

寄件者: 梅窩鄉事委員會 <muiworc@gmail.com>  
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收件者: tpbpd@pland.gov.hk  
主旨: (更正版)大蠔分區計畫大綱圖  
附件: 更正-大蠔大綱圖.pdf

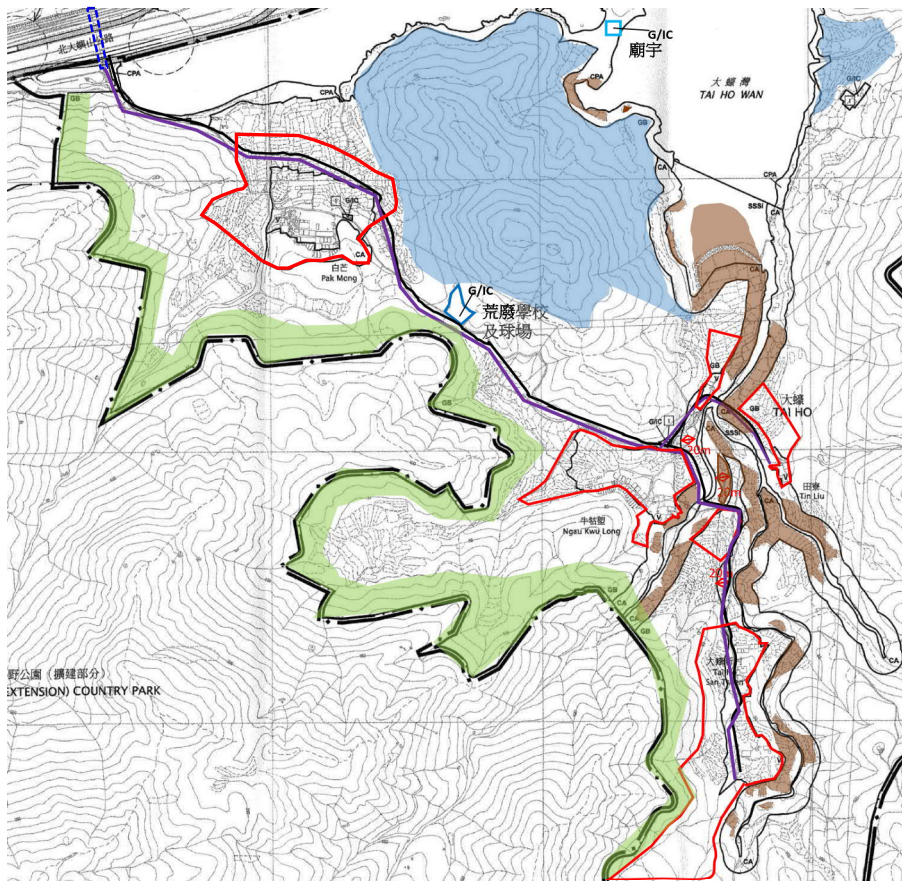
城市規劃委員會  
秘書處:

梅窩鄉事委員會之編號 R12 -R1061  
現附上(更正版)大蠔分區計畫大綱的圖片。  
煩請跟進。  
謝謝!

Please feel free to contact us during office hour if you have any inquiries, Thank you.

Best Regards,

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# MASTERPLAN LIMITED

Planning and Development Advisors

領賢規劃顧問有限公司

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

Date: 13 July, 2017

By Hand

Dear Sirs,

**Re: Comment on Representations relating  
to the Draft Tai Ho OZP No. S/I-TH/1**

***Proposal for a Balanced Conservation  
and Development Approach for Tai Ho***

**1. Introduction**

- 1.1 We are authorized by the Commenter, a consortium of major private land owners of Tai Ho, including Sun Hung Kai Properties, Swire Properties Limited, and Hong Kong Land; to act on their behalf in submitting this Comment under Section 6A(1) of the Town Planning Ordinance to the Town Planning Board, with respect to the Draft Tai Ho OZP No. S/I-TH/1 (the "OZP").
- 1.2 This Comment is in response to the Representations of the Green Groups (i.e. R1 to R9), and the Villagers and their representatives (i.e. R10 to R1061).

**2. Responses to Green Groups**

- 2.1 The Commenter agrees with the Green Group's position on increasing conservation measures to protect the Tai Ho Stream (SSSI zone) at the most ecologically sensitive location in Tai Ho. In this respect, the current Conservation Area (CA) zoning at the Tai Ho Stream could be expanded to cover the surrounding riparian land. (Figure 1) As a result, the CA zone coverage could double in size, compared to the OZP.
- 2.2 However, the Tai Ho Stream and its riparian area are largely privately-owned, and its long-term conservation can only be effectively implemented by addressing the development needs of these private land owners. As such, the Commenter proposes an expanded CA zone with management under Management Agreement (MA) at the most ecologically sensitive locations at Tai Ho stream; *in conjunction* with suitable residential and other developments at less ecologically sensitive locations to the west. (Figure 2) Under the MA approach, a suitable Non-Government Organization (NGO) could be identified to initiate a management proposal to the Government and to undertake the conservation management. This is in line with the New Nature Conservation Policy (NNCP) that has designated Tai Ho as the third priority site.

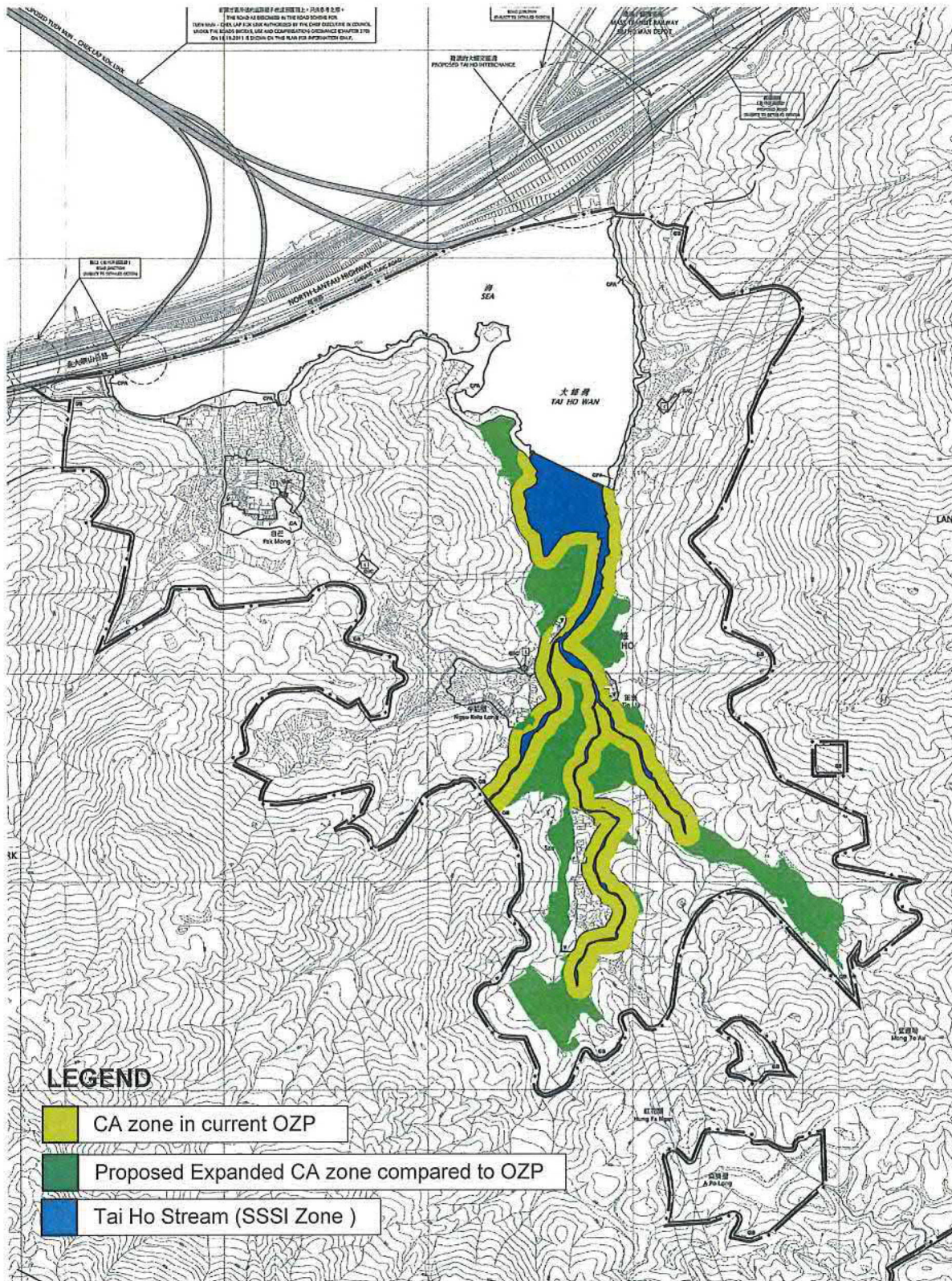


Figure 1: (*Indicative*) Proposed expanded CA zone and NBA at Pak Mong Stream, compared with OZP

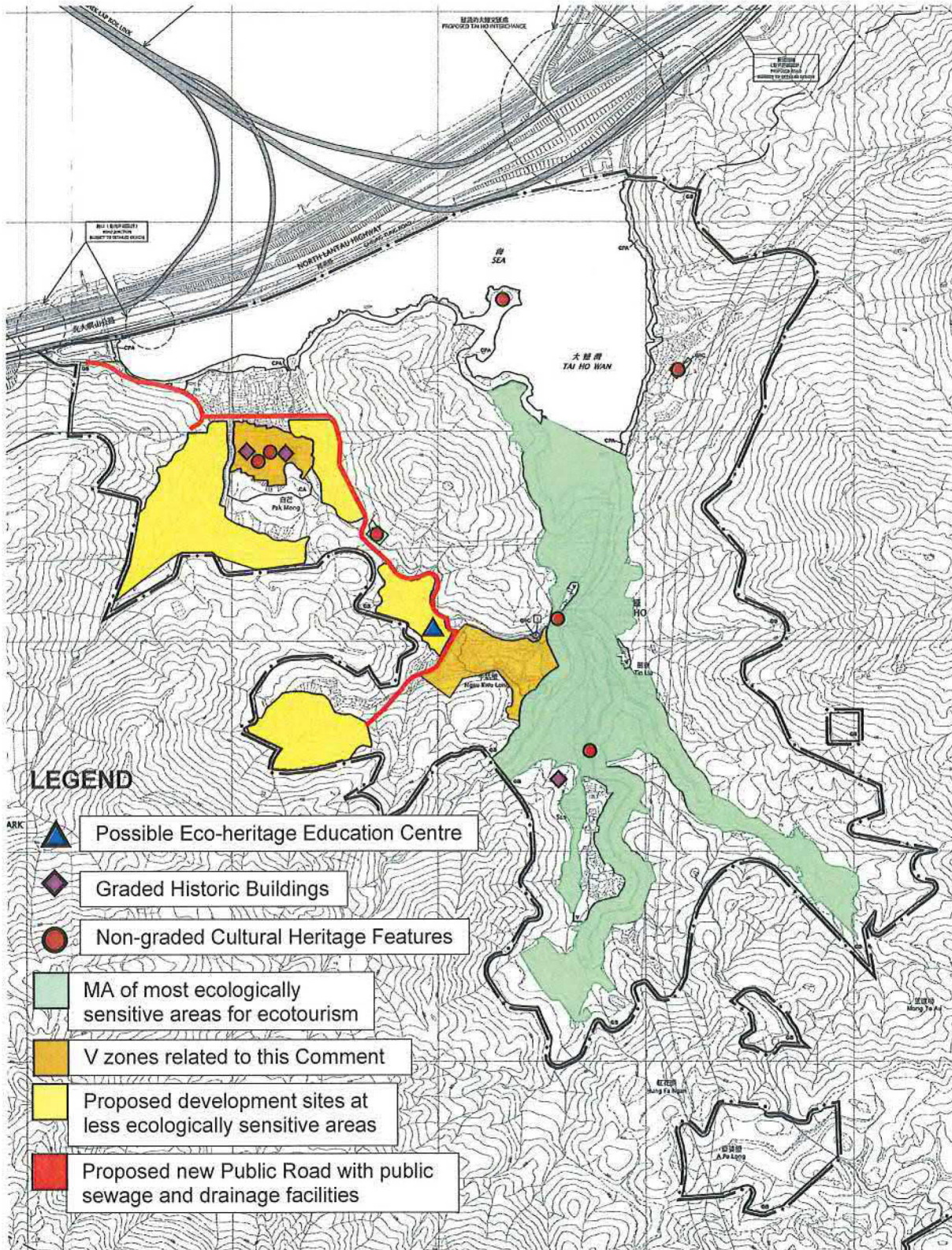


Figure 2: (*Indicative*) Proposed MA approach and opportunities for eco-heritage tourism

### **3. Responses to Villagers**

- 3.1 The Commenter agrees that the overall planning intention of the OZP is biased towards ecological conservation, and the “incremental approach” for the V zones in the OZP does not justify undermining the need to meet the village housing demand. The OZP is restrictive to the point that it constitutes a deprivation of private development rights. The conservation measures should be concentrated at the most ecologically sensitive area at the Tai Ho stream locality, while providing flexibility for development at the less ecologically sensitive areas.
- 3.2 In addition, the Government concerns on adverse ecological impact of the additional developments could well be addressed by providing needed infrastructure facilities. The proposed new public road is such a measure that would enable the provision of sewage and drainage facilities, as well as an orderly development pattern and efficient use of land for village house development. (Figure 2)
- 3.3 The Commenter agrees to expand the V zone at Ngau Kwu Long Village to provide land to reallocate village housing away from the more ecologically sensitive locations or CA zones. The V zone at Pak Mong Village could also be able to accommodate more village housing than that proposed in the OZP. (Figure 2) This would provide incentive for the Commenter and other private land owners (including villagers) to take forward the land exchange process to consolidate developable land and to surrender land at the conservation zones. Without a zoning plan that defines and balances a land use framework for *both* conservation and development together, there is no certainty or guarantee for development to take place and land exchange to proceed.

### **4. The Sustainable Lantau Blueprint**

- 4.1 The Sustainable Lantau Blueprint (SLB) was published in June 2017, after the closing date of representations, and earmarked Tai Ho for eco-tourism development. The SLB suggests an “education centre” to be located within Tai Ho to facilitate the public education and conservation of the natural area. The Commenter believes this is only possible by balancing the needs of the major stakeholder groups, which require a zoning framework to facilitate development and village housing at suitable locations, and a MA approach to boost ecotourism and conservation of the Tai Ho stream.
- 4.2 Tai Ho is important for both heritage and ecology, and managed in an appropriate way, would stimulate tourism development. To support the MA approach, the Commenter is open to include an “Eco-heritage Education Centre” at the development sites in their private land, providing essential conservation education facilities and displays, as well as a gathering place for eco-heritage tours and other public education activities. (Figure 2) The tour routes will make use of existing trails and will be designed with avoidance of certain areas of high conservation value, to achieve a balance of preserving the biodiversity while still serving the education purposes. There is also potential to link together heritage features for the eco-heritage tours. There are three graded historic buildings (i.e. Pak Mong watch tower, Pak Mong entrance gate, and Tai Ho watch tower) by the Antiquities Advisor Board, and a number of cultural heritage features that reflect the important history of the area, including the Leung Ma Temple, Luk Hap Yuen Temple, Man Hing Bridge, Kwok Ancestral Hall, and Pak Mong Fung Shui Wall, etc... A proposed concept for potential eco-heritage tourism, in line with the MA approach is provided in Figure 2. It could become a site for the sensitive protection of the ecologically significant components related to the Tai Ho stream, for public education and for enjoyment of the rich cultural heritage and natural environment.

4.3 The MA approach in conjunction with development, would meet the conservation objectives under the NNCP, and provide opportunities for eco-tourism sought for by the Government in Tai Ho. Again, private sector and villagers involvement is critical for the effective implementation of this approach.

**5. Conclusion**

5.1 The current state of affairs, as reflected by the OZP, is that the Tai Ho stream would continue to degenerate from the uncontrolled village house development in the absence of public infrastructure, and no positive management of conservation.

5.2 The Commenter (major private land owners), villagers, and the Green Groups have clearly laid out their positions and proposals. There is a need for zoning adjustments to the OZP to ensure a balanced conservation and development approach for these major stakeholders.

5.3 The Commenter believes that the proposed MA approach in conjunction with development, would facilitate suitable development at the less ecologically sensitive locations, and strengthen conservation at the more ecologically sensitive Tai Ho stream. In turn, this would lead to opportunities for an eco-heritage tourism node, and to create incentive for the private land owners to consolidate land ownership and facilitate the conservation process.

Yours faithfully,



Ian Brownlee  
For and On Behalf of Masterplan Limited

Encl.

c.c. Client (By Email)  
DPO SI&I (Mr. Richard Siu) (By Email)