valley should be protected by "CA" zone. This is also in line with the conservation approach of the *Fung Shui* woods of Ngau Au and north of Shek Mun Kap.**

We would be grateful if our comments and recommendations can be duly considered by the Board.

Thank you for your attention.

Yours faithfully,



Andrew Chan
Conservation Officer, Local Biodiversity

Figure 1. C&D waste dumping at Pui O where has no DPA Plan and the planning authority cannot take enforcement action. Similar ecological degradation can happen in Wong Lung Hang & Tin Sam if not covered by DPA Plan.



Figure. 2 Recommended DPA Plan by Joint Green Groups in October 2015 (The version of higher resolution attached as Appendix 1)

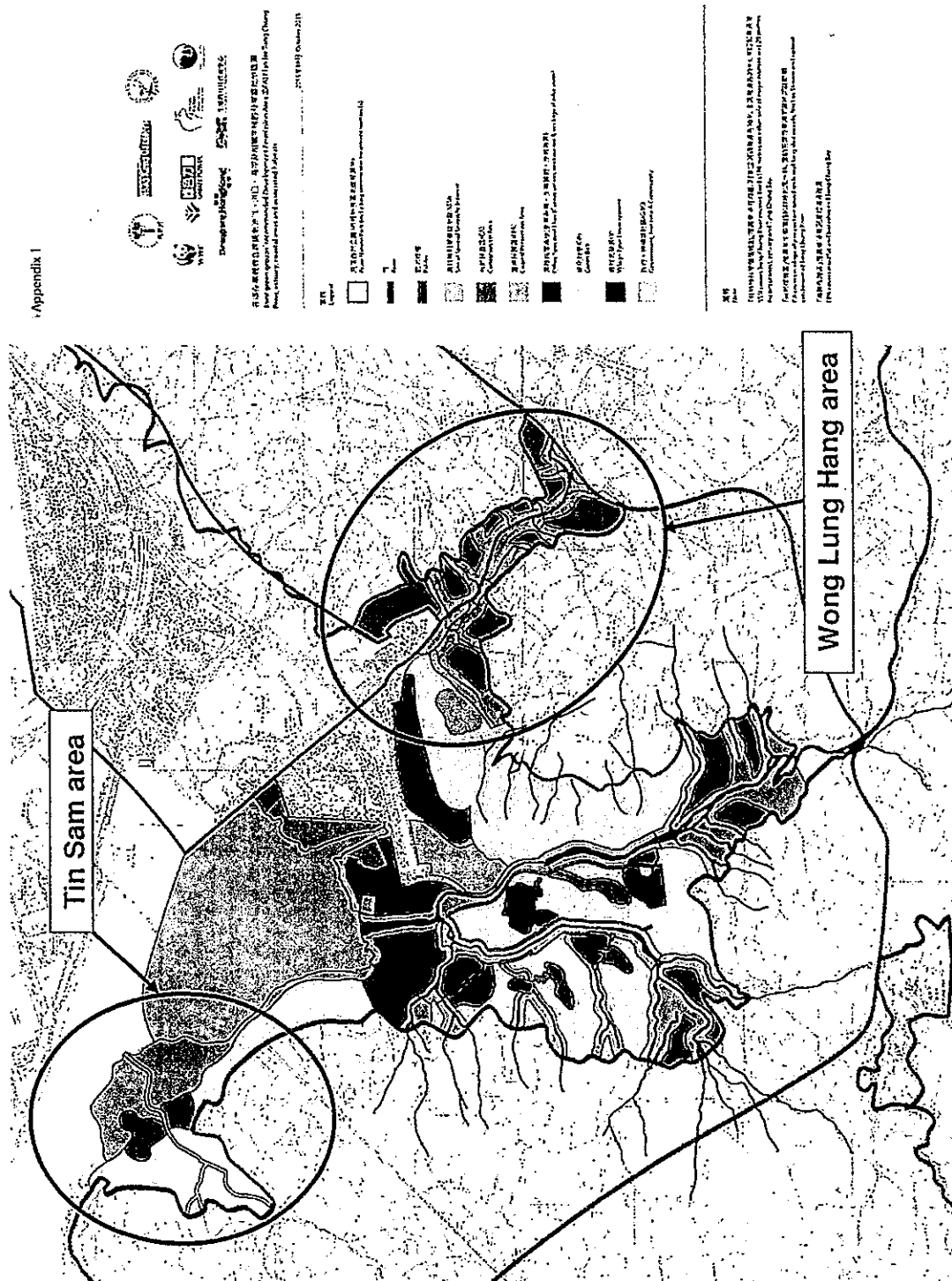
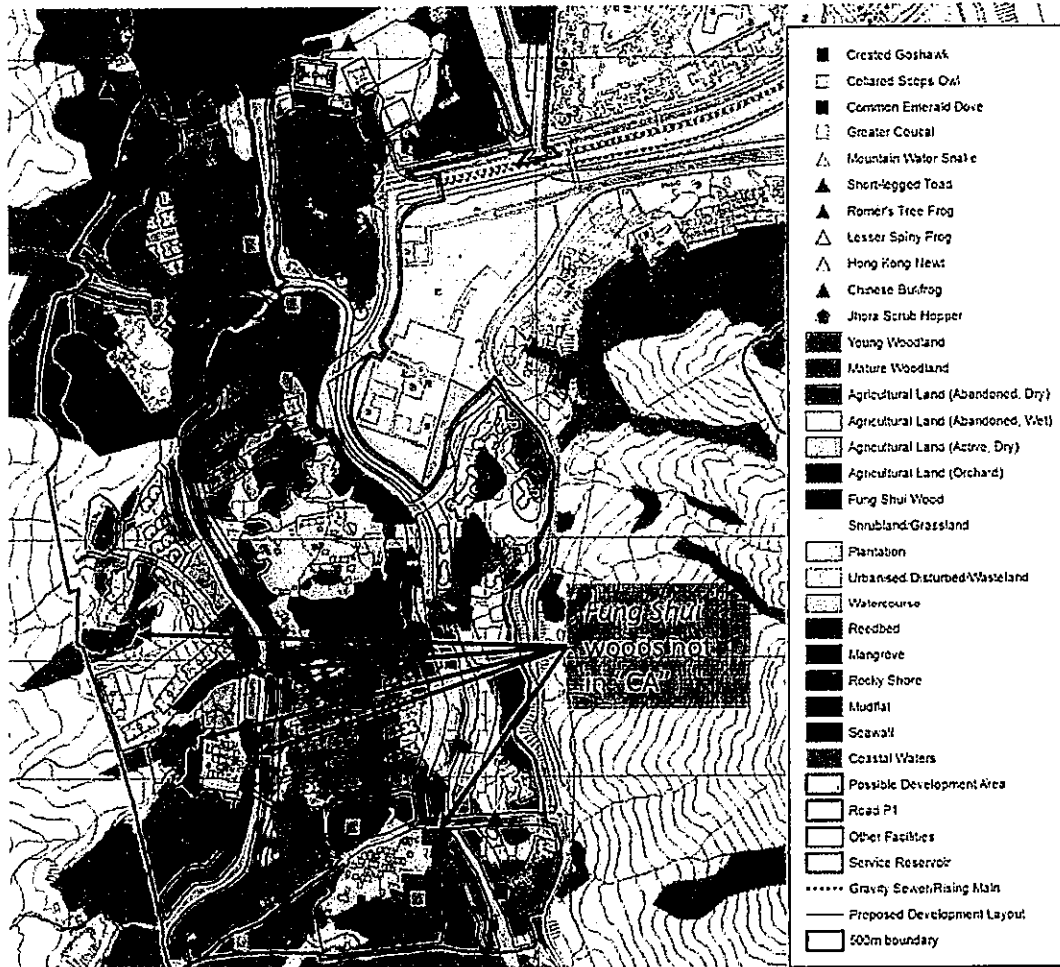
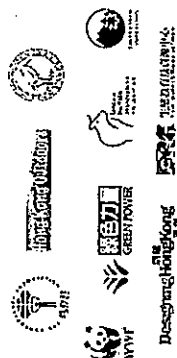


Figure 3. *Fung Shui* woods that are not protected by "CA" zone (Habitat map extracted from the Tung Chung New Town Extension EIA report No.EIA-233/2015)





全港發展策略及土地用途、河口、運河及相關生態環境發展策略
 Joint Green Group's Recommended Development Permission Areas (DPA) Plan for Tung Chung River, estuary, coastal area and associated habitats

2016年10月, October 2016

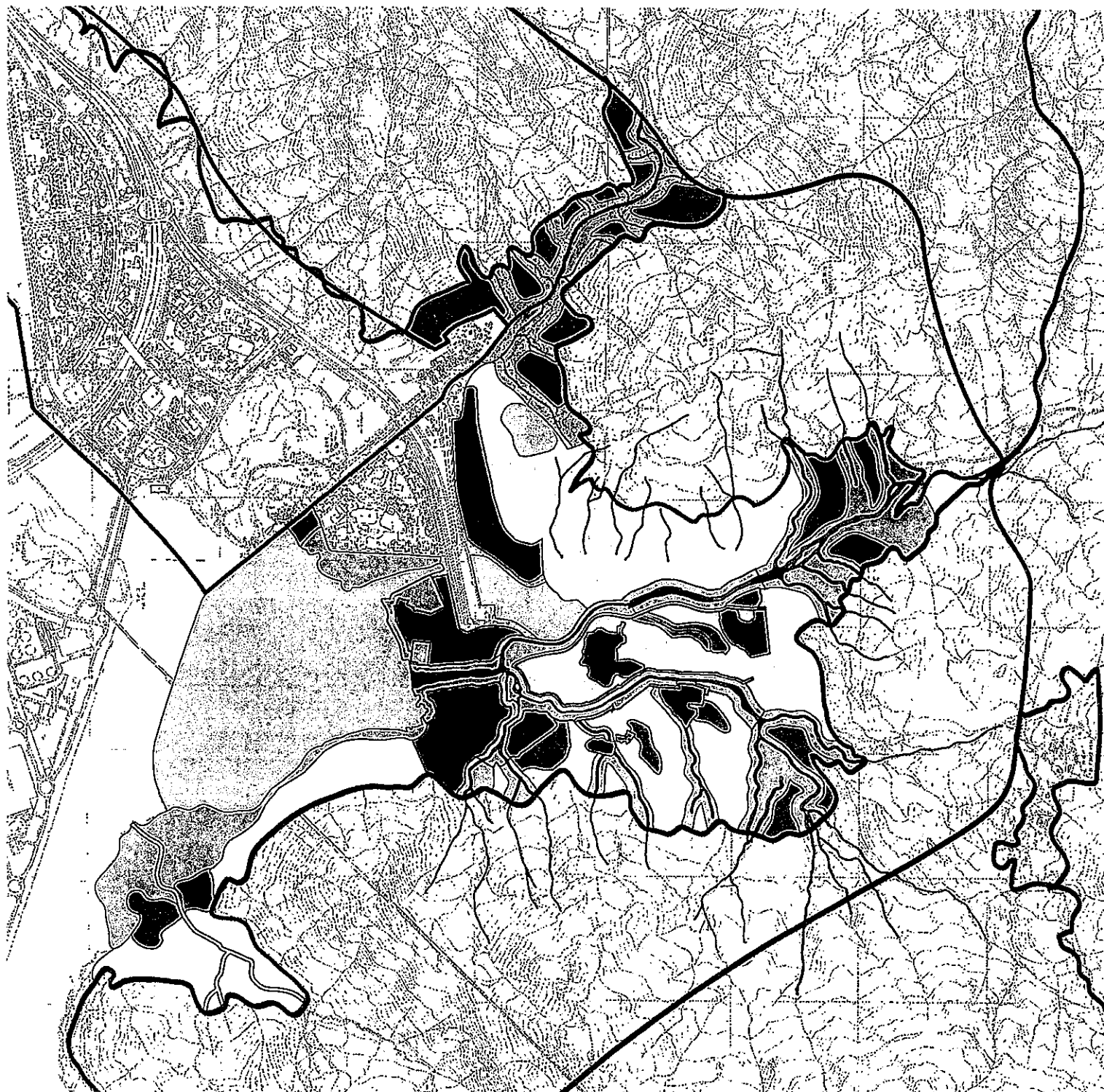
- 圖例
 Legend
- 香港自然公園 (包括綠洲及自然保護區)
 River Nature Park (including stream and natural reserve)
 - 河
 River
 - 河床
 River bed
 - 河床底層
 River bed bottom
 - 河床底層 (特別科學地點)
 River bed bottom (Site of Special Scientific Interest)
 - 自然保護區
 Natural Conservation Area
 - 自然保護區 (DPA)
 Natural Conservation Area (DPA)
 - 自然保護區 (DPA)
 Natural Conservation Area (DPA)
 - 其他指定用途 (保育、生態、教育)
 Other Specified Uses (Conservation, ecology & education)
 - 綠洲
 Green Belt
 - 鄉村發展
 Village Type Development
 - 政府、機構及社區
 Government, Institute & Community

說明
 Note

1. 本圖以自然公園為主要發展策略，河床底層及自然保護區，應以保育為主，並應保留自然環境，以作生態及自然科學研究之用。
 1. The plan is based on the River Nature Park as the main development strategy. The river bed bottom and natural reserve should be mainly for conservation, and the natural environment should be retained for ecological and natural science research.

2. 本圖以自然公園為主要發展策略，河床底層及自然保護區，應以保育為主，並應保留自然環境，以作生態及自然科學研究之用。
 2. The plan is based on the River Nature Park as the main development strategy. The river bed bottom and natural reserve should be mainly for conservation, and the natural environment should be retained for ecological and natural science research.

3. 本圖以自然公園為主要發展策略，河床底層及自然保護區，應以保育為主，並應保留自然環境，以作生態及自然科學研究之用。
 3. The plan is based on the River Nature Park as the main development strategy. The river bed bottom and natural reserve should be mainly for conservation, and the natural environment should be retained for ecological and natural science research.



tpbpd

寄件日期:
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附件:

KFBG EAP
01日03月2016年星期二 9:42
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KFBG's comments on Draft TCV OZP and Amendments to TCTC OZP
160301 Draft TCV OZP and Amendments to TCTC OZP.pdf

TPB/R/S/I-TCV/1-34

Dear Sir/ Madam,

Attached please see our comments regarding the captioned.

Best Regards,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden



嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

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

(Email: tpbpd@pland.gov.hk)

1st March, 2016.

By email only

Dear Sir/ Madam,

Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1
&
Amendments to Approved Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/20

1. We would like to express our grave concerns regarding the captioned.
2. We have previously commented, in December 2015, on a statutory EIA entitled 'Tung Chung New Town Extension' which covered the land use zoning plan of the Tung Chung Valley. We consider that our comments regarding this EIA are also highly applicable to the Draft Tung Chung Valley OZP No. S/I-TCV/1 (Please see **Appendix 1**).
3. We consider that many of the natural habitats and wooded areas such as some of the *fung shui* woodlands in the Tung Chung Valley are not well protected under the proposed land use zoning plan. We strongly urge that these areas should be better protected by more appropriate zonings. Please refer to the attached document in the appendix for further elaborations and our detailed recommendations.
4. In addition, we strongly object to the incorporation of the Wong Lung Hang Valley (the area to the southeast of the Chek Lap Kok New Village including the Wong Lung Hang Stream, which is an Ecologically Important Stream (EIS); **Figure 1**) into the proposed Tung Chung Town Centre Area OZP.

5. We have, on many occasions, expressed our grave concerns to the Planning Department about the present statutory loophole which involves the absence of coverage by a DPA plan in many rural areas. There was also a recent newspaper article elaborating upon the issue¹. For instance, in South Lantau, in an area without previous coverage by a DPA plan but with OZP, the Planning Department has no enforcement power to curtail or cause to cease activities which are destructive to the environment. In the Coastal Protection Area (CPA) zone at Pui O, indiscriminate dumping activities frequently occur (Figure 2) BUT the Planning Department can do nothing because there was no DPA plan covering the area.

6. The so-called CPA zone exists on paper only – it is not a protective zone at all, in reality. This is, of course, not a desirable situation and we consider that the integrity of the Government is also being undermined by the lack of any kind of authority under such situations. Surprisingly, the Planning Department is, now, creating and perpetuating the same kind of legal loophole in the Wong Lung Hang Area, i.e., designating an OZP for a highly sensitive area without any prior DPA plan.

7. The Wong Lung Hang Valley is widely recognised to be ecologically important. There is at least an EIS, and as shown in Figure 3, the whole valley is naturally wooded with the vegetation even denser than many woodlands in the Tung Chung Valley. Otherwise, it would not be proposed to be covered mainly with GB and CA zones under the current amendment plan. However, because of the lack of coverage by a DPA plan, these zones will never actually protect the areas (i.e., any land filling/ excavation activities appearing on the private land in these zones will not be controllable by the Planning Department even though these zones are generally being designated for conservation purposes). We are deeply worried that the many cases of environmental destruction now happening along the South Lantau coast, such as those in Pui O, would inevitably occur in this area. What the Planning Department is now doing, is not, by any means, protecting this highly sensitive area but is in practice pushing the area to the brink of lawlessness and the gulf of environmental destruction. It seems that The Planning Department is incapable of learning the bitter lessons of the past.

8. We rigorously object to the proposal to cover the Wong Lung Hang Valley with the amended Tung Chung Town Centre OZP. This area should be completely excised from the current proposed plan/ amendment. We urge that this area should be accorded due statutory process and be covered with a DPA plan, first, and later followed through with an OZP with

¹ http://news.mingpao.com/pns/dailynews/web_tc/article/20160229/s00012/1456682982359

appropriate conservation zonings.

9. These are the only responsible steps to protect this area. Its fate should not be hung in the balance. There should be no administrative or planning shortcuts for the biologically rich and ecologically endowed natural landscapes of the Wong Lung Hang Valley.

10. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

cc. Conservancy Association
Designing Hong Kong
Green Power
Hong Kong Bird Watching Society
WWF – Hong Kong

Figure 1. The Wong Lung Hang Valley

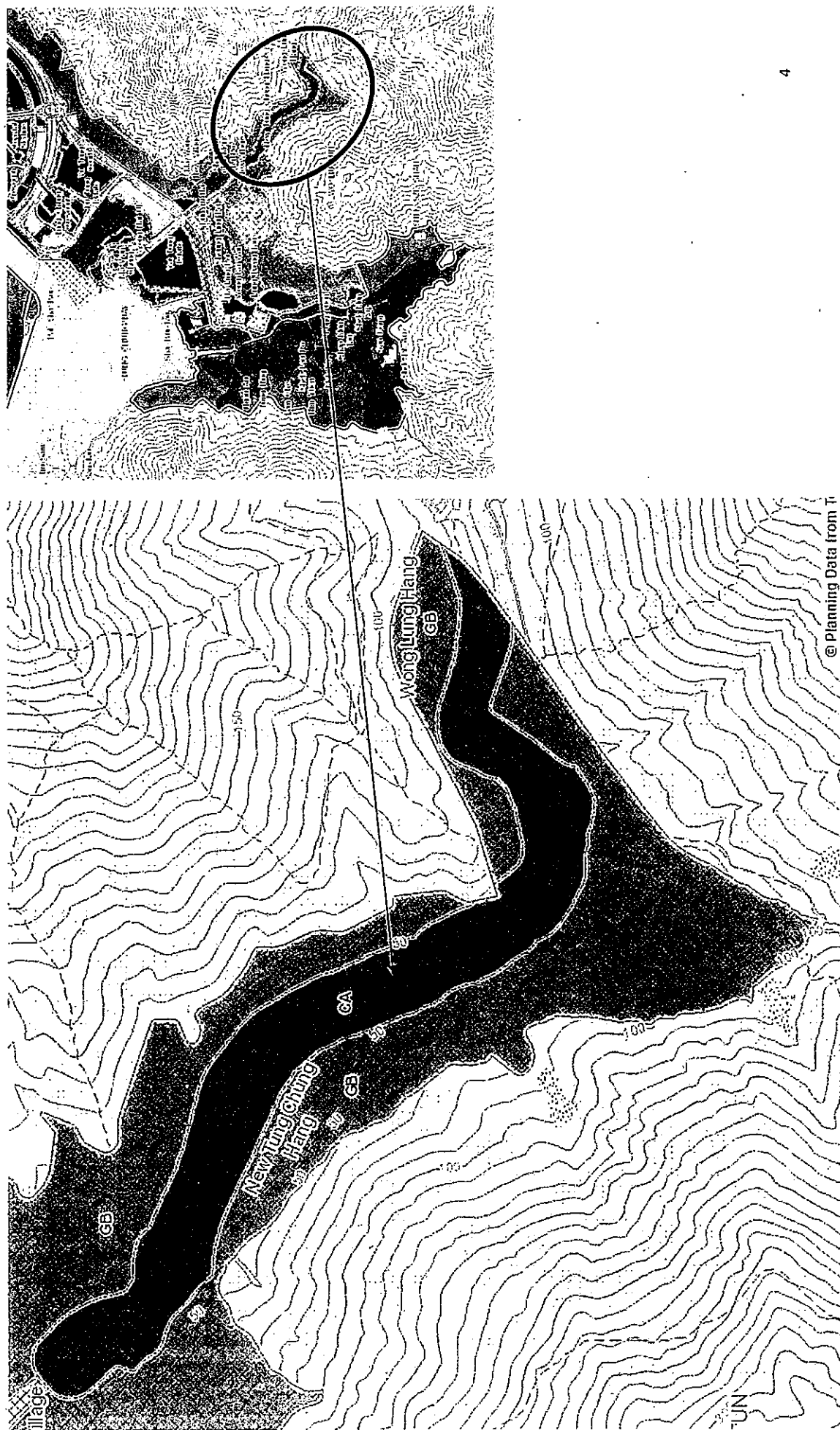


Figure 2. Flagrant dumping within the CPA zone at Pui O, Lantau. Although it is stated as a CPA zone on the OZP, the Planning Department has no enforcement power to curtail or cause to cease these environmentally damaging activities.

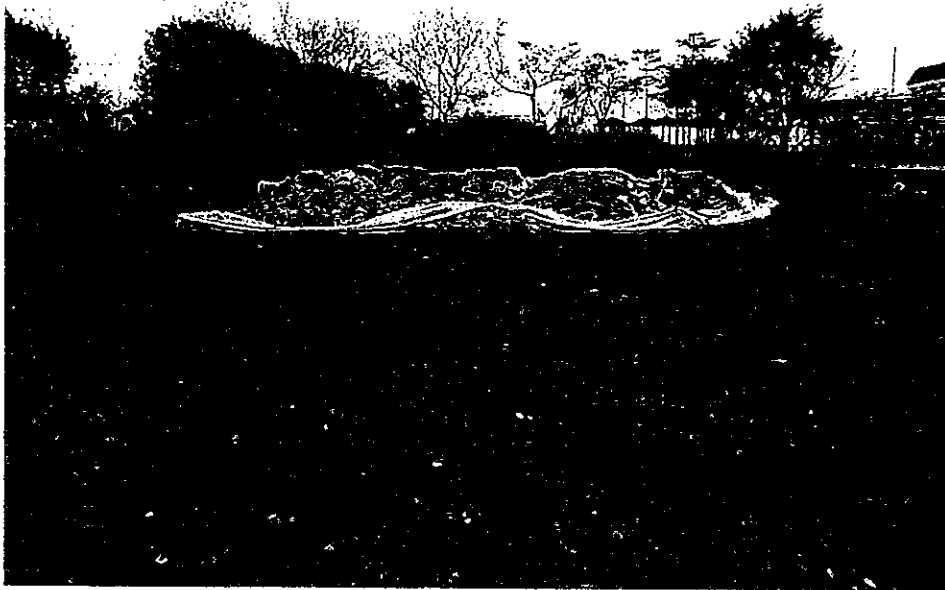


Figure 3. The pristine natural settings and landscape of the Wong Lung Hang Valley



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Lam Kam Road, Tai Po, New Territories, Hong Kong
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嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

Ms. Anissa WONG, Sean-Yee, JP
Director of Environmental Protection
16/F, East Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong

(Email: eiaocomment@epd.gov.hk)

31st December, 2015

By email only

Dear Madam,

Tung Chung New Town Extension EIA
(EIA-233/2015)

1. We refer to the captioned.
2. In general, we appreciate that the authorities responsible for this proposed development have adopted many of our previous recommendations (e.g., in the proposed land use zoning plan). However, the plan now published in the EIA still contains many deficiencies and the assessment in the EIA is simply inadequate. For instance, the proposed village development zones are not included in the estimation for habitat loss. We would also like to provide our views on further reclamation in Hong Kong and our concerns regarding the potential impacts on aquatic ecology including those on the Chinese White Dolphin.

Inadequate and Misleading Assessment

3. *The assessment is simply not adequate: Many vegetated areas and important habitats, including Fung Shui and mature woodland may be seriously threatened by direct loss but these potential impacts are not included in the assessment.*

3.1 Figure 2.3 of the EIA (the Revised Recommended Outline Development Plan – TCW; RODP – TCW) shows that part of the riparian zone in an area to the northwest of the existing Ngau Au Village is recommended to be covered with a Village Development Area (V) zone. This is different to what is shown in the Stage 3 Public Engagement Digest (the Digest) for the same project¹. The area of concern is shown in **Figure 1** of this letter. As indicated in the

¹ http://www.tung-chung.hk/TC3_Draft13a_PREVIEW_For_Download.pdf



嘉道理農場暨植物園公司 Kadoorie Farm & Botanic Garden Corporation

Draft Recommended Outline Development Plan (DRODP) in the Digest, the riparian area next to Ngau Au Village is marked with a Conservation Area (CA) zone (i.e., the same type of zoning) as for other riparian areas in the Tung Chung Valley. As shown in the habitat map of the EIA, the area located to the northwest of the Ngau Au Village (including the riparian zone) is covered with 'mature woodland' (Figure 2) and it is considered to be of moderate to high ecological importance (according to the EIA). An aerial photograph taken in August 2015 and an on-site photograph taken in December 2015 very clearly show that this area is very well vegetated (Figures 3 and 4).

3.2 We do not understand how such an area (i.e., mature woodland and riparian zone of an important stream) could become zoned for village development (see Figure 5) – the potential impacts that would appear include the following: extensive tree felling, vegetation clearance, exposure of bare ground during site formation and, thus, potentially producing muddy surface runoff and sedimentation that would affect the nearby stream. All of these environmental impacts should be avoided in sensitive habitats, and the avoidance of such impacts can be facilitated, quite simply, by appropriate land use zonings (i.e., changing from a zone for development to conservation zonings such as CA). We are highly concerned that the potential and future construction of additional village houses within the proposed V zone will greatly affect (during both operation and construction) the mature woodland, the riparian zone and, also, the tributary which drains into the Tung Chung Stream which is considered to be the key ecological element and conservation focus of the Tung Chung Valley.

3.3 Indeed, we are also shocked to learn from the EIA that the proposed V zones are excluded from the habitat loss estimation in the EIA (stated in Section 9.6.1.5). Of course, an argument might be put forward that even without the proposed RODP – TCW, villagers may still be able to apply for house developments following the existing procedure (e.g., application through the Lands Authority). We would like to point out that the present EIA is a formal document under the statutory EIA process. Any of its recommendation (i.e., the RODP – TCW) would definitely have a guiding effect on the future land use planning of the Tung Chung Valley (e.g., the boundary of the Village Type Development (VTD) zones on the future OZP), and, under the VTD zone, applications for New Territories Exempted Houses do not require any planning permission from the Town Planning Board.

3.4 We believe it is common sense to expect that a zone to be designated for village development would mainly be intended for building village houses and associated infrastructures (e.g., roads, paths). Thus, it is inappropriate to exclude the proposed V

zones from the habitat loss estimation – it is highly possible that the habitats within the proposed V zones will be directly, irreversibly and permanently lost due to village development (e.g., housing) – this is a potential impact highly likely to occur. Furthermore, it is even more inappropriate to include sensitive habitats such as mature woodlands and *Fung Shui* woodlands which are identified to be habitats of moderate to high ecological importance (by the EIA itself) into the proposed V zones but, unfortunately this is the present case as shown the RODP – TCW (see Figure 6 for further details). Indeed, in the DRODP published in the Digest, many of these natural habitats in good condition have originally been excluded from development (Figure 7).

3.5 A visit was made on 29th December 2015 to check the status of the habitats within some of the proposed V zones. Many sensitive habitats were identified within or very close to the V zones: natural watercourses within the orchard to the south of the existing Shek Mun Kap Village and close to the existing Mok Ka Village; and dense woodlands or *Fung Shui* Woodlands (as indicated in the EIA) close to Shek Mun Kap and Mok Ka Villages (all shown in Figure 8). All these habitats should simply be excluded from the proposed V zones or other zones intended for development.

3.6 To conclude, we consider that the assessment of this EIA is inadequate as the potential impact caused by the proposed V zones which is highly likely to occur is NOT adequately assessed and it is also an absolute mistake to cover sensitive habitats with V zones.

4. *The effect of habitat fragmentation should be reviewed and the potential movement corridor is misleading.*

4.1 Figures 9.9b and c of the EIA show the ‘potential’ movement corridors of wildlife (including non-flying animals) during the operation phase. We consider that the efficacy of at least one of these so-called ‘potential’ corridors is misleading. The potential corridor to the north of the development area TCV-5a would indeed pass through a proposed V zone at the western end (Figure 9). The proposed V zones, as mentioned above, are of course intended for village development and it is common sense to expect that the man-made destruction effects within these zones would be intense. Under such dire circumstances, how can the so-called corridor passing through this area still be considered to be a potential functional area in the EIA? This is absolutely misleading.

4.2 We urge that, in order to create viable movement corridors, these areas should not pass through or be encompassed by any zones intended for development (e.g., the V zone). We strongly urge for conservation zonings (e.g., GB, CA) to facilitate viable movement corridors and our recommendations are shown in **Figure 10**. In addition, we request that the GB and CA zones to the south of areas TCV-5a and 5b should be increased in size in order to widen the potential movement corridor for wildlife (also shown in **Figure 11**).

4.3 The potential movement corridor to the north of the area TCV-5a would also pass through the attenuation pond. **We urge that the fencing surrounding this pond should not block the passage of wildlife.** Otherwise, the function of the potential corridor would become invalid. We urge the applicant to make reference to the design of the fencing for the artificial wetlands for the West Rail project.

4.4 In addition, we would like to request the relevant authorities and the ACE to discuss whether or not the 'Road-Kill' issue has been seriously assessed in the EIA. In the EIA, we could not find any detailed description nor evaluation for this impact upon wildlife. Indeed, as shown in Figure 2.3 of the EIA, there will be 'proposed roads' passing through the entire Tung Chung Valley and these new roads will intercept with the so-called potential wildlife corridors (**Figure 12**). If there are no measures to mitigate or practical designs incorporated to off-set the Road-Kill impact, how can these corridors be considered as valid in any functional sense?

4.5 We urge the ACE and the applicant to thoroughly discuss this issue. We very strongly recommend that **ecologically friendly and functional designs** should be made reference to, and incorporated into the road design of the present project to prevent Road-Kills. As examples, designs for terrestrial wildlife crossing as described in the approved EIA report for Tung Chung Road Widening (EIA-075/2002)² and an AFCD's Practice Note³ should be adopted. **Without the incorporation of practical measures, the potential movement corridors are just simply a paper exercise and 'empty talk'.**

4.6 As shown in Figure 2.3 of the EIA, there would be at least seven junctions where the proposed road would intercept with the main watercourses in the Tung Chung Valley. We urge that appropriate designs^{2,3} should be made reference to in order to ensure that the potential corridors along the watercourses as shown in Figures 9.9b and c of the EIA can remain valid.

² http://www.cpd.gov.hk/eia/register/report/ciareport/cia_0752002/EIA%20Report/contents_with_hyperlink.htm

³ https://www.afcd.gov.hk/english/conservation/con_tech/files/NCPN_No.04_Wildlife_Underpass_Structures_v2006.pdf

In addition, the stream bed under the future bridges should remain natural so as to allow for free and unobstructed passage of wildlife.

Conflicts between Current Proposed Zonings and Well Vegetated Habitats

5. We find from the RODP – TCW that some well vegetated areas are included into the development/ non-conservation zonings and some Fung Shui woodlands are not adequately protected.

5.1 The area TCV-8 is now covered with a residential zone according to the EIA. However, as shown in the Digest, this area was previously proposed to be a GB zone under the DRODP (see Figure 13). We consider this is to be significant change (the area is about 4 ha) and we hope the ACE would request for elaborations from the authorities as to why there is such a major change. According to Figure 9.6a of the EIA, this area is largely an orchard and Romer's Tree Frog was recorded in the vicinity. As shown in an aerial photograph taken in August 2015, the area (TCV-8) is currently largely vegetated (Figure 13). We consider that it is still ecologically linked with the Tung Chung Stream, the coastal habitats, and the hillside woodlands. As mentioned in our Technical Report for the Tung Chung Valley area, Romer's Tree Frog has been recorded in the orchard habitat in the valley⁴ and is definitely able to utilise the orchard within the TCV-8 area. Following the RODP – TCW in the EIA, the orchard habitat in this area will be permanently lost. We strongly oppose the latest zoning proposal for this area as recommended in the EIA. We urge the authorities to re-zone the area back to GB as previously indicated in the Digest.

5.2 We have shown the relevant authorities and consultants the ecological study of Tung Chung carried out by KFBG¹, many times. In our study, we have outlined the boundary of the Fung Shui woodlands in the subject area and their ecological importance has been mentioned in our report. Many Fung Shui woodlands are also identified by the present EIA. We know that some of these woodlands are now proposed to be covered with Conservation Area (CA) zone but some are only covered with a Green Belt (GB) zone while others are even covered with V zones (such as the wooded area next to Mok Ka Village as shown in Figure 8). We have also mentioned to the authorities, on innumerable occasions, that in the GB zone, construction of Small Houses would be allowed through the planning applications process and the approval rate is not low, i.e., a more than 30% success rate is possible based on our records. We urge the authorities to use a consistent approach in zoning these woodlands and we consider that all the woodlands should be zoned as CA rather than being given a GB (or even V) status (Figure 14).

⁴ <http://www.kfbg.org/upload/Documents/Free-Resources-Download/Report-and-Documents/2013TungChungReport.pdf>

5.3 There are mudflat and mangrove habitats covered by the proposed Regional Open Space (RO) zone under the RODP – TCW (Figure 15). However, it is not obvious or clear from the habitat loss estimation documented in Table 9.29a of the EIA that there is any provision for loss of mangrove or mudflat habitat. We would like the applicant to clarify further in the ACE as to how these habitats would be well preserved, and thus, able to guarantee that no losses would appear or occur.

Miscellaneous Issues in Tung Chung West

6. *Suspected illegal bridges*

6.1 There are, at least, two suspected illegal bridges crossing the Tung Chung stream tributaries (Figure 16). We have urged the authorities to remove these sub-standard bridges when the New Town in Tung Chung West is in the process of construction. Indeed, various environmental NGOs have already made complaints regarding these bridges for years but so far in vain as no remedial action has been taken to handle this issue. To date, we have not received any response or positive confirmation from the relevant authorities as to whether these bridges would be removed or replaced. The lack of appropriate response is disappointing as these bridges obviously obstruct the flow of stream water and, thus, would affect the passage of migratory aquatic fauna moving throughout the length of these natural watercourses. Furthermore, it would also increase the flooding risk of the area. The Government always claims that Hong Kong is a World Class City. If this is true, we would urge that haphazard vernacular structures of Third World standards should not appear in Hong Kong. We consider that removing these shoddy sub-standard structures is simply what any responsible government agency should do and we urge that the relevant authorities handle this issue in a responsive and responsible manner.

7. *Treatment of surface runoff*

7.1 The EIA mentions that some treatment facilities in the form of artificial wetlands would be constructed so as to collect and treat the potentially polluted surface runoff. Indeed, during our site visit in December 2015, we observed that the Tung Chung River was heavily polluted by discharge from a drain which is supposed to collect surface runoff only (Figure 17). However, we are aware that the relevant maintenance authority has no previous experience in the design, building, operation and maintenance of this kind of large-scale infrastructure facility in Hong Kong. We urge that the applicant should propose carefully designed facilities that can be properly managed and would not cause long-term maintenance problems. We urge the applicant to liaise with the relevant maintenance authority in the comprehensive design of such complex infrastructure systems for the collection and treatment of surface runoff.

8. Communal sewer

8.1 The septic tank and soak-away pit system (STSs) for domestic premises causes water pollution and this is a well-recognised environmental problem by the Hong Kong Government (e.g., 5). However, in many rural villages, this system is still in common use for collecting sewage from domestic premises. We note that the V zones now being proposed in the EIA are much larger than the existing village settlements in the Tung Chung West area. We strongly urge that these additional village areas should be well-equipped with communal sewers in the future. We also urge that the applicant should ensure that the connection rate of communal sewers to additional village houses should be of a satisfactory level.

Land Reclamation in Tung Chung East – its Consequences and Implications

9. *While the applicant (after being made aware of the ecological importance of Tung Chung Bay) has revised the initial proposal and, thus, the Bay could now be said to be largely untouched (relative to the previous plan), we, nevertheless, consider that the proposed development in Tung Chung East would still cause unavoidable ecological impacts, both of a direct and indirect nature*

9.1 Under the current proposal, about 145 hectares of area of seabed (around 129 hectares of water column) to the east of Tung Chung will be permanently lost due to land reclamation. We would like to point out that this area is close to Tai Ho Wan. Although the water quality and water movement within Tai Ho Wan may not be seriously affected, the reclamation will still cause permanent loss of the adjacent coastal area. The Tai Ho Wan area contains several aquatic species of high conservation concern – Horseshoe Crabs (e.g., *Carcinoscorpius rotundicauda*) and Ayu Sweetfish (*Plecoglossus altivelis*). These species can utilise the shallow coastal area that is to be reclaimed for development.

9.2 We are highly concerned, in particular, about the future situation of the Ayu Sweetfish. It is a diadromous fish species considered to be Critically Endangered in Hong Kong (based on the preliminary Fish Red List for Hong Kong's Biodiversity Strategy and Action Plan, see below). The Tai Ho area, including the streams in Tai Ho and the Tai Ho Wan as well as the north Lantau coast are believed to be the prime habitat for this species. This fish species was first discovered in Hong Kong (in the Tai Ho Stream) in 1985 but the population number has since dropped dramatically. We are concerned that the reclamation in Tung Chung East would significantly affect the ecology of this species and greatly reduce the size of a nearby, suitable habitat for this species. We would also like to mention that there will also be a dramatic

5 http://www.epd.gov.hk/epd/english/news_events/legco/files/EA_Panel_20130422a_eng.pdf



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increase in overall human population in the region as there will be many residential zones in the reclamation site (and also, in Tung Chung West). We are highly concerned that this would potentially increase the human disturbance to the Tai Ho area and its surroundings, and, thus, the ecological quality of the locality would be affected by increased human activities. We wish to unequivocally state that the proposed reclamation under the current project and all its associated impacts (e.g., human disturbance) may be 'the straw that breaks the camel's back', i.e., drive the Critically Endangered Ayu Sweetfish to extinction in Hong Kong.

9.3 Although the area to be reclaimed is not a hotspot for the Chinese White Dolphins, the increased volume of marine traffic during the construction phase, (e.g., from construction barges) would definitely impose pressure on the dolphin habitat in the North Lantau waters and the Brothers Marine Park. Furthermore, there is a proposed marina in the development area in Tung Chung East. We are highly concerned that the increase in marine vessel traffic would impose long-term impacts on the Chinese White Dolphins (e.g., underwater noise, collision with vessels, visual disturbance). These effects, in combination with the cumulative impacts caused by all other on-going/ planned projects (e.g., Third Runway, Hong Kong-Zhuhai-Macau Bridge) in the waters off Lantau may simply cause the extirpation of the dolphins from the Northeast Lantau waters. In addition, the conservation function of the planned Brothers Marine Park would also be detrimentally affected by the reduced size of coastal marine habitats and the increased marine activities. This is a highly significant ecological time-bomb which can be envisaged if the applicant continues to insist on carrying out the reclamation of the shallow coastal waters of this area.

9.4 The Convention on Biological Diversity was extended to Hong Kong in 2011 and the Government is now working with various environmental NGOs to establish a framework for a Biodiversity Strategy and Action Plan for Hong Kong. We consider that the current proposal for land reclamation in the Northeast Lantau waters to be contrary to the ultimate principle of the Convention – to halt biodiversity loss – it is obvious that the coastal reclamation would affect species of high conservation concern and generate irreversible ecological impacts on their natural habitats. In addition, we strongly doubt the necessity and appropriateness of carrying out even more land reclamation along our coastlines as indicated by the following paragraphs on the status of land reclamation on the mainland, in the Pearl River Estuary and in Hong Kong.

10. *Should Hong Kong and China be carrying out more land reclamation?*

10.1 Before answering the above question, it would be wise to first understand the status of



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China's natural coastlines. The Head of the State Oceanic Administration, The People's Republic of China, stated recently that China has already lost 57% of its coastal wetlands (including shallow coastal waters). Much of the original mangrove and coral reef areas have been lost; 73% and 80%, respectively, and now, in China, less than 40% of the shoreline can be considered to be natural⁶. Some scholars have estimated that China's coastal wetlands have been lost at a rate of 20,000 hectares per year⁷, with an estimated total loss of 2,190,000 hectares of coastal wetlands since the 1950s⁸.

10.2 In considering the Pearl River Estuary, the rate of coastal wetlands loss is also shocking. Between 1986 and 2005, about 14% of coastal wetlands have been lost⁹, and the central point of the coastal zone of the Pearl River Estuary has moved towards the southeast (i.e., the sea) by 6.1 km between 1995 and 2005¹⁰. These changes, unfortunately, were not brought on by natural processes (e.g., natural sedimentation) but primarily through man-made reclamation activities. The total area of land reclamation within the Pearl River Estuary was estimated to be about 79,721 hectares between 1950 and 1997¹¹.

10.3 The Head of the State Oceanic Administration has stated that, in order to sustain the eco-system services provided by shallow in-shore and coastal waters (e.g., fish nursery and spawning grounds), China's coastal eco-system has to be urgently restored⁴. An article published on 31st May, 2011 on the website of the Ministry of Land and Resources, The People's Republic of China, also urged that reclamation projects should be supported by scientific feasibility studies, and due consideration should be given to associated environmental impacts¹². In 2011, an article published in the "Xin Hua Net" (China's official

6 http://www.gov.cn/gzdt/2013-06/03/content_2417721.htm

7 Gu, D., Zhao, X. and Xia, D. 2003. A systemic analysis of the environmental pressure factors to the degradation of coastal wetlands in China. *Acta Oceanologica Sinica* 25, 78-85.

8 Zhang, X., Li, P., Li, P. and Xu, X. 2005. Present conditions and prospects of study on coastal wetlands in China. *Advances in Marine Science* 23, 87-95.

9 Li, J., Wang, A. and Li, T. 2011. Variations of coastal wetland landscapes in the Pearl River Delta in the last 20 years. *Advances in Marine Science* 29, 170-178.

10 Gao, Y., Su, F., Sun, X. and Xue, Z. 2010. On changes in landscape pattern of coastal wetland around the Pearl River Estuary in past two decades. *Tropical Geography* 30, 215-220.

11 Li, B. and Huang, G. 2008. Ecology effect and counter measure of urbanisation in Pearl River Estuary. *Marine Environmental Science* 27, 543-546.

12 http://www.mlr.gov.cn/xwdt/xwpl/201105/t20110531_872583.htm



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website) was also critical about the many reclamation areas in China that were created to build deluxe “sea-view” housing (for commercial gain) without considering the irreversible environmental impacts¹³.

10.4 In 2012, a reclamation proposal at Dongguan (a city within the Pearl River Delta) received considerable criticism from the local populace as the community considered that there were still many vacant land plots at Dongguan and, thus, queried the actual logic behind the project¹⁴. The examples above indicate that the Chinese authorities and the mainland communities have started to review the appropriateness of “blind” (without due consideration) land reclamation, because it is now realised that a considerable loss of China’s natural coastlines has taken place. In fact, the rate of wetland loss in China has decreased in recent decades¹⁵.

10.5 While the mainland authorities are critically reviewing the need for land reclamation, the strategy of the Hong Kong Government seems to run counter to the mainland scenario, and, seemingly unaware or unwilling to consider the cumulative impacts of this regional crisis. The Hong Kong Government is currently promoting, what it calls, the “urgent” need for land reclamation to solve pressing land issues, despite the fact that Hong Kong has about an estimated 1,192 hectares of brownfield sites¹⁶ and about 2,300 hectares of Government Land under short-term tenancies¹⁷, as well as reportedly, more than 900 hectares ‘reserved’ for ‘villagers’ who have yet to exercise their claim on their indigenous right to build a Small House on Government Land¹⁸. Within Hong Kong’s territorial waters there is much valuable natural marine heritage, most notably, the Chinese White Dolphin which is already facing serious threats from many existing/ planned development projects (e.g., Hong Kong-Zhuhai-Macau Bridge, Third Runway, proposed reclamation at Siu Ho Wan) in the Pearl River Estuary.

10.6 Many Hong Kong citizens are proud of the fact that in this small city a considerable amount of natural environment has been preserved, and, many mainland and foreign visitors are also amazed by the extensive green areas of Hong Kong. This natural resource is what

¹³ http://big5.xinhuanet.com/gate/big5/news.xinhuanet.com/house/2011-06/29/c_121601608.htm

¹⁴ <http://finance.chinanews.com/cj/2012/09-05/4160861.shtml>

¹⁵ Niu *et al.* 2012. Mapping wetland changes in China between 1978 and 2008. *Chinese Science Bulletin* 57, 1400-1411

¹⁶ <http://www.inmediahk.net/node/1039715>

¹⁷ http://www.aud.gov.hk/pdf_e/e49ch12.pdf

¹⁸ <http://www.scmp.com/comment/insight-opinion/article/1881867/sacred-cows-hinder-hong-kongs-land-development-policy>

makes Hong Kong unique. Many recent development cases (e.g., the Express Rail Link, Lung Mei artificial beach) have also reflected that Hong Kong people, as a community, do not support “blind” development. However, the government still does not seem to fully appreciate that the eco-system services of the natural environment, and, the critical importance of protecting natural heritage is one of the core values of the Hong Kong community. Furthermore, a full commitment and the responsibility to protect the natural environment under the obligations of the Convention on Biological Diversity which was extended to Hong Kong by the Central People’s Government in 2011, has yet to be realised under current plans.

10.7 The current Hong Kong Government administration always claims that there is an urgent need to solve the ‘housing problem’, which is caused by a shortage of land supply, and thus land reclamation is seriously considered as an option. Despite the large amounts of brownfield sites and Government Land under short-term tenancies mentioned above, the reality, taking the current Tung Chung proposal, as an example, is that many of our valuable land resources (including those existing in Tung Chung West and those in Tung Chung East at the expense of our marine resources) are intended for building **low to medium density** residential developments (see Figures 2.2 and 2.3 of the EIA). The housing problem does not seem to be meaningfully solved or effectively addressed by what the Government, itself, is actually proposing, at least as shown in the current Tung Chung proposal (Area for high density development: 31.72 hectares *versus* Area for low to medium density development: 40.18 hectares).

10.8 Whether we really need more newly created land for housing (in Hong Kong) or an ever-expanding economic sector is arguable; but no matter what, we consider that future development should not be achieved by relentless encroachment and at the expense of sacrificing our natural environment. For instance, as above mentioned, a recent report has already summarised that there are 1,192 hectares of brownfield sites available in Hong Kong (see 16).

10.9 What we really need to do is to optimise the use of our current land resources rather than continuously expand land supply by reclamation. Indeed, there is an actual need for a transition and mindset change from a scenario of unlimited economic and population growth to a state of sustainable development which includes restoring degraded ecosystems, restoring degraded or fallow agricultural lands, population control (e.g., review of the immigration policy), reducing carbon footprint and reducing waste production. The present reclamation proposal, however, reflects that the Hong Kong Government has taken a narrow view of the

urgent need for transition and has disregarded the irreversible consequences of land reclamation. In the longer term, this project cannot really improve the living quality for future generations of Hong Kong people but will actually reduce their chance of enjoying the natural environment.

10.10 The reasons provided by the Hong Kong Government for enhancing land supply through land reclamation are well-meaning intentions but unfortunately have far-reaching and irreversible consequences for the natural environment. We also fully agree with the Head of the State Oceanic Administration's view that China's coastline should be restored urgently rather than be further developed or reduced. Therefore, frankly, our response to the opening question, 'Should Hong Kong and China be carrying out more land reclamation?' is clearly a "No".

Concluding Remarks and Recommendations

11. *Tung Chung West*

11.1 The habitat loss estimation is inadequate. The V zones and other zones for development (if any) should NOT be excluded from the projections and estimates for loss of habitats.

11.2 Sensitive and ecologically important habitats such as mature and *Fung Shui* woodlands as well as riparian zones should not be covered with proposed V zones or other zonings intended for development.

11.3 The extent of zones for village development will be discussed during the planning process for gazetting of the future OZP for the Tung Chung Valley; we do not understand why the boundary of the V zones needs to be emphasised in the EIA but at the same time the future and potential impacts caused by this zoning is neither properly nor adequately assessed.

11.4 The potential movement corridor as shown in the EIA is misleading. We urge that the conservation zonings should be enlarged (as shown in **Figures 8 and 9**) to ensure there will be viable movement corridors during the operation phase.

11.5 The designs to prevent 'Road Kills' (i.e., designs for terrestrial wildlife crossings) adopted in the Tung Chung Road widening (i.e., described in the approved EIA report for EIA-075/2002¹⁹ and AFCD's Practice Note²⁰) should be made reference to, and incorporated

¹⁹ http://www.epd.gov.hk/eia/register/report/eiareport/eia_0752002/EIA%20Report/contents_with_hyperlink.htm

into the road designs (including those bridges crossing the watercourses) of the present project.

11.6 The potential movement corridor to the north of the area TCV-5a would pass through the attenuation pond. We urge that the design of the fencing surrounding this pond should not block nor pose an obstruction to the free passage of wildlife.

11.7 We urge the authorities to re-zone the area TCV-8 back to GB, following what has been previously shown in the Digest.

11.8 All *Fung Shui* woodlands should be zoned as CA rather than being given a GB or V status.

11.9 The applicant should clarify and further elaborate in the ACE as to how the areas of mangroves and mudflats under the proposed RO as shown in Figure 13 would be preserved, and thus, no loss of these natural habitats would occur at any time in the future.

11.10 The suspected illegal bridges should either be removed or replaced with ecologically-friendly designs.

11.11 The applicant should liaise with the relevant maintenance authority in the comprehensive design of the drainage and wetland system for the collection and treatment of surface runoff.

11.12 The applicant should ensure that the connection rate of communal sewers to village houses should be of a satisfactory level.

12. *Tung Chung East*

12.1 There should not be any reclamation.

12.2 The potential impacts on the Ayu Sweetfish, the Horseshoe Crab and the Chinese White Dolphin should be adequately addressed and effectively mitigated.

13. *Convention on Biological Diversity*

13.1 In addition, we would like to remind the applicant that The Convention on Biological Diversity (CBD) was extended to Hong Kong by the Central People's Government in May

²⁰ https://www.afcd.gov.hk/english/conservation/con_tech/files/NCPN_No.04_Wildlife_Underpass_Structures_v2006.pdf



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2011. Article 8 (*in-situ* conservation) of the CBD²¹ requires contracting parties to follow the approach as reproduced below:

Article 8, (d): Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings

Article 8, (i): Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components

13.2 Ecological studies carried out by various environmental NGOs, our Technical Report and even the EIA report, itself, have shown that the Tung Chung area and its surroundings are unique and unbelievably rich in terms of biological diversity. The applicant should critically review whether the Tung Chung West area, in particular the Tung Chung Valley, can accommodate the carrying capacity of the proposed increase in population and the Government should also critically review the necessity of the land reclamation proposal. We consider that the Government should fully respect, commit to and implement the CBD principles.

Yours faithfully,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden Corporation

cc.

DevB

EnB

AFCD

Conservancy Association

Designing Hong Kong

Green Power

Hong Kong Bird Watching Society

WWF – Hong Kong

²¹ <http://www.cbd.int/convention/articles/?a=cbd-08>

Figure 1. The proposed zonings around Ngau Au Village in the Digest and the indicated zonings in the EIA (the area of concern is indicated by the red circle).

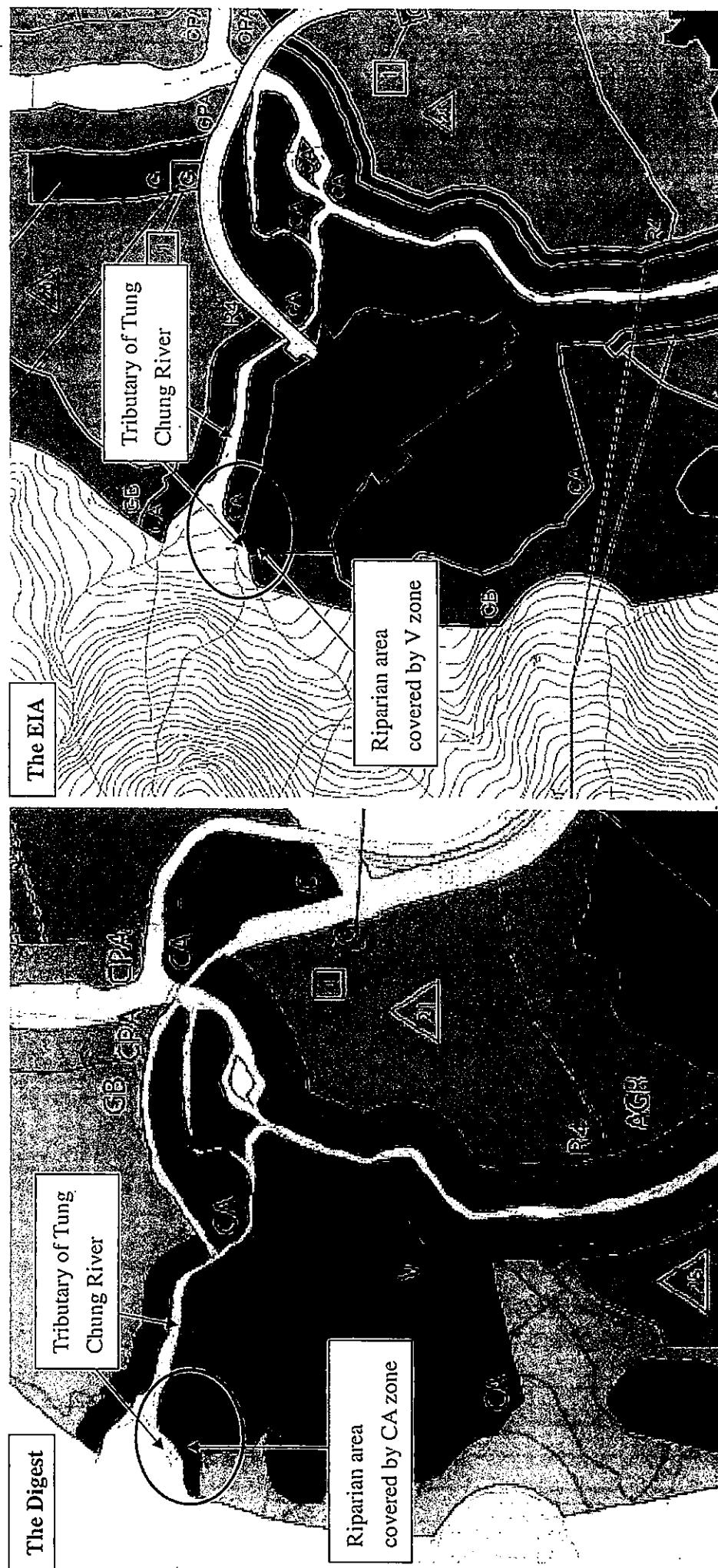


Figure 2. Habitat map extracted from the EIA shows that the area to the northwest of Ngau Au Village is covered with mature woodland.

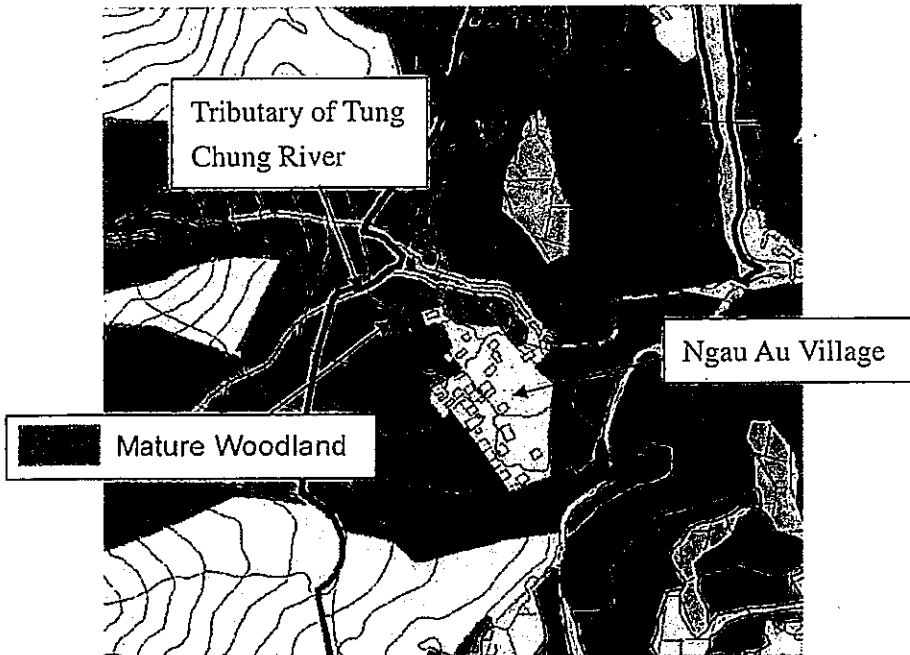


Figure 3. Aerial photograph taken in August 2015 showing Ngau Au Village and its well vegetated surroundings.

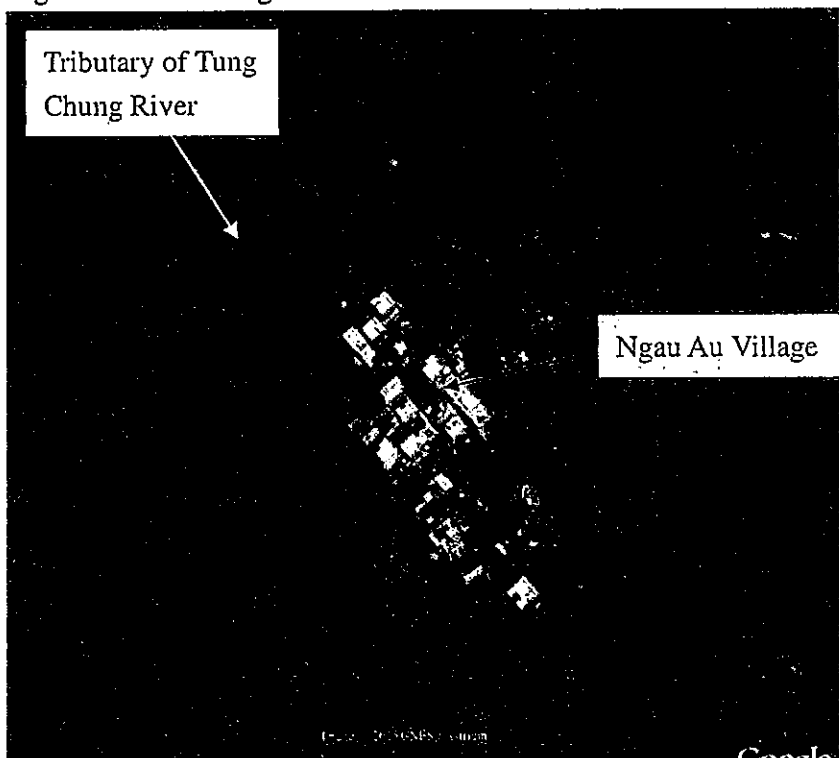


Figure 4. On-site photograph showing the well-vegetated riparian area at Ngau Au Village (taken in December 2015).



Figure 5. Various figures showing the mature woodland area to the northwest of Ngau Au Village that is now indicated as a V zone under the EIA's proposal (approximately marked by the arrows).

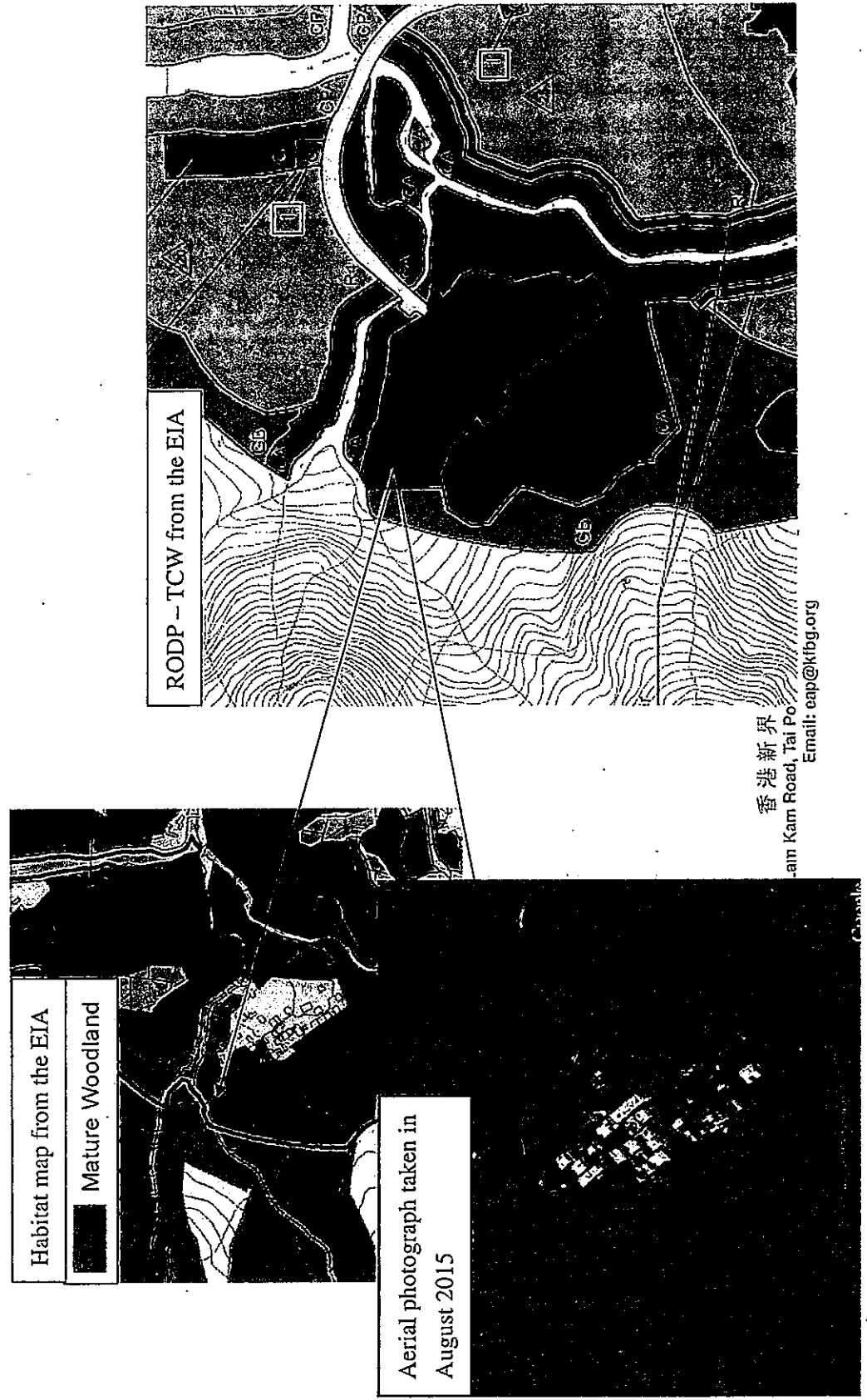


Figure 6. Sensitive habitats (not including those at Ngau Au Village, mentioned above) that are now included in the V zones (indicated approximately by the white line) under the EIA's proposal (approximately marked by the arrows)

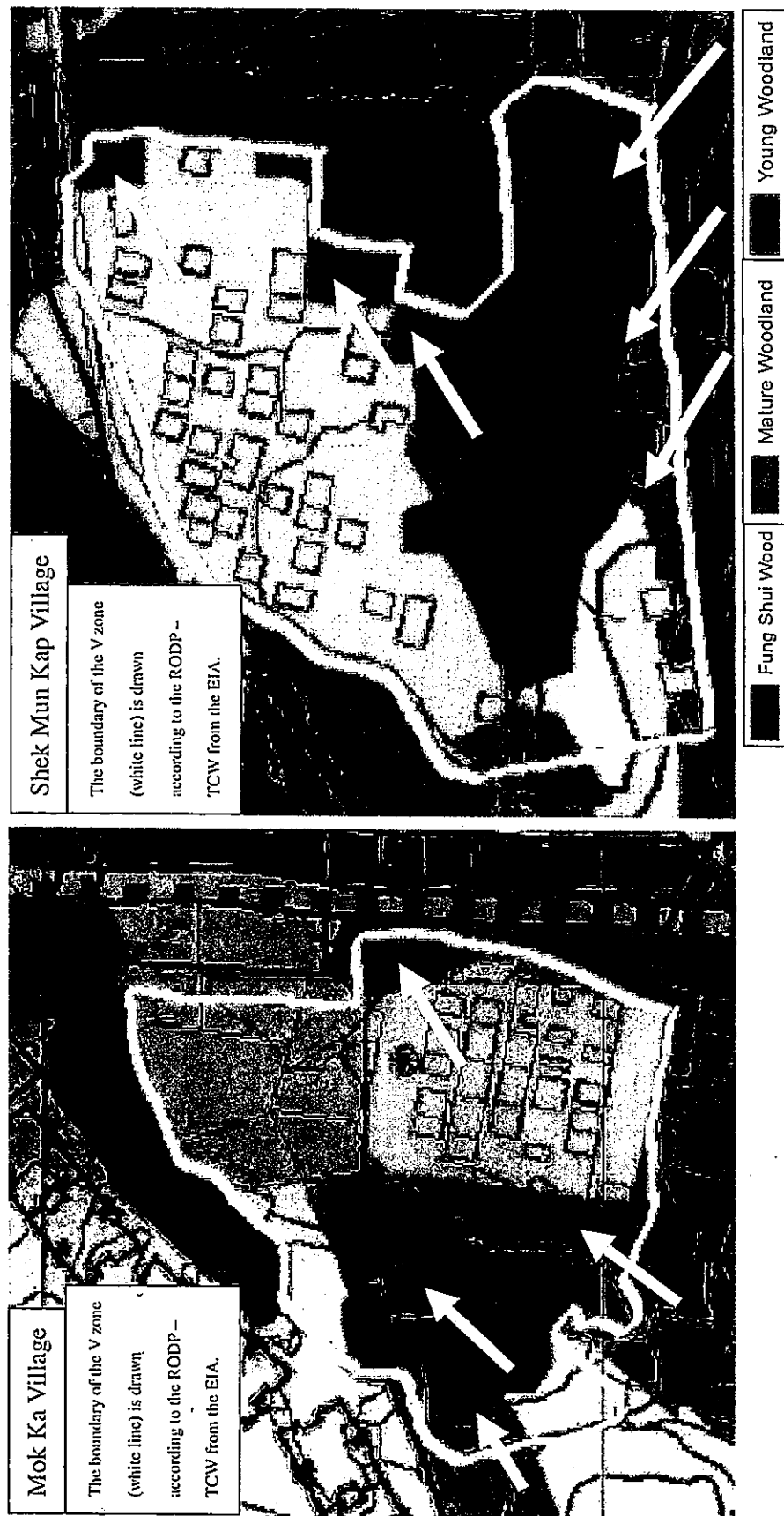


Figure 7. Sensitive habitats were excluded from the proposed V zones in the DRODP in the Digest of the Stage 3 public engagement consultation exercise



Figure 8. Sensitive habitats within or very close to the proposed V zones.



Dense secondary woodland
 to the south of Shek Mun
 Kap Village



Natural watercourse in the
 orchard to the south of Shek
 Mun Kap Village

Figure 8. Con't

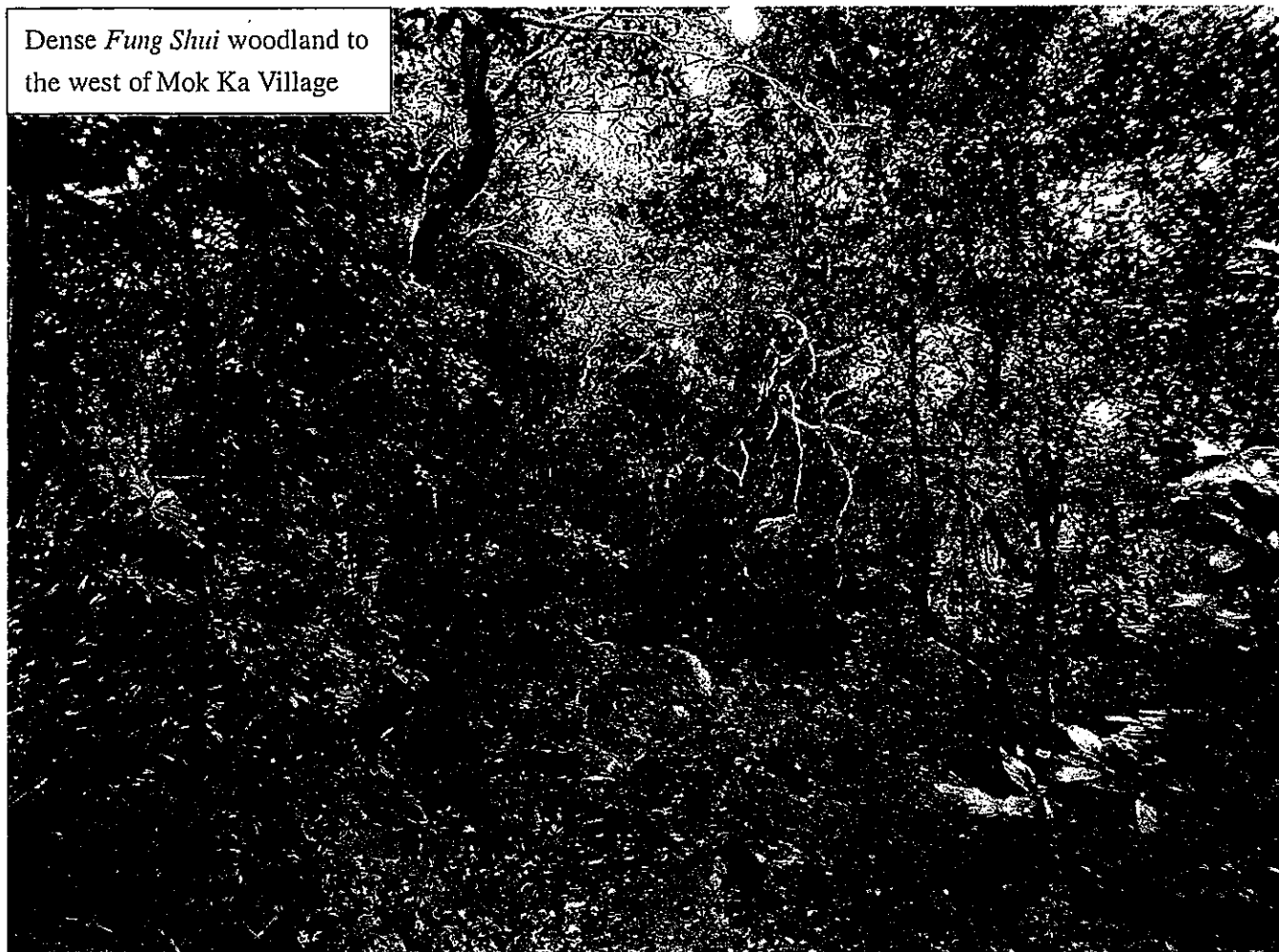


Figure 8. Con't

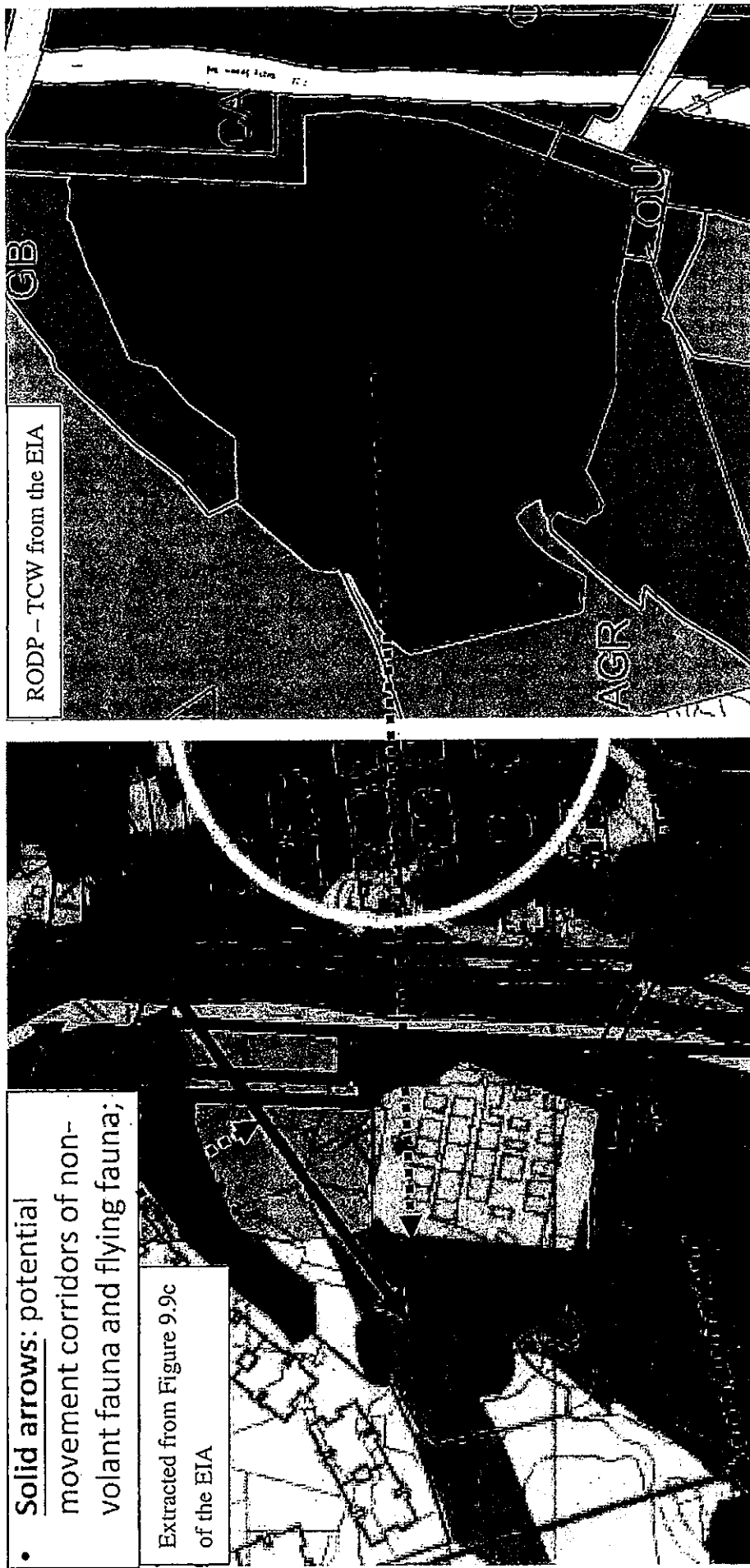
Natural watercourse to the
west of Mok Ka Village



Natural watercourse to the
west of Mok Ka Village



Figure 9. The potential movement corridor shown in the EIA actually passes through the proposed V zone near the existing Mok Ka Village.



- **Solid arrows:** potential movement corridors of non-volant fauna and flying fauna;

Extracted from Figure 9.9c
 of the EIA

Figure 10. Valid movement corridor (solid arrow) with conservation zonings recommended by KFBG (approximately indicated by the green rectangle with dotted boundary) adjacent to Mok Ka Village.



Figure 11. GB and CA zones to the south of areas TCV-5a and 5b should be increased in size (KFBG's proposal bounded by dotted line) in order to widen the potential movement corridor (solid arrow) for wildlife.



Figure 12. Many of the predicted movement corridors (arrows) intersect with the proposed new roads network (white lines).



Figure 13. A large piece of proposed GB zone to the north-east of Ngau Au Village shown in the Digest, which is currently well vegetated, that is now zoned as R4 in the EIA.

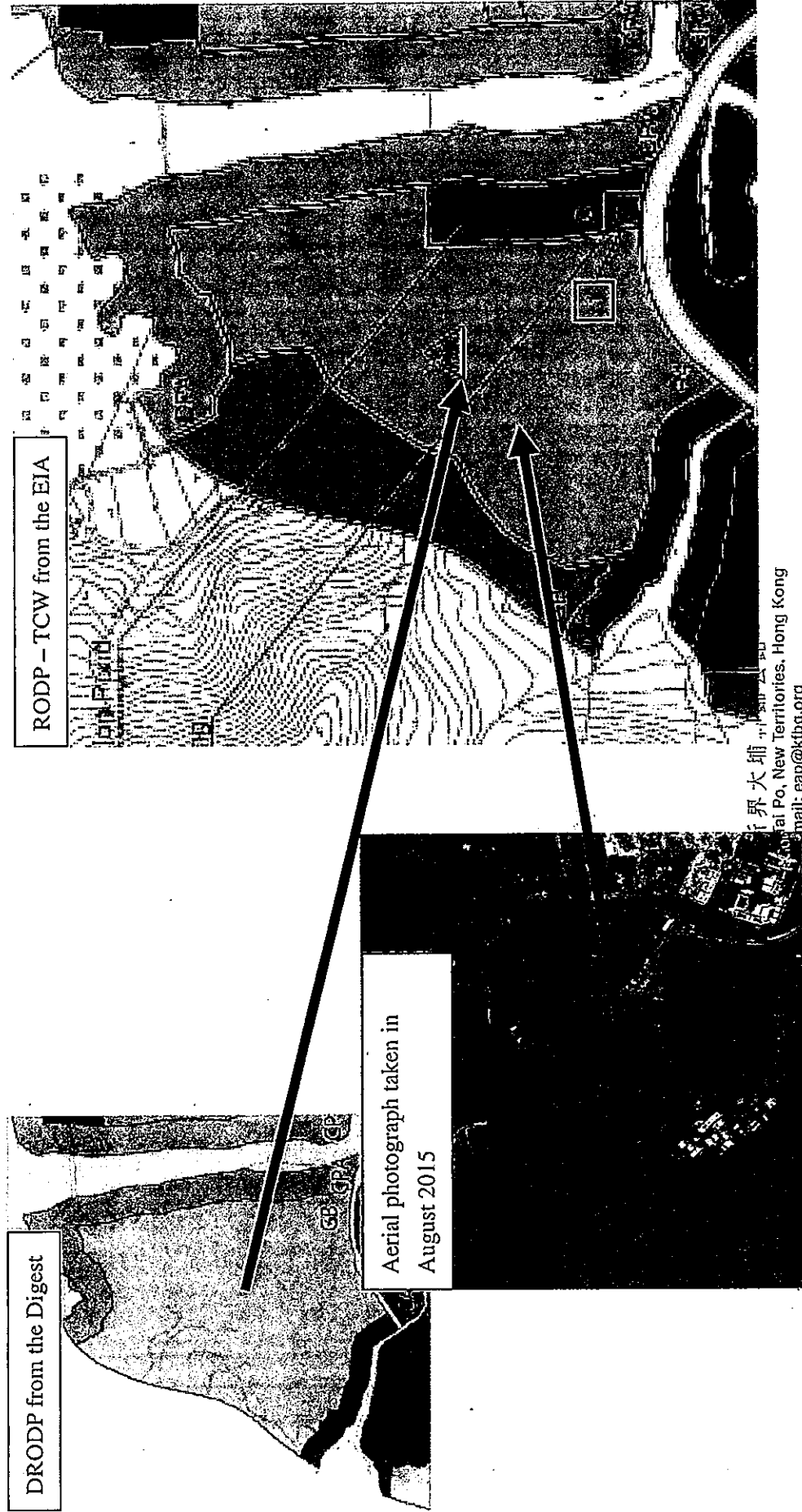


Figure 14. *Fung Shui* woodlands identified in the KFBG's Technical Report covered with proposed GB and V zones (approximately indicated by the blue arrows).



Figure 7. *Fung Shui* Woodlands at Tung Chung (approximately marked by the red line)

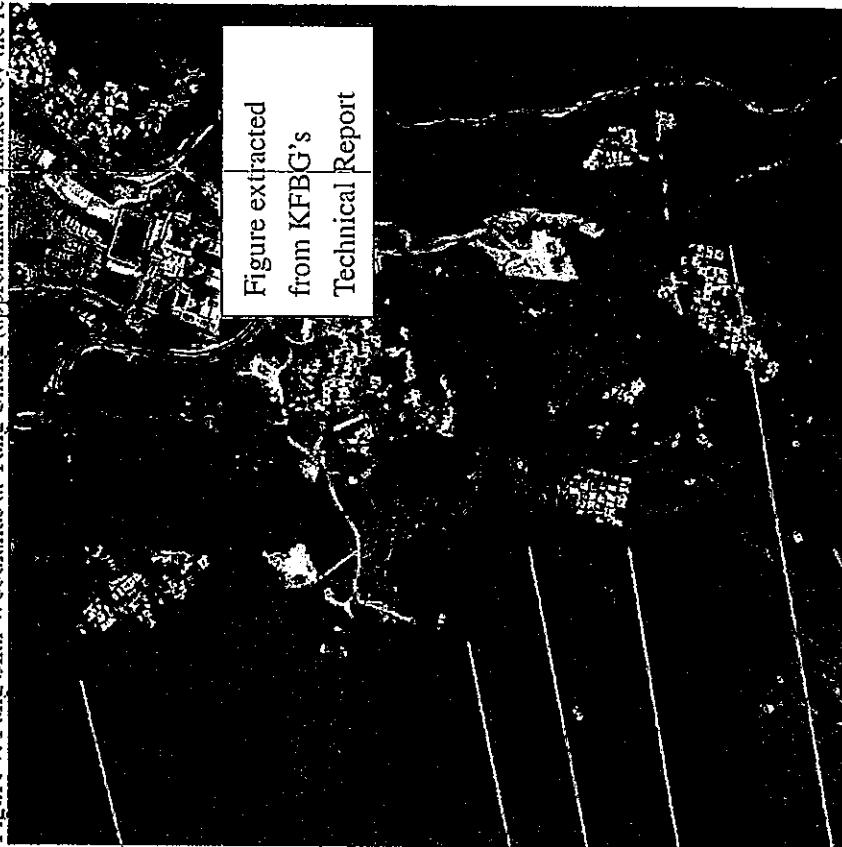


Figure 15. Mudflat and mangrove habitats covered by the proposed Regional Open Space (RO) zone under the RODP – TCW.

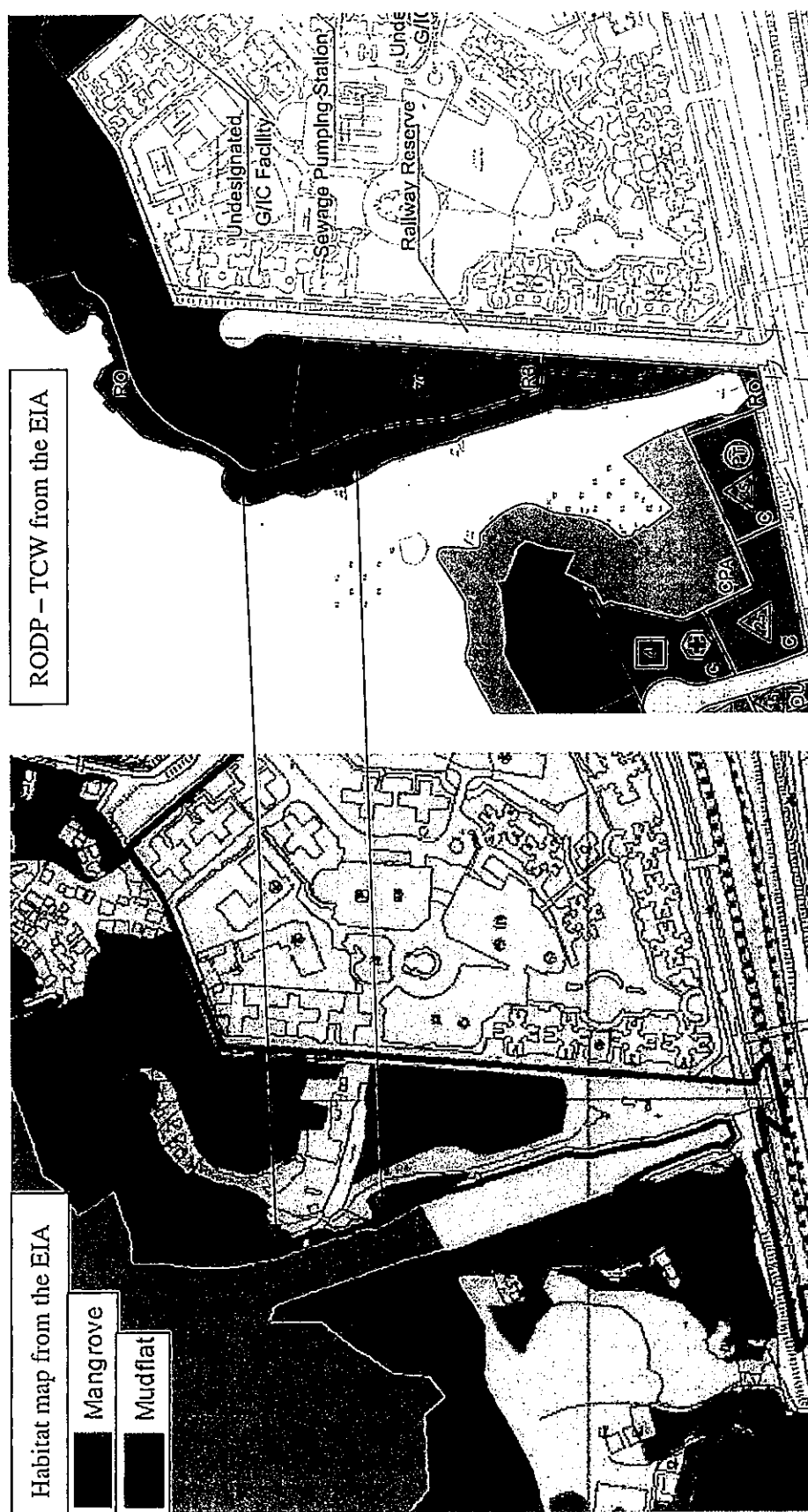


Figure 16. Suspected illegal bridges constructed across Tung Chung streams.

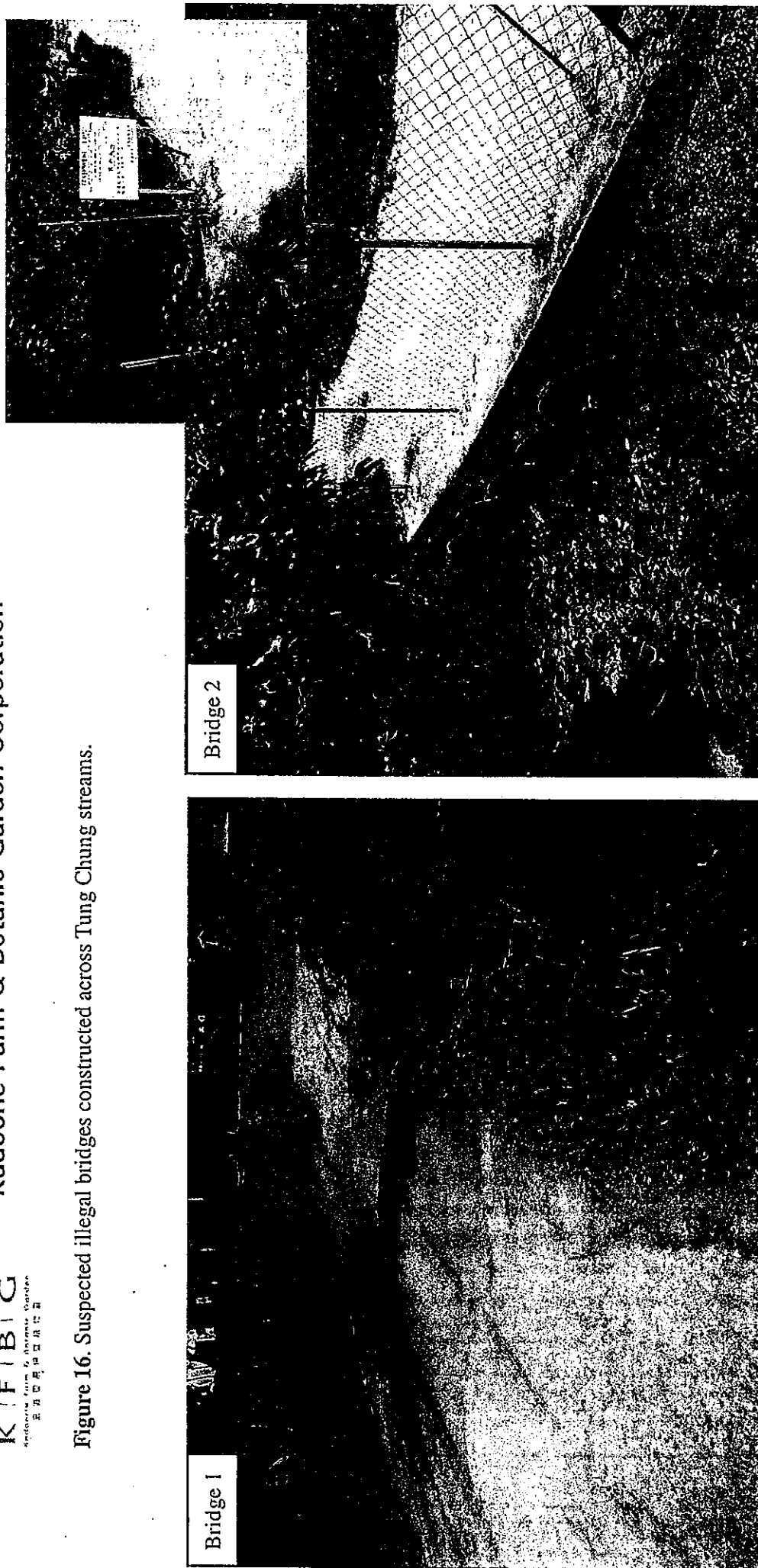
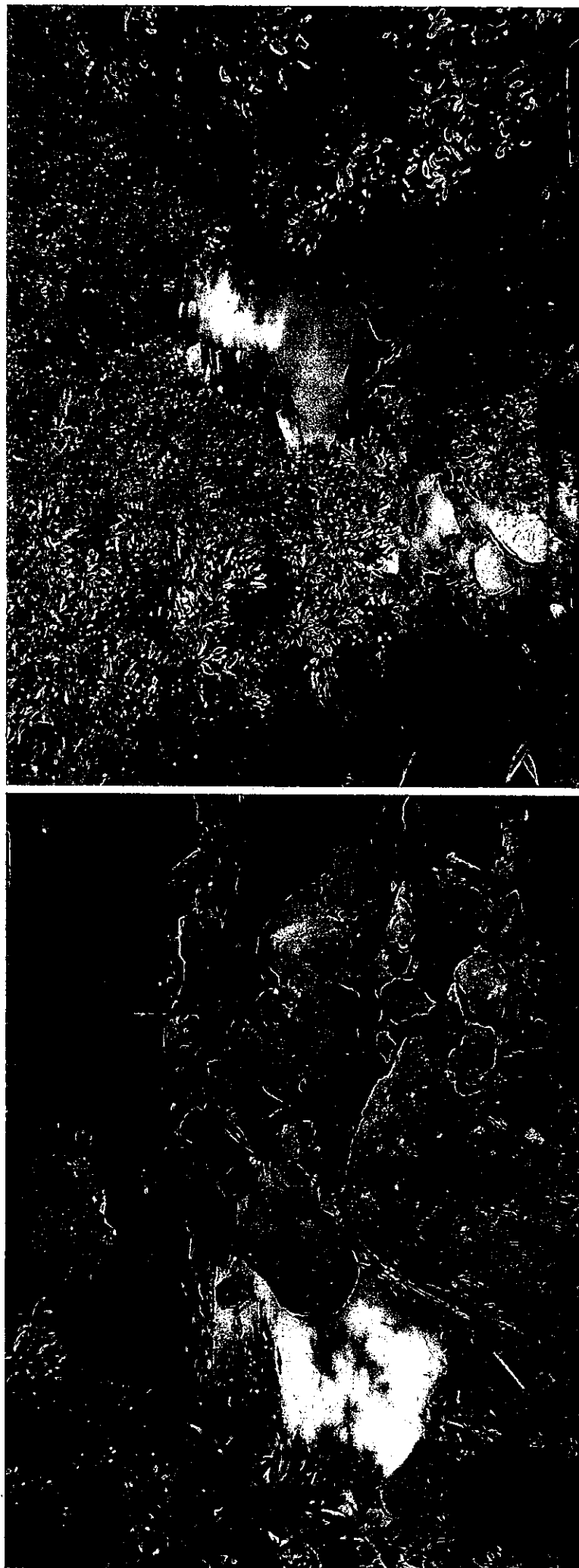


Figure 17. Polluted runoff discharging into the Tung Chung Stream from a drain observed in December 2015



Figure 17. Con't



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寄日期:
收件者:
副本:
主旨: -

Wright Fu
08日03月2016年星期二 14:57
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sdev@devb.gov.hk; sthoffice@thb.gov.hk; sen@enb.gov.hk; kkling@pland.gov.hk; kcjo@cedd.gov.hk; kklau@hyd.gov.hk; comr@td.gov.hk
就東涌谷分區計劃大綱草圖編號S/I-TCV/1、東涌市中心分區計劃大綱草圖編號S/I-TCTC/21、及東涌擴展區分區計劃大綱草圖編號S/I-TCE/1提出申述
附件:
SLA_Tung Chung OZP submissions.docx

TPB/R/S/I-TCV/1-35

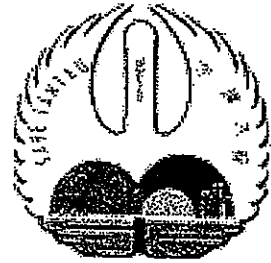
To whom it may concern,

Enclosed please find the representation made by Save Lantau Alliance towards the 3 above-mentioned outline zoning plans.

Best regards,

Wright FU

On behalf of Save Lantau Alliance



城市規劃委員會主席及委員
香港北角渣華道 333 號
北角政府合署 15 樓
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就東涌谷分區計劃大綱草圖編號 S/I-TCV/1、東涌市中心分區計劃大綱草圖編號 S/I-TCTC/21，及東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 提出申述

守護大嶼聯盟（聯盟）一直關注政府在大嶼山的各個發展計劃，聯盟認為大嶼山應以自然永續的方向發展，每一項發展都要以環境和人為本。就有關當局於 2016 年 1 月 8 日刊憲的東涌谷分區計劃大綱草圖編號 S/I-TCV/1、東涌市中心分區計劃大綱草圖編號 S/I-TCTC/21，及東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1，聯盟有以下意見：

1) 加強保育東涌灣生態，做好土地違規用途監察

現時東涌河谷及東涌灣一帶生態環境非常豐富，可發現高達 23 種淡水物種及 148 種蝴蝶品種。東涌河亦是香港少數被環境保護署評為擁有「極佳」水質的河道。雖然東涌谷之規劃大綱圖已把河岸兩旁劃作自然保育區、海岸保護區及其他特定用途，以期保護河流的珍貴生態，但河谷內卻有數個甲類及丙類住宅，以及鄉村式發展用地；東涌灣一帶亦有數個住宅及商業用地發展。新增人口所帶來的噪音、污水及光污染仍然會對東涌河谷和東涌灣的生態帶來負面影響。而在般若禪寺附近的甲類住宅用地，鄰近郊野公園範圍及東涌道的禁區位置，乃一交通樽頸，項目落成後亦將引來更多的交通問題。

更甚的是，現時呈交城規會的規劃大綱圖，部份在「東涌新市鎮拓展研究」第三階段公眾參與時建議闢作農業用地的土地，更被改劃為鄉村式用地。可是早前就東涌新市鎮擴展已進行的環境評估，卻未有用上是次更新的規劃大綱圖作基礎，相關改動會否對東涌河谷的環境帶來更壞的影響，實未有經過詳細計算。現時東涌谷裡仍有活躍的農業活動，上述的房屋用地不僅摧毀了本地農業的生存空間，更會阻礙東涌的地區經濟發展，及令社區內所產生的廚餘無法有效運用。

另一方面，近年在東涌河谷出現不少土地被非法填泥、用作停車場及貨櫃場的情況，有團體調查發展東涌河谷內被破壞的土地面積從 2007 年的約 5% 上升至 2015 年的 13%。可是，現時的城市規劃制度欠缺監管渠道，並無法有效阻止土地上的違規破壞行為繼續發生。而離東涌新市鎮稍遠的礮頭、田心、黃龍坑等地，仍然未被任何一幅規劃大綱圖所覆蓋，在東涌新市鎮進一步發展的情況下，該等地區之土地遭破壞的風險非常高。

聯盟要求取消東涌河谷和東涌灣內的商業、甲類及丙類住宅用地，並預留土地作農業、廚餘回收等用途，照顧社區之需要。聯盟支持環保團體早年提出的「東涌河自然河流公園」之建議及相關的污水處理要求以期更好的保育東涌河谷之珍貴生態。而未有被是次任何一張規劃大綱圖覆蓋的

礮頭、黃龍坑等地區，亦應盡快制定「發展審批地區圖」覆蓋。聯盟認為上述舉動可促進東涌的可持續發展及環境保護。

2) 正視東涌的環境和周遭水域生態，重新審視發展及填海規模，並就北大嶼山的環境生態進行基線評估和策略環評

東涌擴展區內有大量的甲類房屋發展，但擴展區範圍鄰近港珠澳大橋及機場跑道。雖然沿海的地段大多已被劃作政府、機構與社區用地，但大量的車流及飛機升降量，加上東涌的地形問題，擴展區內居民將飽受嚴重的空氣污染問題。根據環境評估報告的資料，東涌擴展工程將令東涌區的一小時總懸浮粒子濃度由現時每立方米最高 404 微克升至 464 微克，離 500 微克的警戒線相差不遠；而二氧化氮濃度由現時每立方米 113 至 163 微克，進一步升至 141 至 168 微克，離 200 微克的警戒線越來越近。而擴展區內廣建高樓，亦會阻礙現時東涌市中心地段的空氣流動，令區內的廢氣更難吹散。故此，高密度的房屋發展加上惡劣的空氣質素，將嚴重影響東涌居民之健康。

此外，東涌擴展區將在現時東涌 54-56 區對出填海達 120 公頃，預料施工期間進出填海範圍的工程躉船多達 42-56 架次。由於東涌擴展區之填海工程跟機場第三條跑道的工期相近，加上距離接近，雖然環境評估報告表示機場第三條跑道工程將不會影響東涌擴展區周邊水域的海岸生態，但若兩項工程同時進行，每日將有多達二百艘高速船、工程船穿梭大嶼山東北部水域，產生巨大交通流量。需注意的是，東涌擴展區毗鄰因港珠澳大橋環境補償而設置的大小磨刀洲海岸公園，但隨著北大嶼山水域多項大型基建工程陸續上馬，2014 年在北大嶼山水域錄得的中華白海豚數字只剩下一條。東涌擴展區的填海工程將嚴重威脅大小磨刀洲海岸公園的生態，令其「名存實亡」。

聯盟要求重新審視東涌擴展區的填海面積，並降低東涌擴展區之發展密度，應著重建築物的擺位，以確保現時東涌市中心地區的空氣質素。而現時政府以「斬件式」的方法，各自就單獨的項目評估其對環境之影響，並無法反映眾多工程同時上馬時對環境的累計影響。此外，政府亦未有詳細就同一地點在發展項目開展前後的環境影響估算。故此，在眾多大型建設項目同時於大嶼山北岸的水域進行的情況下，一個就大嶼山北岸水域的基線評估和策略環評乃必須，以全面探討各填海項目對周遭環境的累積影響。

此外，擴展區擬劃作遊艇會的其他用途土地亦應予以取消，讓公眾人士可暢通無阻地享用海濱設施。

3) 提供更多社區設施，多元就業機會，切合居民不同需要，達致以人為本社區

東涌社區設施匱乏的問題長期為人疾病，雖然東涌谷及擴展區的規劃大綱圖已預留相當之政府、機構及社區用地發展學校、專上學院、運動場、健康中心等設施，亦會興建市鎮公園，但仍未能完全符合居民之需要。而在建議的東涌東地鐵站旁興建的大型商場及寫字樓，雖有關當局估算能夠提供四萬就業機會，但工種亦只以零售業、飲食業、專業服務等為主，種類單一。根據 2011 年人口普查的資料，荃灣葵青區在相對能提供較多元的工種的情況下，仍只有四成多的居民能夠原區就業，故此東涌的商業發展對促進居民原區就業，幫助實在有限。

此外，倡議中的大型商場鄰近多個大型跨境基建項目。雖然在東涌擴展區內預留了空間設置步行街和位處街道旁的商店，而針對大嶼山發展策略所作的「大嶼山綜合經濟發展策略及大嶼山主要發展上商業用地的初步市場定位研究」也就機場北商業區、港珠澳大橋口岸上蓋商業發展，及東涌擴展區的商業發展項目作出分工，但由於商場定位及商店組合終歸將由市場決定，加上「橋頭

經濟」概念的熱炒，大量遊客需求將容易令商場設計及商店定位以服務旅客為主，居民如需購買日用品，只能面對款式少、價錢昂貴的苦況，現時東薈城的情況勢將複製至擴展區內。「橋頭經濟」最終只能讓一小撮大商家從巨大旅客人流中賺取更多，居民卻苦無獲益，甚至犧牲了生活質素。

聯盟要求在擴展區及鄰近逸東村的地方增劃更多政府、機構及社區用地，以提供居民爭取多年的市政街市、墟市、綜合服務大樓等設施，結合東涌西現存的農業活動，發展社區經濟，給予小商戶生存的空間，給予居民實踐經濟自主、促進睦鄰交流的空間。有關當局亦應按照人口增長預測，審視建議興建之學校數量，以期釋放更多土地發展其他社區設施，令東涌能夠成為一個更「以人為本」的社區。

4) 審視交通設施負荷，減少規劃失誤之負面影響

當東涌谷及東涌擴展區完全發展過後，東涌人口將增加至二十六萬，加上港珠澳大橋及第三條跑道帶來新增的人流車流，東涌不論是區內及對外的交通負荷將會是一大考驗。如將來出現道路擠塞，將會對東涌區居民造成甚大困擾。

聯盟要求應再進一步審視東涌各區內道路、北大嶼山公路及屯門至赤蠟角連接路在東涌擴展計劃完竣後的車流量，並檢視東涌線的負荷。由於「東大嶼都會」等遠期規劃並不會在東涌擴展計劃完竣後短時間內落成，如發現現行的交通配套未能配合新增的人口需要，應減少東涌谷及東涌擴展區的發展密度及可容納人口。

聯盟盼望城規會各委員能詳細審視現時東涌新市鎮擴展計劃背後的各種隱憂和弊端，如計劃獲倉猝通過，屆時不只是東涌居民，全港市民亦需就相關的規劃失誤付出代價。

守護大嶼聯盟 謹啟

2016年3月8日

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Mark Mak | [REDACTED]
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RoyTam Tam
東涌谷分區計劃大綱草圖S/I-TCV/1號 環保觸覺意見書
東涌谷_意見書_final_20160308.docx

TPB/R/S/I-TCV/1-36

please see attached



致 城市規劃委員會

有關：東涌谷分區計劃大綱草圖 S/I-TCV/1 號 環保觸覺意見書

環保觸覺（本會）為本地環保團體，長期關注香港環境保育、城市規劃等議題。本會現就上述分區計劃大綱圖提出意見如下：

本會認為東涌河及東涌谷有很重要的生態價值，亦是一直以來各環保團體希望可以保育的地方。

但本會認為，於河谷中規劃大片住宅區，將影響河流生態，以及污染會影響出河口東涌灣一帶的珍貴環境。草圖規劃的住宅面積是過大。規劃作多個住宅，也會令日後大量工程及平整進行，日後河流或會被建築廢料污染。

而且，東涌河石門甲不少綠化地變成鄉村式發展土地。東涌河是淺水濕地，除河流中有不少動物，濕地上也有珍貴昆蟲、蝴蝶等。當局須考慮減少鄉村式發展土地至最少的面積，例如只包括目前有建築物的地方。本會亦要求城規會進行詳細生態調查，將有價值的地方規劃保育區等作更佳規劃方向。

本會亦同意其他團體所指，草圖中沒有把沒把擁有大片海草床、列為具特殊科學價值地點的礮頭海灘納入保護的意見，城規會亦考慮修訂草圖。

如有任何回覆，請致電 8100-4877 或電郵至 info@greensense.org.hk 與本會聯絡。

環保觸覺

二零一六年三月八日

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SMTP Server id 15.0.1130.7 via Frontend Transport; Tue, 8 Mar 2016 23:58:58
+0800

Received: from mail37.scig.gov.hk ([202.128.251.45]) by ttсенmta9.ttasia.com over TLS secured channel with Microsoft SMTPSVC(7.5.7601.17514);
Tue, 8 Mar 2016 23:58:51 +0800

X-IronPort-AV: E=Sophos;i="5.22,556,1449504000";
d="xymal3...; l=a:

Received-SPF: Neutral (dmeas13.ijail.scig.gov.bk: domain of

mark@greensense.org.hk does not assert whether or not
2607:f8b0:4002:c07::229 is permitted sender)

identity=mailfrom; client-ip=2607:f8b0:4002:c07::229;
receiver-domain=google.com;

receiver=dmeas13.imal.scig.gov.hk;

envelope-from="mark@greensense.org.hk";

x-sender="mark@greensense.org.hk"; x-conformance=spf_only;
x-record-type="vspf1"

x-record-type="v=spf1"

Authentication-Results: dmeas13.imal.scig.gov.hk; dkim=pass (signature verified)
header.i=@greensense-org-hk 20150622

header.i=@greensense-org-hk.20150623.gappssmtp.com
X-IronPort-Anti-Spam-Engine: 1.0.0-10.0

X-IronPort-Anti-Spam-Filtered: true

X-IronPort-Anti-Spam-Result:

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X=IronPort AY: E s : [REDACTED]

X-IronPort-AV: E=Sophos;i="5.22,556,1449504000";

K-Envelope-Sender: mark@greensense.org.hk

X-Envelope-Sender: mark@greensense.org.hk

K-DKIM: PASS

K-SPF: FAIL

K-SPF: FAIR

E-TLS: YES

-IRONPORT-CLEAN: YES

-IRONPORT-CLEAN: YES

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X-Received: by 10.37.64.214 with SMTP id n205mr8242738yba.12.1457452729674;

Tue, 08 Mar 2016 07:58:49 -0800 (PST)

From: Mark Mak <mark@greensense.org.hk>

Date: Tue, 8 Mar 2016 23:58:30 +0800

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To: tpbpd<tpbpd@pland.gov.hk>

CC: RoyTam Tam <roytam@greensense.org.hk>

Content-Type: multipart/mixed; boundary="001a11c04d6c3b360a052d8ba8a5"

Return-Path: mark@greensense.org.hk

X-OriginalArrivalTime: 08 Mar 2016 15:58:51.0861 (UTC) FILETIME=[68D6D050:01D17953]

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X-MS-Exchange-Organization-AuthSource: DC01HEX13Mail01.hostedservices.ttasia.com

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MIME-Version: 1.0

寄件者: Land Justice League土盟
寄件日期: 08日03月2016年星期二 0:00
收件者: 城規會
主旨: Tung Chung Valley Outline Zoning Plan No. S/I-TCV/C

TPB/R/S/I-TCV/1-37

Dear Sir / Madam,

We have reservation on the "V" zone in Shek Lau Po which provided a large area of the village development zone.

1. The village development zone can cater for 120.39% of new small house demand without strong reason.
2. Northern part of the village development zone is zoned as agriculture in the 3rd stage of public consultation. The reason for such a change is needed.

Yours faithfully,
Land Justice League

From: Yin Siu [REDACTED]
Sent: Tuesday, March 08, 2016 12:09 PM
To: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; DSD HKSARG
Cc: [REDACTED]
Subject: 就東涌新市鎮擴展的意見

就東涌新市鎮擴展的意見

城市規劃委員會主席及委員、規劃署署長、土木工程拓展署署長及渠務署署長，

你們好，本人就對東涌谷分區計劃大綱草圖編號S/I-TCV/1、東涌市中心分區計劃大綱草圖編號S/I-TCTC/21，東涌擴展區分區計劃大綱草圖編號S/I-TCE/1及工務計劃項目第7786CL號地政總署工務計劃項目第7786CL號東涌新市鎮擴展提出意見，見附件。

Eddie TSE



反對東涌東填海_Eddie TSE.docx



東涌市中心發展-Eddie TSE.docx



東涌谷_Eddie TSE.docx

Eddie TSE



東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項
在東涌河兩邊的區域劃作低密度私人住宅；

(B) 該申述的性質及理由

低密度私人住宅不能為香港帶來很大的經濟收益，而且是一筆過利益，非長遠及可持續，低密度私人住宅的落成意味着私家車的數量上升，會造成環境污染或催化自然。

(C) 建議對有關草圖作出的修訂

發展有機農業區

本土有機農作物有價有市；而且中國內地毒菜等問題，一直令港人憂心入口農產品的安全性。有見及此，支持發展一套安全及有保障的本土有機農業是一門符合長遠利益的產業；近年來政府積極推廣【源頭減廢】，而東涌區正正有大量廚餘可為本土有機農業提供有機肥料。比如：逸東邨、富東邨、裕東苑、映灣園、海堤灣畔及機場等地區均設有林林總總的食肆，當中更以機場和酒店以廚餘過剩聞名；

鄰近東涌住宅區的有機商品能以便捷及快速運送到區內的不同屋苑販賣，當中包括私人住宅區如映灣園，東堤灣畔，以及日後的東涌東填海區，符合區內原經濟發展。



Your Ref. : TPB/R/S/I-TCV/1-R7
Our Ref. : BOD/OC/TPB/10052016/AC

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

By Fax and Hand



10 May 2016

Dear Sir/Madam

Tung Chung Nim Yuen (東涌念園)

Comments on the Representations on draft Tung Chung Valley

Outline Zoning Plan No. S/I-TCV/1 (the "Plan")

We are the registered land owner (Uni-Creation Investments Limited) and current manager (Tung Chung Nim Yuen Cultural Institution Limited) of Tung Chung Nim Yuen, a columbarium consisting of eight 3-storey NTEHs, (the "Columbarium") on Lot Nos. 2754, 2755, 2756, 2757, 2758, 2760 & 2761 in D.D.1 Tung Chung.

We have made our representation on the Plan by our letter dated 8 March 2016 (TPB/R/S/I-TVC/1-R7 refers).

We wish to comment on the Representations No. TPB/R/S/I-TCV/1-R1 and TPB/R/S/I-TCV/1-R2.

1. The proposition to develop a columbarium in the Nim Yuen Village was made known to local villagers of Lam Che and Shek Lau Po as early as 2010. We attach copies of supporting letters from Mr. Law Wai Hung, the Indigenous Inhabitant Representative of Shek Lau Po, and Mr. Kwan Yip Chuen, the former village Representative of Nim Yuen and Lam Che for your reference;
2. The Plan should include columbarium as one of the permitted uses in the Nim Yuen Village area for the following reasons:-



建世投資有限公司

Uni-Creation Investments Limited

- a. our existing use of the Columbarium in Nim Yuen prior to the gazette of the Plan and the Draft Tung Chung Valley Development Permission Area Plan.No. DPA/I-TCV/1;
- b. the area surrounding the Columbarium has been used by villagers of Shek Lau Po, Lam Che and Nim Yuen village as the traditional burial area; and
- c. no supply of suitable land for building village houses as all the private land within the Nim Yuen Village had been sold to outsiders and the Government land within the village is very limited;

By reason of the above, we are of the view that it is more suitable to designate the zoning of Nim Yuen village as "Institution or Community"

Meanwhile, we reserve our right to take further legal actions if the Government deprive our right and interests in Nim Yuen village.

Yours faithfully,

For and on behalf of
UNI-CREATION INVESTMENTS LIMITED
建世投資有限公司

albert cheng

Authorized Signature(s)

Your faithfully,

For and on behalf of
TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
東涌念園文化機構有限公司

[Signature]

Authorized Signature(s)

東涌石榴埔村公所

大嶼山東涌石榴埔村壹號

敬啟者：

就解決骨灰位不足、私營骨灰龕發牌制度等問題，社會各階層傳來不同聲音。再者，對大嶼山東涌梨園村私人發展商申請建骨灰龕事項亦然，本人認為申請通過合法規例呈文，向政府申請合法骨灰龕個案，應該支持。

反之，非法骨灰龕應被反對，政府亦要執法對付非法經營者，免市民受騙，蒙受金錢，時間損失，造成社會不安。

此致

西貢及離島規劃署專員

離島地政處專員

離島民政事務處專員

東涌石榴埔村原居民代表

羅維漢

二〇一〇年七月九日

致：

離島規劃處專員

離島地政處專員

離島民政事務處專員

敬啟者：

對於私人發展商在東涌稔園村申請興建骨灰龕，以合法渠道向有關政府部門申請興建合法骨灰龕，本村認為要支持。

對心存僥倖，非法手段經營非法骨灰龕機構，本村認為要反對。

東涌稔園村及藍輦村原居民代表

關榮銓

二零一零年七月十日

TPB/R/S/I-TCV/1-1

TPB/R/S/I-TCV/1-2

致：

香港城市規劃委員會

秘書先生：

有關回應 TPB/R/S/I-TCV/1-1 和 TPB/R/S/I-TVC/1-2 之申述

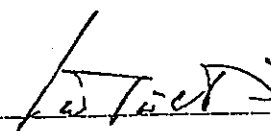
於本年三月七日，本人經已陳述石榴埔村村民普遍支持發展商在東涌稔園村內私人土地上發展骨灰龕(申述編號：TPB/R/S/I-TVC/1-4)。並因村內已無合適土地發展丁屋，建議將稔園村範圍劃成“機構或社區”用途。

現就以上申述提出的反對信，作出以下回應：

1. 稔園村附近滿佈來自石榴埔/藍峯/稔園村民先人之金塔及墳墓，故於稔園村內興建骨灰龕將與周圍環境相協調。
2. 村民早年經已知悉發展商在東涌稔園村內私人土地上發展骨灰龕的計劃，並已透過石榴埔村原居民代表羅維洪致信西貢及離島規劃署專員，離島地政處專員足離島民政事務署專員表示贊同支持。

稔園村至今經已空置數十年，無人居住，村內亦無適合土地供興建丁屋。若留作鄉村式發展用地，實屬浪費寶貴資源。如能把該處劃成“機構或社區”用途，則更具彈性並能迎合附近實際需求，更可達致充分利用土地資源的目標。





石榴埔村居民代表羅禮詞

暨村民 上

2016年5月8日

聯絡電話：[REDACTED]

致：城市規劃委員會秘書處

回應：TPB/R/S/I-TCV/1-1

及 TPB/R/S/I-TCV/1-2

敬啟者：



(I) 有關東涌谷分區計劃大綱圖編號 S/I-TCV/1

本人於 2016 年 2 月 29 日就上述東涌谷分區計劃大綱圖編號 S/I-TCV/1 致函貴會作出下列申述：請參閱(申述編號: TPB/R/S/I-TCV/1-3)

- a. 稔園及藍輦村村民一向知悉及支持發展商在稔園村土地上發展及經營合法私營骨灰龕場。
- b. 稔園村內的私人土地已全部售予外來發展商，村民於村內再沒擁有任何土地，村民亦不會以高價錢向發展商購回土地建丁屋。村內地理環境局限，村內亦無適合政府土地可供建丁屋。因此，規劃稔園村土地用途為「鄉村式發展」，絕對不合時宜。村民建議規劃成「機構或社區」用途最為合理。

(II) 回應申述編號：TPB/R/S/I-TCV/1-1 及 TPB/R/S/I-TCV/1-2

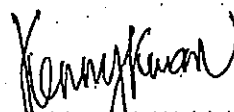
現回應以上兩份來自藍輦村及石榴埔村的申述：

- a. 藍輦村及石榴埔村村民並非於 2015 年 4 月中才知悉有發展商在稔園村發展合法私營骨灰龕。早於 2010 年中，稔園及藍輦村村民經已知曉此計劃，其後更透過石榴埔村原居民代表羅維洪致信西貢及離島規劃署專員，離島地政處專員及離島民政事務專員表示贊同支持。

- b. 稔園村局限於地理環境，村內剩餘的政府土地要不是太狹窄便是位處陡峭斜坡上，村內無(私人或政府)土地適合建丁屋。如要提供合適興建丁屋的土地，政府必須斬伐大量樹木、削平山坡及填塞天然溪澗，此舉不但破壞區內生態環境，違反政府保育政策，更涉及龐大工程費用，實在不切實際。若堅持將稔園村一帶規劃為「鄉村式發展」，實有違善用土地原則。
- c. 稔園村自八十年代開始空置至今，周邊滿佈附近村民先人的金塔及祖墳(包括來自石榴埔村、藍輦村及稔園村)。加上稔園村地處幽靜山谷，於村內發展合法私營骨灰龕，實在十分配合附近本村墓地環境，故村民均表示認同。

此致

城市規劃委員會秘書



東涌稔園村及藍輦村代表

關偉安

暨村民 上

(聯絡電話：[REDACTED])

香港新界大嶼山東涌
東涌鄉事委員會

TUNG CHUNG RURAL COMMITTEE
TUNG CHUNG, LANTAU ISLAND, N.T. HONG KONG.
地址：香港大嶼山東涌上嶺皮村壹號
電話：2988 8228 傳真：2988 8924

TPB/R/S/I-TCV/1-C4

TPB/R/S/I-TCV/1-1
TPB/R/S/I-TCV/1-2

敬啟者：

關於回應東涌谷分區大綱圖
申述編號：TPB/R/S/I-TCV/1-1 及 TPB/R/S/I-TVC/1-2

繼本會於 2016 年 3 月 4 日致函 貴會(請參考 TPB/R/S/I-TCV/1-6 之申述)，現作補充如下：

- (甲)東涌鄉內村民早已知悉有發展商計劃於稔園村發展合法私營骨灰龕一事，幾近十載，相信村民不會覺得陌生。
- (乙)稔園村地處幽谷，被樹林環抱，遠離民居。實地視察所得，稔園村貼鄰是村民墓地及金塔集中區域，所以於該處興建合法私營骨灰龕將與周邊環境協調。
- (丙)稔園村村內私人土地已盡售予發展商，剩餘政府土地狹小且位於山坡，實際無地可供鄉村式發展，若能把該片土地規劃作「機構或社區」用途，反而更有利區內需求。

此致
香港城市規劃委員會秘書處



樊志平

東涌鄉事委員會主席：樊志平

日期：2016 年 5 月 9 日

009



建世控股有限公司
UNI-CREATION Holdings Limited

Your Ref.: TPB/R/OZP/I-TCV/1

Our Ref.: UCH/08032016/TC

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

By Fax and Hand

8 March 2016

Dear Sir,

**Representation on Draft Tung Chung Valley
Outline Zoning Plan No. S/I-TCV/1**

We are the landowner of Lot Nos. 1868, 1872 and 1874 in D.D. 1 Tung Chung, Lantau Island, which location fall within Area 67, the R (C) 2 zone (Low Density Residential Development) as shown on the captioned Outline Zoning Plan (OZP). The location of this area is at a quiet corner of the Tung Chung Valley and at the end of a village road (enclosed extract of the OZP refers).

In view of the population of elderly people in the territory is soaring and care and support services for them are mostly inadequate, we would be grateful if you would consider to change the zoning of Area 67 from R (C) 2 to "Institution or Community" use. Such a rezoning would encourage participation in the development of community care and support services for the elderly, including:

- Elderly Community Centre
- Social Centre for the Elderly
- Day Care Centre
- Nursing Home
- Home for the Aged, etc.



建世控股有限公司
UNI-CREATION Holdings Limited

As set out in the Explanatory Statement attached to the abovementioned OZP, the needs of the community should also be accommodated through thoughtful town planning strategies. Hence, we firmly believe that landowners of the lots within Area 67 and the local community share the same expectation for enhanced development of community care and support services for the elderly in the territory

Yours faithfully,
For and on behalf of
Uni – Creation Holdings Ltd.

For and on behalf of
UNI-CREATION HOLDINGS LIMITED
建世控股有限公司

.....
Authorized Signature(s)

Authorised Signatory



Encl.



建世控股有限公司
UNI-CREATION Holdings Limited

TPB/R/S/I-TCV/1-C5

Your Ref.: TPB/R/S/I-TCV/1-R8

Our Ref.: UCH/10052016/TC

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

BY Fax and Hand

10 May 2016

Dear Sir


Comments on the Representations on Draft Tung Chung Valley
Outline Zoning Plan No. S/I-TVC/1

We are the landowner of Lot Nos. 1868, 1872 and 1874 in D.D.1 Tung Chung, Lantau Island, and wish to reiterate our stance as stipulated in our letter to you dated 8 March 2016 (copy attached for your ease of reference).

Yours faithfully,
For and on behalf of
Uni-Creation Holdings Ltd



For and on behalf of
UNI-CREATION HOLDINGS LIMITED
建世控股有限公司

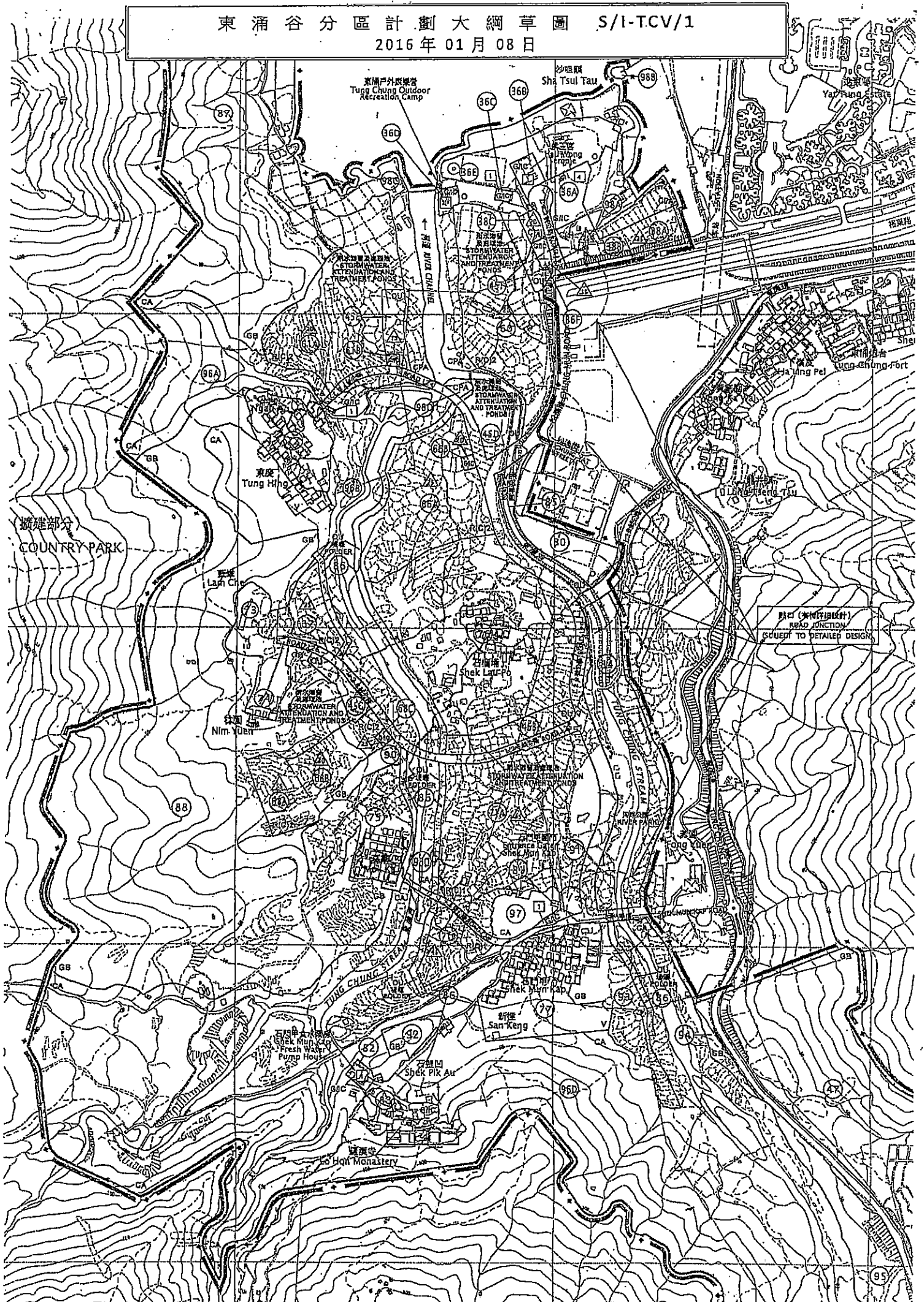

.....
Authorized Signature(s)

Authorised Signatory

008

東涌谷分區計劃大綱草圖 S/I-TCV/1

2016年01月08日



TPB/R/S/I-TCV/1-C6

就草圖的申述提出意見

Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

160512-223709-17120

提交限期

Deadline for submission:

13/05/2016

提交日期及時間

Date and time of submission:

12/05/2016 22:37:09

提出此份意見的人士(下稱「提意見人」)

Person Making This Comment

先生 Mr. 石門甲村村代表羅美發

(known as "Commenter") hereafter:

與意見相關的草圖

Draft plan to which the comment relates:

S/I-TCV/1

意見詳情

Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
TPB/R/S/I-TCV/1-3 TPB/R/S/I-TCV/1-4 TPB/R/S/I-TCV/1-5 TPB/R/S/I-TCV/1-6 TPB/R/S/I-TCV/1-7 TPB/R/S/I-TCV/1-8 TPB/R/S/I-TCV/1-9	<p>我們強烈反對TPB/R/S/I-TCV/1-3至TPB/R/S/I-TCV/1-9這七個申述的內容，稔園村及附近一帶範圍只有一小部份的地方是用作安放金塔，而金塔的數量只有三十多個左右，這些金塔全都屬於本鄉的原居民，多是附近村落的先人，而位於稔園村旁大部份土地都是休耕土地，並不是用來安放金塔，八十年代中期，政府已規定東涌原居民死後需安葬在東涌「十八區」內，因此並不會令鄉村旁的金塔數量有所增加，更不能將附近的山丘稱為金塔山。時代變遷，現今社會房屋供不應求，如有合適土地作住宅，應加以善用，此外區內免費娛樂、康樂及休憩設施缺乏，大綱圖內有很多綠化土地，我們建議可興建更多球類活動場地或遊樂場，既可推動健康生活，而且能令居民接近大自然。</p> <p>南峯及稔園村屬於合併認可鄉村，在村界範圍內的土地應用作鄉村式發展，鄉村正繼續擴展，減少鄉村式發展用地並不合理，反應完善村內道路及配套，讓我們能繼續繁衍後代，提供合適的環境給下一代。</p> <p>設置一所「靈灰安置所」需要考慮周詳細節，胡亂安放會對社區及生態造成深遠而負面的影響，包括造成區內沉重交通負荷、環境衛生受影響、治安壓力加大等問題，我們相信政府深深明白這個道理，因此才會立例規管，以防奸商為謀取暴利而置他人於不顧，村民盼貴會能維持此裁定，將稔園村劃為鄉村式發展用途、將67區定為住宅用途及提供更多文娛康樂設施供社區使用，讓村民有一個安穩及健康的生活環境。</p>

28770245

Form No. S6A 表格第 S6A 號

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	TPB/R/S/I-TCV/1-C12
	Date Received 收到日期	

1. The comment should be made to the Town Planning Board (the Board) before the expiry of the specified period for making comment on the representation. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
意見必須於指定對申述提出意見的期限屆滿前向城市規劃委員會（下稱「委員會」）提出。單妥的表格及支持有關意見的文件（如有），必須送交香港北角道第333號北角政府合署15樓城市規劃委員會秘書收。
2. Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F, Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.info.gov.hk/tph/>.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規例指引。這份指引可向委員會秘書處（香港北角道第333號北角政府合署15樓-電話：2231 4810或2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角道第333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會的網頁下載（網址：<http://www.info.gov.hk/tph/>）。
3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The comment may be treated as not having been made if the required information is not provided.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出意見的人士須以打印方式或以正楷填寫表格，填寫的資料宜中英文兼備。倘若未能提供所需資料，則委員會可把有關意見視作不曾提出。

1. Person Making This Comment (known as "Commenter" hereafter) 提出此份意見的人士（下稱「提意見人」）	
Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* (先生/夫人/小姐/女士/公司/機構*)) 何 紹 基	
2. Authorized Agent (if applicable) 獲授權代理人 (如適用)	
Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*)	
3. Details of the Comment 意見詳情	
Draft plan to which the comment relates 與意見相關的草圖	TPB/R/S/I-TC/21-22 TPB/R/S/I-TCV/1-33
Representation(s) to which the comment relates (please specify the representation number) 與意見相關的申述（請註明申述編號）	TPB/R/S/I-TC/21-22 TPB/R/S/I-TCV/1-33

* Delete as appropriate. * 刪去不適用者
Please fill "NA" for inapplicable item. 請在不適用時填上「不適用」

Parts 1, 2 and 3 第1、第2及第3部分

Form No. 56A 表格第 5.6.A 號

3. Details of the Comment (Continued) (use separate sheet if necessary)
意見詳情 (續) (如有需要, 請另頁說明)

Detailed comments on the representation(s) mentioned above 對上述所提及的申述的意見詳情

本人何紹基為磡頭村居民代表及大澳鄉
事委員會副主席, 有關 TPB/R/S/I-TCTC/21-22
和 TPB/R/S/I-TCV/1-33 的建議, 村民全
部反對, 因為本村九成多面積係私人土地
政府土地 村民會支持政府規劃, 最重要係
衛生設施及交通作長遠規劃, 尤其是由
東涌至大澳之緊急救援通道是非常逼設
每逢假日, 市民都進行行山或騎單車由東
涌至大澳, 但有意外或傷亡, 救援人員須
用上一小時才到達現場進行救援。

寄件者: Chiu Sein Tuck
寄件日期: 10日05月2016年星期二 11:03
收件者: tpbd@pland.gov.hk
主旨: Comments on Representations relating to Draft Plans: S/I-TCTC/21 & S/I-TCV/1 (Tung Chung)

TPB/R/S/I-TCV/1-C13

Subject: Comments on Representations relating to Draft Plans: S/I-TCTC/21 & S/I-TCV/1 (Tung Chung)

Dear Sir/ Madam;

Please see my comments, as follows:

Comments on Representations relating to S/I-TCV/1

TPB/R/S/I-TCV/1-3 to 6

- In view of the future zonings (with many residential zones) and the ecological sensitivity of Tung Chung Valley, I consider that there may not be suitable sites and enough space to develop a columbarium in Tung Chung.

TPB/R/S/I-TCV/1-10 to 11

- In order to prevent flooding, I do not agree with the proposals to rezone "OU (Stormwater Attenuation and Treatment Ponds)" to R(C)2 or other zonings.

Comments on Representations relating to S/I-TCTC/21

TPB/R/S/I-TCTC/21-1

- I do not agree to re-zoning of GB to other non-conservation zonings.

TPB/R/S/I-TCTC/21-2

- I do not agree with the proposal to expand V zones.

Thank you for your attention.

Regards,

CHIU Sein Tuck

tpi

寄件者: Tony Nip
寄件日期: 10日05月2016年星期二 10:54
收件者: tpbpd
主旨: Comments on Representations relating to Draft Plans: S/I-TCTC/21 & S/I-TCV/1 (Tung Chung)

TPB/R/S/I-TCV/1-C 14

Dear Sir/ Madam,

Below please see my comments:

Comments on Representations relating to S/I-TCV/1

TPB/R/S/I-TCV/1-3 to 6

- In view of the future zonings (with many residential zones) and the ecological sensitivity of Tung Chung Valley, we consider that there may not be suitable sites and enough space to develop columbarium in Tung Chung.

TPB/R/S/I-TCV/1-10 to 11

- In order to prevent flooding, we do not agree with the proposals to rezone "OU (Stormwater Attenuation and Treatment Ponds)" to R(C)2 or other zonings.

Comments on Representations relating to S/I-TCTC/21

TPB/R/S/I-TCTC/21-1

- We do not agree to rezone GB to other non-conservation zonings.

TPB/R/S/I-TCTC/21-2

- We do not agree with the proposal to expand V zones.

Tony NIP

就草圖的申述提出意見

TPB/R/S/I-TCV/1-C15

Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

160512-005201-30025

提交限期

Deadline for submission:

13/05/2016

提交日期及時間

Date and time of submission:

12/05/2016 00:52:01

提出此份意見的人士 (下稱「提意見人」)

Person Making This Comment

先生 Mr. Wright FU

(known as "Commenter") hereafter:

與意見相關的草圖

Draft plan to which the comment relates:

S/I-TCV/1

意見詳情

Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
TPB/R/S/I-TCV/1-1 及 TPB/R/S/I-TCV/1-2	把鄉村式發展的土地擴大並無助解決香港現時的房屋問題，並會進一步破壞東涌河和東涌谷內農地的生態。
TPB/R/S/I-TCV/1-3 至 TPB/R/S/I-TCV/1-9 (除TPB/R/S/I-TCV/1-8)	如把現時在區內非法營運中的骨灰龕場劃入「政府、機構或社區」土地用途，等於把現時的骨灰龕場合法化，有轉移視線之嫌。而骨灰龕場在春秋二祭也會引來大量人流及車流，不但會加重社區設施的負荷，亦會對東涌谷的自然生態環境帶來負面影響

就草圖的申述提出意見

Comment on Representation Relating to Draft Plan

TPB/R/S/I-TCV/1-C 16

參考編號

Reference Number:

160512-005306-44004

提交限期

Deadline for submission:

13/05/2016

提交日期及時間

Date and time of submission:

12/05/2016 00:53:06

提出此份意見的人士 (下稱「提意見人」)

Person Making This Comment

先生 Mr. 5103

(known as "Commenter") hereafter:

與意見相關的草圖

Draft plan to which the comment relates:

S/I-TCV/1

意見詳情

Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
TPB/R/S/I-TCV/1-1 1	認同該申述人士對設立河畔公園的支持，惟所有在東涌谷內的房屋發展應予以取消，以更好的保育東涌谷內的自然生態。而且，現時建議在東涌谷內的房屋發展項目，以私人住宅為主，密度亦不高，無助解決基層人士的住屋需要
TPB/R/S/I-TCV/1-1 2及 TPB/R/S/I-TCV/1-1 4	政府不應為了照顧原居民的利益，而犧牲對環境保護而作出的規劃規管

寄件者: [REDACTED]
寄件日期: 11日05月2016年星期三 14:04
收件者: Town Planning Board
副本: Ian Brownlee
主旨: Tung Chung Valley OZP : Comments on Representation No. 11
201605111343.pdf

TPB/R/S/I-TCV/1-C 17

Dear Sir

Please see the attached letter for your action.

Regards
Anna Wong

MASTERPLAN LIMITED

Planning and Development Advisors

領賢規劃顧問有限公司

11 May 2015
Our Ref. MP/TCV/1

By Fax and Email

The Secretary,
Town Planning Board
15/F, North Point Government Offices,
333 Java Road,
North Point.

Dear Sir,

Draft Tung Chung Valley Outline Zoning Plan Number S/I-TCV/1

Comment on Representation

We are authorised by Forestside Limited to submit this in relation to Representation No. 11.

We support the view expressed in the Representation about the designation of extensive area of land for flood control. The government should inform the public whether alternative flood control methods had been explored and provide more detailed explanation why such land extensive system is adopted.

Land is a scarce resource in the territory. Development potential of land parcels in new development area should be optimized, especially those within 500m from the future railway terminus station. This is in line with the Transit-oriented Development planning concept.

It is considered that sites zoned OU(Stormwater Attenuation and Treatment Ponds) within 500m from the future railway station should be zoned for development use. Relocating such attenuation and treatment ponds underneath the land zoned "Open Space" to the east of the Tung Chung Stream is a possible way of better utilize the scarce land resource.

We also support the view that the Government should acquire the land zoned for "OU(River Park)" and "Conservation Area", taking up the ownership for management responsibility. Land zoned "Coastal Protection Area" should also be taken up by the Government. This would also help speeding up the realization of the planning intention of the Tung Chung Valley area.

Yours faithfully,



I. T. Brownlee,
For and on behalf of
Masterplan Limited

Cc Client

MASTERPLAN LIMITED

Planning and Development Advisors

領賢規劃顧問有限公司

11 May 2015
Our Ref. MP/TCV/1

By Fax and Email

The Secretary,
Town Planning Board
15/F, North Point Government Offices,
333 Java Road,
North Point.

Dear Sir,

Draft Tung Chung Valley Outline Zoning Plan Number S/I-TCV/1

Comment on Representation

We are authorised by Forestside Limited to submit this in relation to Representation No. 11.

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We also support the view that the Government should acquire the land zoned for "OU(River Park)" and "Conservation Area", taking up the ownership for management responsibility. Land zoned "Coastal Protection Area" should also be taken up by the Government. This would also help speeding up the realization of the planning intention of the Tung Chung Valley area.

Yours faithfully,



I. T. Brownlee,
For and on behalf of
Masterplan Limited

Cc Client

tpbd

寄件者: Miffy Ng [REDACTED] TPB/R/S/I-TCV/1-C18
寄件日期: 13日05月2016年星期五 20:41
收件者: tpbd
主旨: DHK Comment on Representation of Draft Tung Chung Outline Zoning Plan No. S/I-TCV/1, S/I-TCE/1 & S/I-TCTC/21
附件: 20160513 DHK Tung Chung OZP_Comment on Representation.pdf

Dear sirs,

Attached please find our comment on the captioned.

Best Regards,

Miffy, Ng Chun Wing

Project Officer

Designing Hong Kong Limited

Tel: [REDACTED]

Fax: 2187 2305

Unit 7, 5/F, Eastern Harbour Centre, 28 Hoi Chak Street, Quarry Bay, Hong Kong

Website: <http://www.designinghongkong.com/>

Facebook Page: <https://www.facebook.com/DesigningHongKong>

創建 Designing Hong Kong 香港.com

Hong Kong, 13 May 2016

Chairman and Members
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245
Email: tpbpd@pland.gov.hk

Dear Sirs,

Re: Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1,
Draft Tung Chung Extension Area S/I-TCE/1, and
Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21
Comments on Representations

Designing Hong Kong Limited is concerned over the captioned draft Outline Zoning Plans:

Draft Tung Chung Extension Area S/I-TCE/1

We are concerned over Representations No. 5-11, 13-14:

- The general public opposes to the proposed marina at the waterfront open space as it would privatize the public space. The plan should specify that the typhoon shelter and surrounding land are for public uses.

Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 and Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21

We support Representations No. 28, 30, 33 in OZP No S/I-TCV/1 and Representations No. 20, 22- 27 in OZP No. S/I-TCTC/21:

- We have serious concerns over incompatible developments and vandalism in Tung Chung River Valley. Over the past decades, green groups have observed a proliferation of these cases along the Valley. In 2015 approximately 13% of the land has been filled with waste and covered with unauthorized structures. With the proposed increase of construction waste disposal charges, the vandalism situation may get more serious. In the EIA report and Outline Zoning Plan, the road has been proposed to extend to Lam Che and Nam Yuen, which will certainly create more opportunities for vandalism. We worry that eco-vandalism situation will extend to areas which are not protected under any Development Permission Area Plan.
- Tin Sam* and *Wong Lung Hang* should be covered with Development Permission Area Plans or incorporated in the Country Park otherwise these will become enclaves without effective land use control.

We object to Representation No. 2 in OZP No. S/I-TCTC/21:

- We object to the expansion of "V" zones, and we are concerned with amendment C and object to amendment R3, the areas zoned for small houses development should be limited to previous "V-zone" plus a reserve for approved small house applications only.

Here we submit for your consideration.
Designing Hong Kong Limited
May 2016

Unit 7, 5/F, Eastern Harbour Centre, 28 Hoi Chak Street, Quarry Bay,
Tel: +852 3104 3107 Fax: +852 2187 2305

t: d

寄件者: Mark Mak [REDACTED]
寄件日期: 13日05月2016年星期五 23:26
收件者: tpbpd
副本: Green Sense環保觸覺
主旨: S/I-TCE/1、S/I-TCTC/21、S/I-TCV/1號草圖_環保觸覺意見書
件: 東涌三草圖_環保觸覺意見書_20160513.pdf

TPB/R/S/I-TCV/1-C19

To: Town Planning Board

Please find attached Green Sense's comment.

Regards
Green Sense



環保觸覺
Green Sense

電話：8100 4877
傳真：3011 9577
地址：荃灣郵政信箱 454 號

電郵：info@greensense.org.hk
網頁：www.greensense.org.hk

致 城市規劃委員會

有關：S/I-TCE/1、S/I-TCTC/21、S/I-TCV/1 號草圖

環保觸覺意見書

環保觸覺（本會）就上述各草圖的申述提出意見如下：

總括

本會認為從申述中可見，各草圖的支持意見少，反對及提出改善意見較多，城規會應考慮民意，就草圖研究及將各申述人士，特別是環保團體及環團的聯署，所提出的有力意見及理據，納入草圖之中。

大嶼山是香港珍貴自然環境的所在，東涌的發展及改變勢必為大嶼山的自然環境帶來不同的影響，當局必須小心考慮，於規劃實踐「可持續發展」，為下一代保留適宜居住的環境。

本會認為城規會有責任要求規劃署與相關部門，向城規會提供其就申述及或意見所作回應的理據所依賴的文件，及將該得文件全面公開，否則所有的討論只會是「空中樓閣」，申述人士無法檢視改劃的理據，亦將不能作出有效回應及陳詞，是有違城規會條例諮詢程序的精神。

本會曾就草圖向城規會作出申述，希望重申本會關注香港整體及東涌環境承載力的立場。當政府至今未有完整及合理的人口規劃，本會及廣大市民實在難以支持犧牲環境及生活空間作所謂的住屋用途。

S/I-TCE/1

本會反對 TPB/R/S/I-TCE/1-2 的申述，認為草圖中的遊艇停泊處將會帶來更多船



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隻進出海域，有機會對海洋生態做成影響，應取消遊艇停泊處；認同 TPB/R/S/I-TCE/1-52 等團體提出的反對意見，特別是將整個大嶼山都納入陸上及海洋生態基線調查研究的要求，為規劃提供更多科學數據。

S/I-TCTC/21

本會反對 TPB/R/S/I-TCTC/21-2 擴大黃泥屋的「鄉村式發展」地帶的意見，認為在香港政府未有為丁屋政策提出改善之前，為保障香港環境，不應增加「鄉村式發展」面積；對 TPB/R/S/I-TCTC/21-3 提及增加房屋用地有極大保留，因為本會重申香港未有長遠的人口計劃，未有科學及認可的評估就增加房屋用地是不智；同意 TPB/R/S/I-TCTC/21-20 等環保團體提出的意見，特別因應近月香港各處以「倒垃圾／泥頭」方式破壞環境的行動愈多，當局應採用申述中提及的方法，更有力地保護自然。

S/I-TCV/1

本會重申東涌河是香港愈來愈少擁有自然出海口的淡水河流，當局應先進行保育，才考慮是否及如何進行必要的發展。本會同意 TPB/R/S/I-TCV/1-35 等的意見，極之擔心住宅和鄉村式發展對東涌河、谷及灣生態的影響。有鑑過去經驗，當局提出的保育措施非常不足，及往往未能如實實踐，本會強烈要求當局於今次改劃的回應中提出比以往更實在及經大眾接受的條款及承諾。請城規會認真考慮各環團提出的意見和要求。

如有任何回覆，請致電 8100-4877 或電郵至 info@greensense.org.hk 與本會聯絡。

環保觸覺

二零一六年五月十三日

Town Planning Board

**Response to representations made on the
draft Tung Chung Valley OZP No. S/I-TCV/1**

Submitted by

**Kevin Laurie,
Independent Horseshoe Crab Researcher,
Hong Kong**

11 May 2016



COVERING LETTER

Chairman and Members, Town Planning Board,

Response to Gist of Representations in respect of draft TCV OZP S/I-TCV/1

This submission is made in response to the Gist of Representations published in respect of the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1.

Tung Chung is important because the lower reaches of the Tung Chung River Valley (the subject of OZP No. S/I-TCV/1) is a critical spawning ground and nursery site for the Mangrove horseshoe crab, Tung Chung bay is a critical spawning ground and nursery site for the Chinese horseshoe crab and protecting these locations is vital to ensure the long term survival of these two species in Hong Kong.

This submission is made in response to the following comments made in the representations:

- concern about the overall capacity of Tung Chung area with the planned increase in population (TPB/R/S/I-TCV/1-29)
- the ecology and the value of Tung Chung Stream should be considered as a whole river system (TPB/R/S/I-TCV/1- 15 to 21) and regard the river system as a whole in assessing the ecological value (TPB/R/S/I-TCV/1-29).
- make use of the ecology of Tung Chung Valley for eco-education (TPB/R/S/I-TCV/1- 15 to 21)
- provision of community facilities and employment opportunity (TPB/R/S/I-TCV/1-35).
- support the proposal of "Tung Chung Stream Nature River Park" (TPB/R/S/I-TCV/1-35)
- designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education)".

This submission is based on proposals that were submitted in response to the Lantau Development Plan consultation exercise, in which it was proposed to construct a continuous boardwalk through the Tung Chung River Valley and across the mudflat at Tung Chung, to provide an educational, community, Green Group and tourism resource.

As you will note, Tung Chung Bay has already over-exceeded its visitor receiving capacity and more visitors or any additional population in Tung Chung will only worsen this situation.

This submission therefore urges you to protect the lower reaches of the Tung Chung River Valley with a status compatible with protecting its biodiversity, at the same time allowing for the construction of the proposed boardwalk.

SUBMITTED BY

Kevin Laurie.
Independent Horseshoe Crab Researcher,
Hong Kong
Email: [REDACTED]
Mobile: [REDACTED]

In making this submission, I give my consent to the TPB and the Government of the HKSAR to
partially or wholly publish my comments
(including my personal details).

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EXECUTIVE SUMMARY

HORSESHOE CRAB CONSERVATION CONCERNS

Tung Chung is important to horseshoe crabs because:

- the lower reaches of Tung Chung River Valley (the subject of OZP No. S/I-TCV/1) is a critical spawning ground and nursery site for Mangrove horseshoe crabs;
- Tung Chung bay is a critical spawning ground and nursery site for Chinese horseshoe crabs;
- protecting this area is vital to ensuring the long term survival of these two species in Hong Kong.

However, rather than object to development proposals in Tung Chung, this submission recommends an approach in which:

- these spawning grounds/nursery areas are incorporated in the development plans;
- development complements conservation;
- conservation complements development;

REPRESENTATIONS BEING RESPONDING TO

Comments are made in response to the following representations made in respect of the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1:

- concern about the overall capacity of Tung Chung area with the planned increase in population (TPB/R/S/I-TCV/1-29)
- the ecology and the value of Tung Chung Stream should be considered as a whole river system (TPB/R/S/I-TCV/1- 15 to 21) and regard the river system as a whole in assessing the ecological value (TPB/R/S/I-TCV/1-29).
- make use of the ecology of Tung Chung Valley for eco-education (TPB/R/S/I-TCV/1- 15 to 21)
- provision of community facilities and employment opportunity (TPB/R/S/I-TCV/1-35).
- support the proposal of "Tung Chung Stream Nature River Park" (TPB/R/S/I-TCV/1-35)
- designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education)" (TPB/R/S/I-TCV/1-32).

THIS SUBMISSION

This submission addresses these issues as follows:

Concern about the overall capacity of Tung Chung area

As you will note, Tung Chung Bay has already over-exceeded its visitor receiving capacity and any additional population in Tung Chung will only worsen this situation.

To alleviate this problem, it is proposed a continuous boardwalk be constructed through the Tung Chung River Valley and across the mudflat at Tung Chung, so that visitors can enjoy the area, without destroying it.

The ecology and the value of Tung Chung Stream should be considered as a whole river system

Constructing a continuous boardwalk through the Tung Chung River Valley and across the mudflat at Tung Chung will treat the 'Tung Chung Stream' as a whole river system.

This will meet the Lantau Development Plan goals of adopting a "point-line-plane" approach linking up places of conservation value to attract visitors and add value to the River Cum Biodiversity Park, which has already been proposed for the area.

Make use of the ecology of Tung Chung Valley for eco-education

Constructing a continuous boardwalk linking the River Cum Biodiversity Park with the inter-tidal mudflat at Tung Chung will provide an unrivalled eco- education resource in Hong Kong.

Provision of community facilities and employment opportunity

Constructing a continuous boardwalk linking the River Cum Biodiversity Park with the inter-tidal mudflat at Tung Chung will provide a community resource for local families to enjoy and will help create local job opportunities.

Support the proposal of "Tung Chung Stream Nature River Park"

This proposal supports the Lantau Development Plan for a River Cum Biodiversity Park at Tung Chung and complements it by extending the park to incorporate the inter-tidal mudflat into the plan.

Designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education)"

Conservation, Ecotourism and Ecological Education can be achieved only if the lower reaches of the Tung Chung River Valley are afforded appropriate protections to protect the biodiversity there, at the same time allowing visitors to access the area without destroying it, which can be achieved with the construction of a boardwalk.

Horseshoe crabs in Hong Kong

‘The Science’

HORSESHOE CRAB OVERVIEW

HORSESHOE CRAB SPECIES

There are four species of horseshoe crab living today:

- *Limulus polyphemus*;
- *Tachypleus tridentatus*;
- *Tachypleus gigas*;
- *Carcinoscorpius rotundicauda*.

Limulus occurs along the east coast of the USA and Mexico. The other three species occur in South-East Asia. *Tachypleus tridentatus*, the Chinese horseshoe crab and *Carcinoscorpius rotundicauda*, the Mangrove horseshoe crab are found in Hong Kong.

HORSESHOE CRAB RELATIVES

Horseshoe crabs are an ancient animal group which belong to the Phylum Arthropoda, Subphylum Chelicerata, Class Merostomata. Despite their name, they are not true crabs but are more closely related to scorpions, spiders and ancient sea scorpions.

LIVING FOSSILS

Horseshoe crabs are considered to be 'living fossils' because their fossil relatives are recognized as far back as the Late Ordovician Period, about 475 million years ago, and modern-day horseshoe crabs have a body structure that dates back to the Jurassic Period, from 200 million to 146 million years ago (Rudkin and Young 2009).

MAJOR VALUE TO HUMANS

Horseshoe crabs famously have 'blue blood'. In the 1950's it was observed that horseshoe crab blood clotted when exposed to bacterial endotoxins, even in incredibly small amounts. From this basic observation, a reagent called *Limulus* Amoebocyte Lysate (LAL) was developed that can detect minute levels of bacterial contamination.

LAL is now used worldwide to test injectable drugs, biomedical devices and instrumentation used in the pharmaceutical industry and the Food and Drug Administration (FDA) in the USA requires that all medical devices be pre-screened using the LAL test prior to use on humans.

HORSESHOE CRABS IN HONG KONG

There are two species of horseshoe crab in Hong Kong:



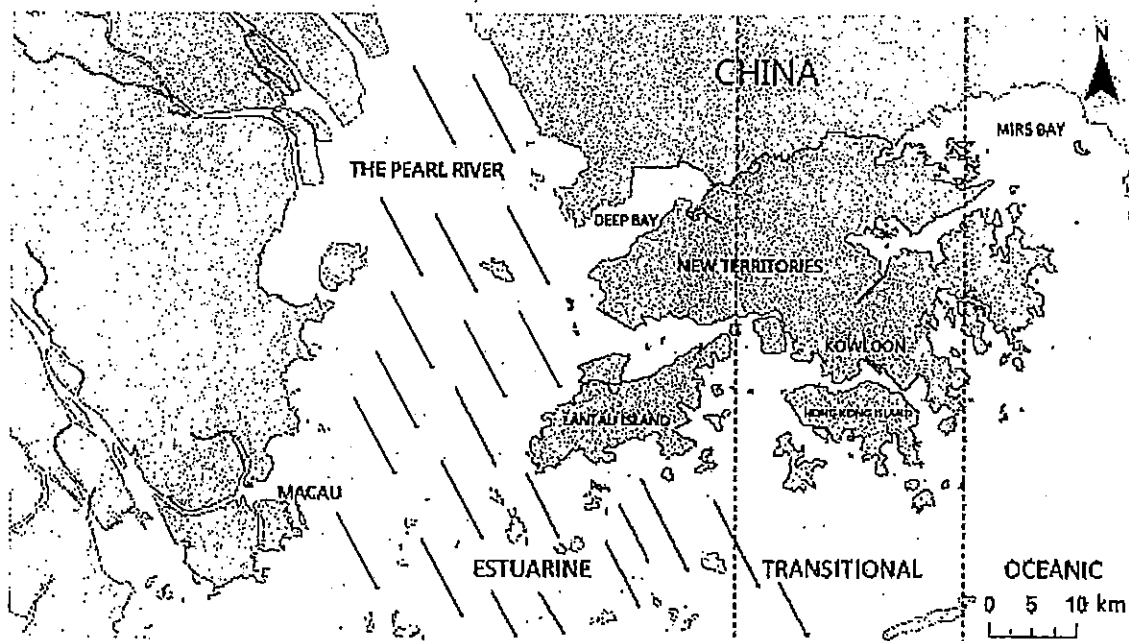
Chinese horseshoe crab (*Tachypleus tridentatus*).



Mangrove horseshoe crab (*Carcinoscorpius rotundicauda*).

FACTORS AFFECTING HORSESHOE CRAB DISTRIBUTION IN HONG KONG

Hong Kong's waters can be divided into three hydrographic zones based on the influence of the Pearl River, which discharges into the western waters of Hong Kong. These divisions are the estuarine west, a central transition zone and the oceanic east (HKRMS).



CHINESE HORSESHOE CRABS

Chinese horseshoe crabs favour estuarine waters, explaining why they are predominantly found on the west side of Hong Kong. Chinese horseshoe crab spawning grounds and nursery beaches in Hong Kong are now restricted to the shore of Deep Bay and select bays and inlets on Lantau. Their young forage on sandy substrate.

MANGROVE HORSESHOE CRABS

Mangrove horseshoe crabs are associated with mangroves, so they are more widely distributed than the Chinese horseshoe crab. Their young forage in mangroves and on the muddy shores surrounding mangroves and they frequently share the same mudflats as the Chinese horseshoe crab. Mangrove horseshoe crabs are found in both eastern and western waters and for a number of reasons, they are less threatened in Hong Kong than the Chinese horseshoe crab.

COMMENT

The importance of Lantau to the survival of Chinese horseshoe crabs in Hong Kong can clearly be seen from this map. Both species inhabit Tung Chung.

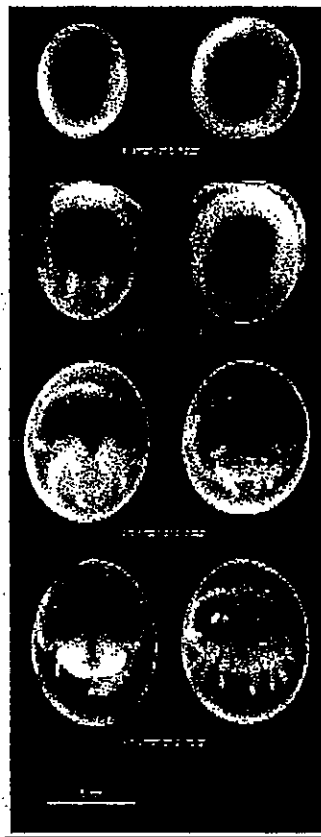
EARLY HORSESHOE CRAB DEVELOPMENT STAGES

All horseshoe crab species have specific and specialized habitat requirements during different stages of their life cycles, related to:

- spawning and larval development;
- juvenile development;
- adulthood.

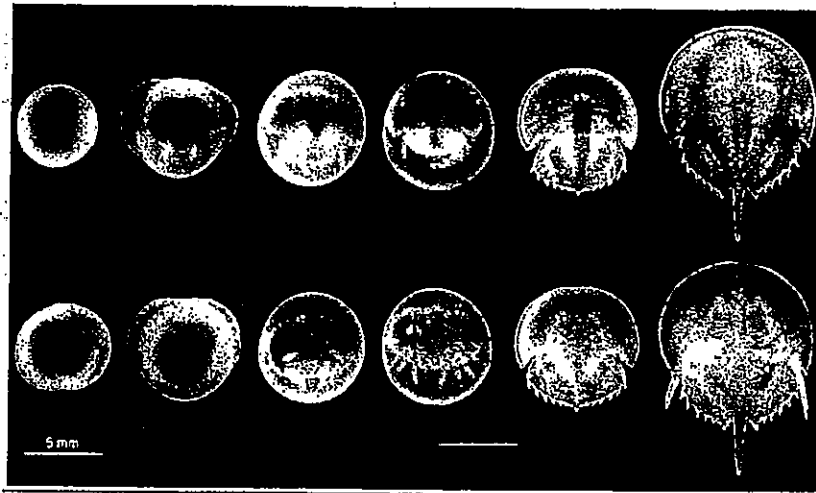
It is the close proximity of these three differing habitats to meet the demands of the different stages of development that is critical to their survival needs, and if either the spawning grounds or juvenile development areas are lost, then the entire habitat suite is lost.

DEVELOPMENT IN THE EGG



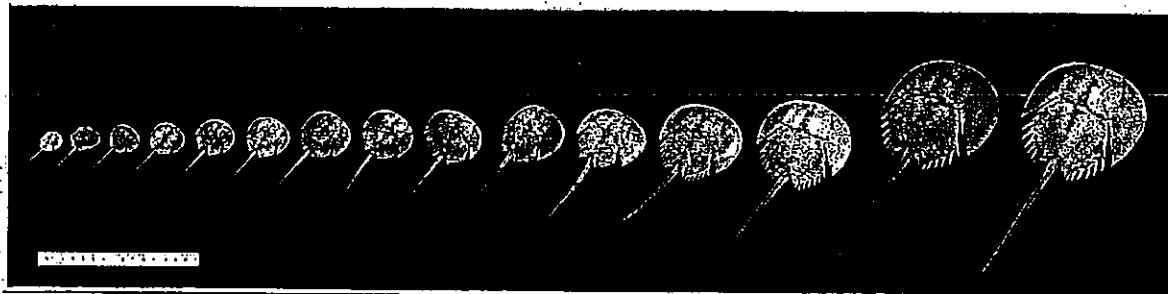
Juvenile horseshoe crabs start life by developing in their eggs (William Lau).

DEVELOPMENT IN THE SPAWNING AREA



Juvenile horseshoe crabs develop in their eggs first, then after hatching they continue to develop in the spawning area (William Lau).

JUVENILE DEVELOPMENT ON INTER-TIDAL MUDEFLATS



After developing in the spawning area for about 6 weeks, the juveniles move to inter-tidal mudflats for the juvenile stages of their development.

This is a growth range of juvenile Chinese horseshoe crab molts collected from the beaches of Ha Pak Nai in Deep Bay.

Each moult represents one stage of growth or instar and the Chinese horseshoe crab might undergo 18 instar (molting) stages before reaching maturity.

The scale is a 1 foot (30 centimetre) ruler.

CONSERVATION STATUS: CHINESE HORSESHOE CRAB IN HONG KONG

Chinese horseshoe crabs are critically endangered and on the verge of extinction in Hong Kong and without our help, they will go extinct. This assessment is based on the following information:

LIFE CYCLE

All horseshoe crab species have specific and specialized habitat requirements during different stages of their life cycles, related to:

- spawning and larval development;
- juvenile development;
- adulthood.

It is the close proximity of these three differing habitats to meet the demands of the different stages of development that is critical to their survival needs, and if either the spawning grounds or juvenile development areas are lost, then the entire habitat suite is lost.

HISTORIC SITUATION

Chinese horseshoe crabs were once widely distributed and abundant in western waters and research suggests Hong Kong was once a haven for them.

WHAT HAS LEAD TO THEIR DECLINE?

A combination of factors has lead to the decline of Chinese horseshoe crabs in Hong Kong, all based on their habitat choices:

Spawning habitat

- where possible, Chinese horseshoe crabs spawn along high tide lines. If these are not available, they will spawn in marginal habitats, such as sand banks in stream beds;
- young horseshoe crabs develop in their eggs and for about 6 weeks after hatching they continue to develop in the spawning area, before moving to inter-tidal mudflats for the juvenile stages of their development;
- coastal reclamation and development have destroyed many of their spawning and juvenile foraging grounds and the lower reaches of many streams have been revetted to improve drainage.

Juveniles and juvenile habitat

- after leaving the spawning area, the juveniles spend the next 15 to 16 years foraging on nearby inter-tidal mudflats, passing through 18 instar or growth stages to become adults;

- juvenile Chinese horseshoe crabs live on sandy sediments near stream mouths, which is also favoured by clams and razor shells;
- after reclamation, the single biggest threat to juvenile horseshoe crabs in Hong Kong is from clam digging. Inter-tidal mudflats are ecologically sensitive, so even walking on them can cause considerable damage;
- of major concern are the results from recent population surveys, which show that new recruits of 1st to 3rd instars are seldom encountered on Hong Kong shores now. This is extinction in action!

Adults and adult habitat

- In the 1970's, the local fishing fleet was upgraded to using trawlers, making the adult horseshoe crab habitat on the sea bed vulnerable to fishing and between 1980 and 2001, much of the adult Chinese horseshoe crab population was caught as by-catch and sold;
- Whilst the trawling ban in 2012 was positive news for adult Chinese horseshoe crabs, the current use of mono-filament nets across stream mouths at high tides often coincides with their peak spawning and if spawning females are caught, they often die from struggling in fishing nets, or if they survive, they are frequently sold, so the remaining adult population is gradually being 'fished out'.

CURRENT CONSERVATION SITUATION

Horseshoe crabs are not protected and no habitats have been dedicated to horseshoe crab conservation in Hong Kong. Based on the evidence of reproductive activity and juvenile population counts, the Chinese horseshoe crab is commercially extinct in Hong Kong and facing considerable threats to its future survival.

Historic records suggest Chinese horseshoe crabs were widespread and common in Hong Kong, but recent survey data shows they are now only found at:

- Pak Nai, Tung Chung Bay, Shui Hau, Yi O and the north shore of Lantau (San Tau, Sha Lo Wan and Sham Wat).

There are now the only remaining Chinese horseshoe crab spawning and nursery locations left in Hong Kong. These are, in order of conservation priority:

1. Pak Nai;
2. Tung Chung;
3. Shui Hau;
4. Yi O;
5. North shore of Lantau.

As can be seen, four out of these five locations are on Lantau and three out of the five, Tung Chung, Shui Hau and Yi O are now subject to development proposals under the Lantau Development Plan.

This further shows the importance of adopting appropriate protection measures at Tung Chung.

SPECIES RECOVERY PLAN

In 2005, the Ocean Park Conservation Foundation (OPCF) sponsored City University of Hong Kong to develop a breed and release programme for Chinese horseshoe crabs as an ex-situ conservation measure in enhancing local populations.

The programme aims to catch mating pairs, let them spawn in the laboratory, then rear the hatched juveniles so they reach a size where they are no longer vulnerable to predation, before releasing them back into the wild. Follow-up field studies using tracking devices have proven the survival and growth of those released juveniles.

The main release beaches have been Ha Pak Nai and Shui Hau, but this programme relies on there being undisturbed mudflats for the juveniles to be released on.

This was the case until recently, but villagers have started promoting clam digging to increase visitor numbers to their villages. Mass clam digging is a recent phenomenon; it used to be restricted to a few villagers on the mudflats of Hong Kong. This is no longer the case.

This Chinese horseshoe crab species recovery plan can be extended to Tung Chung, but only if appropriate measures are put in place to protect the juvenile horseshoe crabs that are released there.

CONSERVATION STATUS: MANGROVE HORSESHOE CRAB IN HONG KONG

Mangrove horseshoe crabs are not as threatened as Chinese horseshoe crabs, but are nevertheless a species of conservation concern in Hong Kong. This assessment is based on the following information:

LIFE CYCLE

Mangrove horseshoe crabs have a similar lifestyle to Chinese horseshoe crabs, except their habitat requirements are tied to mangroves.

HISTORIC SITUATION

The Mangrove horseshoe crab is a more elusive species. It was only 'discovered' in Hong Kong in 1997 and because it spawns in mangroves, which are inhospitable by nature, it has not been widely studied.

Mangrove horseshoe crabs are found in both the eastern and western waters of Hong Kong associated with mangroves and they can frequently be found spawning in the same areas as Chinese horseshoe crabs, although as juveniles, their young forage on muddy substrates.

It is not uncommon to see spawning pairs in certain streams, or find evidence of their presence, usually in the form of dead animals, discarded by fishermen because of their nuisance value – they tangle their fishing nets.

CURRENT CONSERVATION SITUATION

Mangrove horseshoe crabs face lesser threats than the Chinese horseshoe crab in Hong Kong, but still pose cause for conservation concern.

Unlike the Chinese horseshoe crab, which is still kept if an egg-laden female is caught, Mangrove horseshoe crabs have negligible commercial value. Their juveniles forage on mudflats, which are not only lacking in clams, but are also inhospitable places to walk across, so clam diggers do not pose the same threat to them as they do to Chinese horseshoe crabs.

Like Chinese horseshoe crabs, the main threat to adult Mangrove horseshoe crabs is from fishermen who use mono-filament nets across stream mouths at high tides, which often coincides with the peak spawning of Mangrove horseshoe crabs and who kill them because they tangle their nets.

On Lantau, Mangrove horseshoe crabs can be found sharing spawning and nursery grounds with the Chinese horseshoe crab at Tung Chung, Yi O and the beaches on the north shore of Lantau and they are found solely at Tai Ho Wan. Tung Chung, Yi O and Tai Ho Wan are now subject to development proposals under the Lantau Development Plan.

IMPORTANCE OF TUNG CHUNG TO HORSESHOE CRABS IN HONG KONG

A recent scientific paper has proposed three priority areas in Deep Bay, Starling Inlet and Tung Chung to be established as Horseshoe Crab Marine Protected Area's (MPAs)

Biodivers Conserv
DOI 10.1007/s10531-016-1084-z



ORIGINAL PAPER

Present population and habitat status of potentially threatened Asian horseshoe crabs *Tachypleus tridentatus* and *Carcinoscorpius rotundicauda* in Hong Kong: a proposal for marine protected areas

Billy K. Y. Kwan¹ · Hwey-Lian Hsieh² · Siu Gin Cheung^{1,3} · Paul K. S. Shin^{1,3}

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The map below shows the location of the three proposed MPA's, including Tung Chung.

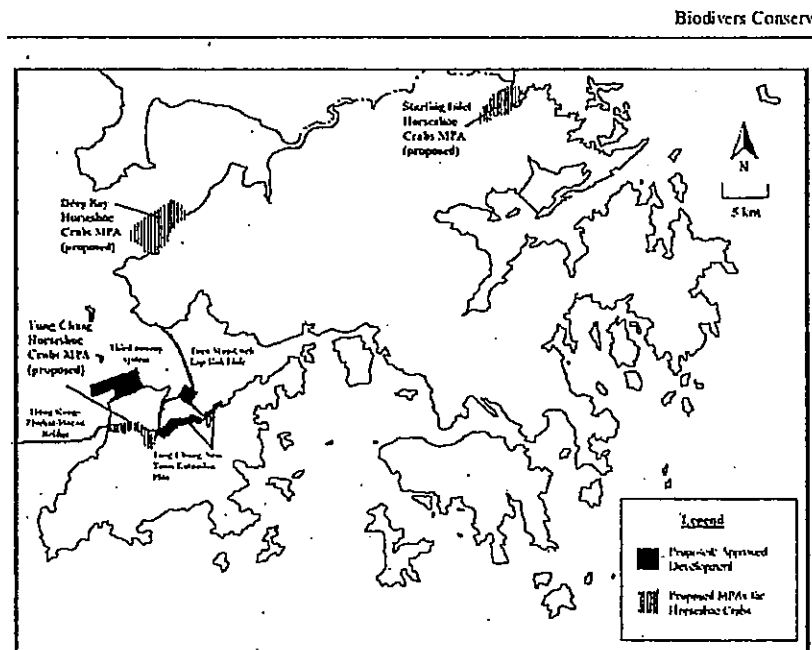


Fig. 3 The locations of the three proposed marine protected areas and the nearby proposed or approved major developments

**‘The Opportunities that exist at
Tung Chung’**

TUNG CHUNG BAY
Natural streams

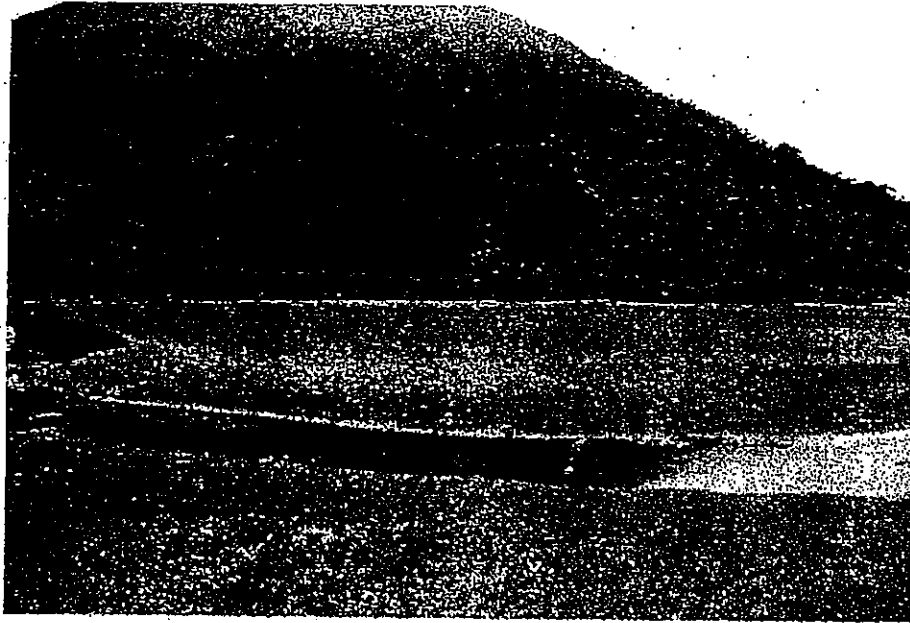


Natural streams feed the mudflat at Tung Chung Bay, bordered by substantial and relatively undisturbed mangrove stands (3 July 2012)

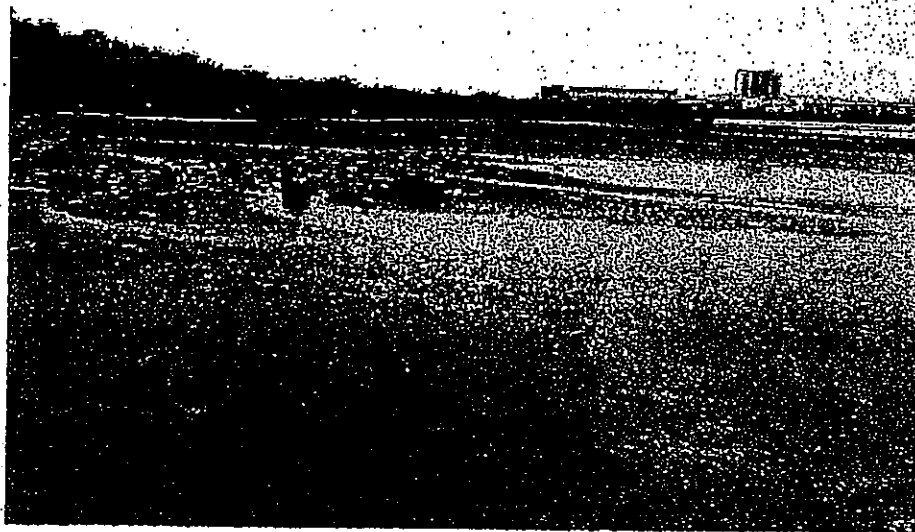


Streams cross the intertidal mudflat at Tung Chung Bay. Horseshoe crabs navigate up the stream beds at high tide to spawn (23 September 2010).

TUNG CHUNG BAY
Intertidal mudflat

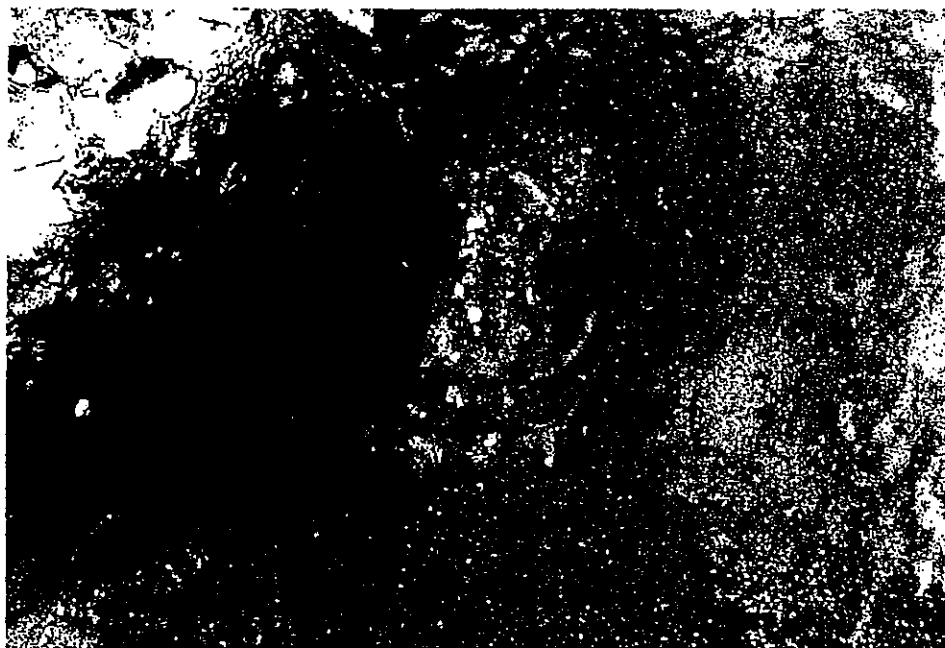


Juvenile Chinese horseshoe crab foraging area on the sandy intertidal mudflat in the centre of Tung Chung Bay (3 July 2012).



Juvenile Mangrove horseshoe crab foraging area on the muddy intertidal mudflat in front of the mangrove stand at the western end of Tung Chung Bay (3 July 2012).

STREAMS DISCHARGE INTO TUNG CHUNG BAY
Mangrove Horseshoe crabs



Mating pair of adult Mangrove horseshoe crab in a stream bed in Tung Chung Bay (3 July 2012).



Juvenile Mangrove horseshoe crab in a stream bed in Tung Chung Bay (3 July 2012).

TUNG CHUNG BAY
Adult Chinese Horseshoe crabs

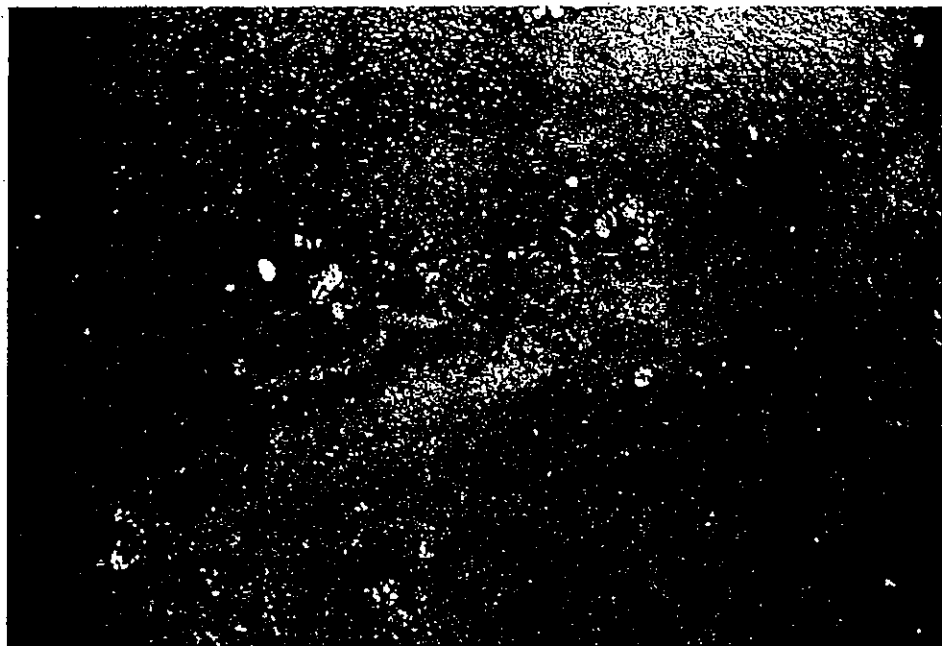


Adult Chinese horseshoe crabs are sometimes seen on the mudflat at Tung Chung
(Jacky Lau, 9 April 2016).



Close-up of the female Chinese horseshoe crab in the picture above
(Jacky Lau, 9 April 2016).

TUNG CHUNG BAY
Juvenile Chinese Horseshoe crabs

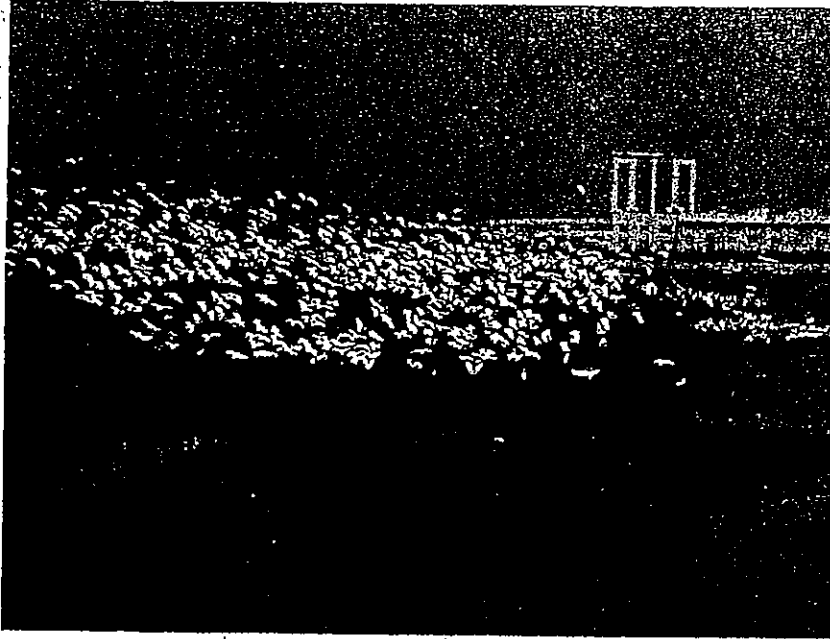


Juvenile Chinese horseshoe crab foraging on the mudflat at Tung Chung (23 September 2010).

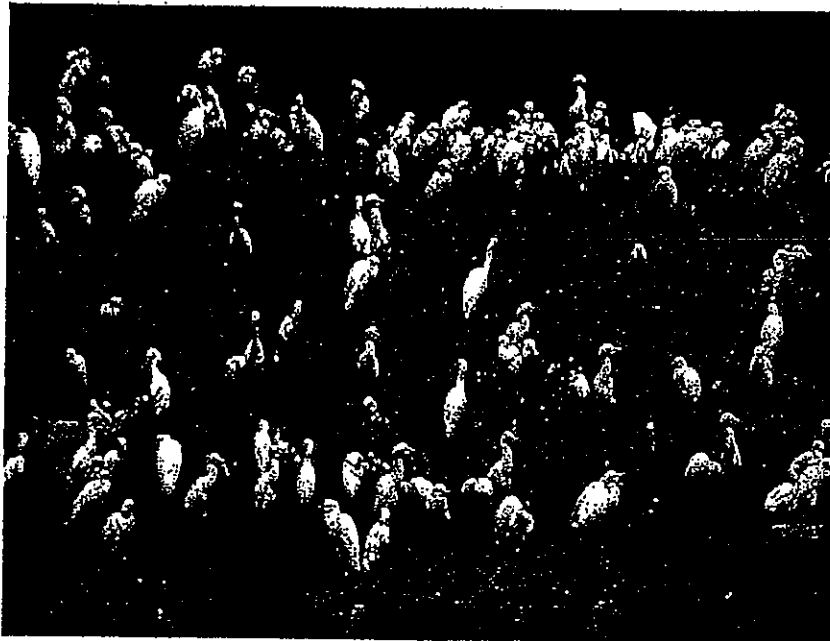


The juvenile Chinese horseshoe crab in the photograph above (23 September 2010).

Egrets at Tung Chung Bay



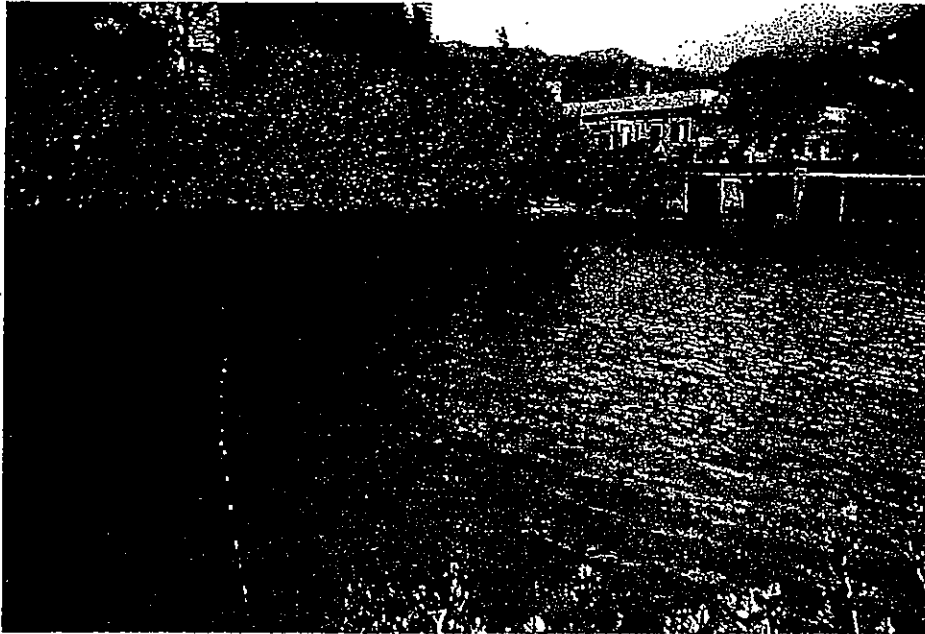
Flock of Egrets at the mouth of the Tung Chung River (Dickson Wong. 24 September 2003)



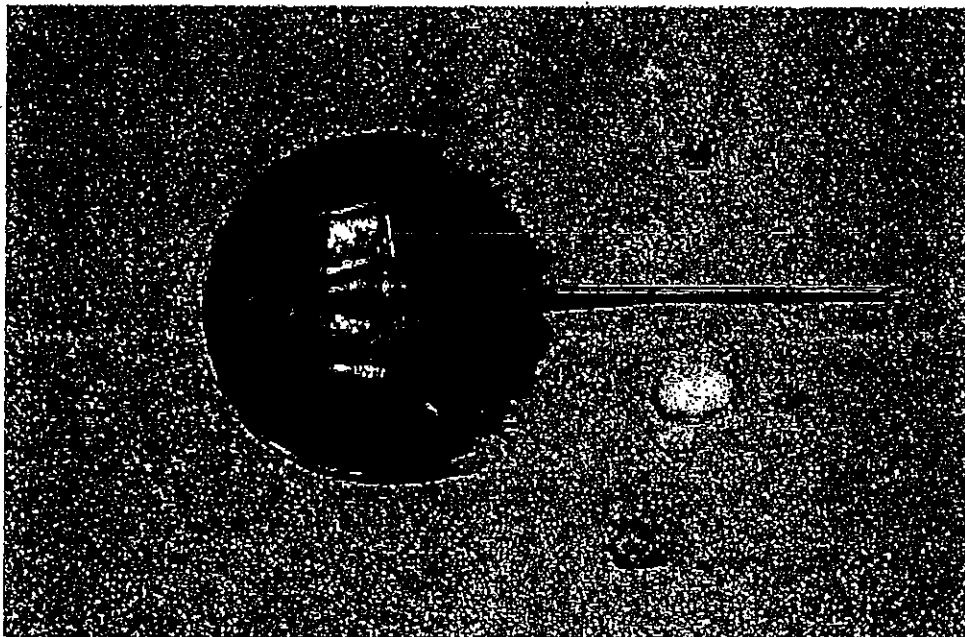
Same flock of Egrets roosting in the Mangroves at the the mouth of the Tung Chung River
(Dickson Wong. 24 September 2003).

‘Threats to biodiversity in the lower Tung Chung River’

Fishing across Tung Chung River mouth using a mono-filament net



A mono-filament fishing net stretched across the mouth of Tung Chung river (6 May 2011).



Adult Mangrove horseshoe crab caught in the net above (6 May 2011).

Bycatch - spawning pairs of Mangrove horseshoe crabs



Mating pair of adult Mangrove horseshoe crabs caught in a mono-filament net across a stream mouth and killed (23 September 2010).

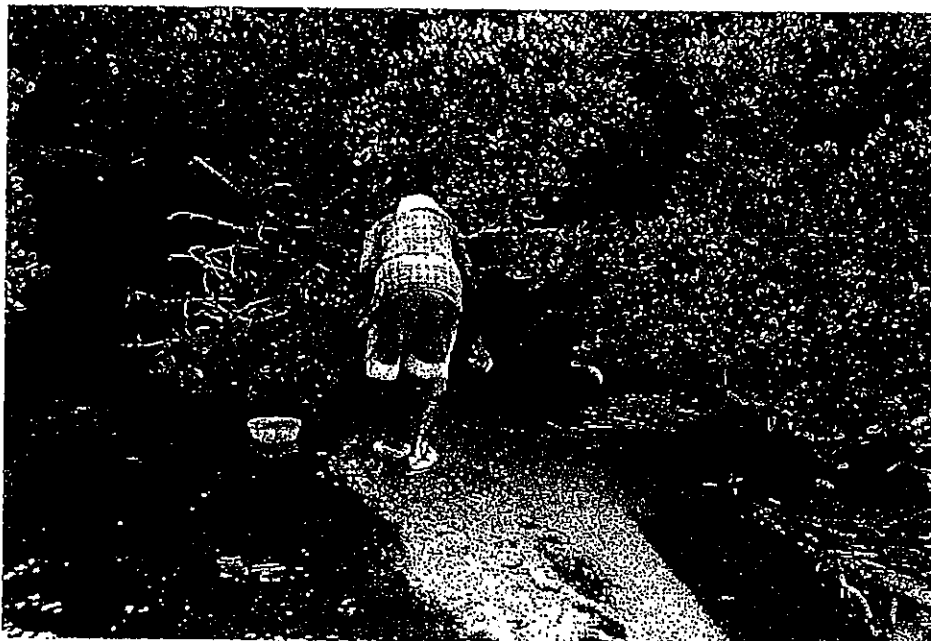


Mating pair of adult Mangrove horseshoe crabs caught in a mono-filament net across a stream mouth and killed (23 May 2013).

Fishing for shrimps in a mangrove stream



Fishing for shrimps in a mangrove stream (23 May 2013).



Fishing for shrimps in a mangrove stream (23 May 2013):

Electric fishing along the banks of the river



Electric fishing along stream banks (23 September 2010).



Electric fishing along stream banks (23 September 2010).

TUNG CHUNG BAY

Mangrove Clam and Snail Collectors Clam diggers pose a real threat to biodiversity



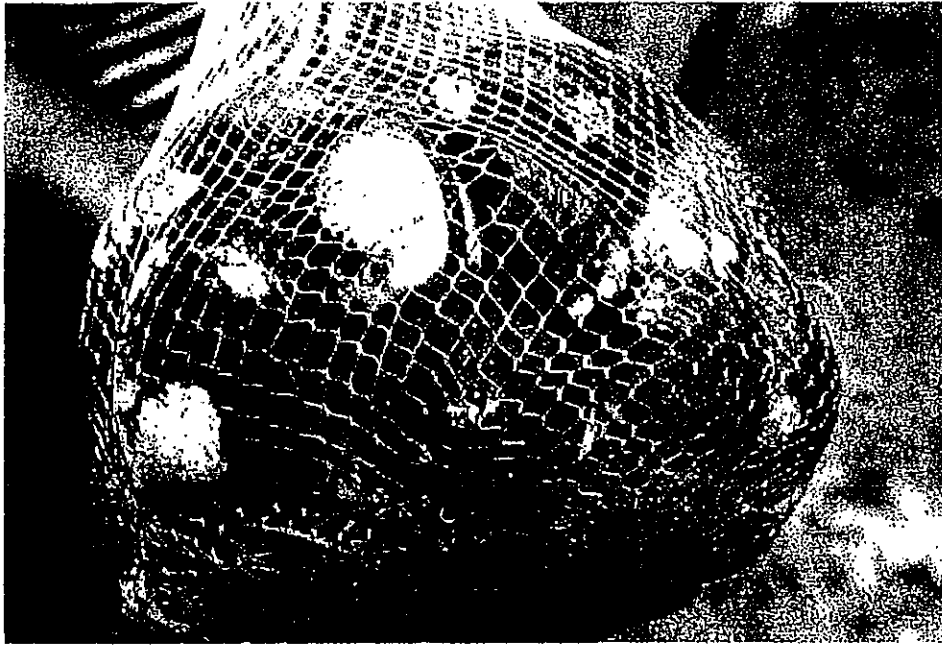
Collecting mangrove clams and gastropods as the tide is receding in the lower reaches of Tung Chung River (6 May 2011).



Collecting mangrove clams and gastropods as the tide has receded (23 September 2010).

TUNG CHUNG BAY

Mangrove Clam and Snail Collectors Clam diggers pose a real threat to biodiversity



Mangrove clams (*Geloïna erosa*) collected by the women on the last page (23 September 2010).



Gastropods collected by the women on the last page (23 September 2010).

**‘Tung Chung Bay has already
exceeded its visitor receiving capacity’**

TUNG CHUNG BAY MUDFLAT
Already exceeded visitor receiving capacity



Cyclist crossing a juvenile horseshoe crab foraging area (19 September 2010).



Cyclist crossing a juvenile horseshoe crab foraging area (6 May 2011).

TUNG CHUNG BAY MUDFLAT
Already exceeded visitor receiving capacity

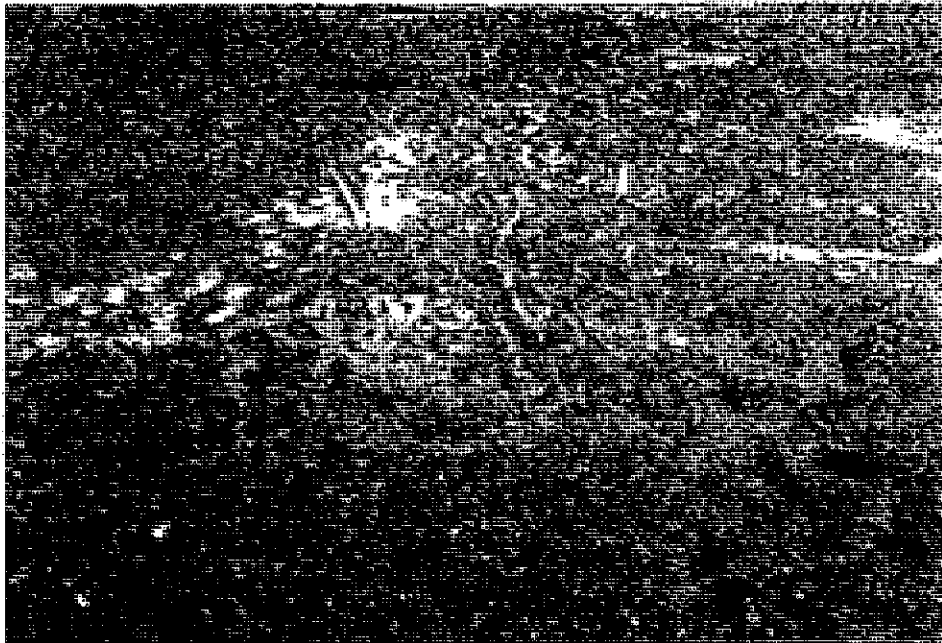


Cycle tracks and footprints on a juvenile horseshoe crab foraging area (3 July 2012).

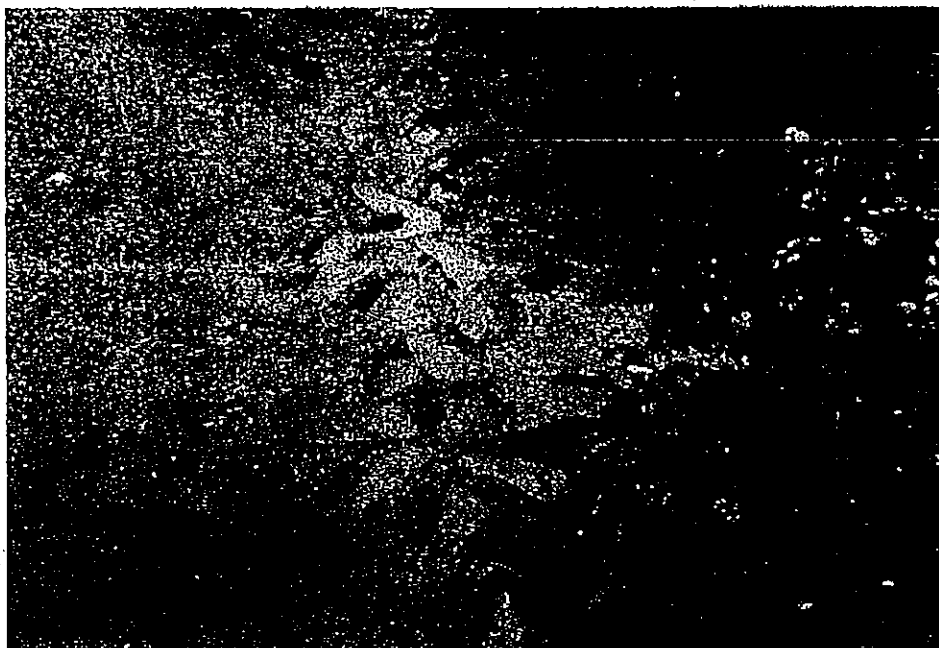


Cycle tracks and footprints on a juvenile horseshoe crab foraging area (23 May 2013).

TUNG CHUNG BAY MUDFLAT
Already exceeded visitor receiving capacity

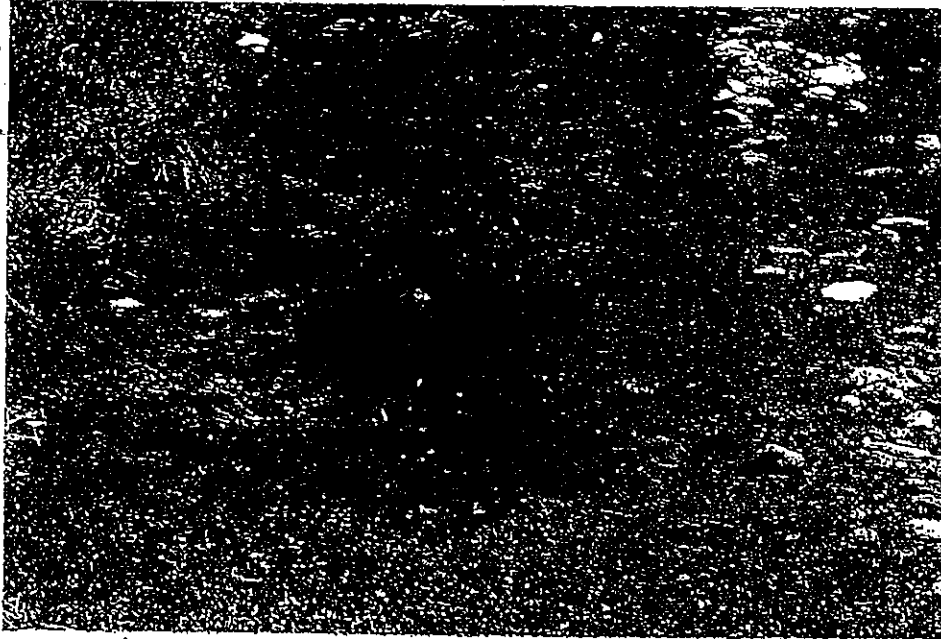


Cycle tracks and footprints on a juvenile horseshoe crab foraging area (23 May 2013).

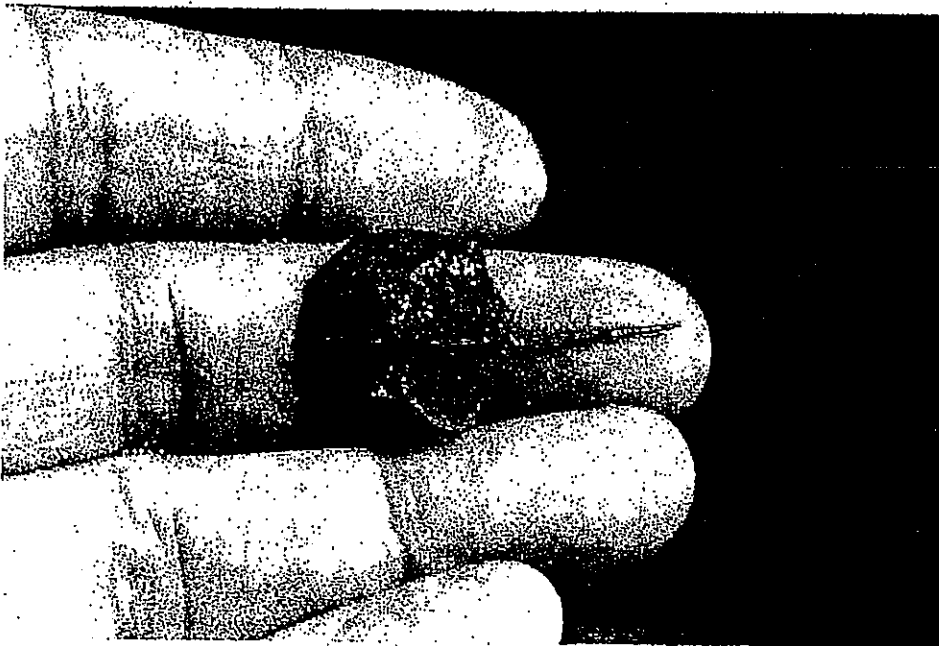


Footprints on a juvenile horseshoe crab foraging area, possibly from a guided nature tour (6 May 2011).

TUNG CHUNG BAY MUDEFLAT
Visitors pose a real threat to juvenile horseshoe crabs



This pool formed in an inter-tidal area on a footpath to the mudflat. Notice the footprints through the pool (3 July 2012).



This juvenile Mangrove horseshoe crab was found foraging in this pool. Juvenile horseshoe crabs of this size are now rarely being found in population surveys (3 July 2012).

TUNG CHUNG BAY MUDFLAT
Clam diggers pose a real threat to juvenile horseshoe crabs

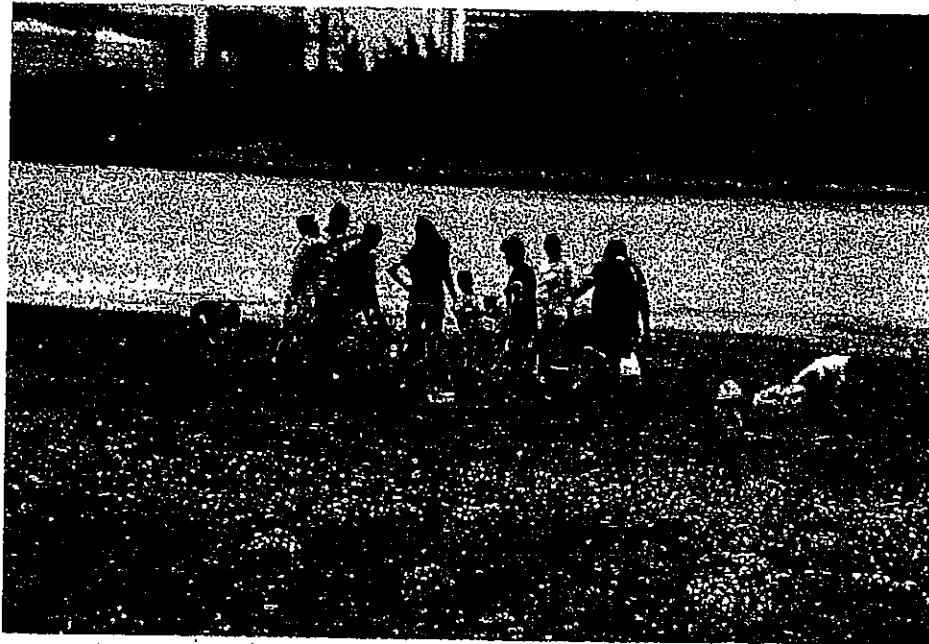


Clam digging on a juvenile horseshoe crab foraging area (3 July 2012).



Clam digging on a juvenile horseshoe crab foraging area (23 May 2013).

TUNG CHUNG BAY MUDFLAT
Clam diggers pose a real threat to juvenile horseshoe crabs



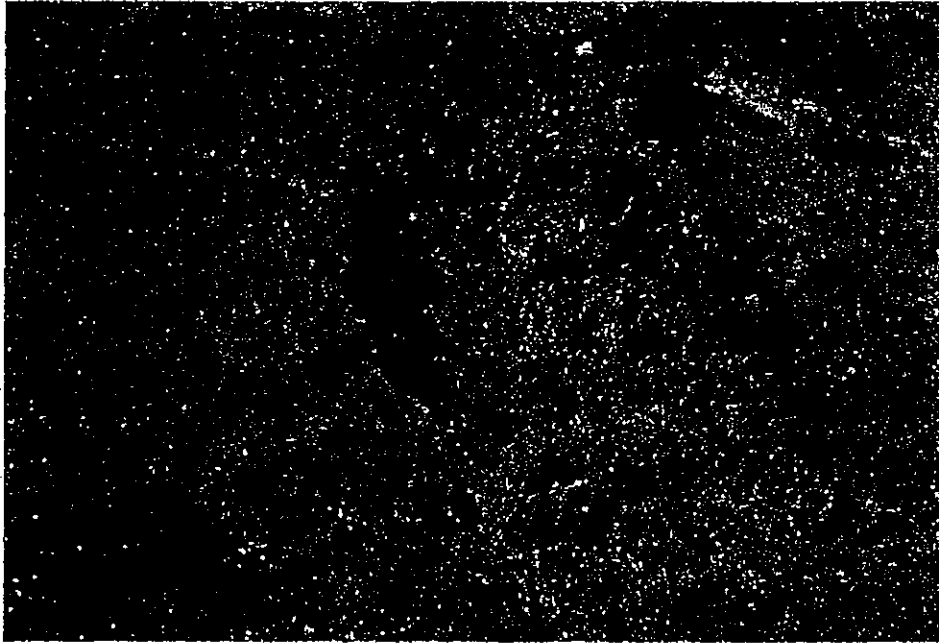
A family clam digging on a juvenile horseshoe crab foraging area (23 September 2010).



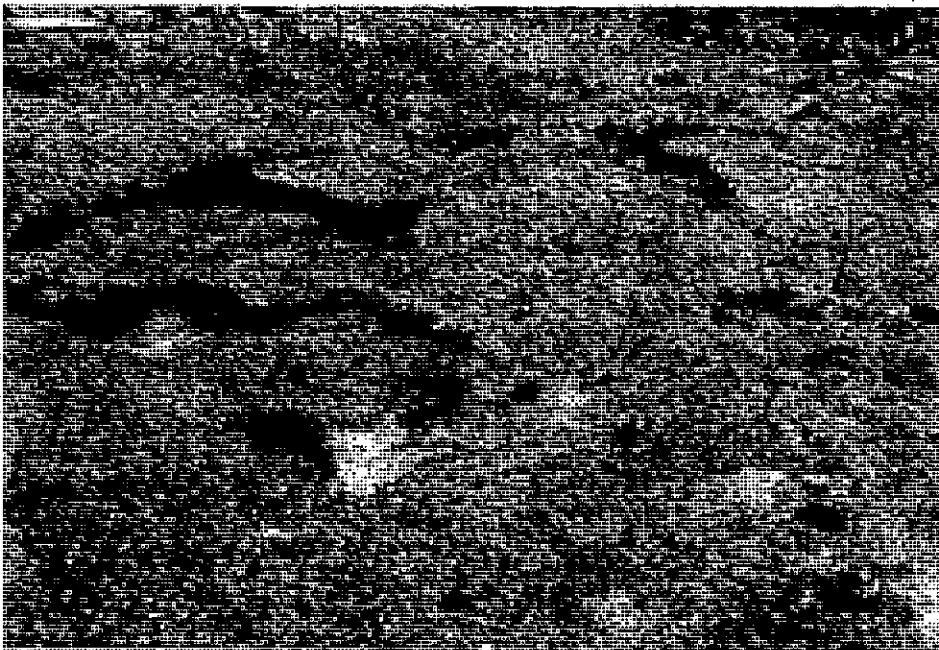
Clam digging excavation on a juvenile horseshoe crab foraging area (23 September 2010).

TUNG CHUNG BAY MUDFLAT

Clam diggers pose a real threat to juvenile horseshoe crabs



Clam digging excavation on a juvenile horseshoe crab foraging area (6 May 2011).



Clam digging excavations on a juvenile horseshoe crab foraging area (6 May 2011).

TUNG CHEUNG BAY
Industrial scale clam diggers on the sub-tidal mudflat



Clam digger heading to the sub-tidal horseshoe crab foraging area (23 May 2013).



Clam digger heading to the sub-tidal horseshoe crab foraging area (23 May 2013).

TUNG CHUNG BAY
Industrial scale clam diggers on the sub-tidal mudflat



Clam diggers heading to the sub-tidal horseshoe crab foraging area (23 May 2013).



Clam diggers on the sub-tidal horseshoe crab foraging area (23 May 2013).

A boardwalk

**‘What the future could look like at
Tung Chung’**

Boardwalk through Tung Chung River Valley

The following proposals are based on activities at Chek Jawa Boardwalk and other visitor facilities in Singapore, which are similar in setting to Tung Chung.



A resource for all ages (Chek Jawa).



Hikers (Chek Jawa).

Boardwalks let you get up close to nature, without destroying it



Curious minds (Chek Jawa).

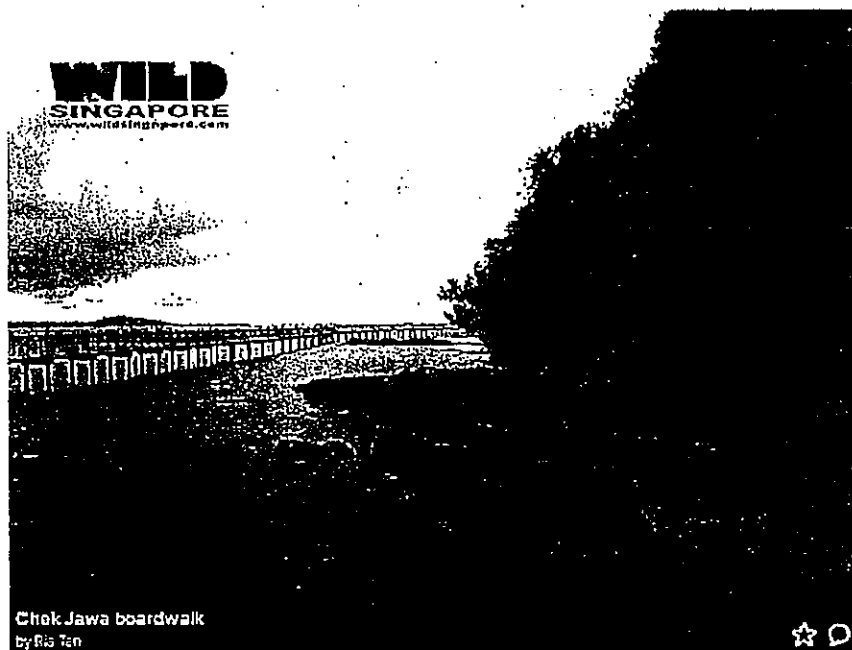


Budding scientists (Chek Jawa).

Boardwalk across the mudflat – continuation of the River Cum Biodiversity Park



Low tide – inter-tidal mudflat viewing (Chek Jawa).



High tide – coastal walkway (Chek Jawa).

An educational resource



School visit (Wild Shores)



Students comparing notes (Wild Shores)

Job opportunities provided by Guided tours by Green Groups

The Naked Hermit Crabs are volunteer guides who lead public walks to conduct free monthly guided tours of Singapore's shores such as Chek Jawa, Pulau Semakau, Kusu Island.

Guided walks are themed towards the water and mud, focusing on children from 7 to 12 years and include tours themed on:

- What's in my Water;
- What's in my Mud;
- Muddy and his home;
- Muddy and his friends.

Green Groups in Hong Kong do not have a convenient, easy to access, ecologically sensitive and safe place to take guided tours to. A boardwalk at Tung Chung would be that resource.

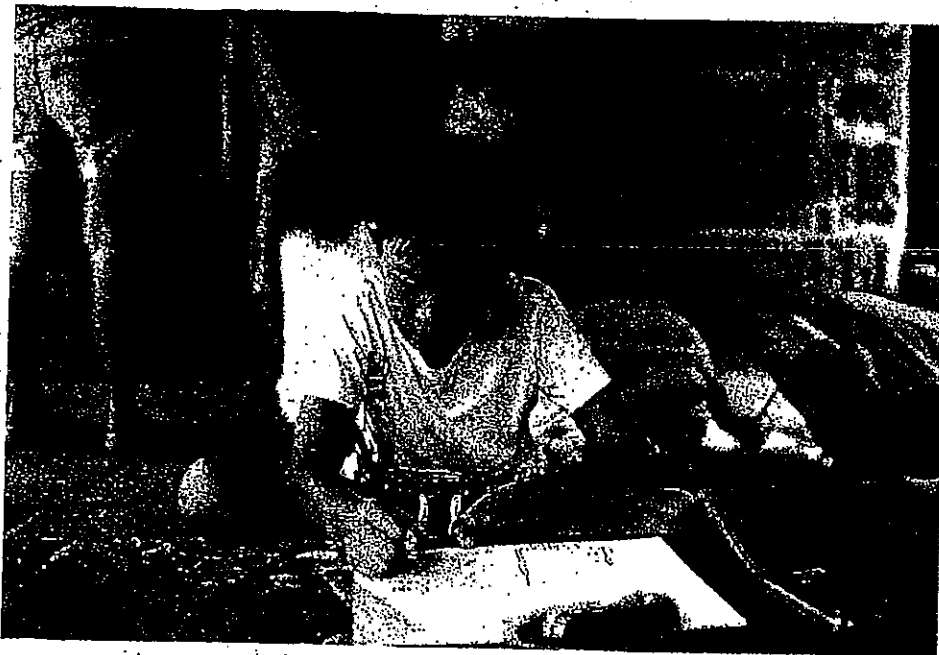


Typical make-up of a Naked Hermit Crabs Guided Tour.

Each tour ends with a drawing session



Everyone participates



The face of concentration

Reflect on what you've seen



'Here's one of the proud and talented artists with their work. I'm constantly amazed at how much the kids notice and remember of the walk' (Ria Tan).

Job opportunities through training nature guides



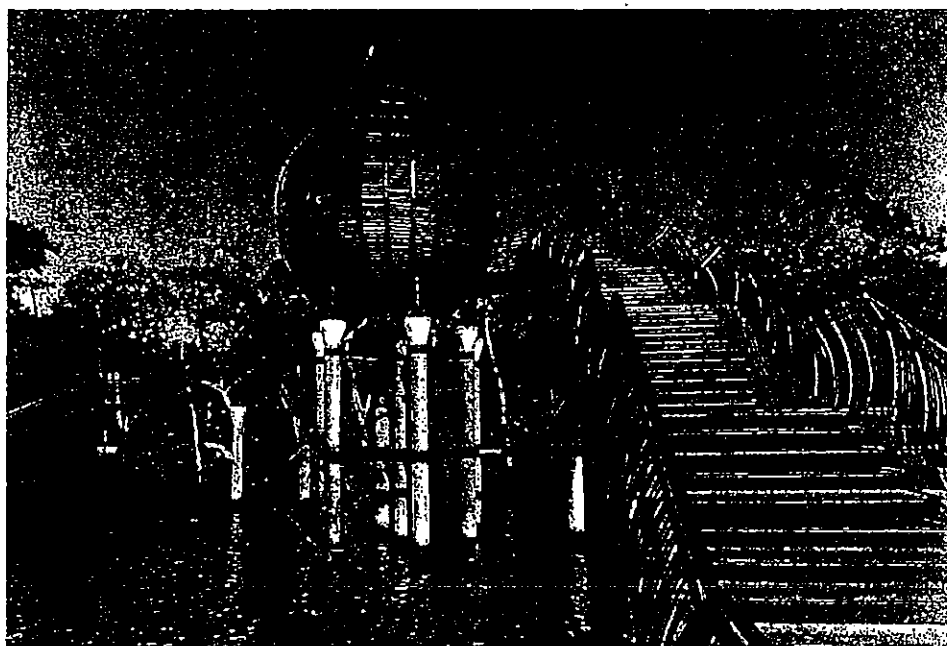
“... four students from CHIJ Katong Convent. This is their first experience at being a nature guide. They are tagging along with the Naked Hermit Crab guides to learn how to conduct nature guiding. They picked up many interesting information and hopefully, they will start guiding slowly in the next session” (Wild Shores. 6 April 2013)

Encouraging and supporting bird watching

Between September to March, Sungei Buloh Wetland Reserve mudflats functions as a "refuelling point" for waders to feed and roost. These habitat-specific birds feed on the polychaetes (worms) found in the mudflats on the Reserve.

Also, throughout the year, look out for resident birds such as herons, kingfishers, bitterns, sunbirds, tailorbirds and fruit pigeons (Sungei Buloh Wetland Reserve).

The same is true for the inter-tidal mudflats of Hong Kong.



Viewing Pod (Bird Hide) at Sungei Buloh Wetland Reserve.
(Singapore through my eyes)

Summary and Submission

SUMMARY

Constructing a boardwalk will enable conservation and development to go hand-in-hand at Tung Chung and both will complement each other. The following comments are pertinent to this proposal:

TUNG CHUNG

Status

- In terms of mudflats, Tung Chung is the 'Crown Jewel of Lantau';
- Tung Chung Bay is an active horseshoe crab spawning ground/nursery area for both the Chinese horseshoe crab and Mangrove horseshoe crab;
- The lower reaches of the Tung Chung River Valley are an important spawning ground and nursery area for Mangrove horseshoe crabs;
- Juvenile horseshoe crab populations are under serious threat from human activities on the mudflat and if no action is taken, the Chinese horseshoe crab will become locally extinct here;
- Tung Chung has recently been identified as one of the critical areas for enhanced protection to conserve both species of horseshoe crabs in Hong Kong (Kwan and others);
- Tung Chung River Valley (Mok Ka and Shek Mun Kap) is listed as an Ecologically Important Stream (EIS No. 27) by AFCD;
- Of all the mudflats in Hong Kong, Tung Chung is the most accessible and user-friendly in terms of existing transport infrastructure, closeness to local amenities and safe and easy access.

Existing activities

None of the existing activities in the river valley or on the mudflat at Tung Chung are consistent with the conservation of horseshoe crabs or other biodiversity. These activities include:

- Walking, cycling and visitor damage to the mudflat;
- Clam Digging;
- Mangrove clam and snail collecting;
- Fishing in stream mouths with mono-filament nets;
- Electric Fishing;
- Fishing in streams.

PROPOSAL TO BUILD A BOARDWALK

This submission proposes the following at Tung Chung:

- Construct a boardwalk through the Tung Chung River Valley and across the mudflat.
- Through “point-line-plane” approach, link the River cum Biodiversity Park with the boardwalk across the mudflat to fully utilize all of the ecological offerings available at Tung Chung.
- Focus on constructing a facility for education first, then as an amenity for local community, then as a facility for Green Groups, then tourism. They are all mutually inclusive and complementary.
- The Tung Chung River Valley be accorded appropriate conservation status, to protect the biodiversity there, at the same time allowing for the construction of a boardwalk;
- Tung Chung Bay be designated a Marine Protected Area, or be accorded similar conservation status to restrict access to stop further visitor damage.
- Promote Tung Chung as Lantau’s “Living Fossil Nature Reserve and Boardwalk”.

ADDRESSING REPRESENTATIONS IN DRAFT TCV OZP NO. S/I-TCV/1

This submission addresses the issues raised in response to the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 as follows:

Concern about the overall capacity of Tung Chung area

- Tung Chung Bay has already over-exceeded its visitor receiving capacity and any additional population or visitors in Tung Chung will only worsen this situation.
- Building a boardwalk through the Tung Chung River Valley and across the mudflat at Tung Chung will alleviate this problem, so visitors can enjoy the area, without destroying it.

The ecology and the value of Tung Chung Stream should be considered as a whole river system

- Constructing a boardwalk through the Tung Chung River Valley and across the mudflat at Tung Chung will treat the “Tung Chung Stream” as a whole river system.
- This will also meet the Lantau Development Plan goals of adopting a “point-line-plane” approach linking up places of conservation value to attract visitors and add value to the River Cum Biodiversity Park, which has already been proposed for the area.

Make use of the ecology of Tung Chung Valley for eco-education

- Constructing a continuous boardwalk linking the River Cum Biodiversity Park with the inter-tidal mudflat at Tung Chung will provide an unrivalled eco-education resource in Hong Kong.

Provision of community facilities and employment opportunity

- Constructing a boardwalk linking the River Cum Biodiversity Park with the inter-tidal mudflat at Tung Chung will provide a community resource, for local families to enjoy and will help create local job opportunities.

Support the proposal of "Tung Chung Stream Nature River Park"

- This proposal supports the Lantau Development Plan for a 'River Cum Biodiversity Park' at Tung Chung, and complements it by extending the park to incorporate the inter-tidal mudflat into the plan.

Designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education)"

- The Lantau Development Plan for a 'River Cum Biodiversity Park' can't be achieved if the biodiversity in the Tung Chung River Valley is being caught or collected.
- Conservation, Ecotourism and Ecological Education can be achieved only if the lower reaches of the Tung Chung River Valley are afforded appropriate protections to protect the biodiversity there, at the same time allowing visitors to access the area without destroying it, which can be achieved with the construction of a boardwalk.

SUBMISSION

This submission has:

- Provided evidence of the importance of the Tung Chung River Valley to Mangrove horseshoe crabs in Hong Kong;
- Demonstrated Tung Chung Bay has already exceeded its visitor receiving capacity;
- Identified threats to the biodiversity at Tung Chung that increases in population and visitor numbers will bring.

To address these concerns, and allow development to take place in the area, it is proposed to build a boardwalk linking the River Cum Biodiversity Park with the mudflat, which will also address the following issues raised in response to the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1:

- Concern about the overall capacity of Tung Chung area;
- The ecology and the value of Tung Chung Stream should be considered as a whole river system;
- Make use of the ecology of Tung Chung Valley for eco-education;
- Provision of community facilities and employment opportunity;
- Support the proposal of "Tung Chung Stream Nature River Park";
- Designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education).

All of this can be achieved if the lower reaches of the Tung Chung River Valley are afforded conservation protection status compatible with the construction of the proposed boardwalk.

This submission therefore urges you to afford the lower reaches of the Tung Chung River Valley a protection status compatible with conservation and construction of the proposed boardwalk.

Kevin Laurie.
Independent Horseshoe Crab Researcher,
Hong Kong.

11 May 2016

ACKNOWLEDGEMENTS

This submission acknowledges the contributions and assistance given by the following persons:

Original drafting

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N. Sivasothi, Department of Biological Sciences, National University of Singapore.

Ria Tan - Creator: Wild Singapore web resources, which includes: Wild Shores of Singapore,
Wild Singapore homepage, Wild Singapore News, Wild Happenings in Singapore and Wild Fact
Sheets. Coordinator: Naked Hermit Crabs and many more.

Hong Kong

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William Lau. Formerly Department of Biology and Chemistry, City University of Hong Kong.
Now with AFCD.

Dickson Wong. Hong Kong Wildlife Net.

Dr. Cynthia Yau (Ph.D), Independent Marine Biology Consultant/Honorary Assistant Professor HKU.

USA

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REFERENCES

- AFCD. *Fiddler Crabs in Hong Kong – An Overview*. Winnie P.W. Kwok & Wing-sze Tang. Coastal Community Working Group. Hong Kong Biodiversity. Issue No. 12 September 2006. Link: https://www.afcd.gov.hk/english/publications/publications_con/files/hkbonewsletter12.pdf
- AFCD. *List of Ecologically Important Streams*. Link: https://www.afcd.gov.hk/english/conservation/con_wet/streams_rivers_hk/Con_NSR/Ecologically_Important_Sstreams.html
- Centre for Food Safety. FEHD. *Food Safety Focus (73rd Issue, August 2012) – Food Incident Highlight. Recreational Shellfish Harvesting*. Link: http://www.cfs.gov.hk/english/multimedia/multimedia_pub/multimedia_pub_fsf_73_04.html
- HKRMS. *Hong Kong Register of Marine Species*. Link: <http://www.marinespecies.org/hkrms/>
- Huang, Q, Chiu, H. and Morton, B. 1998. *Nursery beaches for Horseshoe crabs in Hong Kong*. Porcupine 18. Link: www.hku.com
- KiteHood Kite Surfing School. *Kite Boarding Classes in New York*. Link: <https://kitehood.com/school>
- Kwan and others (Billy K. Y. Kwan, Hwey-Lian Hsieh, Siu Gin Cheung & Paul K. S. Shin) *Present population and habitat status of potentially threatened Asian horseshoe crabs Tachypleus tridentatus and Carcinoscorpius rotundicauda in Hong Kong: a proposal for marine protected areas*. Published in Biodivers Conserv DOI 10.1007/s10531-016-1084-z. 21 March 2016. Link: <http://link.springer.com/article/10.1007/s10531-016-1084-z>
- Lantau Traveller Blog. Photographs and comments promoting clam digging at Shui Hau are from: *(水戶) Shui Hau. A heaven for clam lovers* (8 May 2010). Link: <http://lantautraveller.blogspot.hk/2010/05/shui-hau-heaven-for-clam-lovers.html>
- Martin Williams. Hong Kong Outdoors. *Shui Hau Horseshoe Crab Reflection*. Link: <http://www.hkoutdoors.com/file/2429>
- Oriental Daily. Clam digging at Shui Hau are from: *濫挖摸蜆沙灘大災難*. (28 August 2010).
- Rudkin, D.M. and Young, G.A. (2009) *Horseshoe crabs – An ancient ancestry revealed*. In: Tanacredi, J.T., Botton, M.L., Smith, D.R. (eds), *Biology and Conservation of Horseshoe Crabs*. Springer, New York, pp. 25-44. Link: http://link.springer.com/chapter/10.1007/978-0-387-89959-6_2#page-1
- Singapore through my eyes. *Sungei Buloh Wetland Reserve Extension*. Link: <https://singaporethroughmyeyes.wordpress.com/2015/01/17/sungei-buloh-wetland-reserve-extension/>

寄件者: Yin Siu [REDACTED]
寄件日期: 13日05月2016年星期五 19:58
收件者: tpbpd
主旨: Re: 東涌谷分區計劃大綱草圖編號S/I-TCV/1

TPB/R/S/I-TCV/1-C21

就 S_I-TCV_1

本人支持以下意見。

TPB/R/S/I-TCV/1-15,
TPB/R/S/I-TCV/1-16,
TPB/R/S/I-TCV/1-17,
TPB/R/S/I-TCV/1-18,
TPB/R/S/I-TCV/1-19,
TPB/R/S/I-TCV/1-20,
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TPB/R/S/I-TCTC/21-25,
TPB/R/S/I-TCTC/21-26,
TPB/R/S/I-TCTC/21-27

Fung Siu yin

tpbpd <tpbpd@pland.gov.hk> 於 2016 年 4 月 22 日 上午 9:48 寫道:

城市規劃委員會
香港北角渣華道三百三
十三號

北角政府合署十五樓

TOWN PLANNING BOARD
15/F., North Point Government Offices
333 Java Road, North Point,
Hong Kong.

傳 真 Fax: 2877 0245 / 2522 8426
電 話 Tel: 2231 4810

電郵函件

來函檔號 Your Reference:
覆函請註明本會檔號.

In reply please quote this ref.: TPB/R/S/I-TCV/1-R15

尹小燕

先生／女士：

東涌谷分區計劃大綱草圖編號 S/I-TCV/1

(申述編號：R15)

城市規劃委員會(下稱「城規會」)於 2016 年 3 月 7 日收到你提出的申述。

按照《城市規劃條例》(下稱「條例」)，城規會會在提交申述的兩個月指定法定期結束後公布全部申述(包括你的申述)，為期三個星期，以供公眾提出意見。全部申述亦會供公眾查閱，直至行政長官會同行政會議根據條例第 9 條就有關的草圖作出決定為止。查閱地點為規劃署的規劃資料查詢處(查詢熱線：2231 5000；地址：北角渣華道 333 號北角政府合署 17 樓及沙田上禾輦路 1 號沙田政府合署 14 樓)。在該段三個星期的期間結束後，有關意見(如有的話)會在上述地點供公眾查閱，直至行政長官會同行政會議就該草圖作出決定為止。供公眾查閱申述和意見的訊息會在城規會的網頁上(<http://www.info.gov.hk/tpb/>)公布。而有關上述草圖的申述摘要及意見索引亦會上載城規會網頁(http://www.info.gov.hk/tpb/tc/plan_making/submission_insp.html)。

在提出意見的三個星期限期屆滿後，城規會或其申述聆訊小組委員會(下稱「小組委員會」)會舉行會議以考慮你的申述及有關意見(如有的話)。你及／或你的授權代表可出席城規會／小組委員會的會議，並可按你的意願，獲給予機會在會上作出申述。會議詳情將於稍後奉告。

請於日後的來信中，註明這項申述的編號。

城市規劃委員會秘書

(簡志陶



代行)

二零一六年四月二十二日

城規會東涌未來發展聲明書

Reference List:

http://www.info.gov.hk/tob/tc/plan_making/Attachment/20160422/S_I-TCTC_21_gist_of_representations_eng_chi.pdf
http://www.info.gov.hk/tob/tc/plan_making/Attachment/20160422/S_I-TCE_1_gist_of_representations_eng_chi.pdf
http://www.info.gov.hk/tob/tc/plan_making/Attachment/20160422/S_I-TCV_1_gist_of_representations_eng_chi.pdf

姓名 Name *

馮小燕

電郵 Email *

本人同意這一份聲明 I agree this declaration *

☒ 同意 Agree

你的意見 Opinions

e.g. 東涌區內急需市政街市

我們要建立社區經濟，現時開發東涌谷是破壞我們的農地，要求農地農用，反對改變農田的土地問題。

聲明 Declaration

本人反對東涌發展，除非政府在藍圖中接納以下項目。

I disagree the tung chung development, unless the blueprint includes the following items.

就S_I-TCTC_21文件支持以下的意見 Support the following opinions in document S_I-TCTC_21

本人支持以下意見。

I support the following opinions.

TPB/R/S/I-TCTC/21-6,
TPB/R/S/I-TCTC/21-7,
TPB/R/S/I-TCTC/21-11,
TPB/R/S/I-TCTC/21-12,
TPB/R/S/I-TCTC/21-9,
TPB/R/S/I-TCTC/21-10,
TPB/R/S/I-TCTC/21-20,
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TPB/R/S/I-TCTC/21-23,
TPB/R/S/I-TCTC/21-24,
TPB/R/S/I-TCTC/21-25,
TPB/R/S/I-TCTC/21-26,
TPB/R/S/I-TCTC/21-27,
TPB/R/S/I-TCV/1-29

就S_I-TCE_1文件支持以下的意見 Support the following opinions in document S_I-TCE_1

本人支持以下意見。

I support the following opinions.

TPB/R/S/I-TCE/1-3,
TPB/R/S/I-TCE/1-4,
TPB/R/S/I-TCE/1-5,
TPB/R/S/I-TCE/1-6,
TPB/R/S/I-TCE/1-7,
TPB/R/S/I-TCE/1-10,
TPB/R/S/I-TCE/1-11,
TPB/R/S/I-TCE/1-8,
TPB/R/S/I-TCE/1-9,
TPB/R/S/I-TCE/1-12,
TPB/R/S/I-TCE/1-14,
TPB/R/S/I-TCE/1-13,
TPB/R/S/I-TCE/1-15 to TPB/R/S/I-TCE/1-27,
TPB/R/S/I-TCE/1-28,
TPB/R/S/I-TCE/1-29,
TPB/R/S/I-TCE/1-30 to TPB/R/S/I-TCE/1-44,
TPB/R/S/I-TCE/1-45 to TPB/R/S/I-TCE/1-49,
TPB/R/S/I-TCE/1-50,
TPB/R/S/I-TCE/1-51,
TPB/R/S/I-TCE/1-52,
TPB/R/S/I-TCE/1-53,
TPB/R/S/I-TCE/1-54,
TPB/R/S/I-TCE/1-55,
TPB/R/S/I-TCE/1-56,
TPB/R/S/I-TCE/1-57

~~CONFIDENTIAL~~

就S_I-TCV_1文件支持以下的意見 Support the following opinions in document S_I-TCV_1

本人支持以下意見 -

I support the following opinions.

TPB/R/S/I-TCV/1-15,
TPB/R/S/I-TCV/1-16,
TPB/R/S/I-TCV/1-17,
TPB/R/S/I-TCV/1-18,
TPB/R/S/I-TCV/1-19,
TPB/R/S/I-TCV/1-20,
TPB/R/S/I-TCV/1-21,
TPB/R/S/I-TCV/1-22,
TPB/R/S/I-TCV/1-23,
TPB/R/S/I-TCV/1-24,
TPB/R/S/I-TCV/1-25,
TPB/R/S/I-TCV/1-26,
TPB/R/S/I-TCV/1-27,
TPB/R/S/I-TCV/1-28,
TPB/R/S/I-TCTC/21-21,
TPB/R/S/I-TCTC/21-22,
TPB/R/S/I-TCTC/21-23,
TPB/R/S/I-TCTC/21-24,
TPB/R/S/I-TCTC/21-25,
TPB/R/S/I-TCTC/21-26,
TPB/R/S/I-TCTC/21-27

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Minutes of Meeting of Islands District Council

Date : 1 February 2016 (Monday)
Time : 2:00 p.m.
Venue : Islands District Council Conference Room,
14/F, Harbour Building, 38 Pier Road, Central, Hong Kong.

Present

Chairman

Mr CHOW Yuk-tong, BBS

Vice-Chairman

Mr YU Hon-kwan, Randy, JP

Members

Mr YUNG Chi-ming, BBS
Mr CHAN Lin-wai
Mr CHEUNG Fu
Mr WONG Hon-kuen, Ken
Mr FAN Chi-ping
Mr LOU Cheuk-wing
Mr WONG Man-hon
Ms YU Lai-fan
Ms LEE Kwai-chun
Ms YUNG Wing-sheung, Amy
Mr TANG Ka-piu, Bill, JP
Mr KWONG Koon-wan
Mr CHOW Ho-ding, Holden
Ms TSANG Sau-ho, Josephine
Mr KWOK Ping, Eric
Ms FU Hiu-lam, Sammi

Attendance by Invitation

Mr MA Siu-cheung, Eric, JP	Under Secretary for Development, Development Bureau
Mr LAI Cheuk-ho	Principal Assistant Secretary(Works), Development Bureau
Ms LAU Bo-yee, Winnie	Chief Town Planner/Strategic Planning, Planning Department
Ms WU Ming-yee, Amy	Senior Town Planner/Islands, Planning Department
Ms AU Yue-yan, Vicki	Town Planner/Islands, Planning Department
Mr YUEN Wing-cheong	Senior Transport Officer/Planning/Ferry, Transport Department
Mr LEE Ka-hei, Haywood	Engineer/Islands, Transport Department
Ms TSE Sau-lai, Vivianne	Senior Estate Surveyor (District Lands Office, Islands), Lands Department
Ms HON Tsui-san, Shirley	Senior Estate Surveyor, District Lands Office, Islands, Lands Department
Mr PO Chi-lok	Assistant Project Manager (School Building), Education Bureau

Dr. LOUIE Kwok-keung, Peter	Senior Environmental Protection Officer (Air Policy), Environmental Protection Department
Ms HO Hoi-yan, Ava	Assistant Public Relations Manager- External Affairs, MTR Corporation Limited
Mr CHAU Kwok-leung, Eddie	Senior Engineer (Islands Division), Civil Engineering and Development Department
Mr Kenneth KWOK	Associate Director, Ove Arup and Partners Hong Kong Limited
Ms LEE Kit-yee, Kitty	Senior Manager (New Territories South) Promotion, Leisure and Cultural Services Department
Ms NG Lai-fong, Agnes	Manager (New Territories South) Marketing & District Activities, Leisure and Cultural Services Department
Ms KWOK Lai-kuen, Elaine	Senior Librarian (Islands), Leisure and Cultural Services Department

In Attendance

Mr LI Ping-wai, Anthony, JP	District Officer (Islands), Islands District Office
Ms CHONG Yan-yee, Belinda	Assistant District Officer (Islands)1, Islands District Office
Mr CHOW Chit, Joe	Assistant District Officer (Islands)2, Islands District Office
Ms HUI Yuen-mei, May	Senior Liaison Officer (1), Islands District Office
Ms CHAN Hing-kwan, Patty	Senior Liaison Officer (2), Islands District Office
Mr LO Kwok-chung, David	Chief Engineer/Islands, Civil Engineering and Development Department
Ms TAM Yin-ping, Donna	District Planning Officer (Sai Kung and Islands), Planning Department
Mr LI Kin-nga, Denis	District Lands Officer (Islands), Lands Department
Ms LO Man-kam	Administrative Assistant (Lands/Islands), Lands Department
Mr LAM Ding-fung	District Social Welfare Officer (Central Western, Southern & Islands), Social Welfare Department
Mr HO Yun-sing	District Commander (Lantau), Hong Kong Police Force
Mr Richard Brinsley SHERIDAN	District Commander (Marine Port), Hong Kong Police Force
Ms FAN Chin-ting, Erica	Public Community Relations Officer (Lantau District) , Hong Kong Police Force
Mr LAW Tung-wah, Benji	Public Community Relations Officer (Marine Port District) , Hong Kong Police Force
Mr YUEN Hong-shing, Honson	Chief Transport Officer/New Territories South West, Transport Department
Mr WONG Hon-kit	Chief Manager/Management (Wong Tai Sin, Tsing Yi, Tsuen Wan and Islands), Housing Department
Mr WONG Wai-wan	District Environmental Hygiene Superintendent (Islands), Food and Environmental Hygiene Department
Ms CHEUNG Yuk-king	Chief Leisure Manager (New Territories West), Leisure and Cultural Services Department
Mrs Brenda NG	District Leisure Manager(Islands), Leisure and Cultural Services Department

Secretary

Ms CHAN Sum Sum, Candy	Senior Executive Officer (District Council), Islands District Office
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XV. The draft Tung Chung Extension Area Outline Zoning Plan (OZP) No. S/I-TCE/1, the draft Tung Chung Valley OZP No. S/I-TCV/1 and the draft Tung Chung Town Centre Area OZP No. S/I-TCTC/21
(Paper IDC 17/2016)

129. The Chairman welcomed Ms Donna TAM, District Planning Officer (Sai Kung and Islands), Ms Amy WU, Senior Town Planner/Islands and Ms Vicki AU, Town Planner/Islands of PlanD; and Mr David LO, Chief Engineer/Islands of CEDD to the meeting to present the Paper.

130. Ms Donna TAM briefly introduced the background of the paper. Ms Amy WU then explained the contents of the three draft OZPs one by one with the aid of PowerPoint presentation.

131. Mr Holden CHOW said that many residents were eager for the early completion of Tung Chung Town Park. He enquired whether there was an implementation schedule.

132. Mr Eric KWOK enquired whether land was reserved for provision of cultural and recreational facilities (such as indoor sports centres and performance venues) in the plan for Tung Chung West as such facilities which could promote youth development were lacking near Tung Chung West and Yat Tung Estate.

133. Mr FAN Chi-ping expressed his views as follows:

- (a) Plenty of rural land in Tung Chung (for instance, the Wong Lung Hang area) was zoned "Green Belt" and "Conservation Area". As such, the value and development of private land was affected. He enquired whether the Government would compensate the affected private landowners.
- (b) There was no river but a watercourse in Tung Chung. He hoped that the Government would improve the road connection in the villages of Tung Chung old areas as proposed when developing Tung Chung West.
- (c) He urged the Government to grasp the development opportunity to enhance the sewerage system of villages in Tung Chung old areas by replacing the septic tanks for better environmental hygiene.

134. Mr WONG Man-hon said that according to the draft Tung Chung Extension Area OZP, there was a piece of land between Pak Mong and North Lantau Highway and enquired about the future use of the land. He hoped that the Government would provide appropriate transport ancillary facilities for the residents of the three villages in Mui Wo to travel to the proposed Tung Chung East railway station (TCE Station).

135. Ms Donna TAM gave a consolidated response as follows:

- (a) For community facilities, during the public consultation on Tung Chung New Town Extension Study (Tung Chung Study), the study team noted that the local community opined there were inadequate community facilities especially in Tung Chung West where the sports facilities were seriously lacking. Therefore, PlanD put forward the current planning proposal after consultation with relevant government departments and taking into consideration the land use in Tung Chung East, Tung Chung Town Centre and Tung Chung West. The site next to Tung Chung Area 39 was reserved for provision of an indoor recreational centre, and part of the "Open space" zone outside Yat Tung Estate would be used for development of an amphitheatre for holding cultural and recreational events.
- (b) Tung Chung Stream had a high ecological value and should be preserved. PlanD proposed zoning the areas of high ecological value in Tung Chung West as "Conservation Area" and "Green Belt" to preserve the natural environment and the rural characteristics. On the other hand, suitable sites were identified such as areas of lower ecological value (including abandoned agricultural land and orchards) in Tung Chung West for proposed low density residential development for optimal use of land. It was hoped that a balance would be struck between ecological conservation and development needs in the development of Tung Chung West.

136. Mr David LO gave a consolidated response as follows:

- (a) As regards the connecting road in the three villages in Mui Wo, the proposed Road P1 would connect North Lantau Highway via the proposed transport interchange to the west of Siu Ho Wan. Residents of the three villages would then be able to access North Lantau Highway via the transport interchange in future. In addition, there was a subway underneath the section of North Lantau Highway, and CEDD proposed extending the subway to the new reclamation area and link up with Road P1 to facilitate residents' access to the Tung Chung East development area and the MTR station.
- (b) As for the village roads in Tung Chung Valley, CEDD would construct village roads according to the draft OZP.
- (c) For villages affected by the expansion of Tung Chung New Town, CEDD would arrange public sewers for them. As for the request by Mr FAN Chi-ping for construction of sewers for villages not affected by the expansion scheme, CEDD would study with EPD the feasibility of improving facilities in the unsewered villages in Tung Chung old areas.
- (d) Regarding the Town Park, CEDD was responsible for proceeding with the provision of infrastructure in Tung Chung Extension Area, including site formation, reclamation, drainage and water supply works. Other government facilities (such as town park) would be provided by relevant government

departments. CEDD would continue to discuss with relevant departments about the implementation of the various government facilities. The department would report the progress to IDC in due course.

137. Mr Bill TANG expressed his views as follows:

(a) The draft Tung Chung Extension Area OZP

- He enquired whether the cycle park connecting Road P1 and Tai Ho would be constructed by DEVB/CEDD or the Home Affairs Bureau/LCSD.
- With regard to the proposal of setting up a marina club in Tung Chung East reclamation area for carrying out water activities, he enquired how the Government could ensure that the water quality of Tai Ho would not be affected by sewage discharge.
- He asked whether the planning proposals which did not involve reclamation, such as the provision of Tai Ho cycling track, could be implemented prior to 2023.

(b) Proposed Amendments to the Tung Chung Town Centre Area OZP

- PlanD suggested the zoning of a site to the north of Yat Tung Estate and the west of Ma Wan Chung Village in Tung Chung Area 32 as “open space”. As far as he knew, there were a few inhabited licensed structures and asked what arrangements would be made for land resumption and whether any assessment was made on the impacts on the locals.
- He suggested constructing a footpath for residents of Yat Tung Estate to go to the public housing estates in Tung Chung Area 39 and waterfront promenade in Tung Chung Valley. He hoped that the proposal would be considered thoroughly at the planning stage and did not think a footbridge was suitable lest the landscape be affected.
- He enquired whether a cycling track would be built along the waterfront in Tung Chung West so that residents of Yat Tung Estate could cycle to Tung Chung Town Centre along the old waterfront.
- He enquired about the future use of Tung Chung Area 107.

(c) Draft Tung Chung Valley OZP

- He asked how much government land was available for residential housing development in the district.
- He enquired whether the Government planned to expand the River Park in response to the aspirations of environmental organisations and residents.

- In view of the housing shortage, he enquired whether the Government would consider increasing the density of residential housing developments in the district such as upgrading "Residential (Group C)"("R(C)") to "Residential (Group B)"("R(B)") to increase housing supply.
- He enquired what commercial uses the Government had in mind for the "Commercial" sites in Areas 38A, 38B and 38C that were of smaller size and subject to building height restrictions.
- He asked whether the Government reserved any sites for development of municipal markets or barbecue sites.

138. Mr FAN Chi-ping expressed his views as follows:

- (a) He opined that the planning of Tung Chung East was comprehensive but that for Tung Chung West was imbalanced which was dominated by public housing with inadequate government and community facilities, causing inconvenience to the residents.
- (b) With the completion of the public housing estates in Area 39, he was concerned that the existing roads and transport facilities were unable to meet the demand brought about by the rising population in Tung Chung West. He hoped TD would improve the section of Tung Chung Road from Tung Chung Rural Committee to Lung Tseng Tau as he was afraid that many pedestrians and vehicles would go in and out of Area 39 through the junction of Wong Ka Wai in future and traffic accidents might happen. He suggested that the road from Yu Tung Road to Chung Yan Road be open for public use to divert traffic.
- (c) Upon the population intake of the public housing estates in Area 39 and commissioning of HZMB, there would be heavy traffic. However, there were only four parking spaces in Ma Wan Chung Village at present which could not meet the demand. He urged the Government to ensure that parking spaces were provided in Ma Wan Chung Village expeditiously when taking forward the development project.

139. Mr CHEUNG Fu suggested roads linking Tung Chung Road for traffic improvement and diversion, or he would oppose the relevant planning.

140. Mr Holden CHOW noted that the Government planned to build Road P1 but he considered that the traffic connectivity in the three villages had yet to be improved.

141. Ms Donna TAM gave a consolidated response as follows:

Land Use

- (a) Tung Chung Area 107 located near the public housing in Tung Chung Area 39 and the future Tung Chung West Railway Station was proposed to be zoned "Government, Institution or Community" ("G/IC"). Apart from an indoor recreation centre proposed at part of the site, there was no planned use for the remaining part of site at the moment.
- (b) Since plenty of natural features in Tung Chung West had high ecological value, careful consideration should be given to the appropriate development density and height so that the rural environment and natural habitat would not be compromised by the future development. After taking into consideration various factors, sites of lower ecological value were proposed for residential housing near to the existing villages mainly of three-storey village houses. The sites were proposed to be zoned "R(C)" for low density residential development rather than "R(B)" as residential buildings with more than 10 storeys were not suitable.
- (c) Regarding the commercial sites in Tung Chung Area 38, there were many indigenous villages in Tung Chung West but commercial facilities were inadequate. PlanD proposed reserving the land adjacent to the railway station for developing a local shopping centre, mainly with small stores providing daily necessities for residents.
- (d) When conducting the Tung Chung Study, PlanD sought the views of FEHD which had no plan for developing a municipal market in Tung Chung. Therefore, PlanD had not reserved any sites for such a purpose. However a wet market would be provided in the public housing development project in Tung Chung Area 39.

Barbecue and Community Facilities

- (e) Barbecue facilities were uses always permitted in "Open Space" zone.
- (f) A site near Tung Chung Hau Wong Temple, was proposed to be zoned "G/IC" and reserved for development of community or government facilities in future. Besides, part of a "G/IC" site near Ma Wan Chung would be reserved for the improvement works of Ma Wan Chung, with the remaining site reserved for other G/IC uses in future.

Roads

- (g) With regard to the road connection between Tung Chung Area 39 and Yu Tung Road, PlanD had explained time and again that the concerned road was included in the public housing development project in Tung Chung Area 39, and HD would follow up on the road design and arrangements when it undertook the detailed design of the development.

- (h) In the overall planning of Tung Chung West, there were also proposals for building other roads linking Tung Chung West and Tung Chung Town Centre.

142. Mr David LO gave a consolidated response as follows:

Cycling track

- (a) Regarding the provision of a cycling track, the Government planned to construct a waterfront promenade with a cycling track running along part of the promenade between the Ma Wan Chung Pier and Tung Chung Town Centre. In respect of the proposal for a waterfront cycling track linking Tai Ho, given that the seawall maintenance access road would be used as the construction site for Road P1 and Tung Chung East reclamation projects, it would unlikely be feasible to construct a cycling track at that stage lest the reclamation works be hindered. It was hoped that the Tung Chung East reclamation project could be completed in phases expeditiously for early commencement of construction of the cycling track from Tung Chung to Siu Ho Wan.
- (b) Regarding which department would construct cycling park, such an issue would be revisited in the detailed design stage of the Tung Chung New Town Extension Project.

Water quality

- (c) When conducting the Tung Chung Study, CEDD found that Tung Chung Bay and Tai Ho Bay were water quality sensitive receivers. As such, innovative resilient sewerage systems would be adopted in the Tung Chung Extension Area. Such sewerage systems would be designed to guard against sewage discharge into the sea, even in the event of sewage pump failure. The sewage of Tung Chung East would be delivered to the Siu Ho Wan Sewage Treatment Works for centralised treatment.

River park

- (d) The options on linking Yat Tung Estate with the waterfront promenade would be ascertained as the project proceeded to the detailed design stage.
- (e) Regarding the extension of the River Park, the study team put forward the existing planning proposal after taking into consideration various factors, such as the environmental impacts and land use and considered that there was no scope for extension for the time being. He explained that as the ecosystem of the tributaries to the east of Tung Chung Stream had been adversely affected with the roadside surroundings and derelict farmland nearby, the layout was suitable for provision of a park. Meanwhile, a park was not suitable near the tributaries to the west of Tung Chung Stream because there were active agricultural lands and the river channel was narrow.

Ma Wan Chung Car Park

- (f) Regarding the provision of a car park in Ma Wan Chung, CEDD would formulate the implementation schedule the soonest possible at the detailed design stage.

143. The Hon Bill TANG noted that no site had been reserved for setting up a market, but if there was a change in Government policies, he asked whether the market would be built on a "G/IC" site or "Commercial" site, and where its location would be.

144. Ms Donna TAM replied that PlanD had reserved two "G/IC" sites in Tung Chung West, namely, Areas 24A and 36A but their uses had yet to be confirmed. The government departments might apply for using the sites if the needs arose (including the setting up of a market).

145. The Chairman hoped that the Government would consider Members' views.

(Ms LEE Kwai-chun, Mr HO Yun-sing and Mr WONG Wai-wan left the meeting during discussion of this agenda item.)

(Ms Amy WU and Miss Vicki AU left the meeting after discussion of this agenda item.)

Summary of Representations and Planning Department's Responses

Representation No. S/I-TCV/1-	Grounds/ Proposals of Representations	Planning Department's Responses
R1 and R2	Support designating Nim Yuen Village as “Village Type Development” (“V”) zone on the draft Tung Chung Valley (TCV) Outline Zoning Plan (the draft OZP) and oppose converting it for ‘Columbarium’ use as Nim Yuen Village has always been a recognized village and ‘columbarium use’ would have adverse impacts on the community and ecology	Noted.
R3	<p>(a) Concern about the lack of elderly care facilities in the area</p> <p>(b) Support the developer to develop and operate a private columbarium at Nim Yuen Village as the village and its surrounding area have been used for grave yard and storage of ‘kam taps’. There have also been a considerable number of graves and burial grounds in the area as well as historic religious institutions including Lo Hon Monastery and Prajna Dhyana Temple which both have ‘Columbarium’ use</p> <p>(c) Consider that the private columbarium at Nim Yuen Village is far from existing settlements, thus, it is considered compatible with the land uses in Nim Yuen with no adverse impacts (e.g. noise, odour and psychological, etc.) on the nearby residents</p> <p>(d) Consider that the private columbarium development at Nim Yuen can relieve the current shortage of public columbarium niches and support the local economy</p>	See Town Planning Board (TPB) Paper paragraphs 6.17 to 6.21.

	<p>(e) Express that the private land in Nim Yuen Village has all been sold to private developer, the villagers do not own any land in Nim Yuen Village and thus cannot build Small Houses in Nim Yuen</p> <p><u>Proposals</u></p> <p>(i) To rezone Area 67 from “Residential (Group C)2” (“R(C)2”) to ‘Institutional or Community’ use for elderly care homes, including elderly day care facilities to cater for elderly people in the area</p> <p>(ii) To rezone private land in Nim Yuen Village for ‘Institution or Community’ (‘IC’) use</p>	
R4	<p>(a) Concern about the lack of elderly care facilities in the area in view of the increasingly aging population in the community and the shortage of public elderly care facilities</p> <p>(b) Support the developer to develop and operate a private columbarium at Nim Yuen Village as the village and its surrounding area have been used for grave yard and storage of ‘kam taps’</p> <p>(c) Consider that the private columbarium at Nim Yuen Village is compatible with the land uses in Nim Yuen with no adverse impacts on the environment</p> <p>(d) Consider that the private columbarium development at Nim Yuen can relieve the current shortage of public columbarium niches and meet the future demand arising from the future developments in TCNT as well as support the local economy</p>	See TPB Paper paragraphs 6.17 to 6.21.

	<p><u>Proposals</u></p> <p>(i) To rezone Area 67 from “Residential (Group C)2” (“R(C)2”) to ‘Institutional or Community’ use for elderly care homes and ancillary faculties to provide care services to elderly people</p> <p>(ii) To rezone private land in Nim Yuen Village for ‘IC’ use</p>	
R5	<p>(a) Support the columbarium development at Tung Chung Nim Yuen</p> <p>(b) Consider that the private columbarium at Nim Yuen Village is far from existing settlements, thus, it is considered compatible with the land uses in Nim Yuen with no adverse impacts (e.g. noise, odour and psychological, etc.) on the environment</p> <p>(c) Should support the private columbarium for the provision of niches meeting the public demand</p> <p><u>Proposal</u></p> <p>To rezone private land in Nim Yuen Village for ‘IC’ use</p>	See TPB Paper paragraphs 6.17 to 6.19.
R6	<p>(a) Support the columbarium development at Tung Chung Nim Yuen as the village and its surrounding area have been used for grave yard and storage of ‘kam taps’</p> <p>(b) The private columbarium at Nim Yuen Village is far from existing settlements, thus, it is considered compatible with the land uses in Nim Yuen with no adverse impacts on the environment</p>	See TPB Paper paragraphs 6.17 to 6.19.

	<p>(c) Should support the private columbarium for the provision of niches meeting the public demand</p> <p><u>Proposal</u> To rezone private land in Nim Yuen Village for ‘IC’ use</p>	
R7	<p>(a) Oppose the “V” zoning covering Nim Yuen Village and the existing private columbarium development at Nim Yuen Village</p> <p>(b) Express that private columbarium has started operation prior to the gazettal of the draft Development Permission Area Plan (draft DPA Plan) covering the area and should be considered as an existing use</p> <p>(c) Express that Nim Yuen Village and its surrounding area have been used for grave yard and storage of ‘kam taps’. The rural characteristics of the village and its surrounding area are considered suitable for ‘Columbarium’ use. There have also been a considerable number of graves and burial grounds in the area as well as historic religious institutions including Lo Hon Monastery and Prajna Dhyana Temple which both have ‘Columbarium’ use</p> <p>(d) Consider that the private columbarium at Nim Yuen Village is far from existing settlements, thus, it is considered compatible with the land uses in Nim Yuen with no adverse impacts on the ecology, natural environment and rural character of the area</p> <p>(e) Consider that the planning intention of “V” zone does not reflect the existing</p>	See TPB Paper paragraphs 6.17 to 6.21.

	<p>conditions as there has no outstanding Small House application in Nim Yuen Village and no private land nor Government land is available for any Small House development in Nim Yuen Village</p> <p><u>Proposal</u></p> <p>To rezone the columbarium in Nim Yuen Village from “V” to ‘IC’ use for ‘Columbarium’ use and other uses serving the community such as elderly home and religious institution</p>	
R8	<p>Concern about the lack of supporting services for elderly due to the increasingly aging population in the territory and the shortage of public elderly care facilities</p> <p><u>Proposal</u></p> <p>To rezone Area 67 from “R(C)2” to ‘IC’ use for the development of community care and elderly supporting services including elderly community care, social centre for the elderly, day care centre, nursing home, home for the aged, etc.</p>	See TPB Paper paragraphs 6.20 and 6.21.
R9	<p>(a) Oppose the “V” zone for Sincerity Park and columbarium as it may affect the representer’s beneficial interest on his land</p> <p>(b) Express that the representer does not intend to develop its land for any uses permitted under “V” zone</p> <p>(c) Express that Sincerity Park has been in use as a columbarium for decades</p>	See TPB Paper paragraphs 6.17 to 6.19 and 6.47.

	(d) Concern that the draft OZP may pose threats to the ecology in the area	
R10	<p>(a) Object to the proposed land uses at some sites within 500m of the future railway station including the “Government, Institution or Community” (“G/IC”), “Open Space” (“O”) and “Coastal Protection Area” (“CPA”) zonings of a site (Site A) at Sha Tsui Tau, and the “CPA” and “Other Specified Uses” (“OU”) annotated “Stormwater Attenuation and Treatment Ponds” zonings of a site (Site B) near the junction of Chung Yat Road and Chung Mun Road</p> <p>(b) Concern that the boundary of the draft OZP does not follow the coastline at Sha Tsui Tau and mangrove area of the western bank of the Tung Chung Estuary is not covered by the draft OZP which will lead to the area not being protected by proper planning controls. From land administration, ecological protection and planning points of view, the private land and the mangrove area of the western bank of the Tung Chung Estuary should be included within the OZP boundary</p> <p>(c) Concern that the development densities proposed for housing sites are generally too low. This is considered as under-utilisation of scarce land resources, in particular for areas which will be served by utilities and transport infrastructure</p> <p>(d) Concern that the proposed land uses within the 500m catchment of the proposed railway station violate the Transit Oriented Development concept as stated in the Explanatory Statement attached to the draft OZP. These sites within the 500m catchment are considered with too less population accommodated. Designating taller and higher density developments further away from railway station fails to provide</p>	See TPB Paper paragraphs 6.34 to 6.37, 6.39 to 6.42 and 6.63.

	<p>convenience to the large number of population, such as to enable people to have higher accessibility to public transport and community facilities</p> <p>(e) Consider that medium density development comprising residential and/or commercial developments at the undeveloped sites to the west of the proposed railway station can create a vibrant activity node that would contribute to the character for the area</p> <p>(f) Concern from socio-economic point of view that the total flat production of Tung Chung West proposed under the Tung Chung New Town Extension Study (Tung Chung Study) will create over-concentration of public housing due to the existing Yat Tung Estate and the committed public housing development in Area 39 and the relatively higher development intensity for the public housing developments</p> <p>(g) Concern that higher building heights of the three proposed/committed public housing developments at Areas 39, 42 and 46 and the much lower building heights for the proposed private residential sites in TCV create an asymmetric built form which deviates from the urban design concept of Tung Chung West as proposed under the Tung Chung Study</p> <p>(h) Concern that the proposed drainage system with open-air attenuation and treatment ponds is very land extensive and has not been well justified. Consider that the proposed river park and stream buffer zone are sufficient in protecting the river, should additional flood storage be required, it should be incorporated into attenuation tanks built under open space areas to optimise residential development areas</p>	
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	<p><u>Proposals</u></p> <p>(i) To adjust the boundary of the draft OZP to include the mangrove area at Sha Tsui Tau (near Area 96A) and zone the area as “CPA”</p> <p>(ii) <u>Site A</u>: To rearrange the boundary of the “G/IC” zone at Areas 36A and 36B, “O” zone at Area 36E and the “CPA” zone at Area 98A and to include two non-building areas (NBAs) in the “G/IC” zone and add the ‘Flat’ use in Column 2 of the Notes for the “G/IC” zone</p> <p>(iii) <u>Site B</u>: To rezone the “OU (Stormwater Attenuation and Treatment Pond)” site in Area 45D and the “CPA” site in Area 98D to “R(C)2” (with plot ratio of 1 and maximum building height of 20mPD) and “OU (River Park)”</p> <p>(iv) To rezone the “O” site in Area 80 to “O(1)” and add ‘Stormwater Attenuation and Treatment Pond’ as a Column 1 use in the Notes of the draft OZP for the “O(1)” zone</p>	
R11	<p>(a) Generally in support of the draft OZP</p> <p>(b) Support the “R(C)2” zone for Area 61A as it is located at the fringe of the 500m radius from the proposed railway station and will be served by the proposed Road L24</p> <p>(c) Should allow higher density residential developments within 500m radius from future railway station to be in line with concept of Transport Oriented Development and the Government’s policy to increase housing supply</p>	See TPB Paper paragraphs 6.29 to 6.32, 6.34, 6.35, 6.43 to 6.46, 6.54 and 6.58.

	<p>(d) Concern about the extensive areas zoned “OU (Stormwater Attenuation and Treatment Ponds)” as further explanation is needed for over 2ha of land reserved for such use within TCV</p> <p>(e) Appreciate the establishment of a river park as it would preserve the natural environment and ecology of TCV</p> <p>(f) Should review the proposed road system and the capacity/scale of the Public Transport Interchange (PTI) at Shek Mun Kap to enhance internal and external connectivity</p> <p>(g) Consider that there will be inadequate commercial and community facilities to serve the future residents to be in line with the self-sustainable concept for new town development</p> <p><u>Proposals</u></p> <p>(i) To rezone Area 60 from “R(C)2” to “Residential (Group C)1” (“R(C)1”) with increase in plot ratio and building height restriction</p> <p>(ii) To rezone areas that are unnecessarily for “OU (Stormwater Attenuation and Treatment Ponds)” use to other appropriate land use zones for better utilization of scarce land resource</p> <p>(iii) To link up the “CA” sites along the western section of Tung Chung Stream with the</p>	
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	<p>proposed river park as the river park extension for long term conservation of Tung Chung Stream and as an eco-park</p> <p>(iv) Government to resume private land zoned for “OU (River Park)” and “CA” and take up the management responsibility</p> <p>(v) To allow flexibility for the provision of ‘Shops and Services’ use within “Residential (Group C)” (“R(C)”) zones</p> <p>(vi) To remove the NBAs in Areas 60 and 71A</p>	
R12	<p>(a) Oppose the inclusion of some private land lots into the “CA” zone</p> <p>(b) Oppose inclusion of the original buildable area (i.e. the “Village Environs” (“VE”)) in Ngau Au Village into the “CA” zone as it would leave no room for development and deprives the right of indigenous villagers</p> <p><u>Proposal</u> To expand the boundary of Ngau Au Village</p>	See TPB Paper paragraphs 6.22 and 6.23.
R13	<p><u>Proposal</u> “Extend of Hau Wong Temple” (To rezone a part of “G/IC”, “O” and “CPA” in Areas 36D, 36E and 98A respectively near Hau Wong Temple to “Commercial”)</p>	See TPB Paper paragraph 6.28.

R14	The existing burial areas of villagers of Tai O San Tau Village would be affected by the “Green Belt” (“GB”) zoning.	See TPB Paper paragraph 6.24.
R15 to R17	<p>(a) Not appropriate for low-density private residential developments</p> <p>(b) Developments in TCV could not help the economic situation and employment of local residents who are mainly low-skill labours</p> <p>(c) To develop organic farming</p> <p>(d) To build up local brand for organic products to take advantage of TCV’s proximity to the airport for export</p> <p>(e) The Government to resume private land for public to develop agriculture</p> <p>(f) Local agricultural development can reduce the reliance on imported food supply, provide more local job opportunities for low-skill workers and minimize the need for cross-district commuting</p> <p>(g) To reserve land in Tung Chung area and airport to collect food waste to reduce cost of fertilizer</p>	See TPB Paper paragraph 6.25 to 6.27 and 6.38.
R18, R19 and R23	(a) Concern about low-density private residential developments along both banks of the Tung Chung Stream and consider that these developments cannot bring significant and sustainable economic return to Hong Kong	See TPB Paper paragraphs 6.25 to 6.27, 6.38, 6.47, 6.48, 6.57, 6.59 and 6.64.

	<p>(b) The ecology and the value of Tung Chung Stream should be considered as a whole river system. Designating only the river estuary area as “CPA” has limited value to the conservation of Tung Chung Stream</p> <p>(c) Concern the TCV river valley and the “CPA” will become commercialized with environmental pollution</p> <p>(d) TCV is one of the few natural river valleys remaining in Hong Kong with various species of trees, farms of various scale, wetlands, mangroves and bio-diversity. To develop the upstream and midstream areas of the TCV river valley will directly affect the bio-diversity and the living quality of the villagers</p> <p>(e) Query whether an EIA has been conducted for the draft OZP and if there is any control on the implementation/construction methods</p> <p>(f) Concern that low-density private residential developments will bring in more private cars to the area which will cause environmental pollution and destroy the natural environment</p> <p>(g) Turning natural landscape into car parking use is not acceptable</p> <p>(h) Concern about the future developments in the “V” zone of Shek Lau Po will destroy the natural environment and the habitat of fireflies</p>	
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	<ul style="list-style-type: none">(i) TCV is a frequently visited place by the general public and residents in Tung Chung for its natural landscape. Its community and areas of high ecological values should not be destroyed for private property developments. The Government should preserve the natural landscape of the river valley and encourage the general public to enjoy the natural environment of Tung Chung Stream and TCV for health benefits(j) To develop organic farming area and make Tung Chung as a zero-waste new town(k) To reserve land in Tung Chung area and airport to collect food waste to reduce waste at source(l) The treated food waste can provide fertilizer to the organic farms in TCV. This will reduce the amount of food waste to be disposed in the landfills(m) To build up a local brand for organic products to take advantage of TCV's proximity to the airport for export(n) There is a demand for local organic produce. In particular, local organic produce from TCV can be sold to existing and future private residential developments in Tung Chung Town Centre and Tung Chung Extension, supporting the local economy(o) Local agricultural development can reduce the reliance on imported food supply, provide more local job opportunities for low-skill workers and minimize the need for cross-district commuting.	
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	<p>(p) To make use of the ecology of TCV for eco-education such as setting up eco-education camp, and to make use of TCV's agricultural land and orchard land for local agricultural produce as local economic developments</p> <p>(q) To build a low-carbon community with a cycle track network and no-car community. Should make reference to other countries to develop a public bicycle rental service at MTR stations and bus stops and should make reference to Ma Wan and Discovery Bay to prohibit private cars to encourage the public to use public transport</p>	
R20 and R21	<p>(a) The ecology and the value of Tung Chung Stream should be considered as a whole river system. Designating only the river estuary area as "CPA" has limited value to the conservation of Tung Chung Stream</p> <p>(b) Concern the TCV river valley and the "CPA" will become commercialized with environmental pollution</p> <p>(c) Local agricultural development can reduce the reliance on imported food supply, provide more local job opportunities for low-skill workers</p> <p>(d) To make use of the ecology of Tung Chung Valley for eco-education, and its agricultural land and orchard land for local agricultural produce as local economic developments</p>	See TPB Paper paragraphs 6.25, 6.47, 6.57 and 6.59.
R22 and R38	<p>(a) Concern about low-density private residential developments along both banks of the Tung Chung Stream</p>	See TPB Paper paragraphs 6.25 to 6.28, 6.38, 6.47 and 6.64.

	<p>(b) Concern that low-density private residential developments will bring in more private cars to the area which will cause environmental pollution and destroy the natural environment</p> <p>(c) To develop organic farming</p> <p>(d) To recycle the food waste</p> <p>(e) There is a demand for local organic produce. In particular, local organic produce from TCV can be sold to existing and future private residential developments in Tung Chung Town Centre and Tung Chung Extension, supporting the local economy</p>	
R24	<p>(a) Concern about the damage of the natural ecology of Tung Chung Stream and TCV</p> <p>(b) Concern about the future developments in the “V” zone of Shek Lau Po will destroy the natural environment and the habitat of fireflies</p> <p>(c) TCV is a frequently visited place by the general public and residents in Tung Chung for its natural landscape. Its community and areas of high ecological values should not be destroyed for private property developments. The Government should preserve the natural landscape of the river valley and encourage the general public to enjoy the natural environment of Tung Chung Stream and TCV for health benefits</p> <p>(d) Local agricultural development can provide more local job opportunities for low-skill workers</p>	See TPB Paper paragraphs 6.27, 6.38, 6.47, 6.48 and 6.59.

	<p>(e) To make use of the ecology of TCV for eco-education and its agricultural land and orchard land for local agricultural produce as local economic developments</p> <p>(f) To build a low-carbon community with a cycle track network and make reference to other countries to develop a public bicycle rental service at MTR stations and bus stops to encourage the public to use public transport</p>	
R25	<p>(a) Oppose the further development in Tung Chung areas and the incorporation of new areas zoned for residential development</p> <p>(b) Tung Chung carries a lot of ecological value especially in Tin Sam, Tung Chung beach which is one of the most valuable and important seagrass bed in Hong Kong</p> <p>(c) Concern about the developments along Tung Chung Stream having impacts to the marine ecology in Tung Chung including 'hippocampus', seahorses, etc.</p> <p>(d) Concern that the Government is doing nothing to protect or even encourage illegal dumping, shovel and other acts</p>	See TPB Paper paragraphs 6.47 and 6.61.
R26	Oppose affecting ecology	See TPB Paper paragraph 6.47.
R27	Save the Chinese White Dolphins (CWD). Stop the development plan in Tung Chung	See TPB Paper paragraph 6.47. and see additional responses as below:

		<p><u>Impacts on CWD</u></p> <p>The concerned issues had been properly assessed and addressed in the approved Environmental Impact Assessment (EIA) Report for TCNTE. With respect to ecological impacts to CWDs, DAFC comments that the footprint of the proposed reclamation in Tung Chung East (which is outside the Area of the draft OZP) is located in coastal habitats of relatively low ecological value with very low usage by CWDs.</p>
R28	<p>(a) Support the promulgation of a statutory land use plan and agree with the general planning intention of the draft OZP, concentration of village type development within “V” zone, general presumption against development in “GB”, “CA” and “CPA” zones and not permitting temporary use/development in “CA” and “CPA” zones</p> <p>(b) Welcome the zoning in Area 96D, existing fung shui woods west of Ngau Au and north of Shek Mun Kap as “CA”, but disappointed that the remaining fung shui woods receive no proper zoning against development and ecological vandalism</p>	<p>See TPB Paper paragraphs 6.47, 6.51, 6.53 to 6.56, 6.58, 6.59, 6.65, 6.66 and 6.69 and additional responses as below:</p> <p><u>Adverse impacts during construction phase</u></p> <p>During construction phase, site supervisory team will supervise the</p>

	<p>(c) Concern about the impact on the ecosystem of Tung Chung Stream, Valley and Bay, possible proliferation of incompatible developments and vandalism, Tin Sam and Wong Lung Hang which remained unprotected, threat of residential and commercial developments to water quality, ecosystem and landscape of the Tung Chung Valley, Tung Chung Stream and Tung Chung Bay and species of global conservation value, and adverse impact of road network on the environment and ecology</p> <p>(d) Concern the two NBAs in Areas 60 and 71A will become road access, threatening the adjoining “CPA” and “CA” zones</p> <p>(e) To adopt a ‘conservation first before development’ strategy to protect the river source and calling for early implementation of environmental protection and conservation land uses</p> <p>(f) Concern about the construction trucks and machinery will destroy the environment, traffic restrictions should be imposed in Tung Chung Valley and Tung Chung Bay</p> <p>(g) Concern about the development pressure in the area and call for adopting wide ranging measures to alleviate development impacts by (i) avoiding developing residential and industrial areas in Tung Chung River Valley; (ii) allocating permeable land use by conserving vegetation and avoiding large concrete surface areas; and (iii) strengthening enforcement against dumping, unauthorized vehicle access and developments on both sides of Tung Chung Stream</p>	<p>construction works with the aim to minimising nuisance to nearby area, including air and noise pollution, and closely monitor to avoid malpractice of the contractors. Besides, the contractors will be required to submit Waste Management Plan to present, among others, good site practices and measures for waste reduction so as to minimise the trips for transporting waste. With regards to the concern on dumping of construction and demolition (C&D) waste generated in future developments in Tung Chung, the possible generation of C&D waste during the construction has been evaluated in the Tung Chung Study. Strategic mitigation measures, including opportunity for on-site sorting, reusing C&D materials, etc., would be in place to minimise the surplus materials to be disposed off-site. Trip-ticket system will be implemented under works contract to ensure that the disposal of C&D materials are properly documented and verified, with the aim to avoiding</p>
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<p>(h) Concern about the non-essential road access to ecologically sensitive areas (such as Road L28 running across the Tung Chung Stream), and existing illegal road access across Tung Chung Stream in Area 84</p> <p>(i) All private land lots in Tung Chung River Valley should be resumed by the Government to provide flood prevention, environmental and conservation infrastructure in the entire river valley and estuary which will be managed by the Government as a River Nature Park</p> <p><u>Proposals</u></p> <p>(i) To cover Tin Sam and Wong Lung Hang areas in new DPA plans or Country Park Extension</p> <p>(ii) To zone 30m on either side of river courses, banks and tributaries of Tung Chung Stream and Wong Lung Hang, Tung Chung Stream Estuary and Tung Chung Bay as “Site of Special Scientific Interest” (“SSSI”)</p> <p>(iii) To zone all fung shui woodlands as “CA”</p> <p>(iv) To relocate the PTI site in Area 38A to the “G/IC” zone in Area 107 or the “Residential (Group A)1” “R(A)1” zone in Area 39 of the draft Tung Chung Town Centre Area OZP and to include the Mangrove Skimmer habitat in River Park or other proper conservation zoning</p> <p>(v) To amend the Notes of various zones and sections of Explanatory Statement of the</p>	<p>illegal dumping and landfilling of C&D materials in Tung Chung. For better monitoring on possible illegal dumping and landfilling of C&D materials within the work sites during construction phase, a surveillance team will be set up to conduct regular site inspections and report suspected cases to EPD.</p> <p>Opportunity for early implementation of environmental measures and conservational land use zonings will be explored in the detailed design stage for the works in TCW.</p>
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	<p>draft OZP :</p> <ul style="list-style-type: none"> - to prohibit (i) diversion of streams, filling of land/pond or excavation of land; (ii) material change of existing uses that have adverse impacts on the area; (iii) uses not conforming to Water Pollution Control Ordinance; (iv) ‘refreshment kiosk’ use in “CA” and “CPA” zones and agricultural land; (v) constructing septic tank of rebuilt Small House within 30m of watercourse; (vi) temporary use/development in “CA” and “CPA” zones; and (vii) open storage and port back-up land uses; - to favourably consider alteration and/or modification of existing uses which may lead to ecological improvement to the area; and - to require permission from relevant government authorities for maintenance/repair works of watercourses and drainage works that affecting its physical setting and ecology 	
R29	<p>(a) Concern about the overall capacity of Tung Chung area with the planned increase in population, especially, air quality, provision of job opportunities, terrestrial and marine baseline studies and biological diversity</p> <p>(b) Concern about the incompatible developments and vandalism in Tung Chung Valley, and dumping in Shek Mun Kap</p> <p>(c) Concern about the impacts of the residential zonings in TCV and nearby areas and their spillover effects on the landscape, hydrology, ecology, breezeway and view corridor of TCV</p>	<p>See TPB Paper paragraphs 6.25 to 6.27, 6.29, 6.30, 6.32, 6.47, 6.49, 6.58, 6.61, 6.62, 6.64, 6.67, 6.68 and 6.69 and additional responses as below:</p> <p><u>Adverse impacts during construction phase</u></p> <p>During construction phase, site supervisory team will supervise the construction works with the aim to</p>

	<p>(d) Concern about the extension of the “V” zone in Shek Lau Po to include the surrounding land originally proposed as “AGR” zone and the extension has not been justified in the Environmental Impact Assessment</p> <p>(e) Support the Green Group’s Joint Submission</p> <p>(f) To provide a comprehensive plan for Lantau development and to cover the whole Lantau in the terrestrial and marine baseline studies</p> <p>(g) The principle of the Convention on Biological Diversity should be followed and the river system should be regarded as a whole in assessing the ecological value</p> <p>(h) Concern on the control over the existing and potential unauthorized uses and eco-vandalism</p> <p>(i) Calling for early implementation of environmental protection and conservation land uses proposed in the draft OZP prior to other project works</p> <p>(j) A new policy has been proposed to ensure sustainable development of agriculture in Hong Kong. The Board should reserve quality farmland to support quality farmland to support the policy and the potential sustainable local economy.</p> <p>(k) To develop a waste recycling system to collect food waste in Tung Chung area and airport to reduce waste at source. The treated food waste can provide organic</p>	<p>minimising nuisance to nearby area, including air and noise pollution, and closely monitor to avoid malpractice of the contractors. Besides, the contractors will be required to submit Waste Management Plan to present, among others, good site practices and measures for waste reduction so as to minimise the trips for transporting waste. With regards to the concern on dumping of construction and demolition (C&D) waste generated in future developments in Tung Chung, the possible generation of C&D waste during the construction has been evaluated in the Tung Chung Study. Strategic mitigation measures, including opportunity for on-site sorting, reusing C&D materials, etc., would be in place to minimise the surplus materials to be disposed off-site. Trip-ticket system will be implemented under works contract to ensure that the disposal of C&D materials are properly documented and verified, with the aim to avoiding illegal dumping and landfilling of C&D</p>
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	<p>fertilizer to the organic farms in TCV.</p> <p><u>Proposals</u></p> <p>(i) To adopt the new Air Quality Guidelines of the World Health Organization to evaluate the cumulative impacts</p> <p>(ii) To include Tin Sam and Wong Lung Hang areas in a new DPA plan</p> <p>(iii) To resume areas identified for conservation and hydraulic (flooding) uses along Tung Chung Stream</p> <p>(iv) To establish a River Nature Park and resume private land lots in the park</p> <p>(v) To implement traffic restrictions in TCV and Tung Chung Bay</p>	<p>materials in Tung Chung. For better monitoring on possible illegal dumping and landfilling of C&D materials within the work sites during construction phase, a surveillance team will be set up to conduct regular site inspections and report suspected cases to EPD.</p> <p>Opportunity for early implementation of environmental measures and conservational land use zonings will be explored in the detailed design stage for the works in TCW.</p>
R30	<p>(a) Welcome the gazettal of the draft OZP</p> <p>(b) Concern that the draft OZP is deficient for the long-term conservation of Tung Chung Stream-cum-Bay system</p> <p>(c) Highly concern about the impacts of any proposed “Residential” and “V” zones on the fishery, water quality and ecology of Tung Chung Bay</p> <p>(d) Concern about the “Commercial” (“C”) zones, especially that in Area 38A where a public transport terminus (PTI) is planned as it encroaches the mangroves on the western bank of Wong Lung Hang estuary where a breeding population of dragonfly</p>	<p>See TPB Paper paragraphs 6.47, 6.50, 6.51, 6.54 to 6.56, 6.58 to 6.61, 6.64, 6.65 and 6.69 and additional responses as below:</p> <p><u>Geotechnical risks</u></p> <p>Regarding the concerns on the geotechnical stability in TCV, PM/HKI&I, CEDD advised that geotechnical assessment has been</p>

	<p>Mangrove Skimmer was discovered</p> <p>(e) Concern about the vandalism in the area, hydrology of Tung Chung Stream and Bay, drainage, air pollution (Ozone in particular) and geotechnical risks</p> <p>(f) Support the Green Group's Joint Submission</p> <p>(g) Compatible land uses should be proactively incorporated into the draft OZP area for further enhancement of the ecological and cultural value of TCV and Bay including (i) an eco-tourist hub to connect different hiking trails in TCV; (ii) a stream trekking base for Tung Chung Stream; (iii) open spaces and greening areas integrating the original natural features; (iv) provision of educational facilities such as museums; (v) a visitor centre in the non-sensitive part of TCV to help public admiring the ecological importance of Tung Chung River-cum-Bay system; (vi) facilitating visitors to visit various tourist spots in the area in an environmental-friendly way; (vii) making use of the existing landscape and cultural heritage of Tung Chung Stream to enhance tourist appeals of Tung Chung River Valley and promote passive recreational activities; and (viii) scientific research and education</p> <p>(h) Should implement the environmental protection and conservation land uses proposed in the draft OZP and restrict the traffic in the area, especially for construction trucks and machinery immediately</p> <p>(i) Construction and domestic wastes should be mandatorily collected for proper disposal</p>	<p>conducted for the area under the Tung Chung Study with the aim of identifying all potentially significant ground engineering problems and natural terrain hazards that might affect the proposed development and infrastructure. According to the preliminary natural terrain hazard assessment, the relevant catchments have been assessed and showed that there are no insurmountable geotechnical problems. Detailed natural terrain hazard assessment was recommended to be conducted in detailed design stage for determination on the needs for appropriate mitigation measures.</p> <p><u>Adverse impacts during construction phase</u></p> <p>During construction phase, site supervisory team will supervise the construction works with the aim to minimising nuisance to nearby area, including air and noise pollution, and closely monitor to avoid malpractice of</p>
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	<p><u>Proposals</u></p> <p>(i) To cover San Tau, Tung Chung Bay, Tin Sam and Wong Lung Hang areas with a new DPA plan or Country Park extensions</p> <p>(ii) To establish a River Nature Park</p> <p>(iii) To zone Tung Chung Bay as “SSSI”</p> <p>(iv) To include the Mangrove Skimmer habitat in River Park or other proper conservation zonings, and to relocate the PTI site in Area 38A to the “G/IC” site in Area 107 or the “R(A)1” site in Area 39 of the Tung Chung Town Centre</p>	<p>the contractors. Besides, the contractors will be required to submit Waste Management Plan to present, among others, good site practices and measures for waste reduction so as to minimise the trips for transporting waste. With regards to the concern on dumping of construction and demolition (C&D) waste generated in future developments in Tung Chung, the possible generation of C&D waste during the construction has been evaluated in the Tung Chung Study. Strategic mitigation measures, including opportunity for on-site sorting, reusing C&D materials, etc., would be in place to minimise the surplus materials to be disposed off-site. Trip-ticket system will be implemented under works contract to ensure that the disposal of C&D materials are properly documented and verified, with the aim to avoiding illegal dumping and landfilling of C&D materials in Tung Chung. For better monitoring on possible illegal dumping and landfilling of C&D materials within</p>
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		<p>the work sites during construction phase, a surveillance team will be set up to conduct regular site inspections and report suspected cases to EPD.</p> <p>Opportunity for early implementation of environmental measures and conservational land use zonings will be explored in the detailed design stage for the works in TCW.</p>
R31	<p>(a) Concern about the encroachment of the “V” zone into woodlands and tributaries of Tung Chung Stream which would lead to adverse impacts on some woodland dependent bird species of conservation concern</p> <p>(b) Support the Green Group’s Joint Submission</p> <p>(c) To adopt an ‘ecosystem approach’ to protect sensitive habitats in TCV</p> <p><u>Proposals</u></p> <p>(i) To protect all natural streams (including all their tributaries) by “CA” zoning covering 30 m along both sides of the bank</p> <p>(ii) To exclude woodlands, streams and wetlands from the “V” zones</p>	<p>See TPB Paper paragraphs 6.47, 6.54, 6.55, 6.56 and 6.59.</p>

R32	<p>(a) Support the designation of “OU (River Park)” but the boundary should be extended</p> <p>(b) The recommended DPA plan prepared by the joint green groups should be applied to the draft OZP</p> <p>(c) Concern about the ecologically sensitive areas, Tung Chung Bay, Tung Chung Stream and their riparian zones; fung Shui woods and mature woodlands, mudflat and mangroves along the coastline of Tung Chung Bay and other vegetation cover</p> <p>(d) Oppose the designation of “OU (Polder)” covering fung shui woods</p> <p><u>Proposals</u></p> <p>(i) To extend the “OU(River Park)” as shown in the recommended DPA plan by the green groups</p> <p>(ii) To designate the land near Tung Chung Stream estuary as “OU(Conservation, Ecotourism & Ecological Education)”</p> <p>(iii) To cover ecologically sensitive area with conservation zonings</p> <p>(iv) To designate the mainstream of Tung Chung Stream and riparian zone as “SSSI”</p> <p>(v) To designate areas with fung Shui woods and mature woodlands as “CA”</p> <p>(vi) To designate the mudflat and mangroves along the coastline of Tung Chung Bay as “CPA”</p>	<p>See TPB Paper paragraphs 6.47, 6.54 to 6.56, 6.58, 6.59 and 6.63.</p>
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	(vii) To designate areas with orchards, natural vegetation, woodland, hillside shrubland and grassland as “GB”	
R33	<p>(a) Welcome the gazettal of the draft OZP which enables statutory planning enforcement action against eco-vandalism at the ecologically important TCV area</p> <p>(b) Concern about the lack of effective land use control and enforcement power against incompatible developments and dumping of waste in Tin Sam and Wong Lung Hang</p> <p>(c) Appreciate that the fung shui woods of Ngau Au and north of Shek Lau Po are protected by “CA” zoning but have concern that the remaining fung shui woods fall within “V” and “GB” zones</p> <p><u>Proposals</u></p> <p>(i) To cover San Tau/Tin Sam and Wong Lung Hang with DPA plans</p> <p>(ii) To designate all fung shui woods as “CA”</p>	See TPB Paper paragraphs 6.47, 6.55, 6.56 and 6.62.
R34	<p>(a) Concern about many of the natural habitats and wooded areas such as some of the fung shui woodlands are not well protected under the draft OZP</p> <p>(b) The potential wildlife movement corridor identified by the EIA report falls within the proposed “V” zone of Mok Ka Village and the future Small House developments in Mok Ka Village will affect the movement corridor by habitat destruction and</p>	See TPB Paper paragraphs 6.29, 6.30, 6.32, 6.47, 6.50, 6.52, 6.53, 6.55, 6.56, 6.65 and 6.67.

	<p>disturbance</p> <p>(c) The proposed roads passing through the entire TCV which will intercept with the potential wildlife corridors</p> <p>(d) Illegal bridges should be removed or replaced by environmentally-friendly road design to prevent road kills and obstructing the passage of wildlife under the bridges over stream bed</p> <p>(e) Concern about the design of the fencing surrounding the proposed stormwater attenuation and treatment ponds in Area 45B may block or pose an obstruction to the free passage of wildlife</p> <p>(f) To fully respect, commit to and implement the principles of the Convention on Biological Diversity</p> <p>(g) To critically review the carrying capacity of TCV in accommodating the proposed population increase</p> <p><u>Proposals</u></p> <p>(i) Not to cover sensitive and ecologically important habitats as well as riparian zones with “V” zones or other development zones</p> <p>(ii) To enlarge the conservation zonings at the locations proposed by representers to ensure there will be viable movement corridors for wildlife</p>	
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	<p>(iii) To rezone the residential zone at Area 61A to “GB”</p> <p>(iv) To designate all fung shui woodlands as “CA” rather than “GB” or “V”</p>	
R35	<p>(a) Concern about the impacts of the residential and village type developments on the ecology of Tung Chung Bay, unauthorized land uses in Tung Chung Stream valley, the environment of Tung Chung and the ecology of its surrounding waters, provision of community facilities and employment opportunity, and the loading of transport facilities</p> <p>(b) Land for agriculture use and collection of food waste uses etc. should be reserved</p> <p>(c) Concern about zoning some areas originally intended for agricultural use as “V” and that extended the “V” zone has not been justified in the Environmental Impact Assessment</p> <p>(d) Support the proposal of “Tung Chung Stream Nature River Park” and associated sewage treatment requirements raised by the green groups for better conservation of the ecology of Tung Chung Stream Valley.</p> <p>(e) More GIC sites should be reserved in the extended area and the area neighbouring Yat Tung Estate for the provision of market, flea market, municipal services buildings which the residents of Tung Chung has urged for years and to integrate these GIC facilities with the existing agricultural activities in TCV for the</p>	<p>See TPB Paper paragraphs 6.25 to 6.27, 6.29, 6.30, 6.32, 6.33, 6.38, 6.47, 6.49, 6.58, 6.61 and 6.62.</p>

	<p>development of local economy</p> <p>(f) To review the planned provision of schools according to the population forecast to release more sites for other GIC facilities</p> <p>(g) To further review the traffic flow of internal road networks of Tung Chung, North Lantau Highway and Tuen Mun – Chek Lap Kok Link upon completion of the Tung Chung Extension Development and the capacity of Tung Chung Line</p> <p><u>Proposals</u></p> <p>(i) To cover San Tau and Wong Lung Hang etc. areas by new DPA Pans</p> <p>(ii) To reduce the development intensity and population of TCNTE</p> <p>(iii) To delete “C”, “R(A)” and “R(C)” zones within the TCV and Tung Chung Bay</p>	
R36	<p>(a) Conservation of Tung Chung Stream and TCV which have high ecological value</p> <p>(b) The proposed residential zones are too large which may require substantial site formation and construction works. Concern that the construction waste and engineering works might affect the streams</p> <p>(c) Concern about some Greenfield sites in Shek Mun Kap and along the Tung Chung Stream are zoned “V”.</p>	See TPB Paper paragraphs 6.47, 6.50, 6.62 and 6.69.

	<p>(d) Detailed ecological assessment should be conducted and areas with ecological value should be designated as conservation-related zones</p> <p><u>Proposals</u></p> <p>(i) To reduce the size of the “V” zone to minimal to, for example, cover only the existing buildings</p> <p>(ii) To include the Site of Special Scientific Interest, San Tau Beach, into the draft OZP for protection</p>	
R37	<p>(a) Has reservation on the large size of the “V” zone in Shek Lau Po as more than 120% of new Small House demand will be met without strong reason</p> <p>(b) The northern part of the V” zone was proposed for “Agriculture” zone in the third stage of public consultation, a reason for such change is needed</p>	<p>See TPB Paper paragraph 6.49 and the “V” zone in Shek Lau Po is also to help meeting the shortage of land for Small House development in other villages within the Tung Chung Heung in addition to catering for its own villagers’ Small House demand.</p>

Summary of Comments on Representations and Planning Department's Responses

Comment No. S/I-TCV/1-	Grounds/Proposals of Comments	Planning Department's Responses
C1 to C4	<p>Concern on R1 and R2 and support the columbarium development in Nim Yuen, and comment that there is no suitable land in Nim Yuen for village house development</p> <p><u>Proposal</u> To designate Nim Yuen Village as 'Institutional or Community' use</p>	See Town Planning Board (TPB) Paper paragraphs 6.17 to 6.19.
C5	Support R8 (submitted by the same company)	See TPB Paper paragraphs 6.20 and 6.21.
C6 to C11	<p>(a) Oppose R3 to R9 and the columbarium development in Nim Yuen which will lead to adverse social, ecological, traffic, hygiene and security problems</p> <p>(b) Support the "V" zone for Nim Yuen Village and "R(C)2" zone for Area 67</p> <p><u>Proposal:</u> To provide more recreational facilities in Nim Yuen</p>	See TPB Paper paragraphs 6.17 to 6.21 and 6.32.
C12	Oppose R33 and comment that over 90% of the land in San Tau Village is privately owned. The villagers will support the Government's long-term planning for community facilities and transportation on government land,	See TPB Paper paragraphs 6.47, 6.55 to 6.56 and 6.62.

	especially the development of an emergency vehicular access between Tung Chung and Tai O	
C13 and C14	<p>(a) Concern on R3 to R6 and comment that there may not be suitable sites for columbarium development in Tung Chung</p> <p>(b) Concern on R10 and R11 and does not agree with the proposal to rezone “OU (Stormwater Attenuation and Treatment Ponds)” sites to “R(C)2” or other zonings</p>	See TPB Paper paragraphs 6.17 to 6.19, 6.41, 6.42 and 6.46.
C15	<p>(a) Concern on R1 and R2 and comment that enlarging “V” zone will not resolve the current housing problem in Hong Kong, but will further destroy the ecology of the agricultural land in TCV and Tung Chung Stream</p> <p>(b) Concern on R3 to R7 and R9 and does not support the designation of “Government, Institution or Community” (“G/IC”) zone for the columbarium development which will legalise the existing columbarium and lead to adverse impacts on the community and ecology of the TCV</p>	See TPB Paper paragraphs 6.17 to 6.19 and 6.47.
C16	(a) Agree with R11 in supporting the establishment of a river park, but comment that low-density private residential developments in TCV could not resolve the housing need	See TPB Paper paragraphs 6.22 to 6.24, 6.34, 6.37 and 6.47.

	<p>(b) Concern on R12 and R14 and comment that the Government should not meet the interests of the indigenous villagers at the expense of environmental protection</p> <p><u>Proposal:</u> To delete all residential developments to better preserve the natural environment in TCV</p>	
C17	<p>Support R11 about the extensive areas designated for flood control. Also support the view of R11 that the Government should resume private land zoned “OU (River Park)”, “CA” and “CPA” and take up the management responsibility</p> <p><u>Proposal:</u> To rezone those “OU (Stormwater Attenuation and Treatment Ponds)” zones within 500m from the future railway station for development use while such stormwater attenuation and treatment ponds should be relocated underneath the “O” zone in Area 80</p>	See TPB Paper paragraphs 6.41 to 6.42, 6.46 and 6.58.
C18	<p>Support R28, R30 and R33 and raise concerns over incompatible developments and eco-vandalism in Tung Chung River Valley</p> <p><u>Proposal:</u> To cover Tin Sam with DPA plans or incorporated in the Country Park</p>	See TPB Paper paragraphs 6.61 and 6.62.

C19	Support R35 on the impacts on the ecology of Tung Chung River Valley, TCV, Tung Chung Bay from the proposed residential/village developments; and comment that the Government should carry out preservation measures before considering the need for development	See TPB Paper paragraphs 6.25 to 6.27, 6.29, 6.30, 6.32, 6.33, 6.38, 6.47, 6.49, 6.58, 6.61 and 6.62.
C20	<p>(a) Consider Tung Chung is important to horseshoe crabs as the lower reaches of Tung Chung River Valley and Tung Chung Bay is a critical spawning ground and nursery site for Mangrove horseshoe crabs and Chinese horseshoe crabs, protecting this area is vital to ensuring the long term survival of these two species in Hong Kong</p> <p>(b) Concern on R15 to R21 and R29 and comment that the ecology and the value of Tung Chung Stream should be considered as a whole river system and making use of the ecology of TCV for eco-education</p> <p>(c) Raise comments on R32 about designating the land near Tung Chung Stream estuary as “OU (Conservation, Ecotourism & Ecological Education)</p> <p>(d) Raise comments on R35 on the aspects of provision of community facilities and employment opportunity and supporting the proposal of “Tung Chung Stream Nature River Park”</p> <p>(e) The TCV river valley is important to Mangrove horseshoe crabs in Hong Kong</p>	See TPB Paper paragraph 7.2 for the specific response to the boardwalk proposal and see responses to other grounds in paragraphs 6.47, 6.54, 6.57 and 6.58 to 6.60.

	<p>(f) Tung Chung Bay has already exceeded its visitor receiving capacity</p> <p>(g) Identify threats to the biodiversity in Tung Chung that increases in population and visitor numbers will bring</p> <p>(h) The proposed boardwalk will treat the Tung Chung Stream as a whole river system; meet the Lantau Development Plan's goals of adopting a "point-line-plane" approach linking up places of conservation value to attract visitors and add value to the river park; provide an eco-education resource in Hong Kong; alleviate the problem of visitor receiving capacity being over-exceeded in Tung Chung; achieve conservation, ecotourism and ecological education with lower reaches of Tung Chung River Valley are afforded appropriate protections to protect the biodiversity there, at the same time allowing visitors to access the area without destroying it; provide a community resource for local families to enjoy and help create local job opportunities; and support and complement the Lantau Development Plan for a 'River cum Biodiversity Park' at Tung Chung by extending the park to incorporate the inter-tidal mudflat into the plan</p> <p><u>Proposals:</u></p> <p>(i) To construct a continuous boardwalk linking the River cum Biodiversity Park with the inter-tidal mudflat at Tung Chung</p> <p>(ii) Through "point-line-plane" approach, link the River cum Biodiversity</p>	
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	<p>Park with the boardwalk across the mudflat to fully utilize all of the ecological offerings available in Tung Chung</p> <p>(iii) Focus on constructing a facility for education first, then as an amenity for local community, then as a facility for green groups, then tourism.</p> <p>(iv) The Tung Chung River Valley be accorded appropriate conservation status, to protect the biodiversity there, at the same time allowing for the construction of a boardwalk</p> <p>(v) Tung Chung Bay be designated a Marine Protected Area, or be accorded similar conservation status to restrict access to stop further visitor damage</p> <p>(vi) Promote Tung Chung as Lantau's "Living Fossil Nature Reserve and Boardwalk"</p>	
C21	<p>(a) Support R15 to R29</p> <p>(b) Local economy should be established</p> <p>(c) Object to changing agricultural land for other uses and request to maintain the agricultural land for agricultural use</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.
C22 and C76	(a) Support R15 to R29	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38,

	(b) The nature in Tung Chung should be preserved	6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.
C23, C25, C36, C48, C51, C62, C71, C72, C79 and C82	(a) Support R15 to R29 (b) It is necessary for the provision of market operated by FEHD in Tung Chung	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.
C24	(a) Support R15 to R29 (b) It is necessary for the provision of market operated by FEHD in Tung Chung (c) Government should carry out study for the provision of water transport in Tung Chung	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.
C26, C28, C30 to C31, C33 to C35, C39, C40, C42, C46, C49, C50, C52 to C55, C57, C58 to	Support R15 to R29	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.

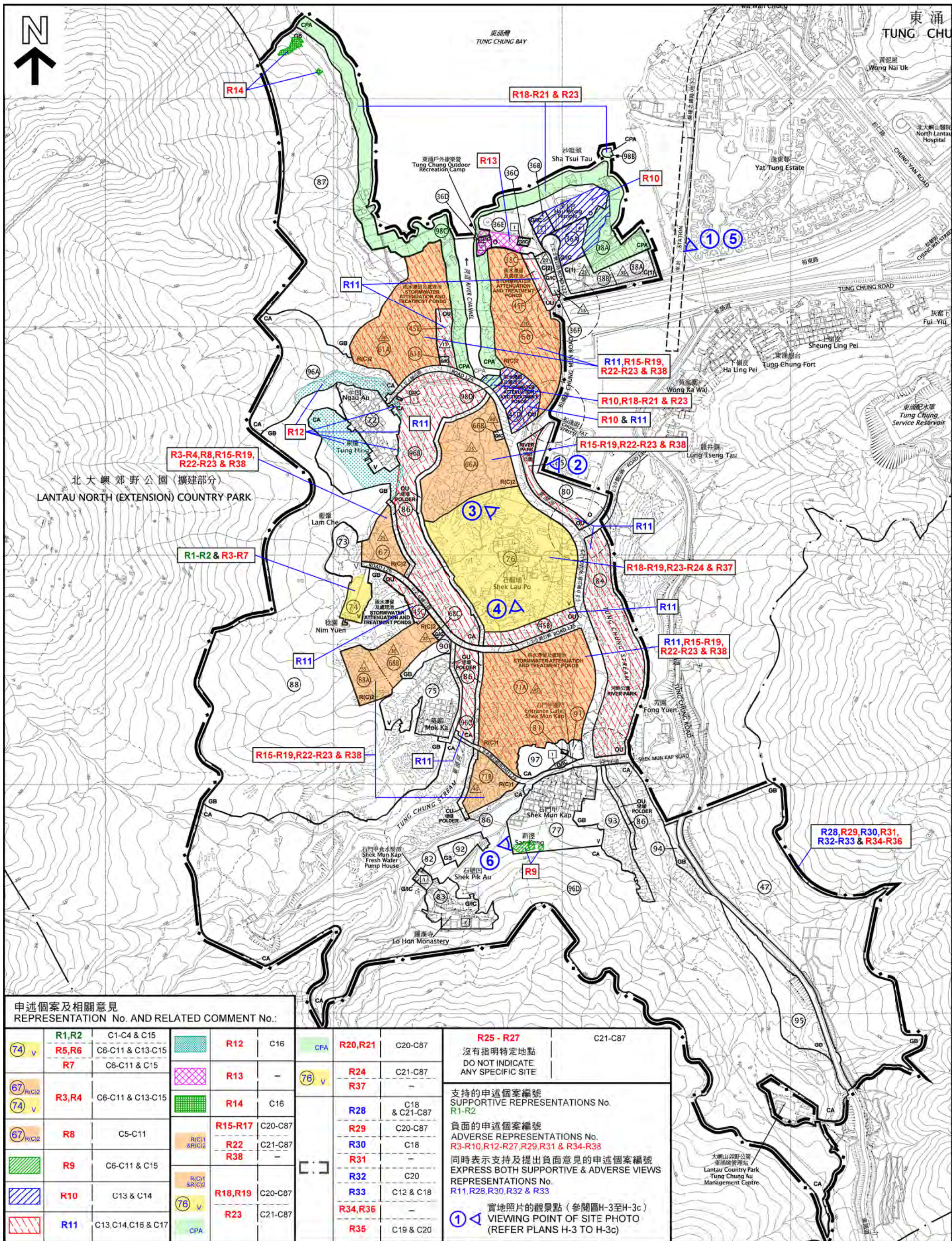
C60, C63 to C67, C70, C73, C75, C77, C78, C81, C83 to C85		
C27	<p>(a) Support R15 to R29</p> <p>(b) Minibus services connecting to the airport should be improved and increased</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.
C29	<p>(a) Support R15 to R29</p> <p>(b) It is necessary for the provision of market operated by FEHD in Tung Chung</p> <p>(c) A lower saturation level should be adopted for the calculation of traffic capacity of Tung Chung</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.
C32	<p>(a) Support R15 to R29</p> <p>(b) It is necessary for the provision of market operated by FEHD in Tung Chung</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.

	<p>(c) The Tung Chung West Railway Station should be implemented as soon as possible</p> <p>(d) Tung Chung Bay should be preserved</p>	
C37	<p>(a) Support R15 to R29</p> <p>(b) Countryside should be protected</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.
C41	<p>(a) Support R15 to R29</p> <p>(b) Object to developing Tung Chung</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.
C43	<p>(a) Support R15 to R29</p> <p>(b) Market operated by Link Real Estate Investment Trust is not necessary</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.
C44	<p>(a) Support R15 to R29</p> <p>(b) Oppose reclamation</p> <p>(c) Enhancement of the provision of community facilities in Tung Chung should be given first priority</p> <p>(d) Further debate is needed for the TCNTE</p>	<p>See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70 and additional responses as below:</p> <p>Three stages of public engagement have been completed under the Tung Chung Study. The need for the TCNTE has been discussed and public views have been incorporated in the Recommended Outline</p>

		Development Plan (RODP) of the Tung Chung Study as appropriate.
C45	(a) Support R15 to R29 (b) Collusion between businesses, villagers and Government.	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.
C47	(a) Support R15 to R29 (b) A comprehensive greening plan is necessary for Tung Chung (c) Adequate local employment support should be provided (d) There are needs for the provision of lower-rent market and improvement on security and environmental hygiene of the Area	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3 and additional responses as below: A comprehensive open space network, greening and amenity have been provided and planned for Tung Chung New Town and TCNTE.
C56	(a) Support R15 to R29 (b) Local character should be preserved	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.
C61	(a) Support R15 to R29 (b) No shopping mall, exhibition centre and resort, and bridge linking to mainland should be provided in Tung Chung	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62 and 6.64 to 6.70.

	(c) Reclamation should not be carried out to save the dolphin	
C68	<p>(a) Support R15 to R29</p> <p>(b) It is necessary for the provision of market operated by FEHD in Tung Chung</p> <p>(c) The development intensity should be reduced</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.
C69	<p>(a) Support R15 to R29</p> <p>(b) It is necessary for the provision of market operated by FEHD in Tung Chung</p> <p>(c) Unjustified developments should not be carried out</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.
C74	<p>(a) Support R15 to R29</p> <p>(b) It is necessary for the provision of market and cooked food centre operated by FEHD in Tung Chung.</p> <p>(c) Housing Authority should allow the provision of market for residents at the open area within public housing estate</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.
C80	(a) Support R15 to R29	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38,

	(b) There is grave demand for the provision of cycle track, large-scale park, open space and market operated by FEHD in Tung Chung but not commercial and private residential developments	6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.
C86	<p>(a) Support R15 to R29</p> <p>(b) It is necessary for the provision of market operated by FEHD in Tung Chung</p> <p>(c) The woodland area should not be destroyed</p> <p>(d) The internal traffic connection should be improved</p>	See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3.
C87	<p>(a) Support R15 to R29</p> <p>(b) It is necessary for the provision of market operated by FEHD in Tung Chung</p> <p>(c) There is demand for the provision of dining service after mid-night</p>	<p>See TPB Paper paragraphs 6.25 to 6.30, 6.32, 6.38, 6.39, 6.47 to 6.49, 6.51, 6.53 to 6.59, 6.61, 6.62, 6.64 to 6.70 and 7.3 and additional responses as below:</p> <p>There is provision for ‘Eating Place’ use under respective land use zonings (e.g. “C” and “V” (ground floor of a New Territories Exempted House)) on the draft OZP. However, relevant regulations should be complied with and government departments should be consulted on the impacts to the surroundings.</p>



本摘要圖於2016年9月13日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1
EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No.
S/I-TCV/1 EXHIBITED ON 8.1.2016

位置圖 LOCATION PLAN

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮

CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87

DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

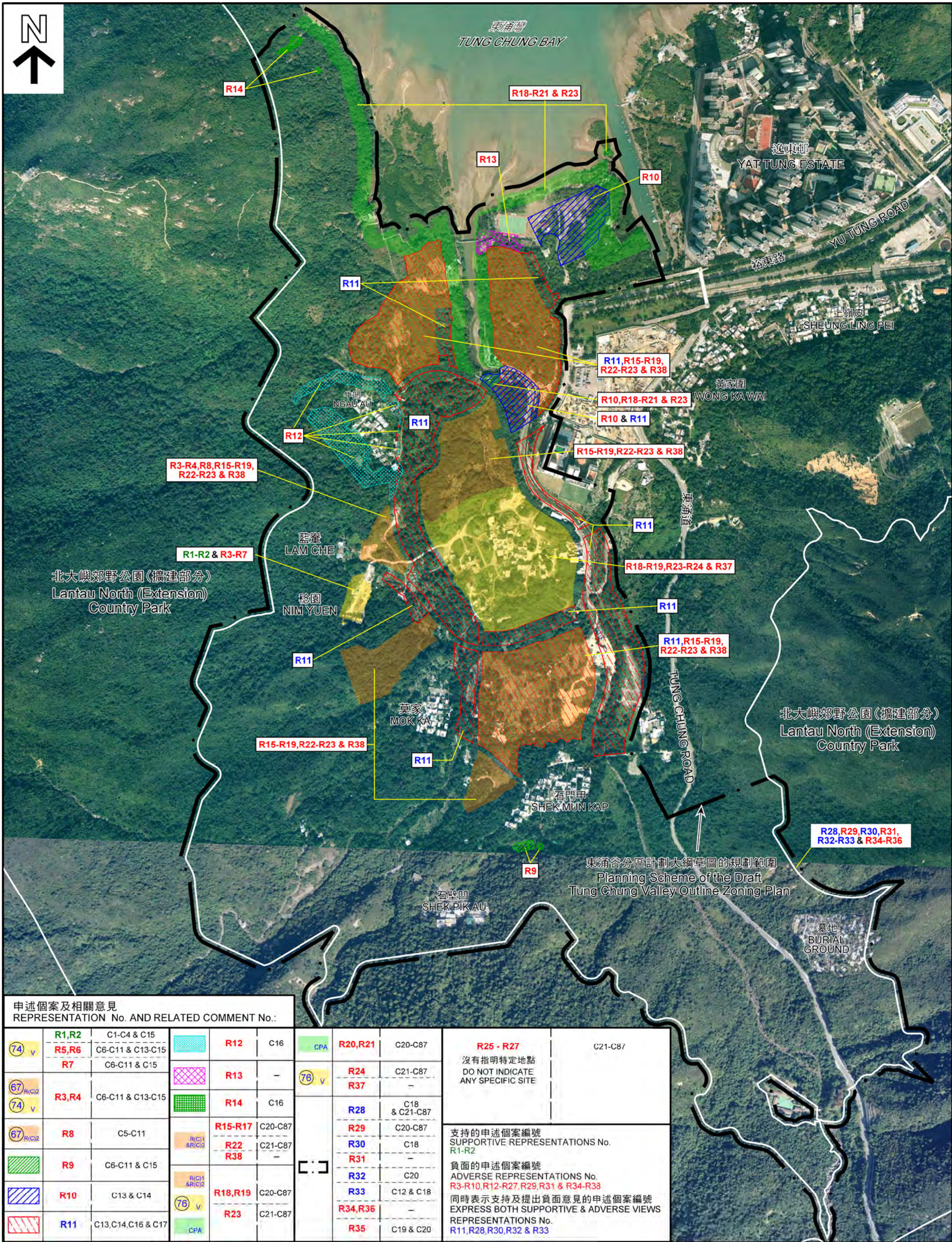
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**規劃署
PLANNING
DEPARTMENT**

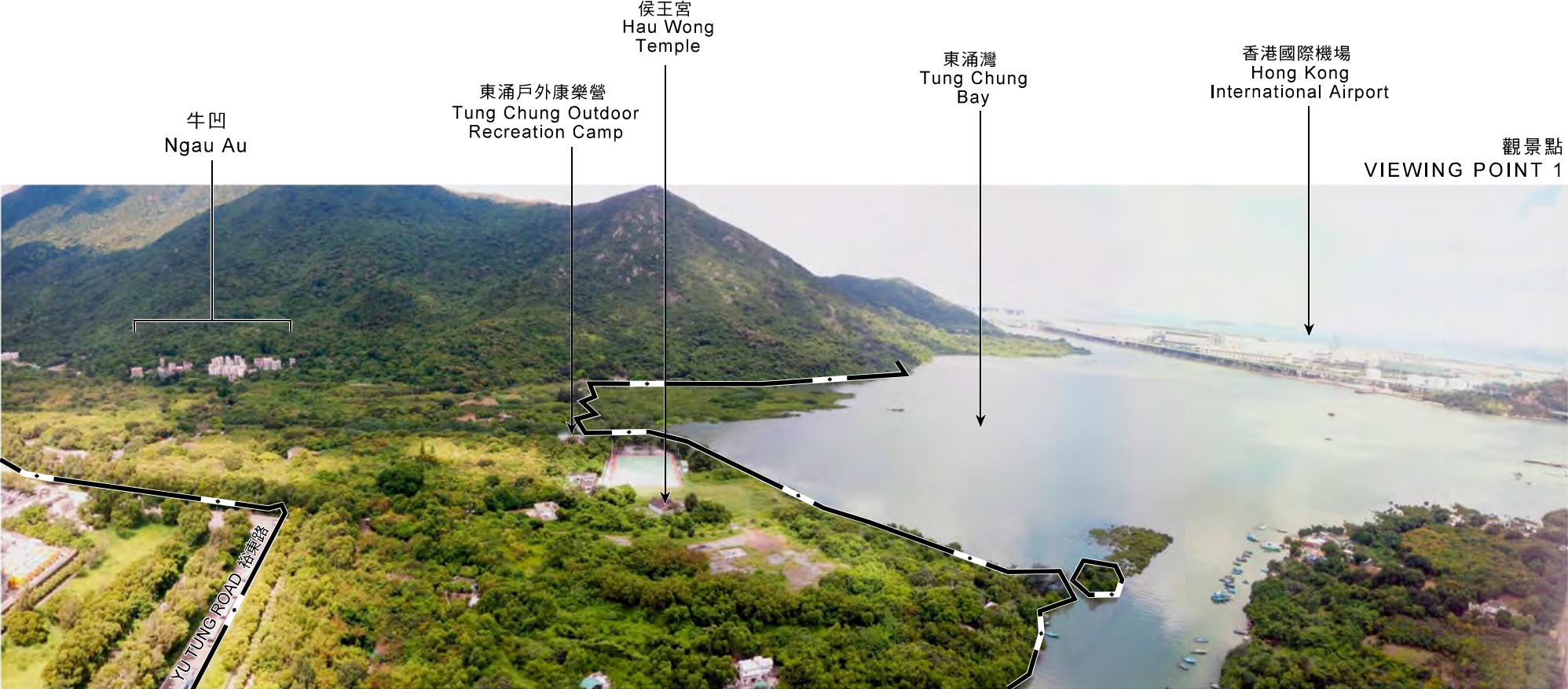
參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 1



申述個案及相關意見
REPRESENTATION No. AND RELATED COMMENT No.:

74	R1,R2	C1-C4 & C15	R12	C16	CPA	R20,R21	C20-C87	R25 - R27	C21-C87
	R5,R6	C6-C11 & C13-C15	R13	-	76	R24	C21-C87	沒有指明特定地點 DO NOT INDICATE ANY SPECIFIC SITE	
	R7	C6-C11 & C15	R14	C16		R37	-		
67	R3,R4	C6-C11 & C13-C15	R15-R17	C20-C87		R28	C18 & C21-C87	支持的申述個案編號 SUPPORTIVE REPRESENTATIONS No. R1-R2	
74	R8	C5-C11	R22	C21-C87		R29	C20-C87	負面的申述個案編號 ADVERSE REPRESENTATIONS No. R3-R10,R12-R27,R29,R31 & R34-R38	
67	R9	C6-C11 & C15	R38	-		R30	C18	同時表示支持及提出負面意見的申述個案編號 EXPRESS BOTH SUPPORTIVE & ADVERSE VIEWS REPRESENTATIONS No. R11,R28,R30,R32 & R33	
	R10	C13 & C14	R18,R19	C20-C87		R31	-		
	R11	C13,C14,C16 & C17	R23	C21-C87		R32	C20		
						R33	C12 & C18		
						R34,R36	-		
						R35	C19 & C20		

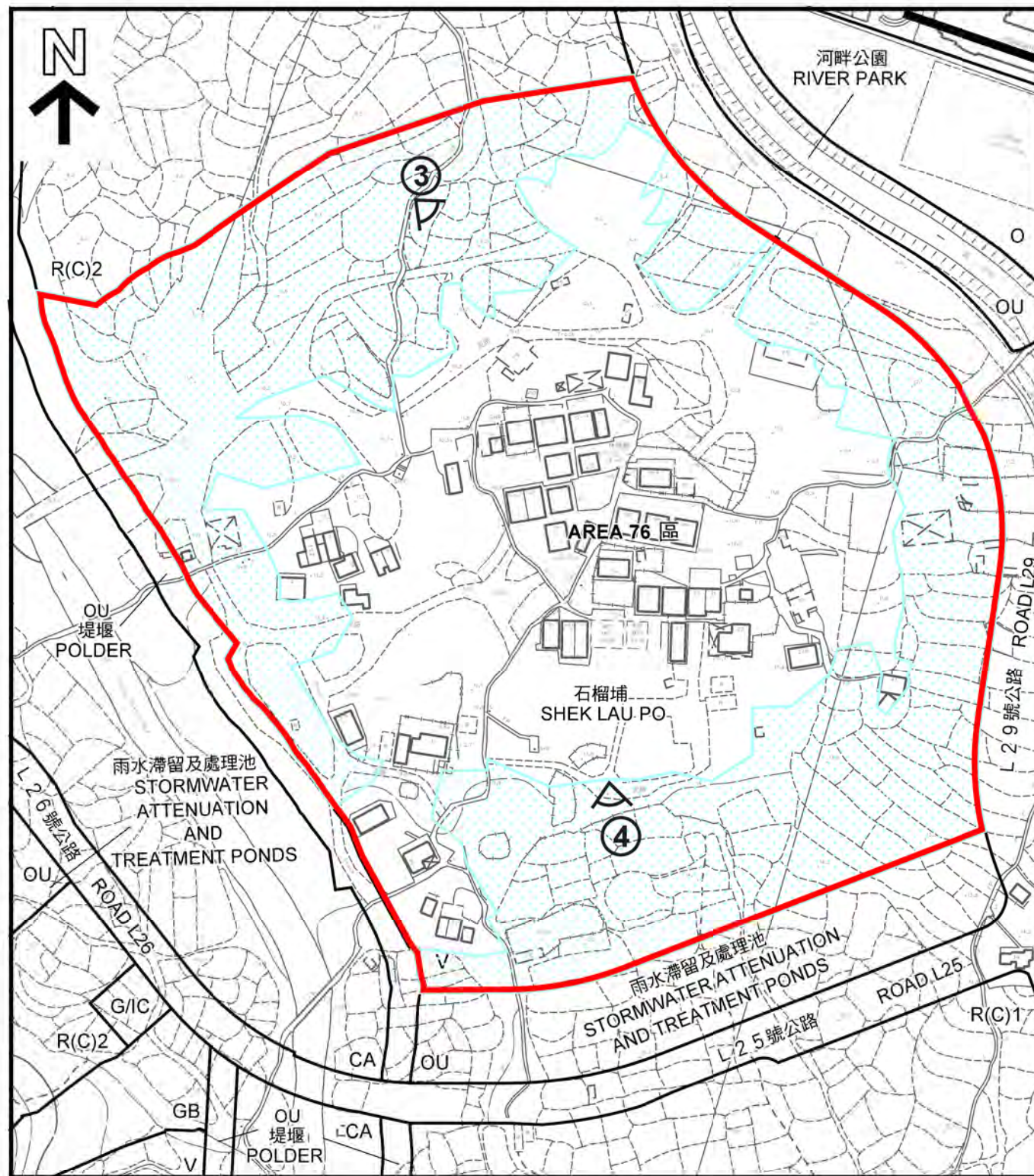


東涌谷分區計劃大綱草圖的規劃範圍（只作識別用）
PLANNING SCHEME OF THE DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN (FOR IDENTIFICATION PURPOSE ONLY)



區域景觀
REGIONAL VIEW

<p>本摘要圖於2016年9月13日擬備， 所根據的資料為攝於2016年7月21日 的實地照片 PLAN PREPARED ON 13.9.2016 BASED ON SITE PHOTOS TAKEN ON 21.7.2016</p>	<p>實地照片 SITE PHOTOS</p> <p>就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號 以及相關意見個案編號C1-C87作出考慮 CONSIDERATION OF REPRESENTATIONS No. R1 - R38 AND RELATED COMMENTS No. C1 - C87 DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1</p>	<p>規劃署 PLANNING DEPARTMENT</p> <p>參考編號 REFERENCE No. R/S/I-TCV/1-1 to 38</p> <p>圖 PLAN H - 3</p>
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在「東涌新市鎮擴展研究」中修訂發展大綱圖
擬議的「農業」用地
"AGRICULTURE" ZONE PROPOSED UNDER THE REVISED
RECOMMENDED OUTLINE DEVELOPMENT PLAN OF
TUNG CHUNG NEW TOWN EXTENSION STUDY

平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

觀景點 VIEWING POINT 3



無人管理的果園 UNMANAGED ORCHARDS

觀景點 VIEWING POINT 4



荒廢農地 ABANDONED FARMLAND

申述地點
REPRESENTATION SITE

實地照片的觀景點
VIEWING POINT OF SITE PHOTO

本摘要圖於2016年9月12日擬備，所根據的資料為測量圖編號9-SE-13A及13C、
地政總署於2016年3月1日拍得的航攝照片編號CS64197
EXTRACT PLAN PREPARED ON 12.9.2016
BASED ON SURVEY SHEETS No. 9-SE-13A & 13C,
AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016 BY LANDS DEPARTMENT

申述個案編號 REPRESENTATIONS No. (R18,R19,R23,R24 & R37)

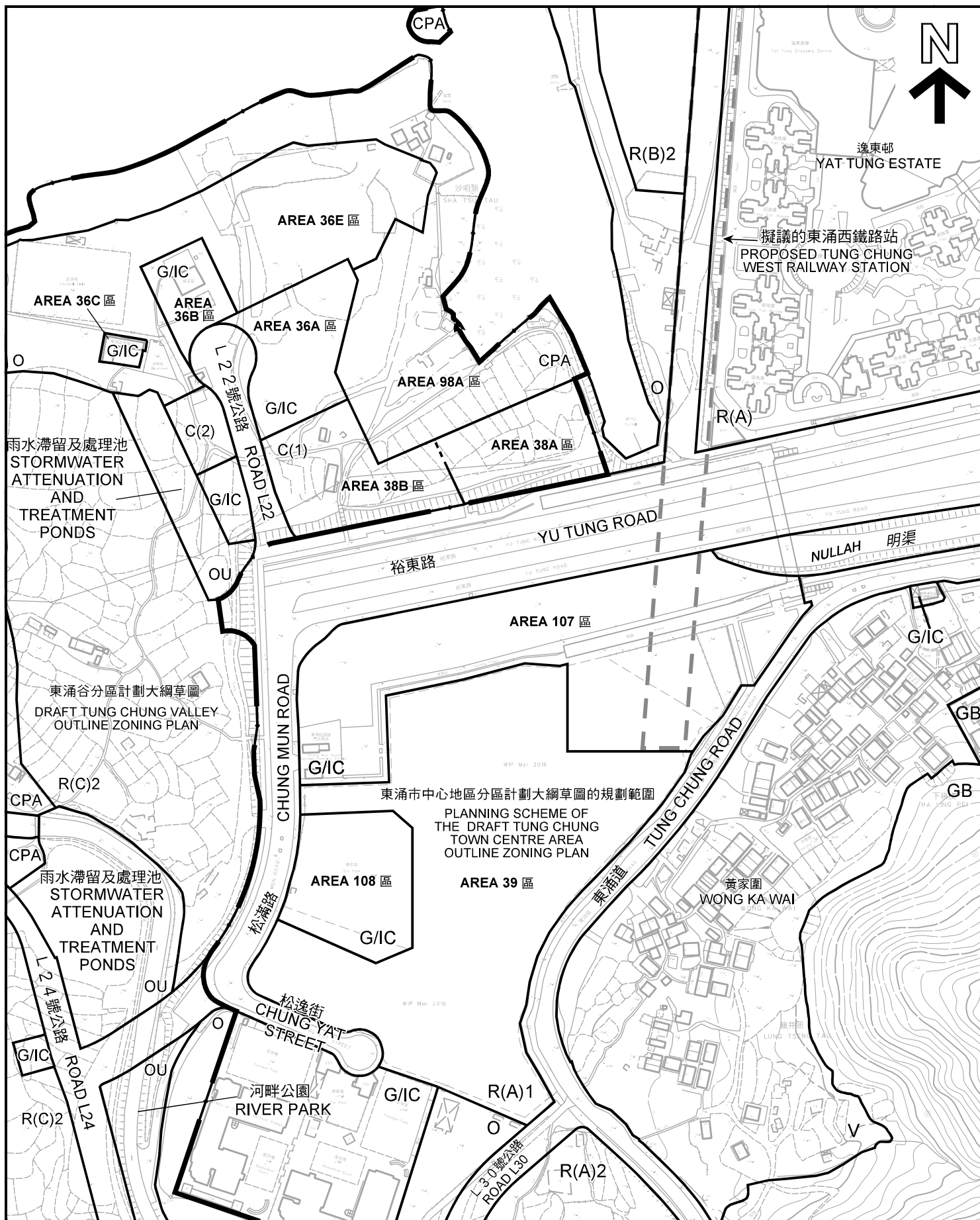
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3a



申述地點（沒有特定地點）
REPRESENTATION SITE
(NO SPECIFIC SITE)

本摘要圖於2016年9月14日擬備，
所根據的資料為測量圖編號9-SE-8C及13A
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS
No. 9-SE-8C & 13A

申述個案編號 REPRESENTATIONS No. (R28, R30 & R32)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案
編號R1-R38號以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

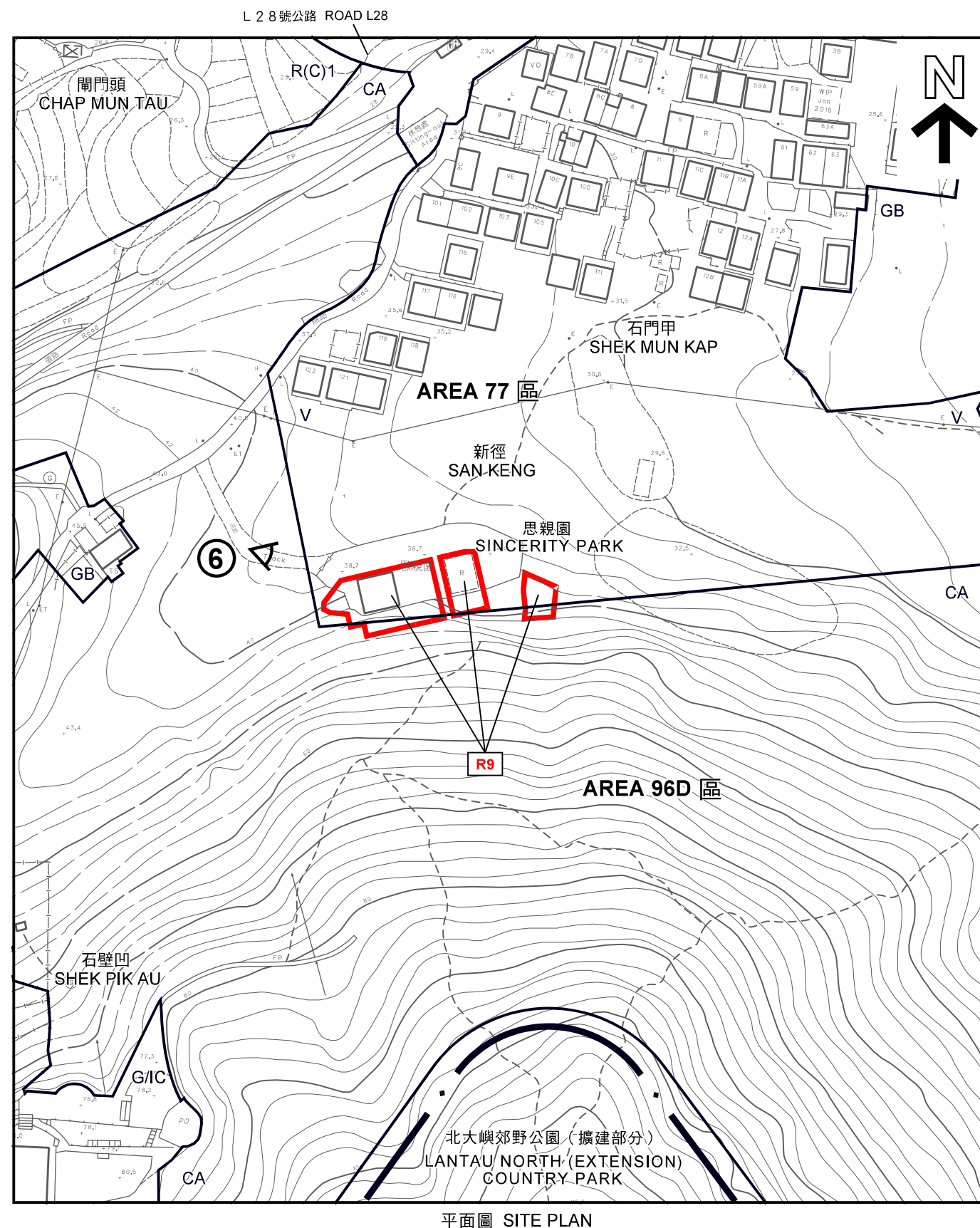
SCALE 1:3 000 比例尺
米 50 0 50 100 米
METRES

規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H-3b



航攝照片 AERIAL PHOTO

觀景點
VIEWING POINT 6



關乎申述個案編號 RELATE TO REPRESENTATION No. **R9**

申述地點
REPRESENTATION SITES

實地照片的觀景點
VIEWING POINT OF SITE PHOTO

本摘要圖於2016年9月13日擬備，
所根據的資料為測量圖編號9-SE-8C及13A、
地政總署於2016年3月1日拍得的航攝照片編號CS64197
及攝於2016年的實地照片
EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON SURVEY SHEETS No. 9-SE-8C & 13A,
AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016 BY LANDS DEPARTMENT
AND SITE PHOTO TAKEN IN 2016

申述個案編號 REPRESENTATION No. (R9)

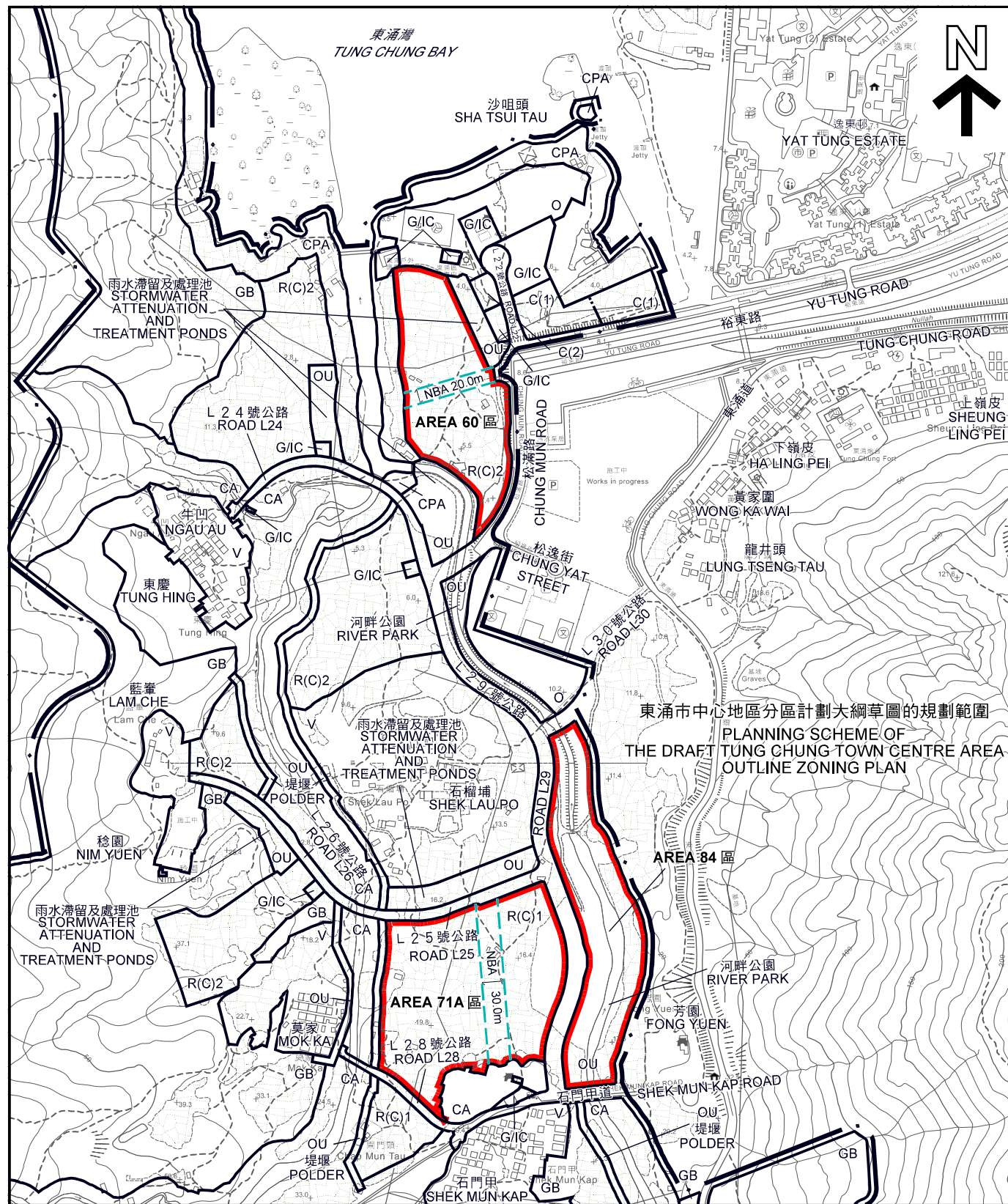
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3c



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

申述地點
REPRESENTATION SITES

本摘要圖於2016年9月14日擬備，
所根據的資料為組別HP5C的測量圖編號9-SE-A、B、C及D
及地政總署於2016年3月1日拍得的航攝照片編號CS64198
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SERIES HP5C SURVEY SHEETS No.9-SE-A, B, C & D
AND AERIAL PHOTO No. CS64198 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

申述個案編號 REPRESENTATION No. (R28)

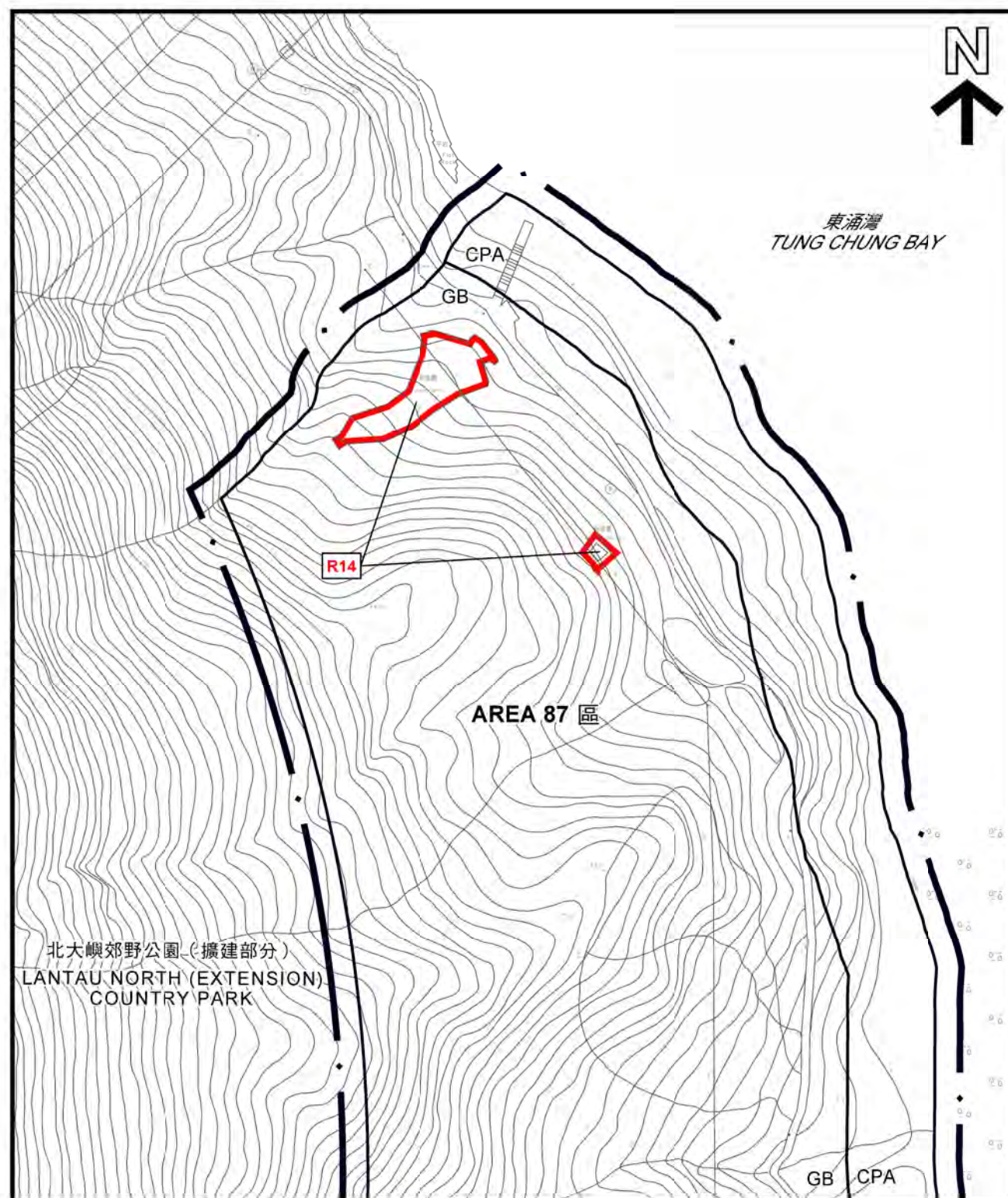
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3d



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

 申述地點
REPRESENTATION SITES

本摘要圖於2016年9月13日擬備
所根據的資料為測量圖編號9-SE-7B、7D及8C
及地政總署於2016年3月1日拍得的航攝照片編號CS64125
EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON SURVEY SHEETS No. 9-SE-7B, 7D & 8C
AND AERIAL PHOTO No. CS64125 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

申述個案編號 REPRESENTATION No. (R14)

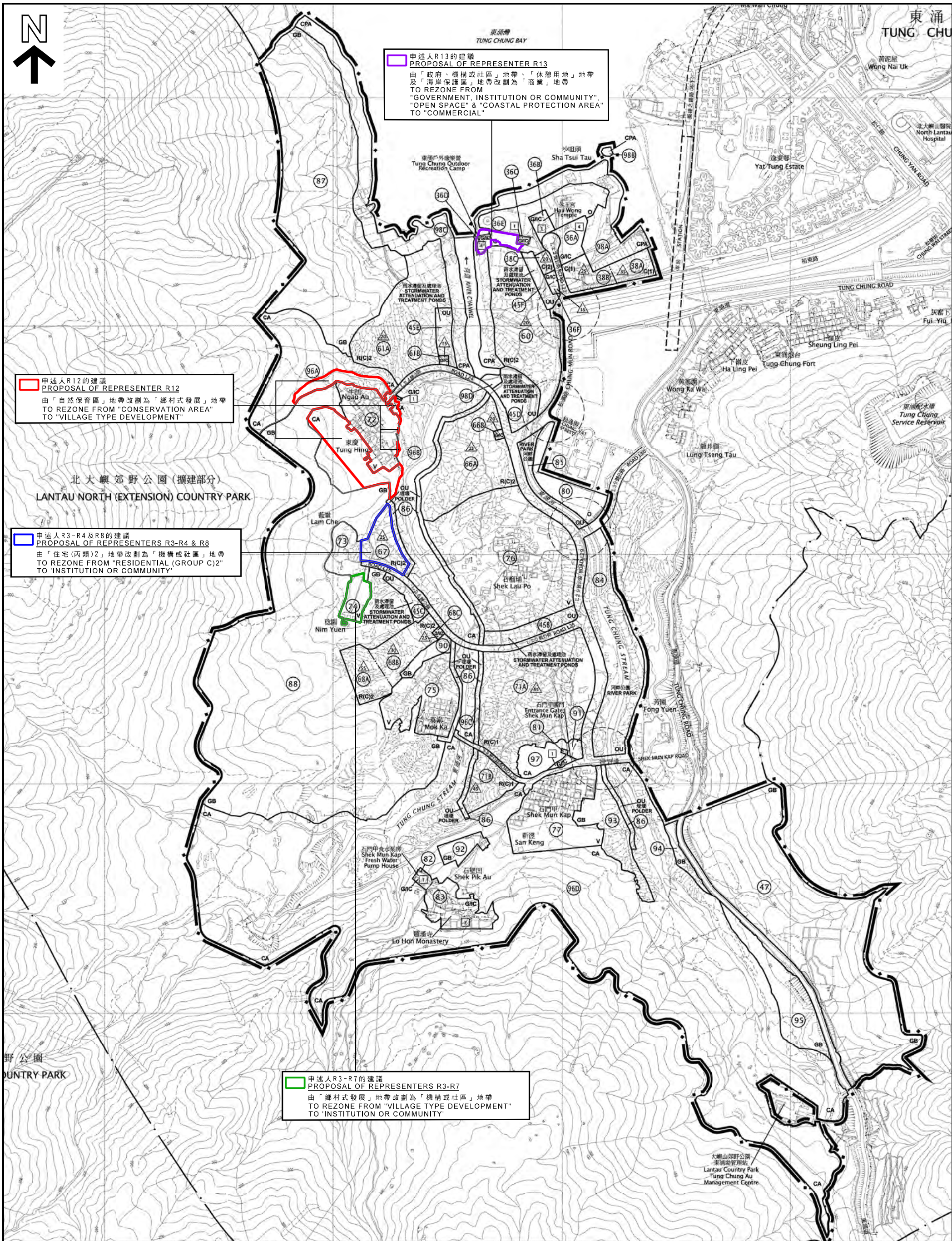
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

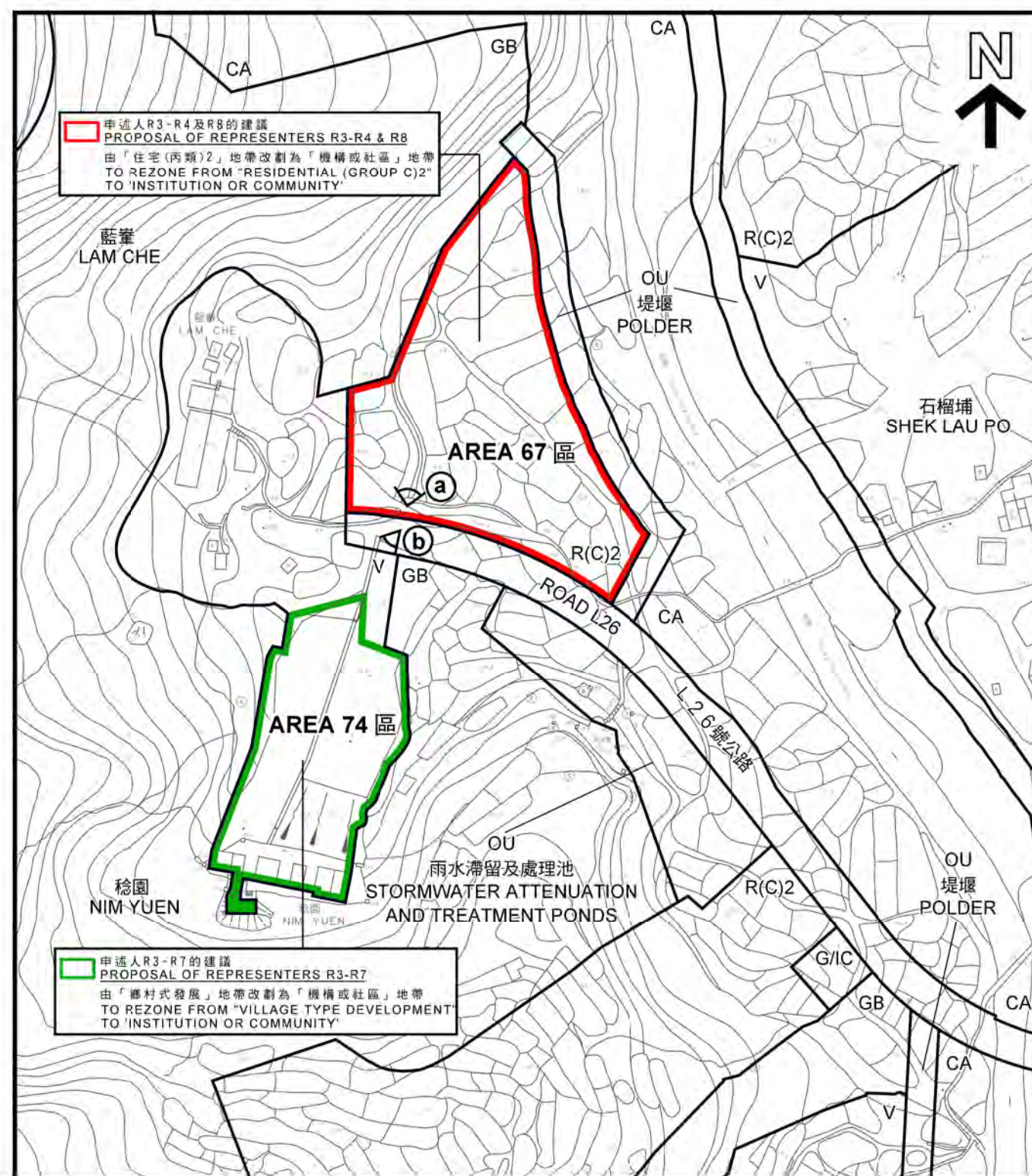
規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3e





平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

觀景點 VIEWING POINT a



觀景點 VIEWING POINT b



a 實地照片的觀景點
VIEWING POINT OF SITE PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為測量圖編號9-SE-12B、12D、13A及13C。
地政總署於2016年3月1日拍得的航攝照片編號CS64197
及攝於2016年的實地照片
EXTRACT PLAN PREPARED ON 14.3.2016
BASED ON SURVEY SHEETS No. 9-SE-12B, 12D, 13A & 13C,
AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016 BY LANDS DEPARTMENT
AND SITE PHOTOS TAKEN IN 2016

申述人(R3-R8)的建議
PROPOSALS OF REPRESENTERS (R3-R8)

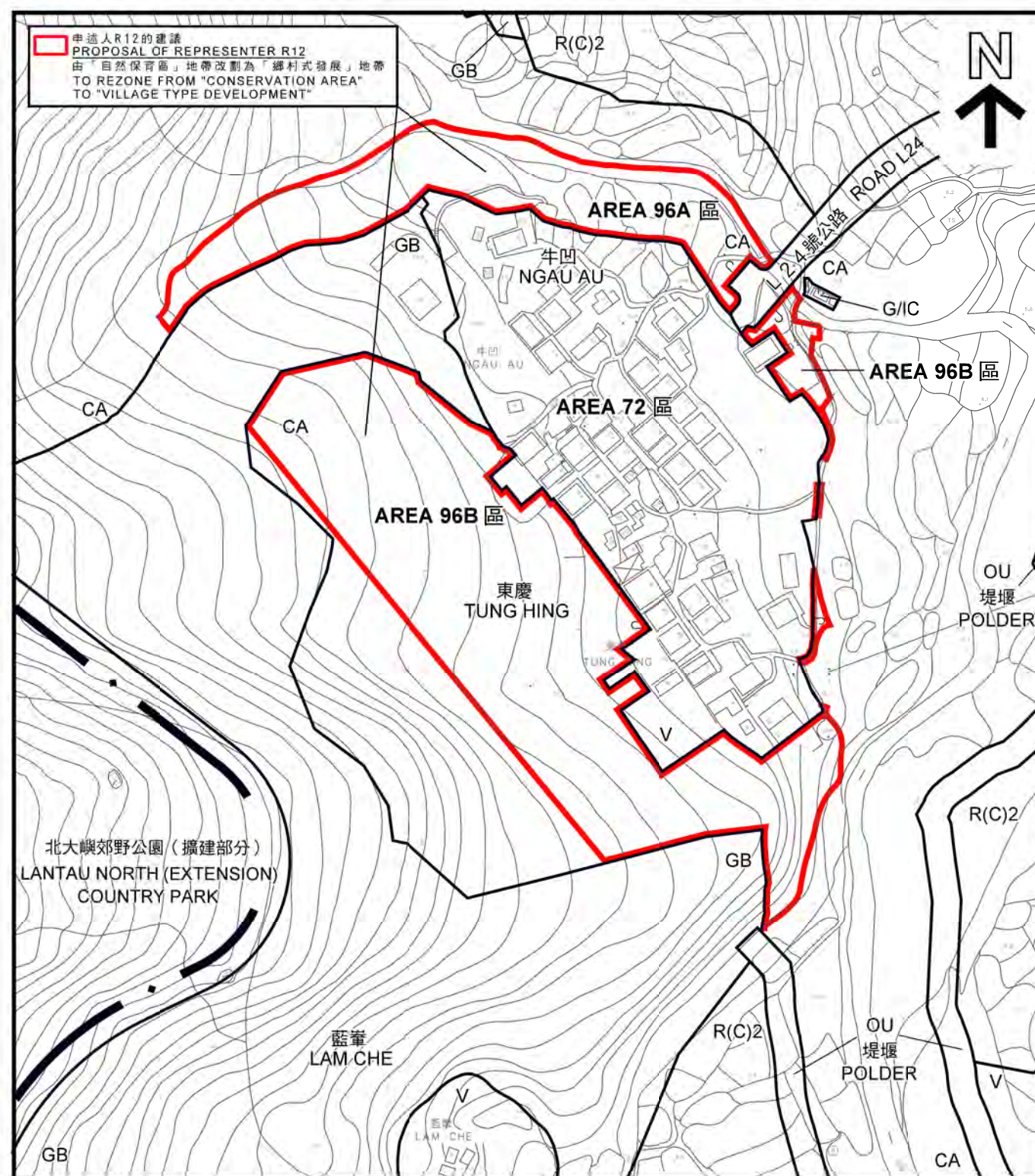
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 4a



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為測量圖編號9-SE-12B、12D、13A及13C
及地政總署於2016年3月1日拍得的航攝照片編號CS64197
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS No. 9-SE-12B, 12D, 13A & 13C
AND AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

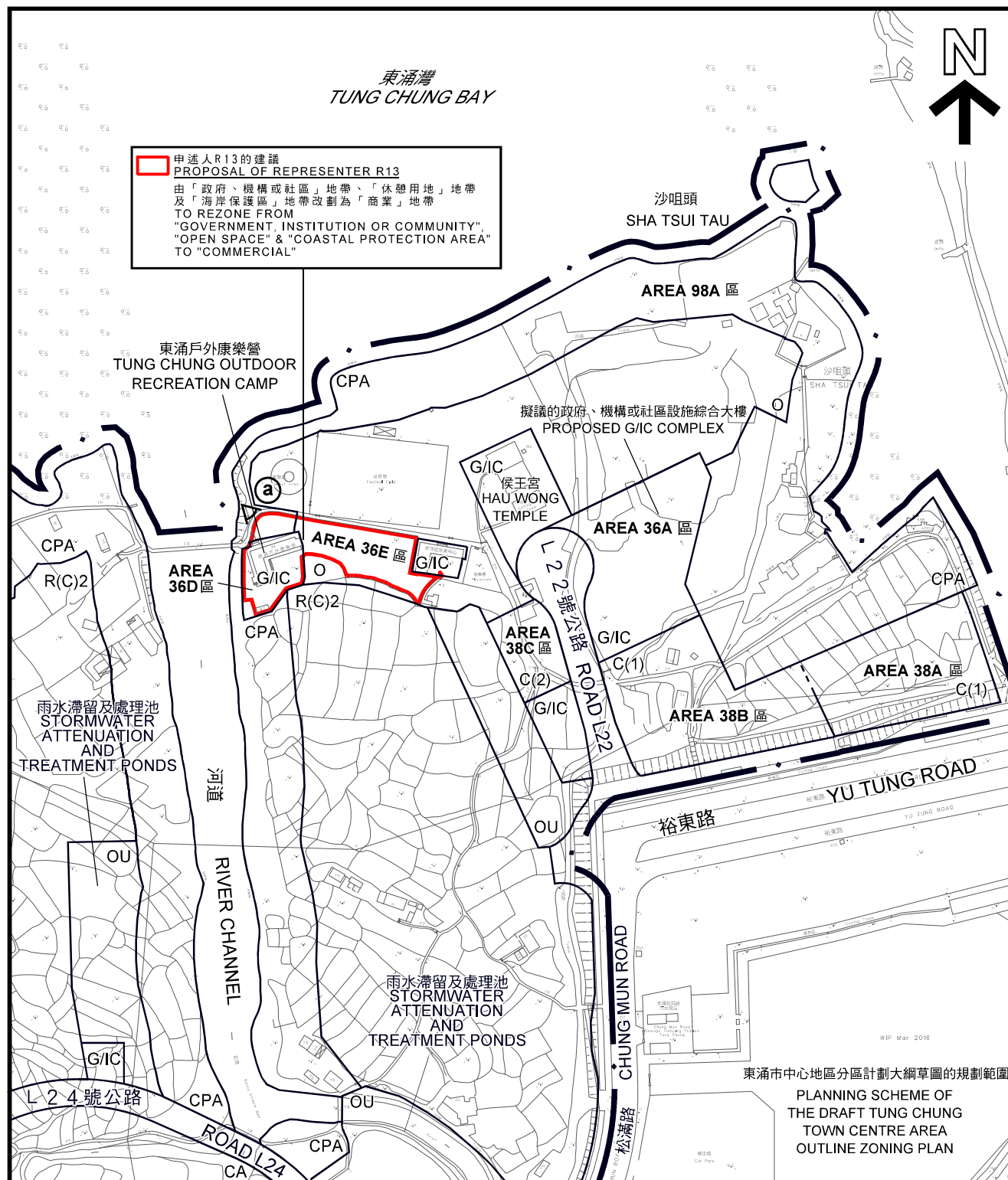
申述人(R12)的建議
PROPOSALS OF REPRESENTER (R12)
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

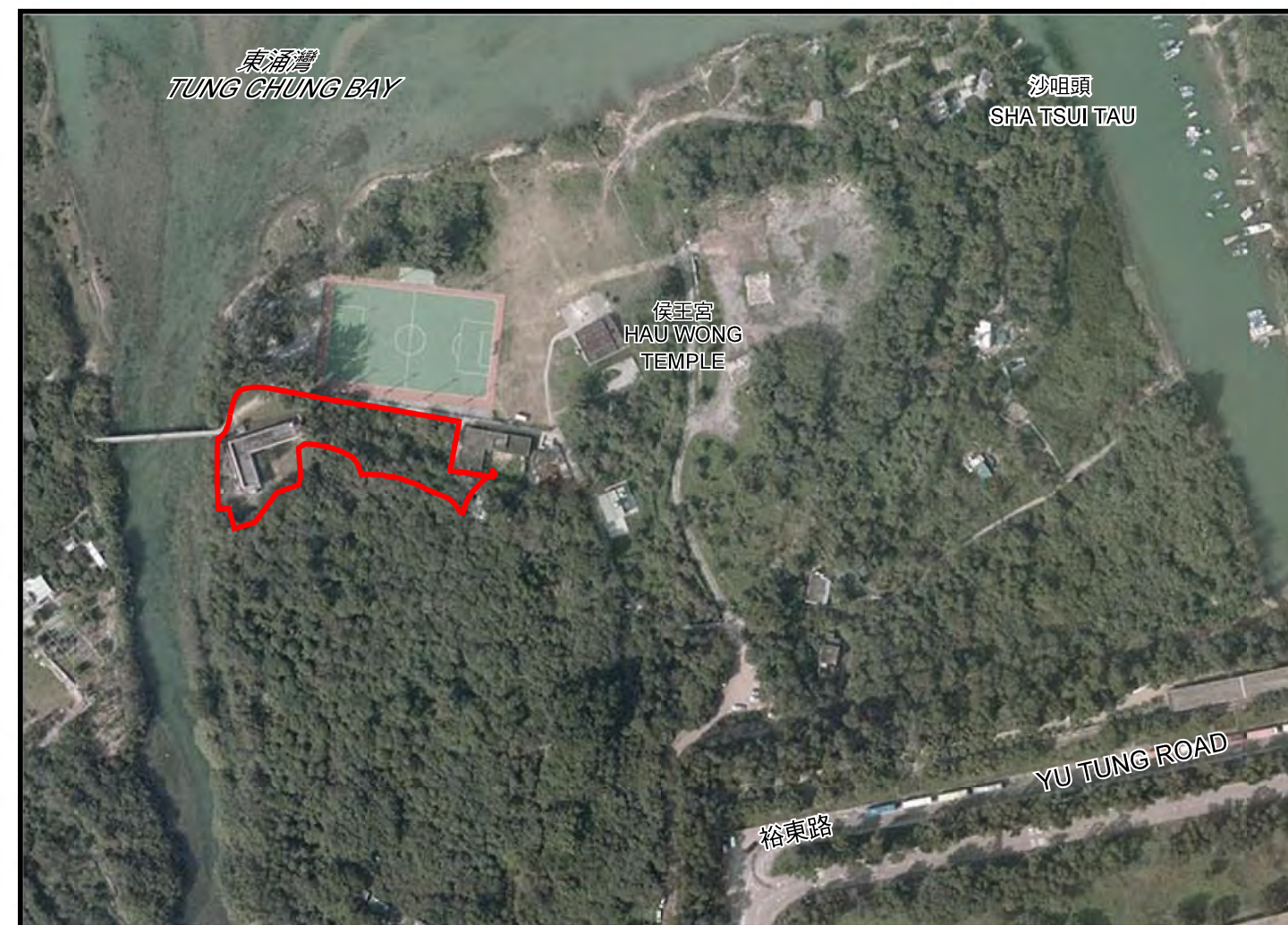


參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 4b



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO



觀景點 VIEWING POINT a

**實地照片的觀景點
VIEWING POINT OF SITE PHOTO**

本摘要圖於2016年9月14日擬備
所根據的資料為測量圖編號9-SE-8C及13A、
地政總署於2016年3月1日拍得的航攝照片編號CS64126
及攝於2016年的實地照片

EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS No.9-SE-8C & 13A,
AERIAL PHOTO No. CS64126 TAKEN ON 1.3.2016 BY LANDS DEPARTMENT
AND SITE PHOTO TAKEN IN 2016

**申述人(R13)的建議
PROPOSALS OF REPRESENTER (R13)**

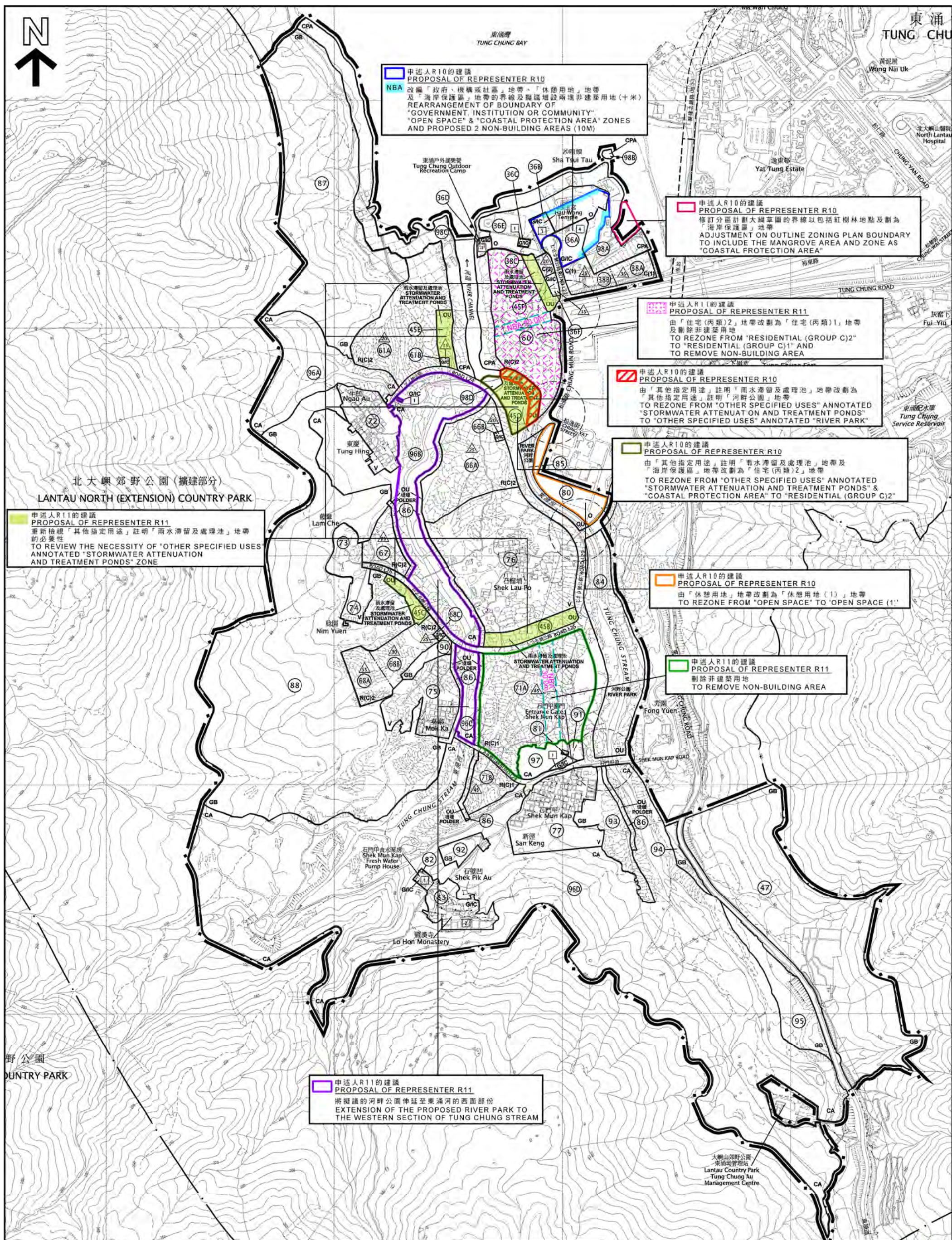
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

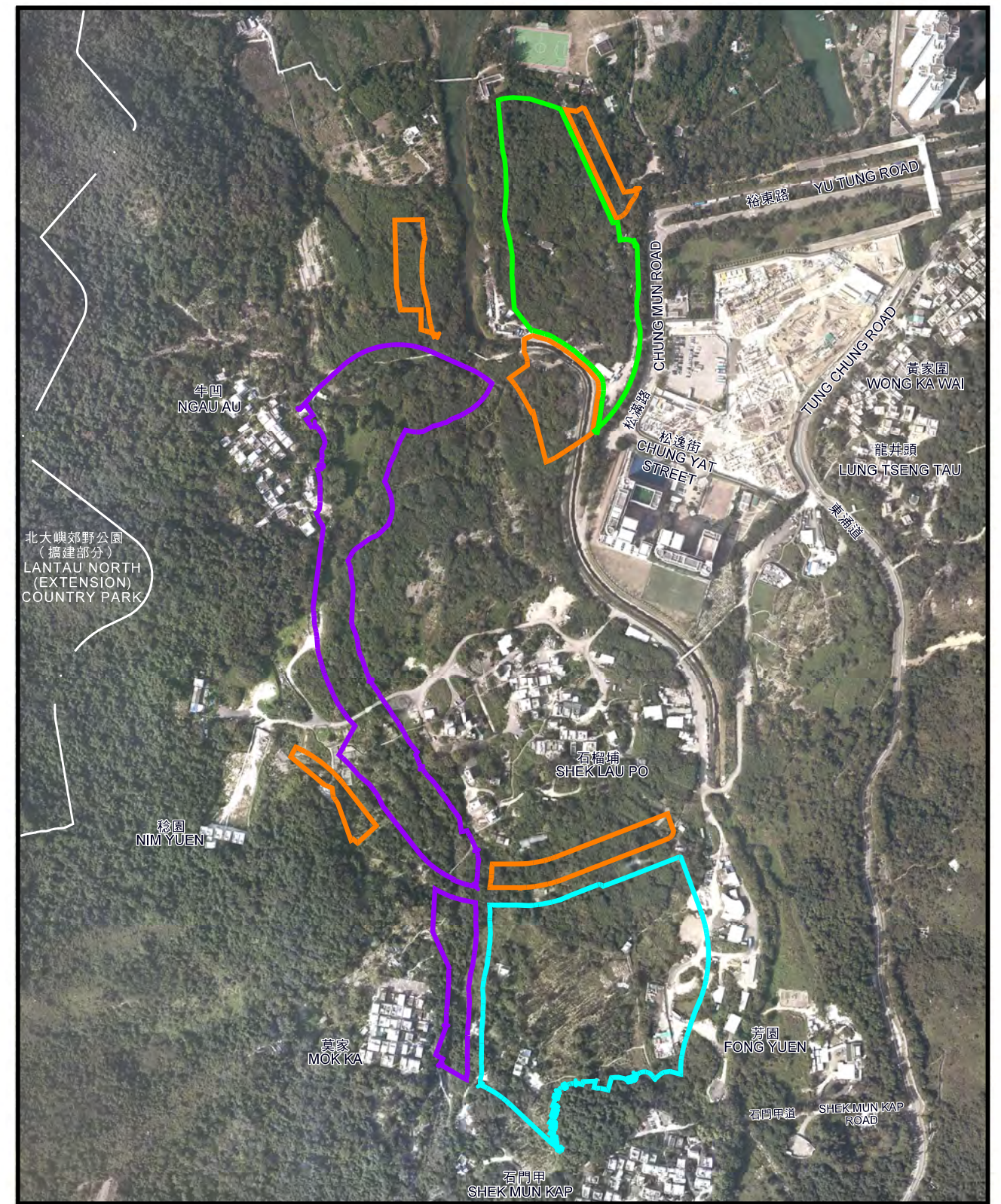
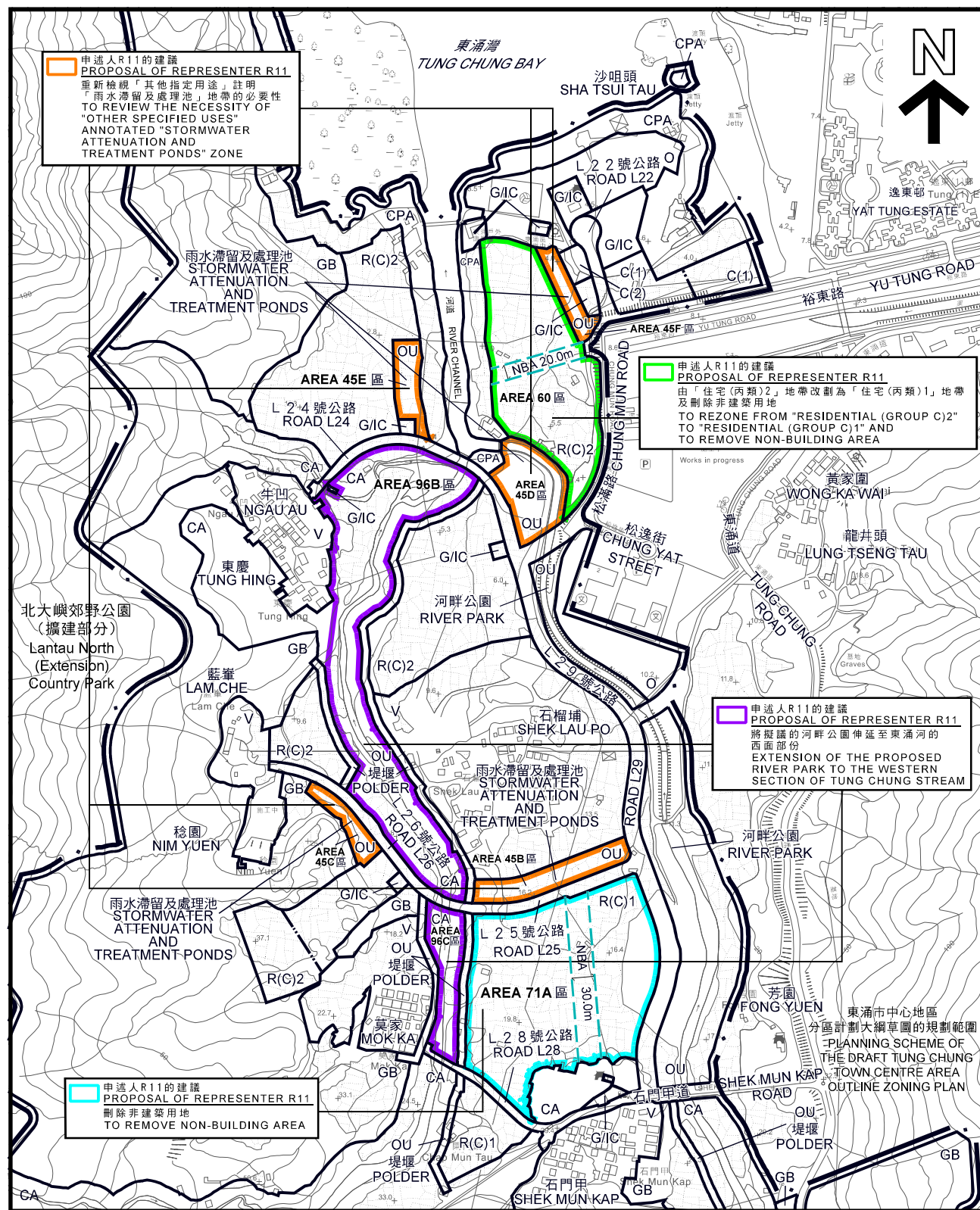
規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 4c





申述人(R11)的建議
PROPOSALS OF REPRESENTER (R11)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

本摘要圖於2016年9月14日擬備
所根據的資料為組別HP5C的測量圖編號9-SE-A、B、C及D
及地政總署於2016年3月1日拍得的航攝照片編號CS64198
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SERIES HP5C SURVEY SHEETS No.9-SE-A, B, C & D
AND AERIAL PHOTO No. CS64198 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

規劃署
PLANNING DEPARTMENT

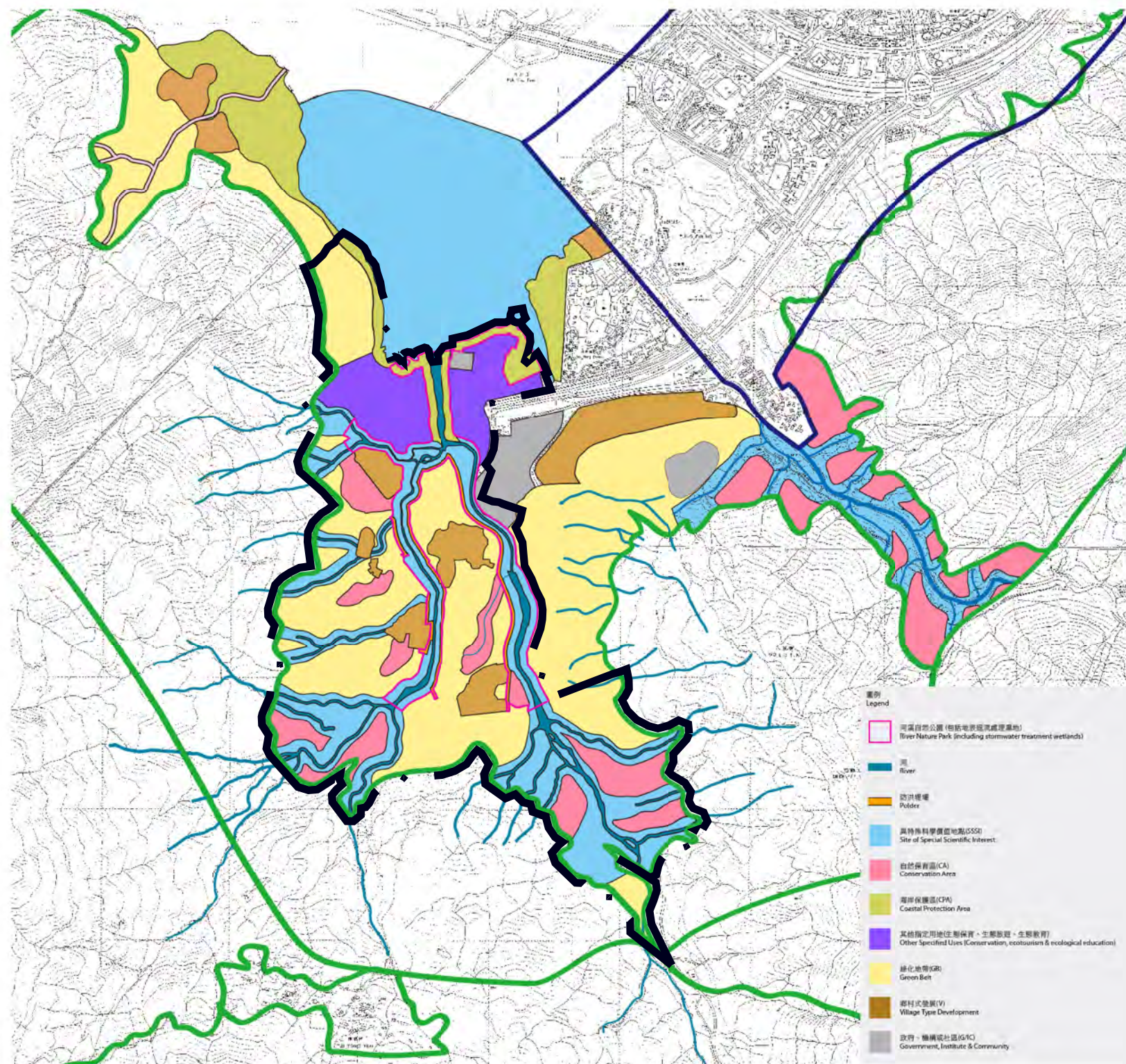


參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

PLAN
H - 5b



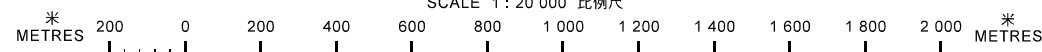
東涌谷分區計劃大綱草圖編號S/I-TCV/1
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1



申述人(R28)提交的繪圖
DRAWING SUBMITTED BY REPRESENTER (R28)

東涌谷分區計劃大綱草圖的規劃範圍（只作識別用）
— — — PLANNING SCHEME OF THE DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN
(FOR IDENTIFICATION PURPOSE ONLY)

申述人(R28)的建議
PROPOSALS OF REPRESENTER (R28)
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1
SCALE 1 : 20 000 比例尺



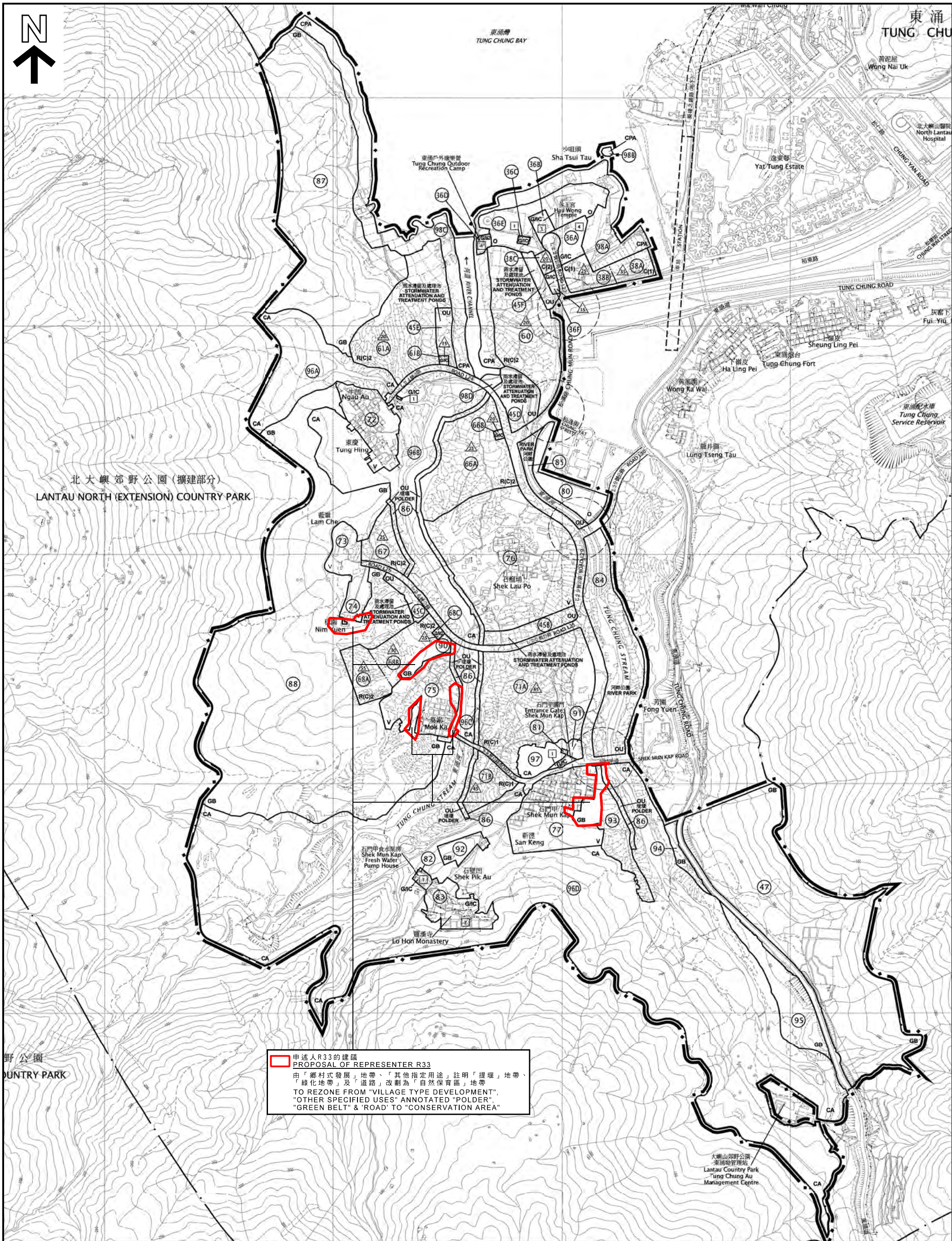
本摘要圖於2016年9月14日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No.
S/I-TCV/1 EXHIBITED ON 8.1.2016

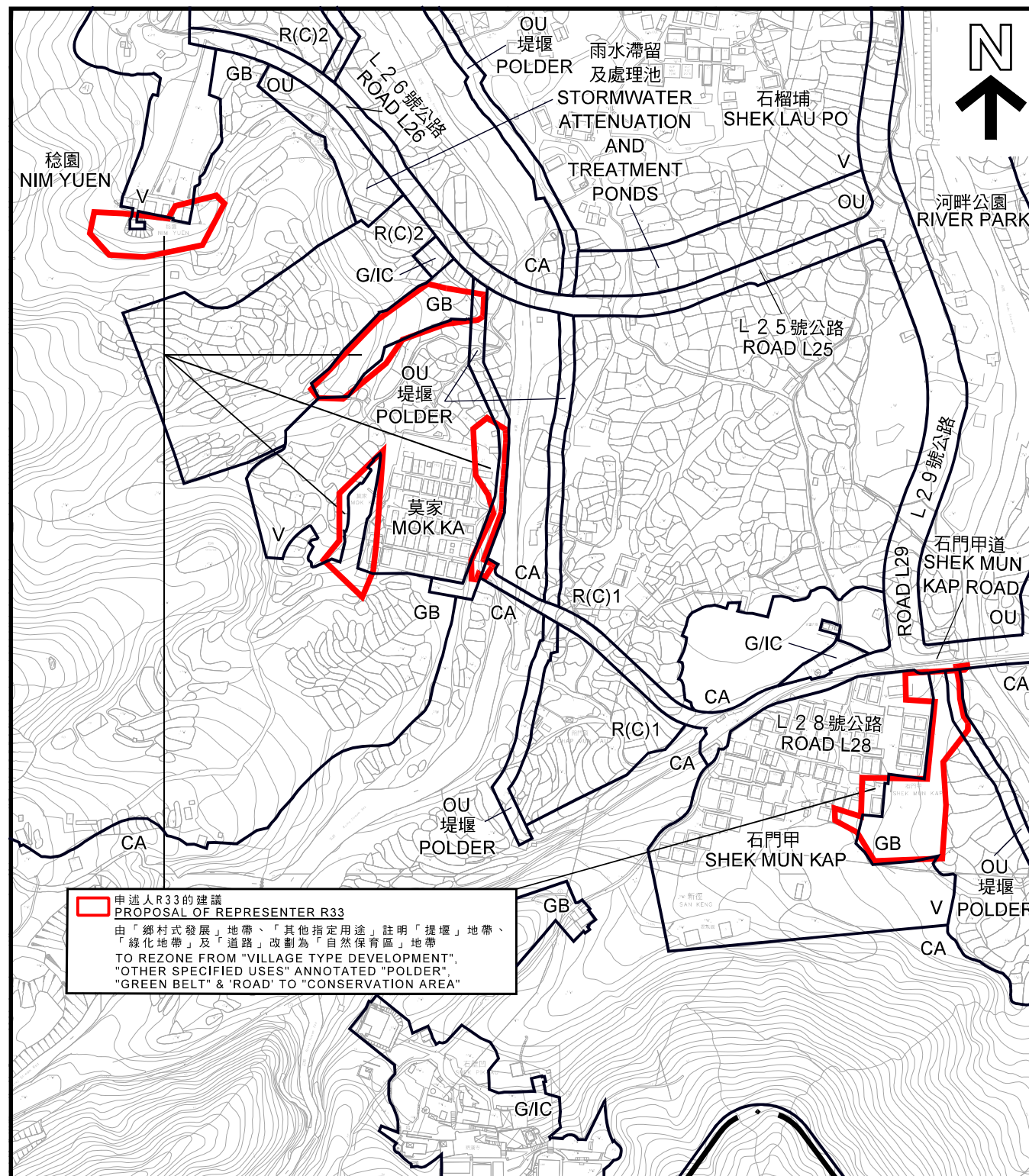
規劃署
PLANNING DEPARTMENT



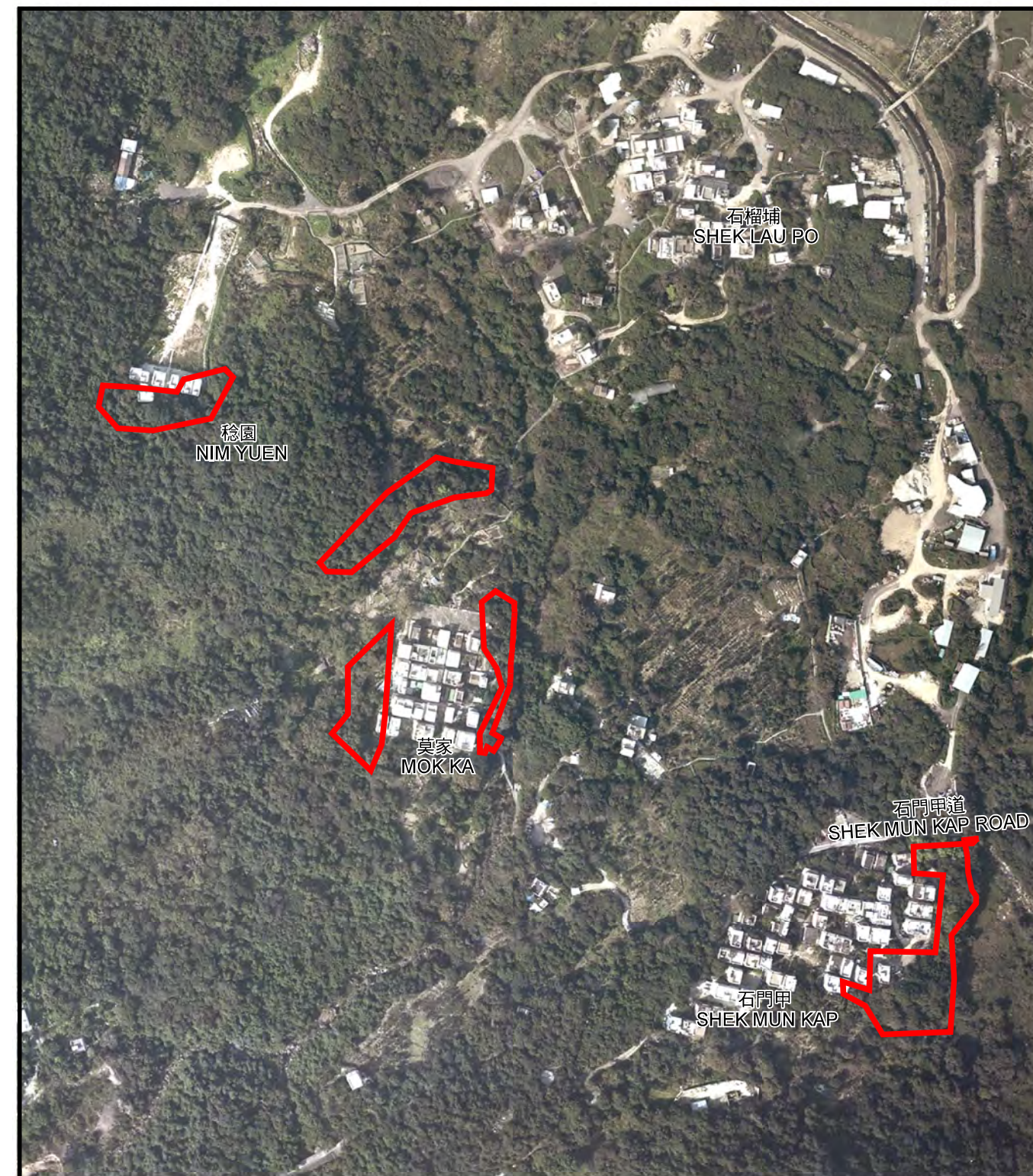
參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 6





平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

本摘要圖於2016年9月14日擬備
 所根據的資料為測量圖編號9-SE-12D、13C、17B及18A
 及地政總署於2016年3月1日拍得的航攝照片編號CS64197
 EXTRACT PLAN PREPARED ON 14.9.2016
 BASED ON SURVEY SHEETS No.9-SE-12D, 13C, 17B & 18A
 AND AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016
 BY LANDS DEPARTMENT

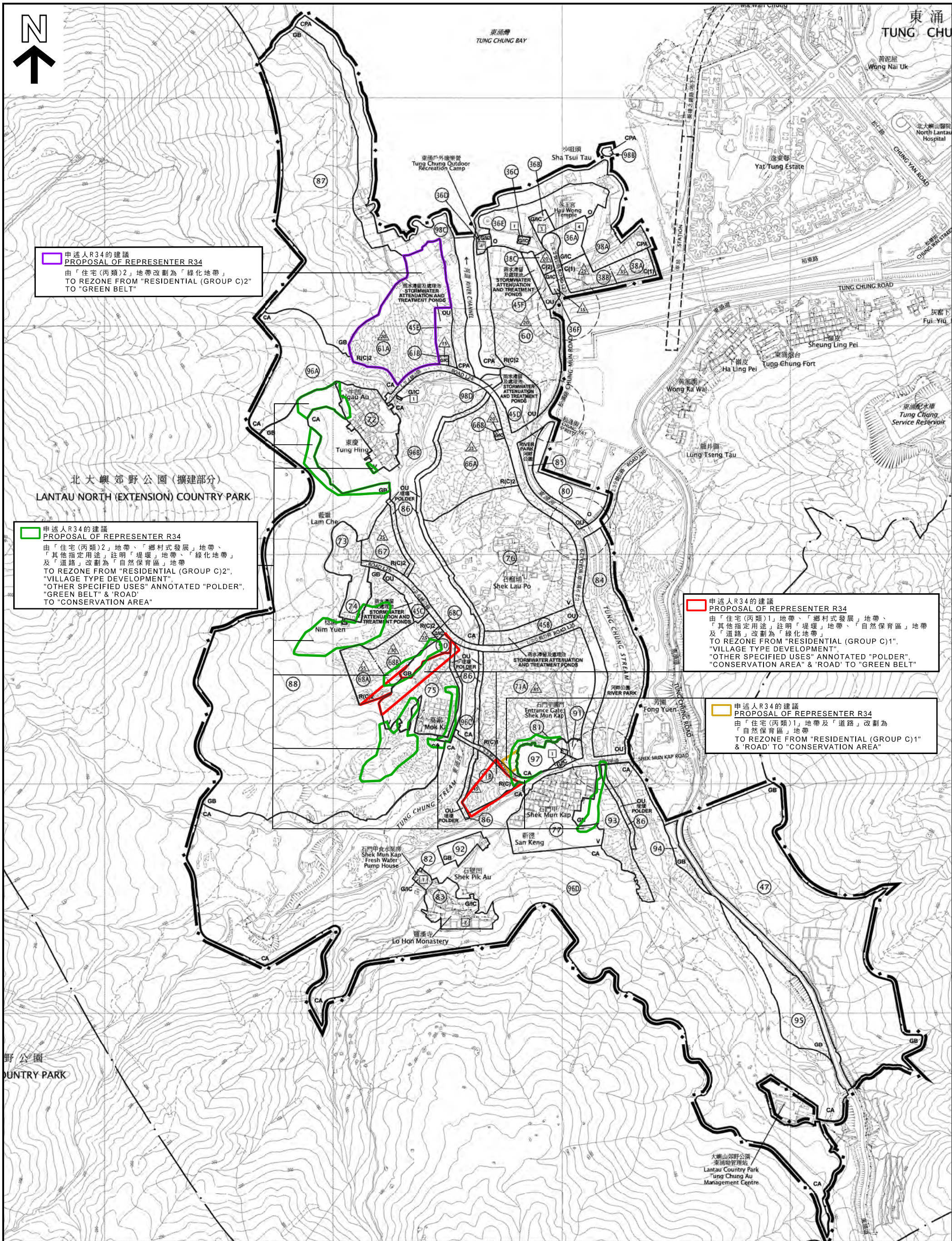
申述人(R33)的建議
PROPOSALS OF REPRESENTER (R33)
 就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
 以及相關意見個案編號C1-C87作出考慮
 CONSIDERATION OF REPRESENTATIONS No. R1 - R38
 AND RELATED COMMENTS No. C1 - C87
 DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

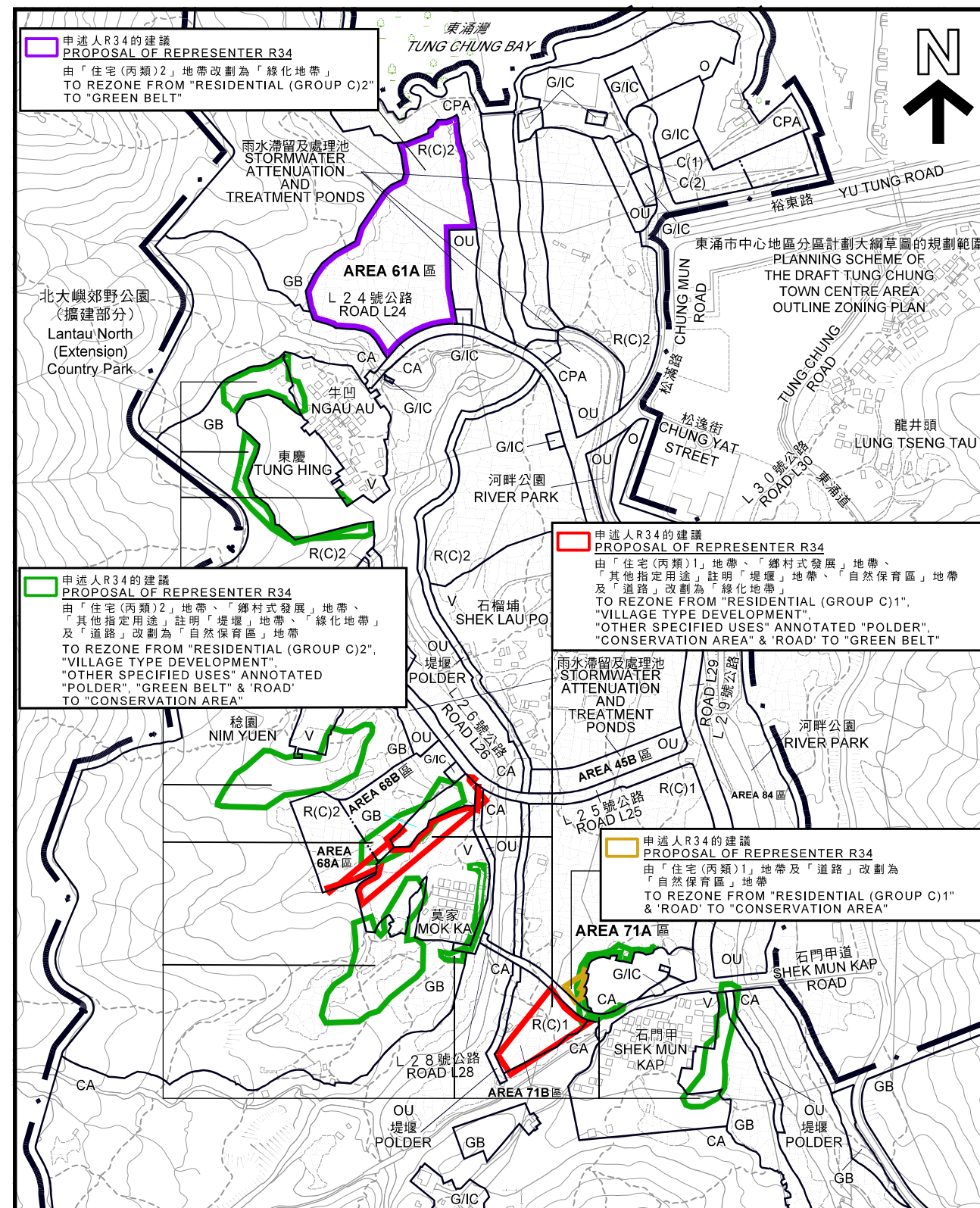
規劃署
 PLANNING DEPARTMENT



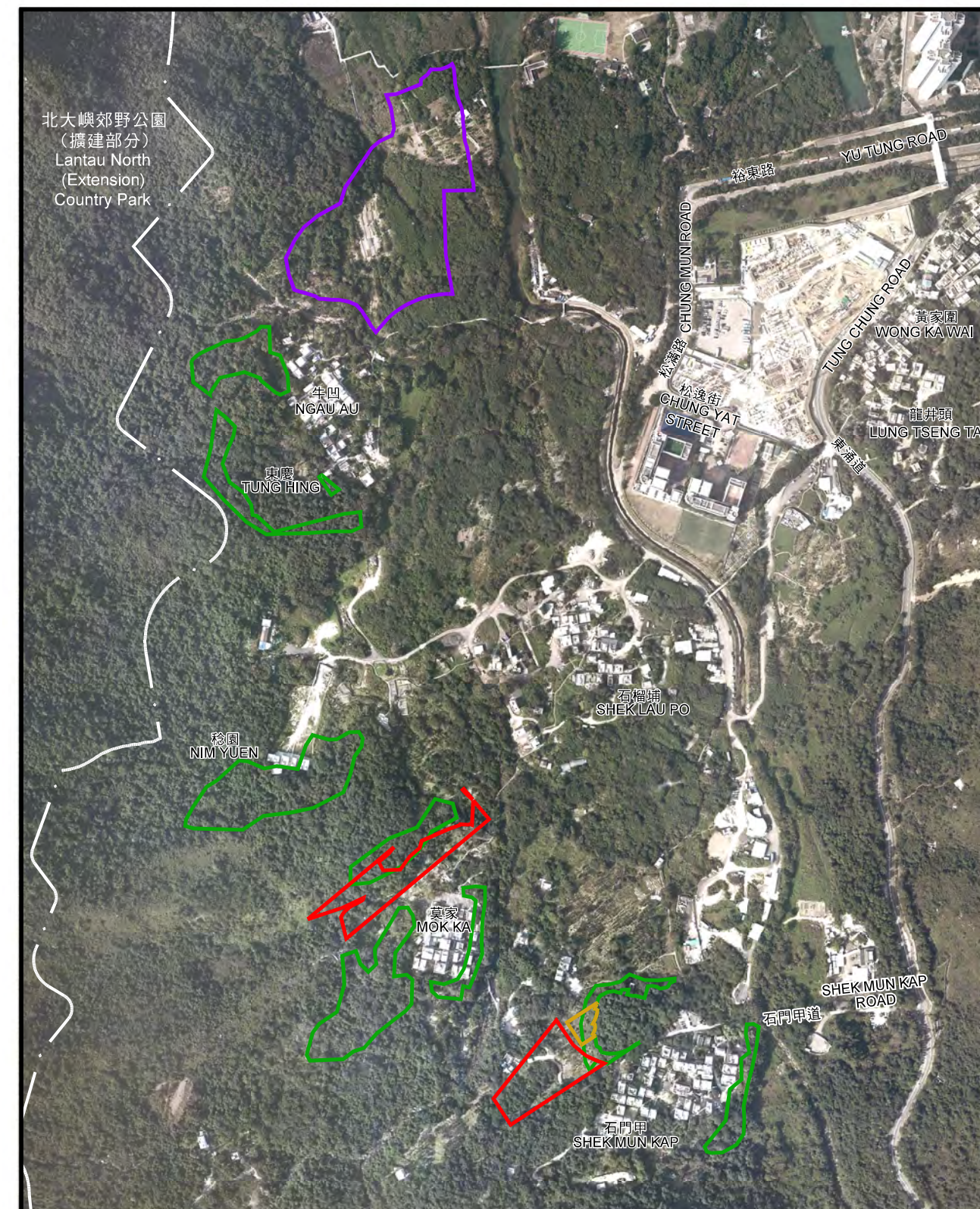
參考編號
 REFERENCE No.
 R/S/I-TCV/1-1 to 38

圖 PLAN
 H - 7a





平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為組別HP5C測量圖編號9-SE-A、B、C及D
及地政總署於2016年3月1日拍得的航攝照片編號CS64198
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SERIES HP5C SURVEY SHEETS No.9-SE-A, B, C & D
AND AERIAL PHOTO No. CS64198 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

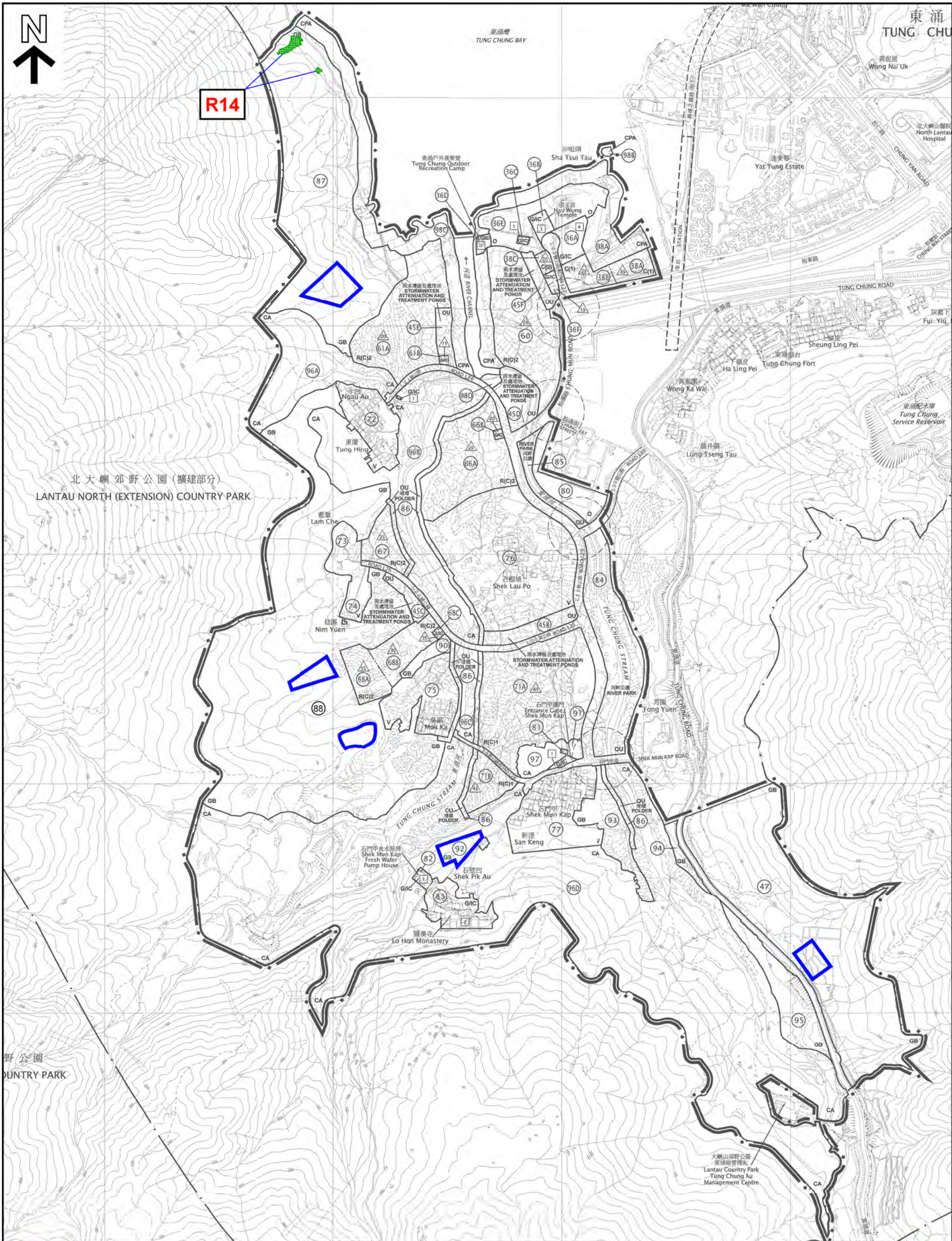
申述人(R34)的建議
PROPOSALS OF REPRESENTER (R34)
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 8a



 許可的墓地
PERMITTED BURIAL GROUNDS

本摘要圖於2016年9月13日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1
EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No.
S/I-TCV/1 EXHIBITED ON 8.1.2016

現有墓地 EXISTING BURIAL GROUNDS

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

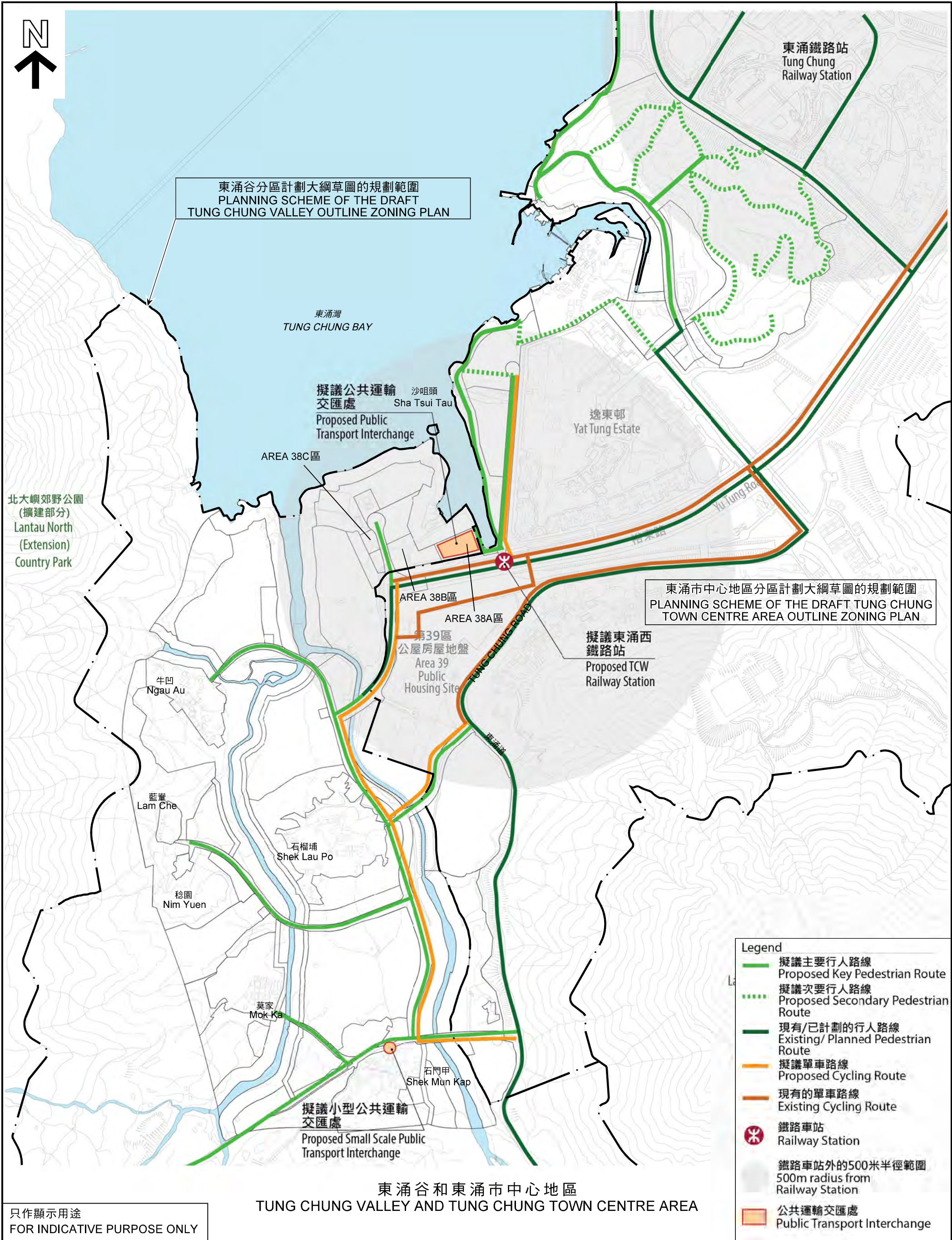
SCALE 1 : 7 500 比例尺
METRES 100 200 300 400 500 600 700 METRES

規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 9



只作顯示用途
FOR INDICATIVE PURPOSE ONLY

分區計劃大綱圖的規劃範圍界線
PLANNING SCHEME BOUNDARY OF OUTLINE ZONING PLAN

本摘要圖於2016年9月14日擬備
EXTRACT PLAN PREPARED ON 14.9.2016

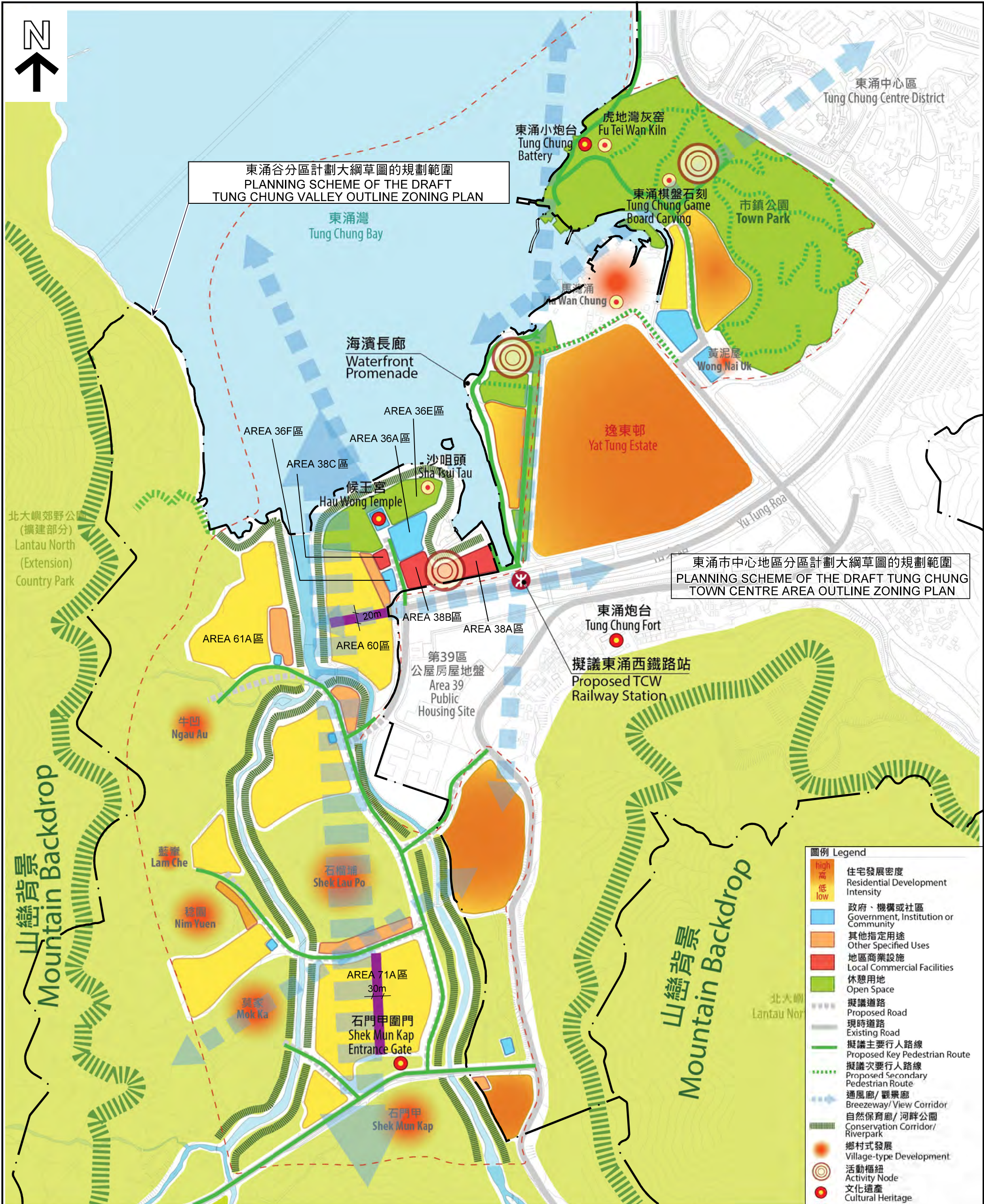
行人及單車徑網絡概念圖
PLAN FOR PEDESTRIAN AND CYCLING NETWORK CONCEPT

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 10



只作顯示用途
FOR INDICATIVE PURPOSE ONLY

東涌谷和東涌市中心地區
TUNG CHUNG VALLEY AND TUNG CHUNG TOWN CENTRE AREA

分區計劃大綱圖的規劃範圍界線
PLANNING SCHEME BOUNDARY
OF OUTLINE ZONING PLAN

本摘要圖於2016年9月14日擬備
EXTRACT PLAN PREPARED ON 14.9.2016

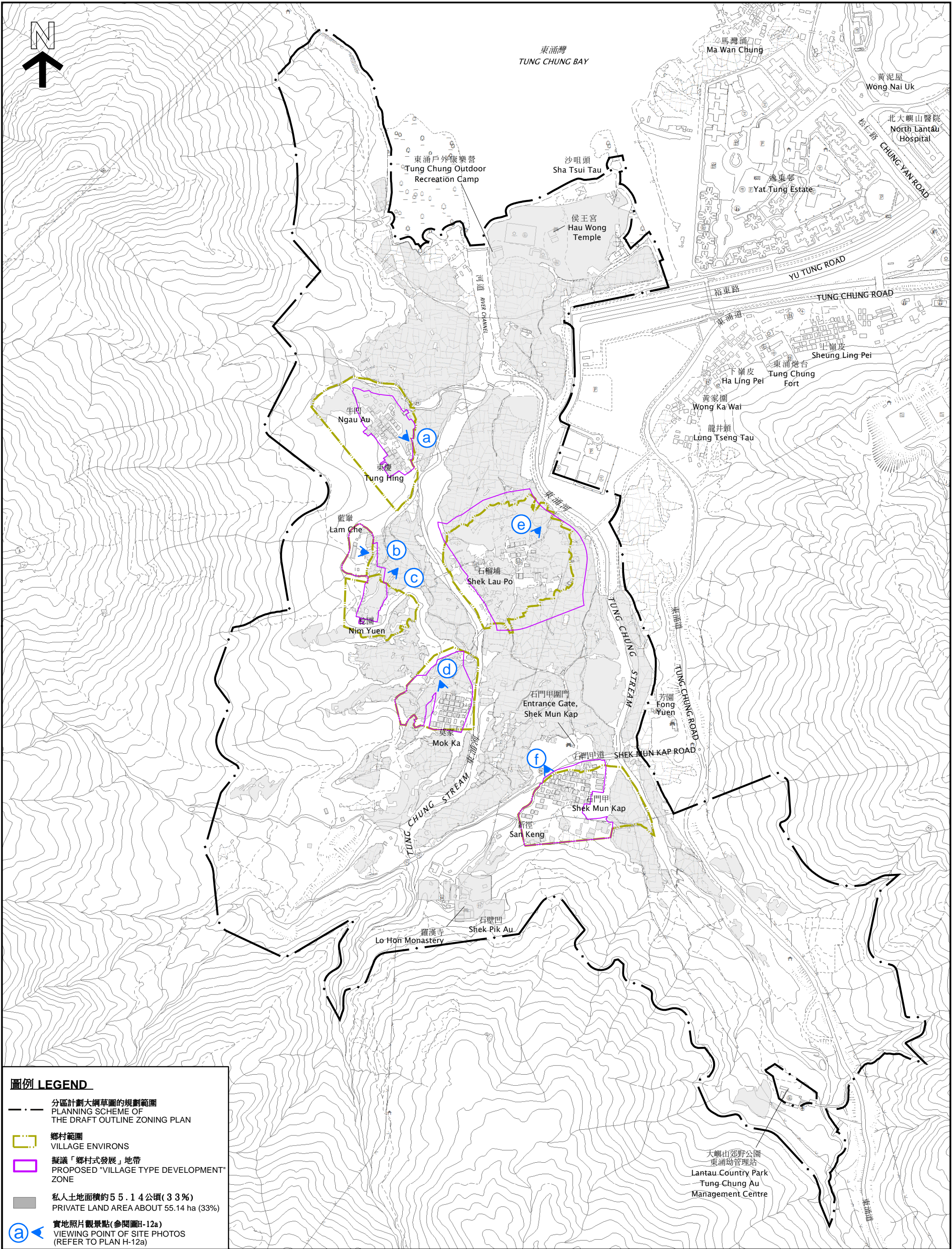
城市設計概念 URBAN DESIGN CONCEPT

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING
DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 11



圖例 LEGEND

- 分區計劃大綱草圖的規劃範圍
PLANNING SCHEME OF THE DRAFT OUTLINE ZONING PLAN
- 鄉村範圍
VILLAGE ENVIRONS
- 擬議「鄉村式發展」地帶
PROPOSED "VILLAGE TYPE DEVELOPMENT" ZONE
- 私人土地面積約55.14公頃(33%)
PRIVATE LAND AREA ABOUT 55.14 ha (33%)
- 實地照片觀景點(參閱圖H-12a)
VIEWING POINT OF SITE PHOTOS (REFER TO PLAN H-12a)

本摘要圖於2016年9月14日擬備
EXTRACT PLAN PREPARED ON 14.9.2016

鄉村範圍、土地業權及擬議「鄉村式發展」地帶
VILLAGE ENVIRONS, LAND OWNERSHIP AND PROPOSED "VILLAGE TYPE DEVELOPMENT" ZONE
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
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CONSIDERATION OF REPRESENTATIONS No. R1 - R38 AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1
比例尺 1:7 500 SCALE

米 METRES 100 50 0 100 200 300 400 500 600 700 METRES

規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 12

Ⓐ 牛凹 NGAU AU



Ⓑ 藍峯 LAM CHE



Ⓒ 稔園 NIM YUEN



Ⓓ 莫家 MOK KA



Ⓔ 石榴埔 SHEK LAU PO



Ⓕ 石門甲 SKEK MUN KAP



Ⓐ 觀景點
VIEWING POINT

本摘要圖於2016年8月26日擬備，
所根據的資料為攝於2015年的實地照片
PLAN PREPARED ON 26.8.2016
BASED ON SITE PHOTOS TAKEN IN 2015

認可鄉村的實地照片 SITE PHOTOS OF RECOGNIZED VILLAGES

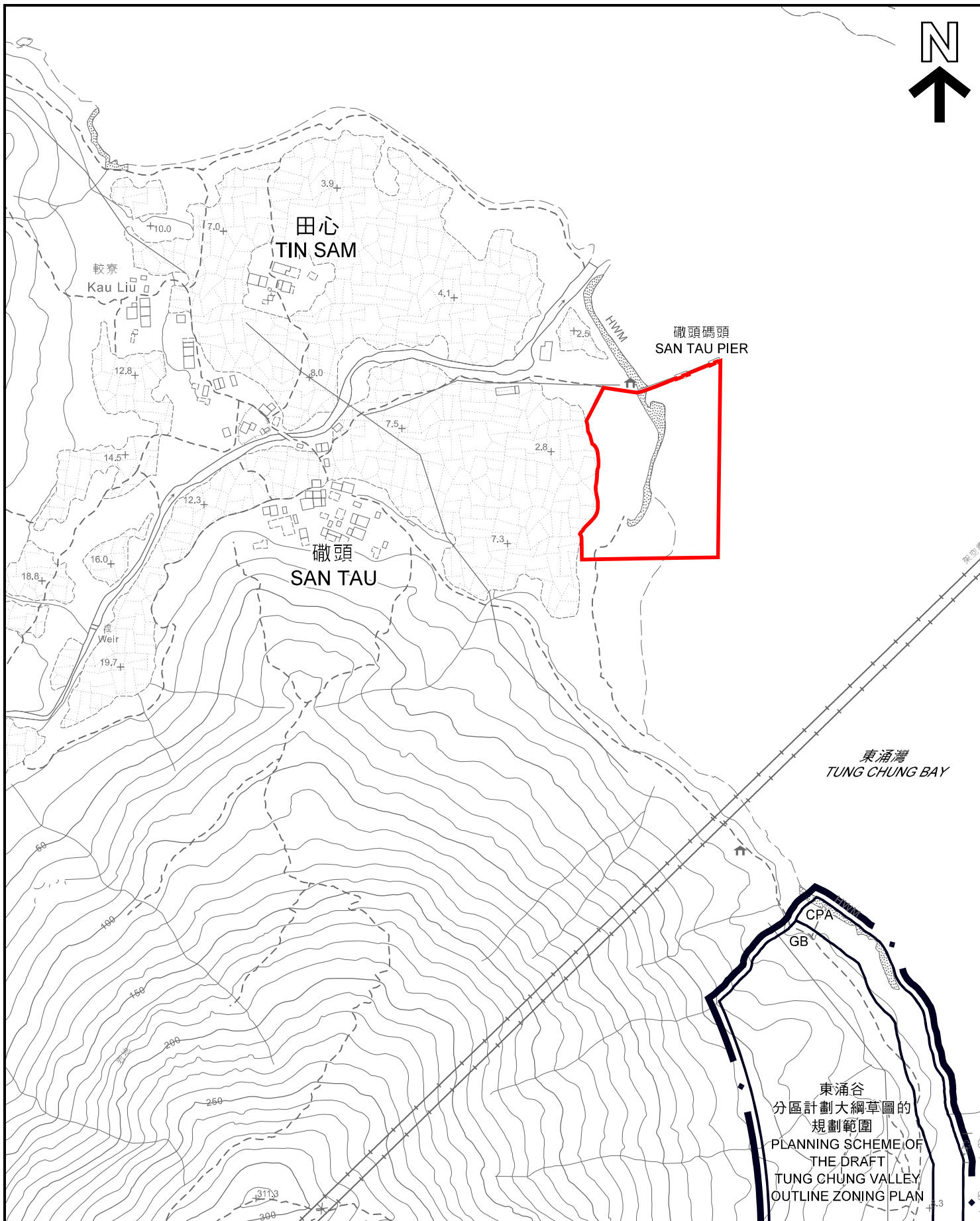
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PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 12a



具特殊科學價值地點
SITE OF SPECIAL
SCIENTIFIC INTEREST

本摘要圖於2016年9月14日擬備，
所根據的資料為組別HP5C
的測量圖編號9-SE-A
BASED ON SERIES HP5C SURVEY SHEET
No.9-SE-A

礮頭海灘具特殊科學價值地點
SAN TAU BEACH SITE OF SPECIAL SCIENTIFIC INTEREST

就東涌谷分區計劃大綱草圖編號S/I-TCV/1
提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

SCALE 1:5 000 比例尺
米 METRES 100 0 100 200 米 METRES

規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 13

創建 Designing Hong Kong 香港 .com

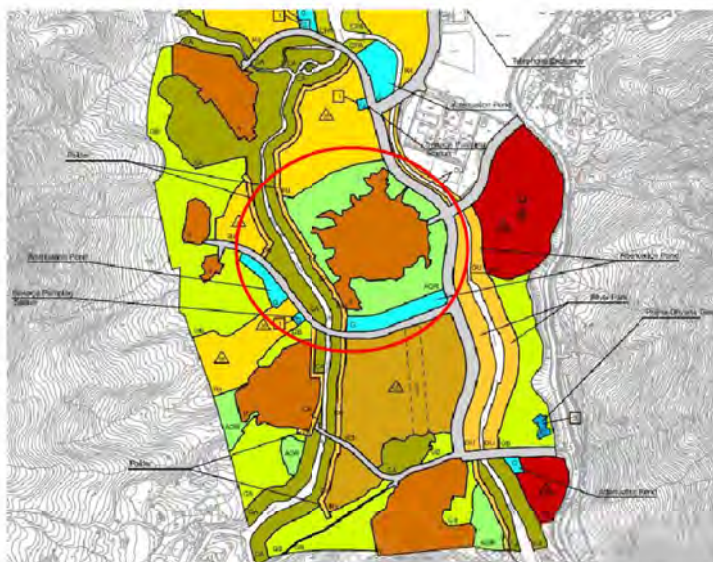
Figure 1

The Draft Tung Chung Valley Outline Zoning Plan
No. S/I-TCE/1

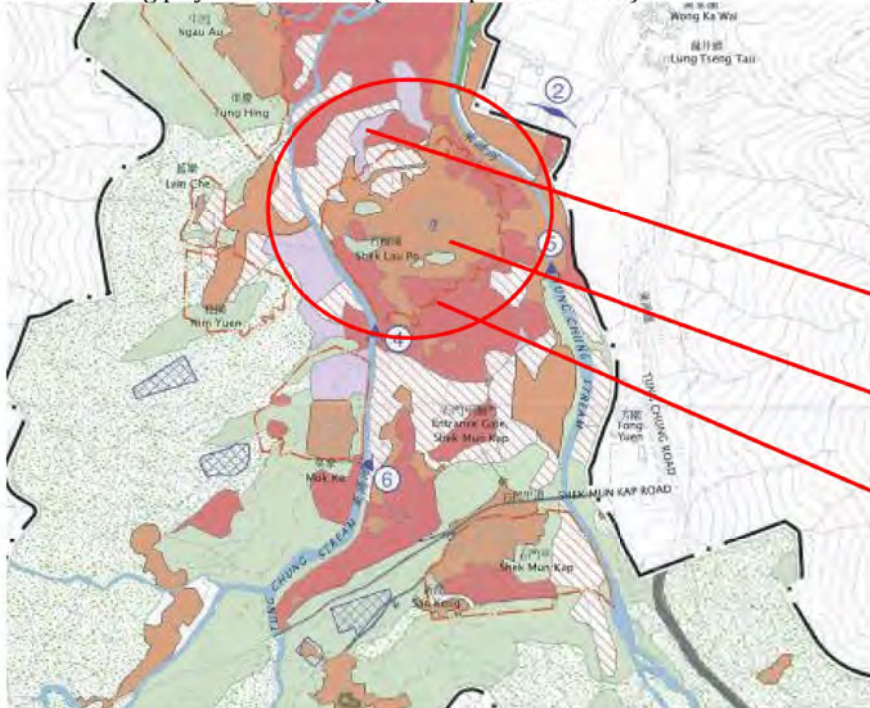
The EIA Report: Revised Recommended Outline
Development Plan-TCW



Extended V zone



OZP existing physical features (TPB Paper No.10045)



The "V zone" in Shek Lau Po has been extended and covered the surrounded "Agriculture" zones in OZP. This has not been justified in the EIA report.

Agricultural land (Active, Dry)

Agricultural land (Abounded, Dry)

Agricultural land (Orchard)

申述人(R29)提交的繪圖
DRAWING SUBMITTED BY REPRESENTER (R29)
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的
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R/S/I-TCV/1-1 to 38

繪圖
DRAWING
H - 1