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TPB/R/S/I-TCE/1-1

城市規劃委員會文件第 10176 號附件 I

Annex I of TPB Paper No. 10176

英國特許測量師學會資深會員
香港測量師學會資深會員
新加坡測量師學會會員
中國房地產估價師學會會員
香港特許測量師學會會員
註冊專業測量師(屋宇測量)

By Hand

Date : 8 March 2016
Our Ref. : LDS/PLAN/5347(3)

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 Extension Area Outline Zoning Plan No. S/I-TCE/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 Extension Area Outline Zoning Plan No. S/I-TCE/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

Sung Shu Hung
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Pun How Wai
潘孝維
MRIBA
英國建築師學會會員

Encl.

c.c. Client

056

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/lpb/>.
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/lpb/>）。
- 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*) 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 Extension Area Outline Zoning Plan No. S/I-TCE/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
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 MPJA, 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 Extension Area Outline Zoning Plan
No. S/I-TCE/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 Extension (TCE) Area Outline Zoning Plan No. S/I-TCE/1 which was published on 8 January, 2016 for public inspection.

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 and integrated land use implementation. The objective of this written representation is to achieve a more comprehensive plan in terms of potential and possibilities of the future use of land.

2. Representation to the Draft Tung Chung Extension Area OZP No. S/I-TCE/1

Commercial Developments in Tung Chung East

The Representer appreciates the planning intention to help create more job and business opportunities for Hong Kong residents and in particular for the Tung Chung community.

The aviation industry and their associated businesses have already provided plenty of job opportunities. There is also considerable land on the airport island yet to be utilized for "airport related" business uses that will create further employment opportunities.

There is a lack of strong justifications to support the provision of such substantial amount of commercial area. Instead of huge office node and regional malls, the Representer suggests some other uses such as Science Park and Industrial Estate for innovative industries like film making and creative, media advertising, etc. should be considered. Moreover, in view of the abundant existing and future retail supply in the region, for instance, Northern Commercial Development (NCD), Hong Kong Border Crossing Facilities (BCF), the existing Citygate and its adjacent new mall under construction at Tung Chung Town Centre, the government should critically review the need for the regional retail provision of 163,300 sq.m. GFA or examine carefully its market positioning from a macro perspective.

TCE is in need of a more comprehensive planning concept to consolidate its functional positioning as a gateway of the Tung Chung New Town. Land uses should be complementary to one another, rather than being co-located in the area. The "Metro Core Area" is planned as an integrated development with housing, office and retail facilities, as the heart of the development, it should be better integrated with its surroundings on both spatial and temporal scales. More thought could be given to the development of innovation and technology industries, i.e. the aforementioned film park, or environmental industry, in particular effective energy services, considering that Tung Chung is a next generation of new town development when comparing to traditional towns.

MASTERPLAN LIMITED*Planning and Development Advisors***領賢規劃顧問有限公司**

TPB/R/S/I-TCE/1-2

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

Our Ref.: MP/TCE/HKWSC1
Dated: 3 March 2016

By Fax and By Hand

Dear Sir,

Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/1**Representation by the Hong Kong Water Sports Council****1. The Representer : The Hong Kong Water Sports Council**

1.1 The Hong Kong Water Sports Council (HKWSC) is a not-for-profit organisation established in 2012 by four National Sports Associations (NSA's) – The Hong Kong China Rowing Association, Hong Kong Canoe Union, Hong Kong Dragon Boat Association and the Hong Kong Sailing Association. It now includes other NSA's as members. It is an umbrella association to promote the development of water sports in Hong Kong. Membership is open to other Associations, Sports Clubs, and other organisations and individuals with an interest in water sports.

1.2 One of the objectives of the HKWSC is to identify locations to expand and improve facilities for water sports training and competitions. The current provision is inadequate in terms of capacity and quality of facilities. The HKWSC represents the needs of watersports bodies to government and other bodies who can assist with the provision of sites and venues, and can assist with funding and management of facilities and events.

1.3 Another important objective is to provide opportunities for young people to learn water sports skills and to enjoy participating in organized team sports, as part of a process of personal and community development.

2. Background

2.1 The HKWSC has previously made submissions regarding the future development of Tung Chung during the Stage 1, Stage 2 and Stage 3 public consultation process.

2.2 From the content of the draft Tung Chung Extension Area Outline Zoning Plan (the OZP) it would appear as if little consideration has been given to many of the points that were included in the previous submissions. The submissions were made on the basis of providing a high quality future living environment for the residents of Tung Chung, with useful access to the water. The relevant portion of the OZP is included as Figure 1.

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- 2.3 It appears as if little consideration has been given to the relationship of the land to the water. There is a great opportunity for designing a high quality interaction between the land and the water which would provide a unique opportunity for recreation and sport for the future residents of the area. The proposal for a marina is welcomed and fully supported, but it could be better located and shows little understanding of functional requirements.

Principles

- 2.4 The principles that have been stated in the submissions during the public consultation which are relevant to this OZP are restated:-

- (a) The waterfront should be designed as a place of interaction between land and water and a place where people can move safely and easily from the land to being on the water;
- (b) Water sports opportunities should be designed into the proposals at an early stage;
- (c) Tung Chung is an ideal location for use by boats because of the relatively protected water. Land needs to be reserved for supporting facilities to enable water sports activities to be undertaken;
- (d) The proposed reclamation area should include the design of areas for recreation, including public beaches, within the sea wall design, and to provide land for water sports facilities;
- (e) Water sports provide great scope for public recreation while using very little land.

- 2.5 The HKWSC supports the "Livable Town" concept, and stresses that public space along the waterfront is severely under provided. The waterfront relationship and use of the water will contribute greatly to the "Livability" of the town in the future. This should be a major feature of the design.

- 2.6 In the 2015 Chief Executives Policy Address specific reference was made to the promotion of a water friendly culture:-

"180. Beyond Victoria Harbour, Hong Kong waters cover a large area, which can be used for promoting water recreational and sports activities and a water-friendly culture. Relevant bureau and departments will continue to identify desirable locations to build new water sports centres."

- 2.7 The HKWSC has been working actively with the Home Affairs Bureau to develop and operate Water Sports Centres in Kai Tak and Tseung Kwan O and to provide water sports events in Victoria Harbour. The scope for providing similar facilities and for carrying out similar events in Tung Chung is really only limited by the lack of provision of suitable land alongside the water, and the lack of facilities such as beaches and stepped seawall to provide public access to the water.

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Tel: (852) 2418 2880 Fax: (852) 2587 7068 Email: info@masterplan.com.hk

3. Detailed Comments and Reasons for the Representation

Moorings in Short Supply; Activity Focal Point

- 3.1 The proposed marina is supported as it will create mooring opportunities which are in short supply, provide an interesting focal point on the waterfront, create business opportunities and provide employment. It will also become an important recreational facility for future residents.

Layout could be Improved

- 3.2 However, the design and layout of the marina has not taken account of practical features such as the need to keep good circulation of water through the marina to maintain good water quality. The proposed design also takes away potential land which could be used for a larger public park on the waterfront. An alternative layout is attached which will enable a marina to accommodate some 200 plus vessels, while providing a larger park and a marina support area (see Figure 2).

Beaches and Access to the Water

- 3.3 As previously proposed, artificial beaches should be incorporated into the sea wall design so as to provide a major public recreational feature right in the area where people are living. This would mean that they have beach facilities within easy walking distance of their homes, and would not need to travel to the beaches on the south coast of Lantau which would serve a different form of recreation. An artificial beach was incorporated into the design of the Gold Coast development in Tuen Mun and a similar facility could be provided here. The proposed location of two public beaches is shown in the attached drawings and they are associated with the waterfront park, and will provide the best for access to the water.

Site for Water Sports Centre

- 3.4 The locality is ideally suited for water sports and a site is proposed for a Water Sports Centre. This could be operated by the Leisure and Cultural Services Department (LCSD) or by the HKWSC, and would include training courses for locals interested in those sports which use an exposed location with good wind conditions, such as small sailing boats, wind surfing, and canoes.

4. Proposals to Meet the Representation

There are several ways in which these requirements could be included in the design of this new development area. Two options are presented for the Town Planning Board's (TPB) consideration.

4.1 Option 1 : Relocated Marina and Improved Public Waterfront Park

- 4.1.1 This option is fundamentally the same as that submitted with the Stage 3 Public Consultation and is illustrated in Figure 2. It involves the following:-

- (a) The expansion of the Planning Area boundary to include a portion of the sea to the north-west of the currently proposed marina. This new area would be shown as "OU(Marina)" and the proposed sea walls would be accessible to the public as part of the waterfront promenade;
- (b) The area previously indicated as the marina would be rezoned to "Open Space" and provides an enlarged waterfront park;
- (c) The zoning for Planning Area 144 be retained as "OU(Marina Club, Boat Repairing and Commercial Facilities Associated with Marina Development)", but enlarged and located adjacent to the re-aligned marina edge;
- (d) Area 143 be rezoned from "OU(Marina Club, Boat Repairing and Commercial Facilities Associated with Marina Development)" to "OU(Water Sports Centre)" with the Planning Intention of being "primarily to reserve land for water sports and recreation facilities";
- (e) Two areas along the waterfront be zoned "OU" annotated "Public Beach".

4.1.2 This is the preferred option as it has a better design marina, a larger area of public open space on the park, and an adequate area for the public to enjoy water sports.

4.2 Option 2 : Marina Location Unchanged.

4.2.1 Should the Board not accept Option 1, then the water sports facilities could be included in a similar manner with less change to the OZP. This is indicated in Figure 3 Option 2 and consists of the following amendments to the OZP:-

- (a) The marina location be unchanged but included within the OZP boundary and zoned "OU(Marina)" so as to give statutory control and certainty to the water area;
- (b) Area 143 be rezoned from "OU(Marina Club, Boat Repairing and Commercial Facilities Associated with Marina Development)" to "OU(Water Sports Centre)" with the Planning Intention of being "primarily to reserve land for water sports and recreation facilities.";
- (c) Two areas along the waterfront be zoned "OU" and annotated "Public Beach" as shown on Figure 2.

4.2.2 This option does not provide as large a public park as Option 1, and does not enable a better marina design and layout. However, it enables all the necessary facilities to be provided with minimal change to the OZP.

5. Conclusion

5.1 The HKWSC has a great depth of knowledge regarding the planning and operational requirements for water sports and their use by the public. The Member NSA's also have great depth of experience in providing courses and events for the introduction of young people to a wide range of water sports. The HKWSC members would be pleased to meet with government departments to refine the proposals in this representation.

MASTERPLAN LIMITED

Room 3516B, 35/F, China Merchants Tower, Shun Tak Centre, 200 Connaught Road Central, Hong Kong.
Tel: (852) 2418 2880 Fax: (852) 2587 7068 Email: info@masterplan.com.hk

- 5.2 The TPB is invited to consider these proposals and amend the OZP so as to provide a higher quality of livable environment for the future residents and to improve the accessibility of the water for the enjoyment of the public.

Yours faithfully,



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

cc. Client
HAB

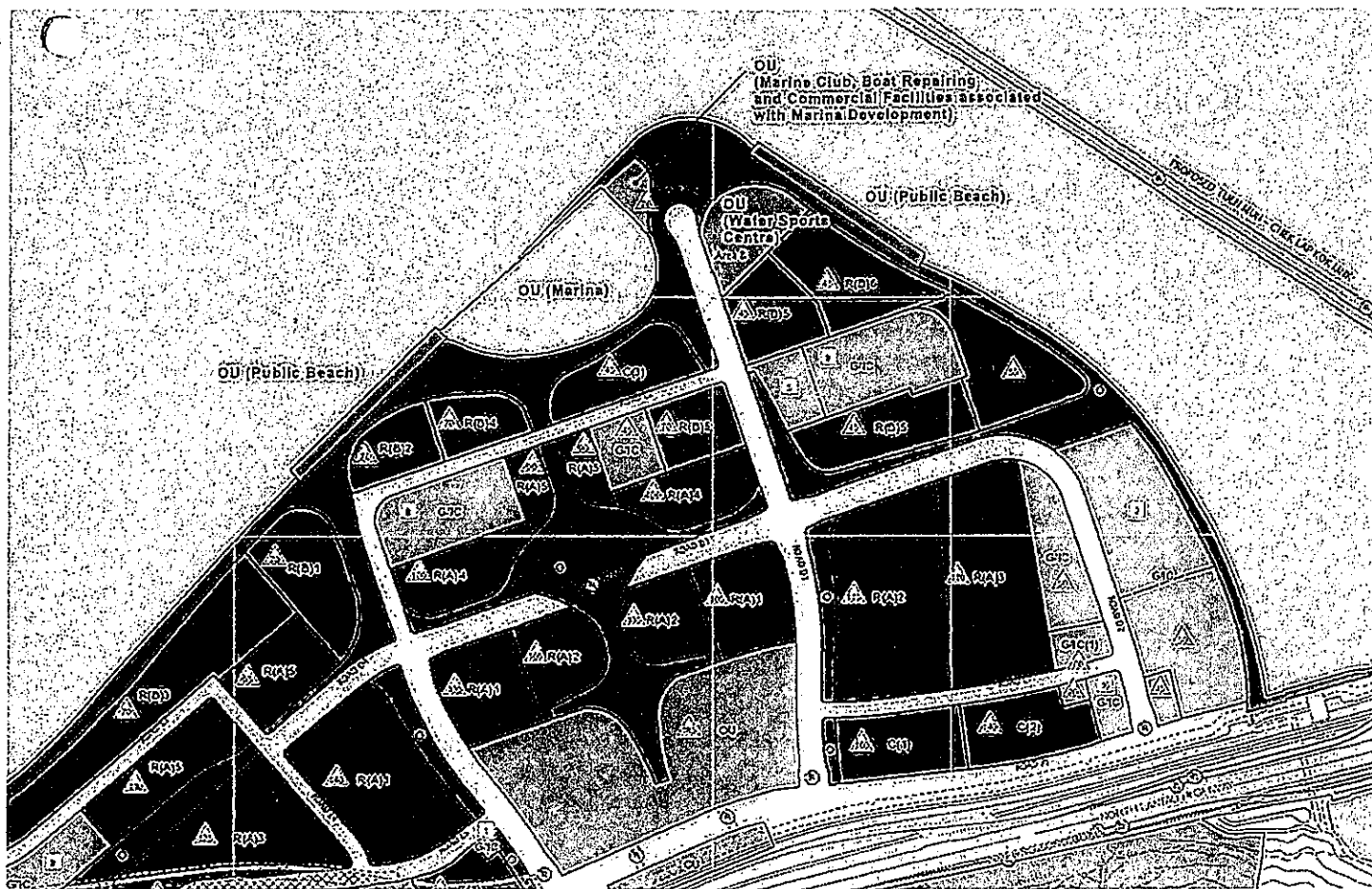
Figure 1: Existing Tung Chung Extension Area OZP



Figure 2: Proposed OPTION 1



Figure 3: Proposed OPTION 2



TPB/R/S/I-TCE/1-3

就草圖作出申述

Representation Relating to Draft Plan

參考編號

Reference Number:

160227-105046-51199

提交限期

Deadline for submission:

08/03/2016

提交日期及時間

Date and time of submission:

27/02/2016 10:50:46

提出此宗申述的人士

Person Making This Representation: 先生 Mr. 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-TCE/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
S/I-TCE/1	反對 Oppose	反對擴建，應配合居民需要及顧及環境

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

--

TPB/R/S/I-TCE/1-4

就草圖作出申述
Representation Relating to Draft Plan

參考編號

Reference Number:

160308-104417-28370

提交限期

Deadline for submission:

08/03/2016

提交日期及時間

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 of 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>

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		<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 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</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 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 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):

寄件日期:
收件者:
主旨:
附件:

Hin tung Chan [REDACTED]

07日03月2016年星期一 22:45

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。

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：

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

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。

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向；

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；

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 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；

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。

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 本地經濟及原區就業

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堪比；

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。鼓勵街坊及店戶幫忙儲起廚餘，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 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，同時也可減少土署有關交通津貼方面支出；

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。

4 建立低碳社區，友善單車政策

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。

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

1. 該申述所關乎的在有關草圖內的特定事項

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；

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. 該項建議的性質及理由、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（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。

.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「道各」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。

.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。

.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。

.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 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；

.2 商業的總面積 7.38 公頃，卻沒有食環街市，不利民生；

.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；

.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:

. 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。

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。

. 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:
寄件日期:
收件者:
主旨:

Alpha Wong

07日03月2016年星期一 20:47

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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。

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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、鬆弛神經

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藥開支,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;

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;

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;

6 地貌被改建為停車場土地用途,是不合理的安排;

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;

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

1 發展有機農業區及成為香港第一個無廢新市鎮

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;

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。比如兔東邨、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;

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。

1.2 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,以爭取更佳的保鮮期。

1.3 本地經濟及原區就業

1.3.1 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;

1.3.2 減低本港依賴入口食物狀況及支持本地農業;

1.3.3 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,同時也可減少土署有關交通津貼方面支出;

1.3.4 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。

1.4 建立低碳社區

1.4.1 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。

1.4.2 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. 該項所述的性質及理由、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。可惜此分區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，小童=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。

1.12 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

有數千多市民輪候公屋，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，建議改劃改為小型的公共房屋或公營長者屋。

1.13 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

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。

1. 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

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_2019/tc/dc_meetings_doc/9962/IS_2016_017_A3_TC.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_2019/tc/dc_meetings_doc/9962/IS_2016_017_A2_TC.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: Yin Siu [REDACTED]
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主旨: 東涌新市鎮擴展意見
附件: 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

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東涌居民

馮小燕

馮小燕 東涌逸東邨居民

Email:

Phone:

東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1

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。

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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

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Haster

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主旨:
附件:

Chun Kei Lam [REDACTED]
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-TCE/1-10

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



東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1

該申述所關乎 的在有關草圖內的特定事項

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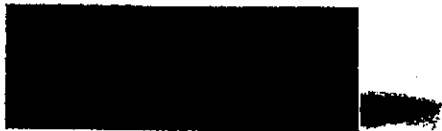
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林俊麒



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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

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TSE sai kit

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TSE sai kit



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Date: 07/03/2016 23:28
Subject: 東涌東填海，東涌河

(See attached file: 反對東涌東填海_王進洋.docx)(See attached file: 東涌河
王進洋.docx)

東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1

該申述所關乎 的在有關草圖內的特定事項

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；

商業的總面積 7.38 公頃，卻沒有食環街市，不利民生；

該申述的性質及理由、對有關草圖作出的建議

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。

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。

王進洋 東涌居民



寄者:
寄件日期:
收件者:
主旨:
附件:

Kwok Yu Hang [REDACTED]
07日03月2016年星期一 22:37
tpbpd@pland.gov.hk; tspd@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-TCE/1-13

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

Num.: [REDACTED]

[REDACTED]

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 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；
2. 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。

東涌富東市民 - 郭裕恒

Num.: [REDACTED]

[REDACTED]

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. 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，加上舖裝良好，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。

2 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。

寄件人: Yin Siu [REDACTED]
寄件日期: 08日03月2016年星期二 12:11
收件者: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; DSD HKSARG
副本: [REDACTED]
主旨: 就東涌新市鎮擴展的意見
附件: 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

CHAN SHUN LEUNG



東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1

該申述所關乎 的在有關草圖內的特定事項

- 1 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；
2. 海傍的休憩用地開闢設遊艇停泊處，是私有化我們的公共空間。

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. 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。

2 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。

寄件者: wongwaisze [REDACTED]
寄件日期: 08日03月2016年星期二 14:02
收件者: Tpbpd
主旨: 有關《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》意見書

致 城市規劃委員會：
有關《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》

就東涌擴展區分區計劃大綱草圖，本人意見如下：

1. 填海危害海洋生態

東涌新市鎮擴展區涉及合共 129.1 公頃的填海土地。是次填海工程將進一步威脅大嶼山北部的中華白海豚。東涌東部填海工程範圍是潛在的海豚夜間重要棲息地，假若工程一旦獲批，該帶中華白海豚棲身地永久消失。

2. 損害海岸公園功能

此外，填海範圍與鄰近建議興建的大小磨刀洲海岸公園相距僅約 1,200 米，工程船將無可避免要穿過此保護區，這將會嚴重影響海岸公園內的生態。

3. 填海影響大鰲

填海及工程位置包括大鰲對出，將影響大鰲河出海口及具特殊科學價值地區的珍貴生態。

4. 填海永不可逆轉，應先使用棕土

根據早前有民間團體發表了的研究報告，有部份新界的棕地接近已興建基礎設施的地區。由於填海工程會造成上述負面影響，政府應考慮善用現有的土地資源以代替在東涌填海。

5. 人口過多，必須考慮承載力

政府欠人口政策，將過多人口置放於各區將為社區帶來巨大壓力。東涌位置偏遠，增加 15 萬人口，勢令各交通及社區設施不敷應用。

因此，本人反對填海及草圖，請城規會重新修訂規劃。

市民黃慧詩謹啟
2016 年 3 月 8 日

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

就草圖作出申述

Representation Relating to Draft Plan

參考編號

Reference Number:

160308-155430-28544

提交限期

Deadline for submission:

08/03/2016

提交日期及時間

Date and time of submission:

08/03/2016 15:54:30

提出此宗申述的人士

Person Making This Representation:

女士 Ms. Ho Ka Po

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-TCE/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
東涌擴展區分區計劃大綱草圖	反對 Oppose	<p>本人反對東涌擴展區分區計劃大綱草圖，有以下五項原因：</p> <ol style="list-style-type: none"> 1. 擬增加接近15萬人口實在太多（是現時東涌人口的兩倍！），住宅地積比最高為6.9倍，地域承載力(包括環境、交通、生活配套等)成疑； 2. 該區比現有新市鎮更貼近機場及人工島，空氣污染現時尚未改善，再添人口極大可能增加市民受污染影響的機會，加重醫療成本，並非可持續發展之舉； 3. 填海及工程東面包括大蠔灣對出位置，大蠔河乃「魚類天堂」，罕有的魚類如香魚等均受到保護，此改劃將影響大蠔河出海口及具特殊科學價值地區的珍貴生態； 4. 東涌新市鎮擴展區涉及上百公頃的填海土地，將進一步威脅大嶼山北部的中華白海豚。東涌東部填海工程範圍是潛在的海豚夜間重要棲息地，假若工程一旦獲批，該帶中華白海豚棲

身地永久消失。

5. 填海範圍與鄰近建議興建的大小磨刀洲海岸公園相距僅約1,200米，工程期間船隻無可避免要穿過此保護區，這將會嚴重影響海岸公園內的生態；加上擬設的遊艇碼頭將增加附近海上交通，進一步使擬建的海岸公園受到威脅。

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

發 件:
寄 件 日 期:
收 件 者:
主 旨:

Eva Wong [REDACTED]
08日03月2016年星期二 23:59
tpbpd@pland.gov.hk
反對東涌擴展區分區計劃大綱草圖S/I-TCE/1號

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

本人反對東涌擴展區分區計劃大綱草圖S/I-TCE/1號

我的反對原因是：

1. 填海危害海洋生態

東涌新市鎮擴展區涉及合共129.1公頃的填海土地。是次填海工程將進一步威脅大嶼山北部的中華白海豚。東涌東部填海工程範圍是潛在的海豚夜間重要棲息地，假若工程一旦獲批，該帶中華白海豚棲身地永久消失。

2. 損害海岸公園功能

此外，填海範圍與鄰近建議興建的大小磨刀洲海岸公園相距僅約1,200米，工程船將無可避免要穿過此保護區，這將會嚴重影響海岸公園內的生態。

3. 填海影響大蠔

填海及工程位置包括大蠔對出，將影響大蠔河出口及具特殊科學價值地區的珍貴生態。

EVA WONG

就草圖作出申述

TPB/R/S/I-TCE/1-30

Representation Relating to Draft Plan

參考編號

Reference Number:

160304-155555-05636

提交限期

Deadline for submission:

08/03/2016

提交日期及時間

Date and time of submission:

04/03/2016 15:55:55

提出此宗申述的人士

Person Making This Representation:

先生 Mr. Andy Chan

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-TCE/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
東涌東填海工程： 新市鎮擴展區的填海土地（約120.5公頃）	反對 Oppose	填海工程範圍是潛在的海豚夜間重要棲息地，假若工程一旦獲批，這將會導致145公頃的中華白海豚棲身地永久消失。另外，填海範圍與鄰近擬建的大小磨刀洲海岸公園相距僅約一千多米，工程船將無可避免要穿過此保護區，這將會嚴重影響海岸公園內的生態。

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

政府應優先發展棕地，善用現有的土地資源以代替在東涌填海。

寄件者: Alvin Chan [REDACTED]
寄件日期: 03日03月2016年星期四 17:14
收件者: tpbpd@pland.gov.hk
主旨: 《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》意見書

TPB/R/S/I-TCE/1-31

致 城市規劃委員會

就東涌擴展區分區計劃大綱草圖，本人意見如下：

東涌新市鎮擴展區會將現有東涌市中心地區延伸出來，當中新市鎮擴展區以及計劃興建 P1 道路（東涌至大蠔段）涉及合共約 129.1 公頃的填海土地。是次填海工程將進一步威脅大嶼山北部的中華白海豚，根據本港海豚保育學會研究員的長期監察，大嶼山東北面的中華白海豚數目持續下降，由 2001 年每日平均發現 20 條跌至 2014 年每日僅 1 條。東涌東部填海工程範圍是潛在的海豚夜間重要棲息地，假若工程一旦獲批，這將會導致 145 公頃的中華白海豚棲身地永久消失。

此外，填海範圍與鄰近建議興建的大小磨刀洲海岸公園相距僅約 1,200 米，工程船將無可避免要穿過此保護區，這將會嚴重影響海岸公園內的生態。在高峰期期間，平均每日出入填海範圍的工程躉船預計會達 42 至 56 架次。機場第三條跑道工程預計將與東涌填海工程施工期重疊，每日會有 200 多艘施工船隻行經附近海域，甚至需駛經海岸公園。繁忙的海上交通將會進一步影響於大小磨刀海岸公園受保護範圍內活動的中華白海豚，亦即影響海岸公園的效用。

由於填海工程會造成上述負面影響，政府其實應考慮善用現有的土地資源以代替在東涌填海。根據早前有民間團體發表了的研究報告，香港現時的「棕土」面積為約 1,192 公頃，而當中有部份新界的棕地接近已興建基礎設施的地區。因此，政府應優先發展棕地，然後才考慮以填海這種對環境影響較大的方法來增加土地供應。

二零一六年三月三日

寄件者: Angela Chan [REDACTED]
寄件日期: 03日03月2016年星期四 17:29
收件者: tpbpd@pland.gov.hk
主旨: 東涌擴展區分區計劃大綱草圖意見書

致 城市規劃委員會

就東涌擴展區分區計劃大綱草圖，本人意見如下：

新市鎮擴展區以及計劃興建的 P1 道路（東涌至大蠔段）將會涉及合共約 129.1 公頃的填海土地。近年來中華白海豚數目越來越少，是次填海工程將進一步危害大嶼山的中華白海豚。東涌東部填海工程範圍是潛在的海豚夜間重要棲息地，假若工程一旦獲批，中華白海豚將會失去約 145 公頃的棲身地。

由於填海範圍與鄰近建議興建的海岸公園相距僅約 1,200 米，這將會嚴重影響海岸公園內的生態和水質。同時，鄰近的工程預計將與東涌填海工程施工期重疊，每日預計會有 200 多艘施工船隻行經附近海域，甚至需駛經海岸公園。繁忙的海上交通將會進一步加劇對海豚騷擾，同時亦會影響海岸公園的效用。

填海工程會對環境造成不良影響，政府其實應考慮善用現有的土地資源以代替在東涌填海。根據早前有民間團體發表了的研究報告，香港現時的「棕土」面積為約 1,192 公頃，而當中新界有不少的棕地可供發展因此，政府應優先發展棕地，然後才考慮在東涌東部填海。

二零一六年三月三日

寄件者: Bowie Lam [REDACTED]
寄件日期: 04日03月2016年星期五 12:36
收件者: tpbpd@pland.gov.hk
主旨: 有關《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》的意見

致 城市規劃委員會

就東涌擴展區分區計劃大綱草圖，本人有以下的意見：

東涌新市鎮擴展區將會有填海工程，但是由於填海工程會造成各樣的負面影響，政府應善用現有的土地資源以代替在東涌填海。香港現時有大約1,192公頃「棕土」，因此政府應優先發展棕地，以減輕對環境帶來的影響。

本港的中華白海豚數目持續下降，是次東涌東部填海工程將進一步威脅大嶼山北部的中華白海豚，而填海工程的範圍更是潛在的海豚夜間重要棲息地。此外，工程船將無可避免要穿過鄰近建議興建的大小磨刀洲海岸公園，這將會嚴重影響海岸公園內的生態。

二零一六年三月四日

寄件者: vicky chan [REDACTED]
寄件日期: 07日03月2016年星期一 10:45
收件者: tpbd@pland.gov.hk
主旨: 《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》意見書

致 城市規劃委員會

就《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》，本人意見如下：

東涌新市鎮擴展區會將現有東涌市中心地區延伸出來，當中涉及新市鎮擴展區的填海土地（約 120.5 公頃），以及計劃興建 P1 道路（東涌至大蠔段）的填海土地（約 8.6 公頃）。由於填海工程會造成各樣的負面影響，政府其實應善用現有的土地資源以代替在東涌填海。香港現時有過千公頃的棕地，而當中有部份新界的棕地接近已興建基礎設施的地區。因此，政府應優先發展棕地，因為這樣會有助減輕對環境帶來的影響。

填海工程除了會對環境造成損害，是次東涌東部填海工程更對大嶼山北部的中華白海豚造成威協。由於機場第三條跑道工程預計將與東涌填海工程施工期重疊，每日會有過百艘施工船隻行經附近海域。繁忙的海上交通將會進一步影響於大小磨刀海岸公園受保護範圍內活動的中華白海豚，同時亦有機會削弱海岸公園的效用。

二零一六年三月七日

寄件者: Martin Tam [REDACTED]
寄件日期: 05日03月2016年星期六 16:00
收件者: tpbpd@pland.gov.hk
主旨: 〈東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1〉意見書

就東涌擴展區分區計劃大綱草圖，本人有以下的意見：

新市鎮擴展區以及計劃興建的 P1 道路（東涌至大蠔段）將會涉及合共約 129.1 公頃的填海工程。香港現時有不少的「棕土」可供政府發展，因此政府其實可考慮優先發展棕地以代替在東涌填海。填海亦會帶來另一問題，就是填海工程的範圍與鄰近建議興建的海岸公園距離相距甚短，根據估計，在工程的高峰期，平均每日出入填海範圍的工程船預計會達 42 至 56 架次。正在進行的港珠澳大橋的接線工程和人工口岸工程亦會對鄰近海域造成累積影響，水質污染及巨大的海上交通流量將一步威脅著海豚的存亡。

tpb
寄件者:
寄件日期:
收件者:
主旨:

Mandy Cheung [REDACTED]
08日03月2016年星期二 11:03
tpbpd@pland.gov.hk
Comments on the Draft Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/I

TPB/R/S/I-TCE/1-36

To the Town Planning Board,

I am writing to express my opinion about the Draft Tung Chung Extension Area Outline Zoning Plan (OZP) based on the following reasons.

According to the Draft Tung Chung Extension Area OZP, the total reclamation area in Tung Chung East will be more than 120 hectares. I oppose to this reclamation plan since it will cause adverse ecological impacts to the Chinese White Dolphins (CWD) in North Lantau waters. The number of dolphins sighted in North Lantau waters has been decreased in recent years. Moreover, the proposed reclamation area is very near to the Brothers Islands Marine Park and there will be a number of concurrent projects in the nearby area. Therefore, huge disturbance will be created to the dolphins.

According to the study report conducted by a community group, the existing "brownfields" in Hong Kong cover an area of 1,192 hectares. The Government should consider developing those brownfield sites so as to reduce those negative impacts caused by reclamation.

Yours sincerely,

Mandy Cheung

就草圖作出申述

TPB/R/S/I-TCE/1-37

Representation Relating to Draft Plan

參考編號

Reference Number:

160308-101506-10200

提交限期

Deadline for submission:

08/03/2016

提交日期及時間

Date and time of submission:

08/03/2016 10:15:06

提出此宗申述的人士

Person Making This Representation:

小姐 Miss Esther Chan

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-TCE/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
東涌東部填海工程	反對 Oppose	新市鎮擴展區以及計劃興建的P1道路（東涌至大蠔段）將會涉及合共過百公頃的填海工程，眼見中華白海豚數目越來越少，當局實在應重新考慮否決填海這決定。東涌東部填海工程範圍是潛在的海豚夜間重要棲息地，填海後海豚將需要另覓棲息地。即使鄰近水域將興建海岸公園，但由於填海範圍與海岸公園距離太短，園內的生態和水質將無可避免地受到影響，其保育海豚的功效亦將會因而降低。

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

--

寄件者:
寄件日期:
收件者:
主旨:

03日03月2016年星期四 17:51

tpbpd@pland.gov.hk

有關《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》意見

TPB/R/S/I-TCE/1-38

本人反對東涌新市鎮擴展區的填海工程，工程不但會對環境造成損害，亦會對大嶼山北部的中華白海豚構成威脅，海豚數目一年比一年少。另外，將來工程船亦有可能要穿過鄰近建議興建的大小磨刀洲海岸公園，這將會嚴重影響海岸公園內的生態。

寄件者:
寄件日期:
收件者:
主旨:

Law Fanny [REDACTED]
04日03月2016年星期五 12:39
tpbpd@pland.gov.hk
《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》意見書

TPB/R/S/I-TCE/1-39

致 城市規劃委員會

就東涌擴展區分區計劃大綱草圖，本人意見如下：

東涌新市鎮擴展區會將現有東涌市中心地區延伸出來，當中新市鎮擴展區以及計劃興建 P1 道路（東涌至大蠔段）將會有大型填海工程。是次填海工程將會對中華白海豚的生境造成影響。在面對本港中華白海豚的數量越來越少這問題的同時，東涌東部填海工程範圍是潛在的海豚夜間重要棲息地，這將會導致 145 公頃的中華白海豚棲身地永久消失。

填海範圍與鄰近建議興建的大小磨刀洲海岸公園距離相距甚短，工程船將無可避免要穿過此保護區。根據估計，在工程的高峰期，平均每日出入填海範圍的工程躉船預計會達 42 至 56 架次。此外，機場第三條跑道工程預計將與東涌填海工程施工期重疊，頻繁的海上交通將會進一步影響於大小磨刀海岸公園受保護範圍內活動的中華白海豚，換言之，影響大小磨刀海岸公園的效用。

寄件者: Ceci Lam [REDACTED]
寄件日期: 07日03月2016年星期一 14:55
收件者: tpbpd@pland.gov.hk
主旨: S/I-TCE/1 東涌擴展區分區計劃大綱草圖意見書

TPB/R/S/I-TCE/1-40

致城規會：

就東涌擴展區分區計劃大綱草圖，本人意見如下：

東涌新市鎮擴展區將涉及合共約129.1公頃的填海工程，而填海工程將進一步威脅大嶼山北部的中華白海豚。大嶼山東北面的中華白海豚數目持續下降，但是次東涌東部的填海工程範圍是潛在的海豚夜間重要棲息地，如果工程獲批，這將會導致145公頃的中華白海豚棲身地永久消失。

填海範圍與擬建的大小磨刀洲海岸公園相距僅約一千多米，進出該水域的工程船將會嚴重影響海岸公園內的生態。東涌填海工程將與附近的機場第三條跑道工程施工期重疊，並推算每日將有逾200艘工程船進出大小磨刀洲海岸公園。同時，由於鄰近的大規模基建亦會對海岸公園造成累積影響，當局應重新審視填海的決定。

市民 林小姐 謹上

寄件人:
寄件日期:
收件者:
主旨:

daisy lee [REDACTED]
04日03月2016年星期五 15:45
tpbpd@pland.gov.hk
Comments on the Draft Tung Chung Extension Area Outline Zoning Plan

TPB/R/S/I-TCE/1-41

To the Town Planning Board,

I am writing to express my point of view about the Draft Tung Chung Extension Area Outline Zoning Plan (OZP) based on the following reasons.

The reclamation project in Tung Chung East will have direct and indirect adverse ecological impacts to the Chinese White Dolphins. Since the proposed reclamation area is very near to the Brothers Islands Marine Park (BIMP), huge disturbance will be created to the dolphins inside the protected area of BIMP. Moreover, there will be a number of concurrent projects in the nearby area, it may reduce the effectiveness of the BIMP.

Yours sincerely,

Daisy Lee

寄 寄: [REDACTED]
寄件日期: 07日03月2016年星期一 14:27
收件者: tpbpd@pland.gov.hk
主旨: S/I - TCE/1 東涌擴展區分區計劃大綱草圖 意見書

TPB/R/S/I-TCE/1-42

就東涌擴展區分區計劃大綱草圖，本人有以下的意見：

東涌東部的填海工程將會造成約145公頃的海床損失，同時亦令海豚失去百多公頃的棲息地。此外，東涌東部填海範圍選址於擬議大小磨刀洲海岸公園距離不足兩公里的區域內，而且工程將長達五年，工程帶來的交通流量及噪音，將會影響棲身於該區水域的中華白海豚。基於上述影響，本人並不贊同在東涌東部填海的決定。

寄件者: Billy Mak [REDACTED]
寄件日期: 08日03月2016年星期二 10:10
收件者: tpbpd@pland.gov.hk
主旨: 《東涌擴展區分區計劃大綱草圖》意見書

致 城市規劃委員會

本人十分憂慮東涌東填海工程所帶來的負面影響。隨著北大嶼山的多項大型基建所影響，海豚的重要棲息地因填海變得越來越少，同時中華白海豚數量在十年間大幅下降。是次東涌東填海工程範圍是潛在的海豚夜間重要棲息地，這將有機會導致海豚數目進一步下跌。此外，由於東涌東填海範圍與鄰近建議興建的大小磨刀洲海岸公園相距不遠，船隻和工程進一步增加會加劇對海豚騷擾，減低海豚再之使用此海岸公園水域的機會。基於上述的憂慮，本人是不支持填海的決定。

二零一六年三月八日

TPB/R/S/I-TCE/1-44

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 160304-170852-29620

提交限期
Deadline for submission: 08/03/2016

提交日期及時間
Date and time of submission: 04/03/2016 17:08:52

提出此宗申述的人士
Person Making This Representation: 先生 Mr. Dennis Cheung

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-TCE/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
The reclamation plan in Tung Chung East	反對 Oppose	The proposed reclamation area is very near to the Brothers Islands Marine Park (BIMP), enormous disturbance will be created to the dolphins inside the protected area of BIMP. About 42-56 working vessels at peak will pass through the proposed BIMP daily for 1.5 years. Therefore, the marine environment will become more congested, resulting in a higher risk of marine vessels hitting dolphins.

對草圖的建議修訂(如有的話)
Proposed Amendments to Draft Plan(if any):

寄件者:
寄件日期:
收件者:
主旨:

Jeff Tam [REDACTED]
07日03月2016年星期一 12:30
tpbpd@pland.gov.hk
[Possible SPAM] Comments on the Draft Tung Chung Extension Area Outline Zoning Plan

TPB/R/S/I-TCE/1-45

To the Town Planning Board,

According to the Draft Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/1, the reclamation area is about 130 hectares. The reclamation work in Tung Chung East will cause loss of important dolphin night-time habitat. Moreover, there will be a number of concurrent projects in the nearby area, such as the Hong Kong Boundary Crossing Facilities, Hong Kong-Zhuhai-Macao Bridge and the third airport runway. Those projects will also physically reduce the recognized dolphin important habitats. Therefore, I oppose to the reclamation plan in Tung Chung East.

The existing "brownfields" in Hong Kong cover an area of 1,192 hectares and the Government should consider developing those brownfield sites before using other methods (e.g. reclamation) that will cause greater environmental impacts.

Yours sincerely,

Jeff Tam

發 寄:
寄 日期:
收件者:
主旨:

Ben Cheung [REDACTED]
07日03月2016年星期一 18:05
tpbpd@pland.gov.hk
S/I-TCE/1 東涌擴展區分區計劃大綱草圖 意見書

TPB/R/S/I-TCE/1-46

致 城市規劃委員會

就東涌擴展區分區計劃大綱草圖，本人意見如下：

本人並不贊成東涌擴展區分區計劃大綱草圖內東涌東的填海方案。填海工程除了會對環境造成損害，是次東涌東部填海工程更會進一步威脅大嶼山北部的中華白海豚及牠們的棲息地。填海將令海面更窄，而且鄰近的工程預計將與東涌填海工程施工期重疊，水上交通將會變得十分頻繁，該區的海豚被船隻撞傷的機會大增。可是本港現時有大約 1,192 公頃棕土，政府應善用現有的土地資源以代替在東涌填海。

二零一六年三月七日

寄件者:
寄件日期:
收件者:
主旨:

Ada Ho [REDACTED]
04日03月2016年星期五 10:14
tpbpd@pland.gov.hk
Comments on the Draft Tung Chung Extension Area Outline Zoning Plan

TPB/R/S/I-TCE/1-47

To the Town Planning Board

Draft Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/1

I am writing to express my opinion about the Draft Tung Chung Extension Area Outline Zoning Plan (OZP) based on the following reasons.

According to the Draft Tung Chung Extension Area OZP, the planning scheme area is covering about 216.67 hectares. The total reclamation area is approximately 129.1 hectares (i.e. 120.5 hectares for the New Town extension and 8.6 hectares for the proposed Road P1 (Tung Chung - Tai Ho Section)). However, there will be direct and indirect adverse ecological impacts to the Chinese White Dolphins (CWD) due to reclamation. The Hong Kong Dolphin Conservation Society has conducted various studies on the CWD and they discovered that the number of CWD sighted in North Lantau waters has been decreased dramatically in recent years. The reclamation work in Tung Chung East will cause loss of important dolphin night-time habitat.

In order to reduce those negative impacts caused by reclamation, the Government should consider developing those brownfield sites. According to the study report conducted by a community group, the existing "brownfields" in Hong Kong cover an area of 1,192 hectares. Developing those brownfield sites will have less environmental impacts than reclamation.

Yours sincerely,
Ada Ho

寄件者:
寄件日期:
收件者:
主旨:

Law Tammy [REDACTED]
05日03月2016年星期六 15:55
tpbpd@pland.gov.hk
有關《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》的意見

TPB/R/S/I-TCE/1-48

致 城市規劃委員會

本人認為東涌東的填海工程將進一步影響大嶼山的中華白海豚。由於填海工程範圍是潛在的海豚生境地，一旦填海，海豚將失去百多公頃的棲身之所。鄰近海域亦有大型基建工程同時進行，大量工程船及運送工人往返的船隻將製造大量水底噪音，嚴重干擾海豚之間的溝通及日常活動。所以本人並不贊同東涌東的填海工程。

寄件者:
寄件日期:
收件者:
主旨:

Ho Anson [REDACTED]
07日03月2016年星期一 17:13
tpbpd@pland.gov.hk
Comments on the Draft Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/1

TPB/R/S/I-TCE/1-49

To the Town Planning Board,

A lot of dolphin habitats in Hong Kong have been damaged or destroyed by reclamation works. The Tung Chung East reclamation plan may degrade water quality and causes further habitat loss. During the peak reclamation construction period, the maximum number of construction-related vessel movements will be 42 to 56 per day. In combination with other vessel traffic, more vessel movements are expected in the vicinity of the project area. This large volume of traffic will certainly create disturbance and adversely impact the Chinese white dolphins in the North Lantau area. Therefore, I oppose to the reclamation plan in Tung Chung East.

Yours sincerely,
Anson Ho

就草圖作出申述

TPB/R/S/I-TCE/1-50

Representation Relating to Draft Plan

參考編號

Reference Number:

160307-232351-98278

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 23:23:51

提出此宗申述的人士

Person Making This Representation: 小姐 Miss Siu Tin Yan

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-TCE/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
Reclamation in Tung Chung	反對 Oppose	Reclamation will have harmful impact on the coastline, the marine environment, and Tung Chung river. The wild lives will be affected by the lost of habitat and runoff that pollutes the water. There's better alternative as there are still some land that has not been properly zoned. The environment north of Lantau is already greatly affected by the Hong Kong - Zhu Hai - Macau Bridge. Please do not further damage our environment!

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

Reclamation will have harmful impact on the coastline, the marine environment, and Tung Chung river. The wild lives will be affected by the lost of habitat and runoff that pollutes the water. There's better alternative as there are still some land that has not been properly zoned. The environment north of Lantau is already greatly affected by the Hong Kong - Zhu Hai - Macau Bridge. Please do not further damage our environment!

tpb

寄件者:
寄件日期:
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-TCE/1-51

請救救白海豚，停止開發東涌區計劃！

tpb

寄件者:
寄件日期:
收件者:
主旨:

Tong Agnes [REDACTED]
08日03月2016年星期二 15:47
tpbpd@pland.gov.hk
反對東涌填海計劃，破壞海洋生態！

反對東涌填海區計劃，
生態！□

to: [redacted]

寄件日期:
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

TPB/R/S/I-TCE/1-52
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

Dear sirs,

Attached please find our comment on the captioned.

Miffy
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>

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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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Tel: +852 3104 3107 Fax: +852 2187 2305

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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 North-eastern 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 exiting 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.

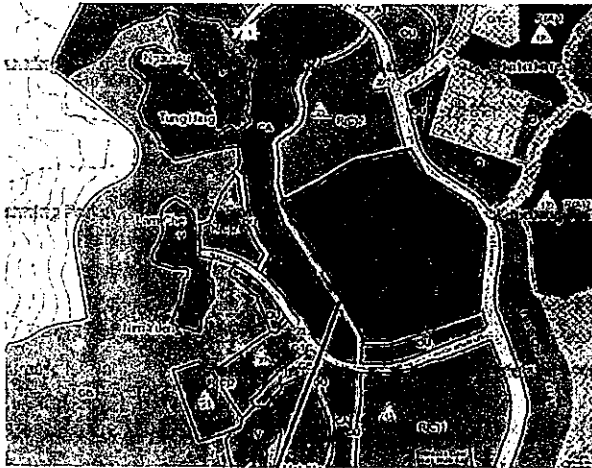
- We are concerned with amendment C and object to amendment R3, the areas zoned for small houses development should be limit to previous "V-zone" plus a reserve for approved small house applications only.
- What is the carry capacity of Tung Chung MTR line? How to minimize the impact of pollution and 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

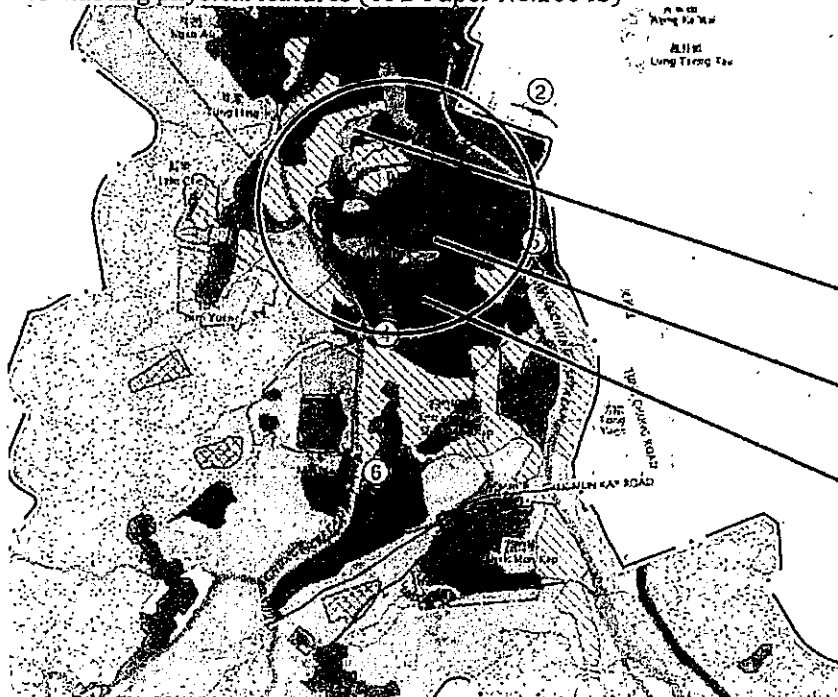


Extended V zone

The EIA Report: Revised Recommended Outline
Development Plan-TCW



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.

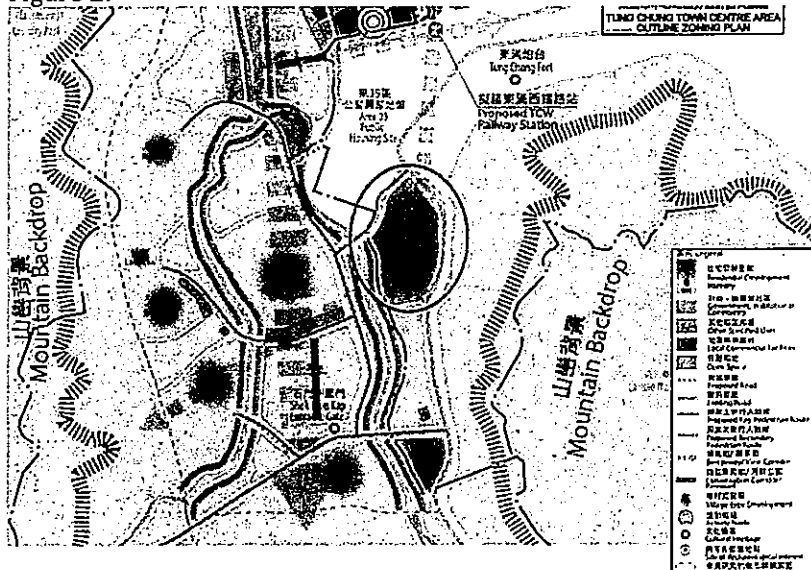
Agricultural land (Active, Dry)

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.

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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

寄件者: Wick Leung [REDACTED]
寄件日期: 08日03月2016年星期二 18:42
收件者: 'tpbpd'
主旨: Comments on Draft Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/1
附件: TPB20160308(TCE).pdf

Dear Sir/Madam,

Please refer to the attachment for comment.

Best Regards,

Wick Leung
Campaign Officer
The Conservancy Association
Unit 102, 1/F, PeakCastle Building, 476 Castle Peak Road, Kowloon, Hong Kong.
T: [REDACTED] !! D: [REDACTED] !! F: 27285538
E: wick@cahk.org.hk !! W: www.cahk.org.hk



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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 Extension Area Outline Zoning Plan No. S/I-TCE/1

The Conservancy Association (CA) **OBJECTS** to the land use zoning for this OZP as the current land use zoning cannot address CA's concern on the ecological impact from reclamation.

1. Degrade the conservation performance of The Brothers Marine Park and damage marine ecosystem

The location of proposed land reclamation at Tung Chung which was planned to commence in 2017 was less than 2 km away from the proposed The Brothers Marine Park (designated in late 2016). During its six years reclamation, mid-2018 and late-2019 would be the peak construction period. 42 to 56 construction barges would travel within and around The Brothers Marine Park every day. In the worst scenario, the construction of the Tung Chung New Town Development Extension will partially overlap with that of the proposed Third Runway, increasing daily marine traffic within and around The Brothers Marine Park to as much as 20 vessels, including construction barges, high-speed ferries, cargo ships and fishing boats. This huge volume of marine traffic would severely disturb marine life within and around Brothers Marine Park and discourage Chinese White Dolphins which are sensitive to noise and water quality, from returning to this once important habitat. Moreover, it will degrade the conservation performance of The Brothers Marine Park which was designated to compensate the environmental impact from the construction of Hong Kong-Zhuhai-Macao Bridge.

2. Feasibility of untried mitigation remains doubtful

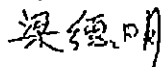
In order to compensate the significant environmental impact from reclaiming 140 ha of land to Chinese White Dolphins, the government only proposed to construct an ecological coastline which is an untried measure in Hong Kong, to compensate the impact. CA opined that it was non-considerate and unacceptable as Chinese White Dolphins was a species with high conservation importance. This mitigation should be tested before adopting it.

3. Request for proper mitigation

The government should implement the following measures to mitigate and compensate for the development impact to marine life, especially Chinese White Dolphins, before the project commences.

First, the project's construction barges should be barred from the proposed The Brothers Marine Park. Second, the government should 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 it is 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 proposed Third Runway – creating a marine protected area network for the dolphins.

Yours faithfully,



Leung Tak Ming
Campaign Officer

寄件者: Samantha Lee (Conservation) [REDACTED]
寄件日期: 01日02月2016年星期一 16:28
收件者: tpbpd@pland.gov.hk
主旨: Re: Draft Tung Chung Extension Area Outline Zoning Plan No. S/I-TCE/1
附件: Draft TCE OZP_WWF_Feb 2016.pdf

Dear Sir/ Madam,

Please find attached the WWF's submission on the captioned project for your consideration.

Yours faithfully,
Samantha

Samantha Lee Klaus
Assistant Conservation Manager, Marine

WWF-Hong Kong
15/F, Manhattan Centre, 8 Kwai Cheong Road,
Kwai Chung, Hong Kong

Tel: (852) 2161 9674
Fax: (852) 2845 2764
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WWF - SOLUTIONS FOR A LIVING PLANET
This e-mail is empowered by Novell.

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

WWF-Hong Kong

香港新界葵涌葵昌路8號
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wwf@wwf.org.hk
wwf.org.hk

Our Ref.: SHK/LDD 5 (i)/ 15
1 February 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 Extension Area Outline Zoning Plan No. S/I-TCE/1

WWF has grave concerns on the captioned particularly over the potential impacts caused by the reclamation works to the marine environment. This development project is going to erode the integrity, weaken the conservation performance of the future Brothers Marine Park, and hinder the recovery of the Chinese white dolphins in western Hong Kong waters. The implementation of more robust and stringent mitigation and compensation measures is necessary so as to ensure the impacts from the development project to the environment will be minimized, while the health and future of the habitats and its species will be safeguarded.

As a conservation organisation, WWF-Hong Kong's main focus on this proposed project is its impact on the marine ecology and is deeply disappointed with the quality of EIA report. It has failed to properly address the impacts to the marine ecology, in particular Chinese white dolphins (CWD), as well as fisheries resources. WWF shows serious concern on the captioned project, and objects the "OU" annotated "Marina Club, Boat Repairing and Commercial Facilities associated with Marina Development" zone which will be located in Areas 143 and 144.

The main reasons are as follows:

1) Urgent Need for Designating the West Lantau Waters as a Marine Park to compensate for the Reclamation Works by 2019

- 1 -

贊助：香港特區政府
副主席：郭榮鏗先生, GBM
副主席：陳仁港先生, GBM
副主席：鍾錦榮先生
主席：楊子儀先生
行政總裁：趙國棟先生

總幹事：黃宜宏先生
總幹事：黃宜宏先生
總幹事：黃宜宏先生
總幹事：黃宜宏先生
總幹事：黃宜宏先生

Patron: The Honourable Donald Tsang, GBM,
Chief Executive of the HKSAR
President: Mr. Markus Shaw
Vice-President: The Hon. Sir David Akers-Jones, GBM, KBE, JP
Mr. Hans Michael Johnson, BBS
Chairman: Mr. Trevor Yang
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Honorary Auditors: Grant Thornton
Honorary Company Secretary:
United Secretaries Limited
Honorary Solicitors: JSM
Honorary Treasurer: HSBC
Registered Charity
(Incorporated With Limited Liability)

The Hong Kong government has been taking the "Develop first, conserve later" approach over many years. Marine Parks has always been designated to compensate for habitat loss caused by the development projects to the marine environment:

Development Project	Marine Park as Compensation Measures
Aviation Fuel Receiving Facility (AFRF) for the Hong Kong International Airport	Sha Chau and Lung Kwu Chau Marine Park (1,200 ha)
Hong Kong-Zhuhai-Macao Bridge (HZMB) Border Crossing Facility (BCF)	The Brothers Marine Park (970 ha)
Integrated Waste Management Facility	Soko Islands Extension (700 ha)
The Third Runway	Vicinity of Third Runway (2,400 ha)

According to the Environmental Impact assessment (EIA) of the project, about 145 ha of seabed will be lost due to the 129.1 ha of reclamation from both Tung Chung East (TCE) and Road P1. However, no mitigation or compensation measures were suggested to mitigate such impact from the direct habitat loss.

Before 2012, the water areas in the close vicinity to the Project Area (i.e. The Brothers, Tai Ho Wan, Siu Ho Wan etc.) were found to be the habitats of Chinese white dolphins (CWD) with various importance (*Figure 1 and 2*). However, due to the escalating threats from past and current reclamation works, dredging, dumping, facilities installation, increased vessel traffic, as well as the impacts from water and noise pollution, the dolphin number in the N Lantau waters has dropped drastically with only one dolphin recorded in the NW Lantau during the monitoring (i.e. the proposed The Brothers Marine Park area) (*Figure 3*).

The HZMB project would be completed by 2017. The majority of TCE reclamation would be conducted mainly between 2017 and 2022 (with peak construction period lasts from mid 2018 to end of 2019), whilst the reclamation of Third Runway would be conducted between 2016 and 2023 (peak construction period lasts from 2016 Q2 to 2017 Q4). The construction schedule of these large-scale reclamation projects are going to overlap with others, and the cumulative impacts would cause excessive habitat loss and disturbance to the Chinese white dolphins in Hong Kong waters. It would seem highly unlikely that these valuable marine mammals will return and recover in proposed Brothers Island Marine Park.

Range shift of individual dolphins from the North and Northwest Lantau waters down to Tai O and Fan Lau has been recorded lately, which is believed to be caused by the impacts from the development works of HZMB and increase in marine traffic in the area. Two decades ago, the areas of Tai O and south Lantau were both identified as key habitat and today, the importance of these habitats has increased given the shift of individual dolphins and increased habitat use of these areas.

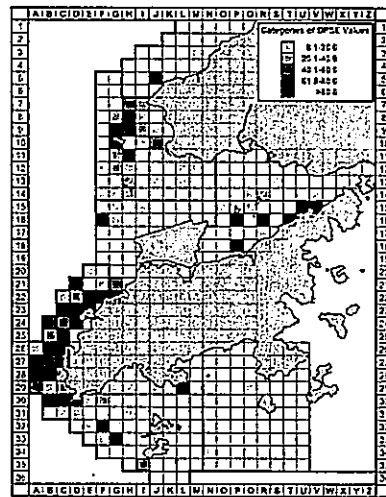


Figure 19. The map of Chinese white dolphins with corrected survey effort per km² in waters around Lantau Island, survey data collected during 2009-10. DPSE = no. of dolphins per 100 units of survey effort

Figure 1. The Chinese white dolphin densities in the western waters of Hong Kong in 2009 – 2010.
(Extracted figure from the AFCD report¹)

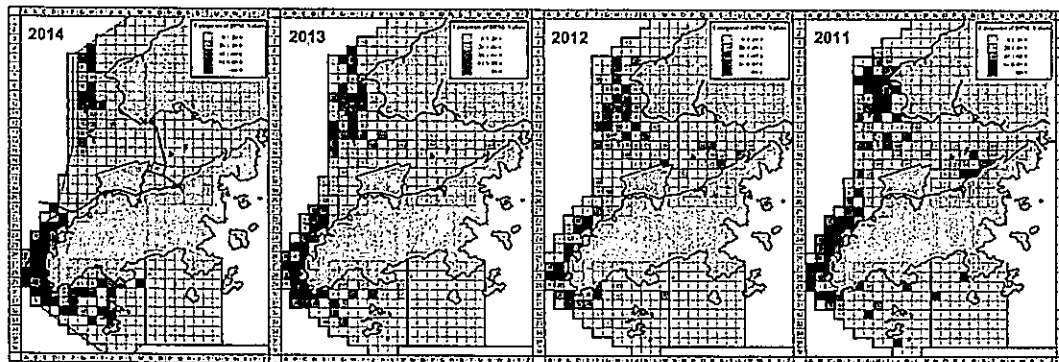


Figure 24. Comparison of Chinese white dolphin densities with corrected survey effort per km² in waters around Lantau Island in 2011-14
(number within grids represent "DPSE" = no. of dolphins per 100 units of survey effort)

Figure 2. The Chinese white dolphin densities in the western waters of Hong Kong in 2011 – 2014.
(Extracted figure from the AFCD report²)

¹ SKY Hung. 2009. Monitoring of Marine Mammals in Hong Kong Waters (2009-2010). Final Report. (1 April 2009 to 31 March 2010). Submitted to the Agriculture, Fisheries and Conservation Department.

² SKY Hung. 2015. Monitoring of Marine Mammals in Hong Kong Waters (2014-2015). Final Report. (1 April 2014 to 31 March 2015). Submitted to the Agriculture, Fisheries and Conservation Department.

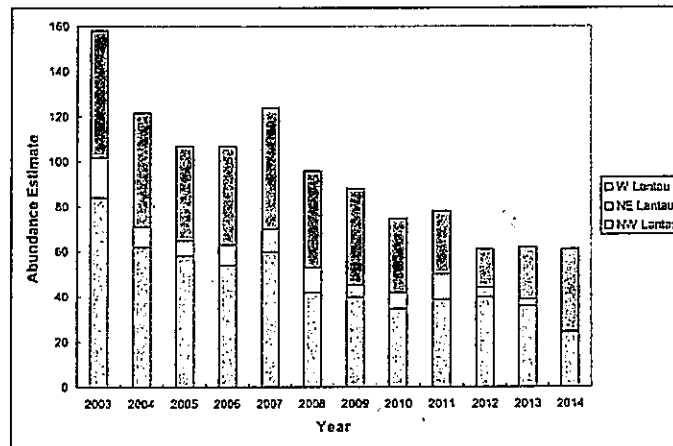


Figure 20. Temporal trends in combined abundance estimates of Chinese white dolphins in West, Northwest & Northeast Lantau from 2003-14

Figure 3. Temporal trends in combined abundance estimates of CWD in W, NW and NE Lantau from 2003-2014. (Extracted figure from the AFCD report²)

WWF's Recommendation:

To safeguard the future of the remaining dolphins in the Hông Kong waters, it is crucial to protect and conserve dolphins' prime habitats and travelling corridors as soon as possible. According to the latest survey, although very few dolphins were spotted in the North Lantau waters over the first nine months, there is an increasing habitat use of West Lantau waters (i.e. Tai O and Fan Lau) for the dolphins³. It is important to designate the West Lantau (i.e. surrounding waters of Tai O) as Marine Park as the compensation measure for the reclamation work in this Tung Chung New Town Extension project by 2019. This West Lantau Marine Park could link up the proposed The Brothers Marine Park in the east, the Sha Chau and Lung Kwu Chau Marine Park, the third runway Marine Park in the north, and SW Lantau Marine Park in the south, to form a robust Marine Protected Area network around the Lantau Island (Figure 4). Only a large and effectively managed Marine Park network can ensure all the important dolphin habitats are protected and allow this declining species to recover.

The statutory process of marine park designation takes at least two years. It is important to kick start the process and work out a sound management plan with relevant stakeholders such as fishermen and local communities. The government's commitment on the designation of West Lantau Marine Park now will greatly facilitate the process and the marine conservation network could be established by 2019, bringing benefits not only to the Chinese white dolphins but also to the local communities as the fisheries resources are restored.

³ AFCD annual dolphin monitoring progress report presented in the Marine Mammal Conservation Working Group on 8 December 2015.

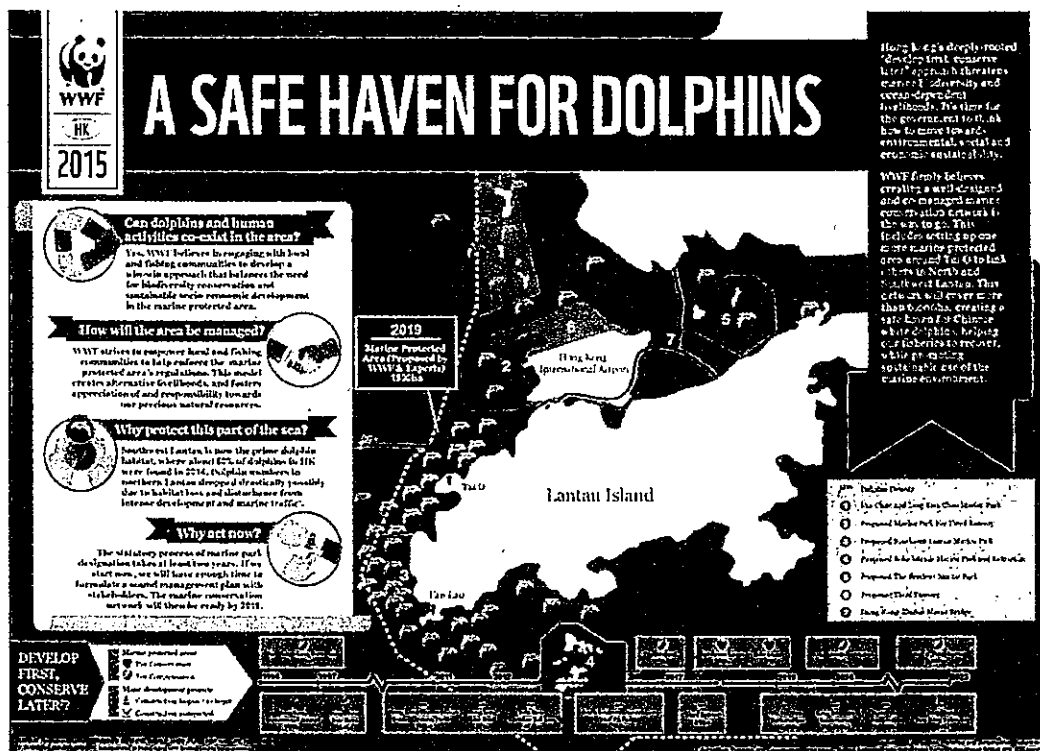


Figure 4. The Marine Park Network for safeguarding the future of Chinese white dolphins in Hong Kong.

2) Eroding the Integrity and Weakening the Conservation Performance of the Proposed The Brothers Marine Park

The proposed The Brothers Marine Park (PTBMP, ~970 ha), which was once known as a core habitat of Chinese white dolphins in Hong Kong, will be designated in late 2016 as a **compensation measure of the HZMB BCF project**. The purpose of the establishment of PTBMP is *"for protection and enhancement of Chinese white dolphins within the areas"*⁴.

According to the EIA, the marine traffic generated by the work barges during the construction period of TCE will cause serious impacts to the marine environment inside the PTBMP. During the peak construction period, approximately 42-56 vessels will be travelling in the area per day. If the construction of 3RS experiences delays and cause the peak construction period of both projects to overlap, there could be as much as 236 construction vessels using north. Not to mention the other vessels (such as high speed vessels, fishing boats, river-trade vessels) that usually share the same water areas. The marine traffic in the North Lantau will be very intensive in 2017-2018.

It is of serious concern that so many work vessels can travel freely in and out of the PTBMP. Although the speed of vessel will be restricted down to 10 knots, the high volume/ frequency of vessels crossing

⁴ ACE Paper 17/2011. Proposed Marine Park in the Brothers Island. Prepared by Highway Department.

the Marine Park could cause significant disturbances to the dolphins and undermine the effectiveness of the Marine Park. In addition, the water areas used and occupied by the work barges will be larger than the reclamation footprint of the TCE Project Site (i.e. mooring in the surrounding waters of the proposed reclamation site). It should be noted that this impact had always been neglected in the EIA of other projects. The current HZMB BCF construction project well demonstrated this situation, with many work barges occupying a large sea area near the BCF Project Area at all time and some of them even moored close to the waters of Brothers Islands, posing potential disturbance to the dolphins in the areas.

In addition, no study has ever conducted to investigate the extent of disturbance caused by the underwater noise generated by the increased marine traffic, including both mobile and idle vessels (as idle engine could also generate noise). The increasing marine traffic also poses threats of obscuring sounds and acoustic communication, also interfering with echolocation by the dolphins. High levels of boat noise can lead to injuries or disturbance, as manifested by changes in behaviour and the use of acoustic signalling.

This intense increase in the marine traffic by the work barges is going to threaten the conservation performance of the PTBMP (which is supposed to be the compensation measure of HZMB and help mitigate the residual impacts during the operation phase) and hamper the recovery of the Chinese white dolphins inside the protected area and Hong Kong waters, and intensify the underwater noise pollution problem. WWF strongly opines that this impact should not only be assessed as "minor to moderate" and more stringent measures shall need to be implemented.

WWF's Recommendation:

The mitigation measures proposed by the Project Proponent such as control and minimization of marine traffic, larger-sized barges, land transportation of materials, speed limits and regular routes of works vessels will not be able to mitigate the impact caused by the work barge traffic inside the PTBMP, as it could only help to reduce not more than 10% of marine traffic. In order to ensure the conservation performance of the PTBMP could reach its maximum and the project would cause least disturbance to the marine life in the protected area, **work barges from the TCE construction works should be forbidden from entering the PTBMP.** The skippers of the work barges shall travel to the Project Area by taking other set routes outside the Marine Park.

In addition, an **underwater noise impact assessment should be conducted** to investigate the underwater noise generated by the increased marine traffic, and how it could impact the dolphins inside the PTBMP and nearby habitats such as Siu Ho Wan.

3) Uncertain Disturbance from the Proposed Marina

A marina with 95 berths is proposed to be built at the northern part of PDA at TCE. The facility will bring in a substantial number of vessels (likely including a fair number with powerful motors that generate

much underwater noise and pose high collision risk to the dolphins) visiting and mooring both inside and outside the marina area, resulting in an increase in marine traffic in Tung Chung area and the already busy North Lantau waters. The increased levels of vessel movement and the underwater noise will disturb to the dolphins in nearby habitat and cause behavioural change in dolphins as well as driving them away from the preferred habitat. The rise in the number of boats moving in and out of the marina may also increase the risk of dolphins being killed or injured in vessel collisions. Most importantly, the need for having a marina containing up to 95 yachts at Tung Chung is not clearly evident and justified in the EIA.

WWF's Recommendation:

As it is privately-owned marina with its social benefits insufficiently justified for the public's needs and interests, WWF opines that **the entire marina proposal should be scrapped** so as to avoid causing additional threats to the dolphins inhabit the area. **WWF strongly objects the "OU" annotated "Marina Club, Boat Repairing and Commercial Facilities associated with Marina Development" zone which will be located in Areas 143 and 144.**

4) Conservation Outcome and Cost-Effectiveness of Eco-shoreline is Questionable

According to the Study Brief, it was mentioned that *"about 120 hectare of land to be reclaimed at the eastern part of the TCE.. Reclamation of 9 hectare of land for extension of Road P1 from Tung Chung to Tai Ho"*. However, in the EIA report, Session 9.7, *"... the total area sizes of the seabed footprint of the above two reclamations reaching 145 ha"*. The discrepancy of this 16 ha (12% increase in area when compared with the original proposal) was said to be contributed to the inclined seawall, and part of it potentially will be constructed as eco-shoreline.

Eco-shoreline shall only be treated as an enhancement measure, rather than a mitigation measure. WWF opines that it is of high risk to sacrifice this extra 16 ha seabed to construct Eco-shoreline on the artificial seawalls with unknown performance and conservation outcome.

Although there are some overseas eco-shoreline examples to refer to, however, this novel concept has never been implemented in Hong Kong, and the extent of conservation outcome in bringing benefits to the nearby ecosystem is unknown. In addition, if transplantation of flora and fauna is needed, the potential impacts caused at the donor and recipient site(s) should also be considered but has not been assessed in the EIA report. Moreover, a huge amount of money will be needed to design, construct, monitor and maintain this Eco-shoreline, with the outcome not guaranteed.

WWF's Recommendation:

A pilot study on Eco-shoreline should be first conducted on the existing artificial sloping seawalls to test out different designs and their conservation performance and effectiveness before adopting it as the mitigation measure for any development project. If the result is unsatisfactory, then it shall not be implemented and the reclamation footprint shall be cut back down.

5) Potential Dolphin Usage during Night Time at Project Area

No in-situ ground-truthing night time dolphin survey was conducted for the EIA. The Project Proponent only made reference to the data collected in Sunny Bay from the other EIA report and commented that *"Tung Chung area is similar to Sunny Bay on having a very low, if not none, CWD use based on existing information mainly from day time record, it is anticipated that the potential of having a significant night time CWD use is low"*. Siu Ho Wan, which is closer to the Project Area and also shares similar topographic features, did show that there was considerable night time use by the dolphins⁵. In view of this, the Project Area is a potential area used by the dolphins during night time. As such, WWF considered that the impact assessment on the Chinese white dolphins is incomplete and misleading.

WWF's Recommendation:

A series of passive acoustic monitoring (PAM) shall be conducted in the Project Area for at least six months so as to confirm there is insignificant night time CWD use in the area. The impact assessment of this part should be re-done after field data is collected and mitigation/compensation measures to be revised accordingly.

6) Unfair Assessment on Fisheries Impact Evaluation

According to the Session 10.6.1.4 of EIA, *"When compared with the 1,651 km² (approximately 165,100 ha) of Hong Kong total marine waters which is mostly available for fishing, the construction phase fishing ground loss (about 200 ha) of marine waters for a duration of about 6 years) caused by the Project is considered to be of minor proportion (approximately 0.12%)"*. In the reality, the Hong Kong fishermen cannot really make use of entire 1,651 km² for fishing, as some water areas are the navigation channels, dredging and dumping grounds, Airport exclusion zones, typhoon shelters, intake and outlet zones, water area shallower than 1 meter etc. These areas are **not suitable for fishing and fishing operations are rarely taken place**, so compared the potential loss of fishing ground from the Project with the entire Hong Kong water's area is extremely unfair for the impact assessment. In addition, these fishermen who usually do the local inshore small-scale fishing operations would mainly stay in the nearby area, i.e. fishermen who fish near Tung Chung waters would not go further beyond Lantau waters. Moreover, if there are concurrent projects taken place at the same time, i.e. construction of Third Runway, HZMB and TCE, a total of 1,592 ha of fishing ground will be loss in that of the Lantau waters, contribute to a large proportion of fishing ground loss. In view of this, WWF strongly disagrees that the impact to the fisheries is Minor.

WWF's Recommendation:

The Project Proponent shall re-calculate the total active fishing grounds in Hong Kong and in Lantau waters correspondingly, and re-assess the impacts and the extent to the operation of fishermen.

7) Cumulative Exceedance of Suspended Solids Level is being Neglected

According to the Water Quality impact assessment, it was found that if the cumulative impacts of other concurrent projects including the East Sha Chau Contaminated Mud Pit and the Third Runway were taken into account, the predicted maximum concentration of suspended solids (SS) would exceed the SS criteria inside the PTBMP (Table 1).

Table 1. Summary of cumulative exceedance of predicted maximum concentration of suspended solids (SS) at certain Water Sensitive Receivers.

Water Sensitive Receiver	Dry Season		Wet Season	
	Modelling Result of Max SS (mg/L)	SS Criteria (mg/L)	Modelling Result of Max SS (mg/L)	SS Criteria (mg/L)
Marine Parks at Brothers Islands and Tai Mo To (Dolphin Habitat)	5.77	3.9	2.78	2.6
Coral Communities at the Brothers Islands	7.41	3.9	4.34	2.6

The excessive suspended sediment often results in reduced diversity, alteration of species composition, size and age structure. This certainly will threaten the health of marine life such as fish and corals inside the marine park. Increased sediment loads on corals will reduce the amount of available light and increase the sedimentation rates, posing adverse effects to the feeding and the growth rates of corals, whereas bleaching, partial and total mortality may be resulted. In view of this, impacts to corals should be carefully assessed. For fish, sediment can clog fish gills, reducing resistance to disease, lowering growth rates, and affecting fish egg and larvae development.

According to AFCD's research, *"the waters surrounding Siu Mo To was found to support relatively high abundance and biomass of fish resources, and demonstrated the need to offer protection to the area"*⁵. In view of this, this area would be designated as a Core Area. A number of fisheries enhancement measures will be implemented inside the Core Area, such as prohibiting commercial fishing, deployment of artificial reefs and release of fish fry. **The exceedance of sediment loads is going to undermine the function of these conservation measures and lower the cost-effectiveness in protecting and recovering the fish stocks and the prey for the Chinese white dolphins.**

⁵ A CEDD dolphin survey conducted in 2013.

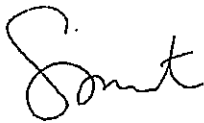
⁶ Country and Marine Parks Board working paper WP/CMPB/6/2015. The proposal to designate the Brothers Marine Park.

WWF's Recommendation:

The Project Proponent shall deploy double silt curtains at the Project Area, and set up monthly water sampling stations at Siu Mo To and other areas inside the PTBMP in order to stringently monitor the water quality inside the Marine Park. In addition, this shall be included in the Water Quality Event and Action Plan – if exceedance is being recorded, the construction shall put to a halt until it goes back to the normal level.

We are grateful if our concern and objection would be duly considered and upheld by members of the Town Planning Board.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Sant', written in a cursive style.

Samantha Lee
Assistant Conservation Manager, Marine
WWF – Hong Kong

寄件者: KFBG EAP [eap@kfbg.org]
寄件日期: 08日03月2016年星期二 10:55
收件者: tpbpd
主旨: KFBG's comments on Draft Tung Chung Extension Area OZP (S/I-TCE/1)
附件: Tung Chung New Town Extension EIA-233-2015 fn.pdf

Dear Sir/ Madam,

We strongly object to the reclamation proposal at Tung Chung and please see attached for the justification.

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

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

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 (ELA-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.epd.gov.hk/cia/register/report/ciareport/cia_0752002/EIA%20Report/contents_with_hyperlink.htm

³ https://www.afcd.gov.hk/english/conservation/cons_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

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

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/gzdu/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

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/cia/register/report/ciareport/cia_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



嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

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).

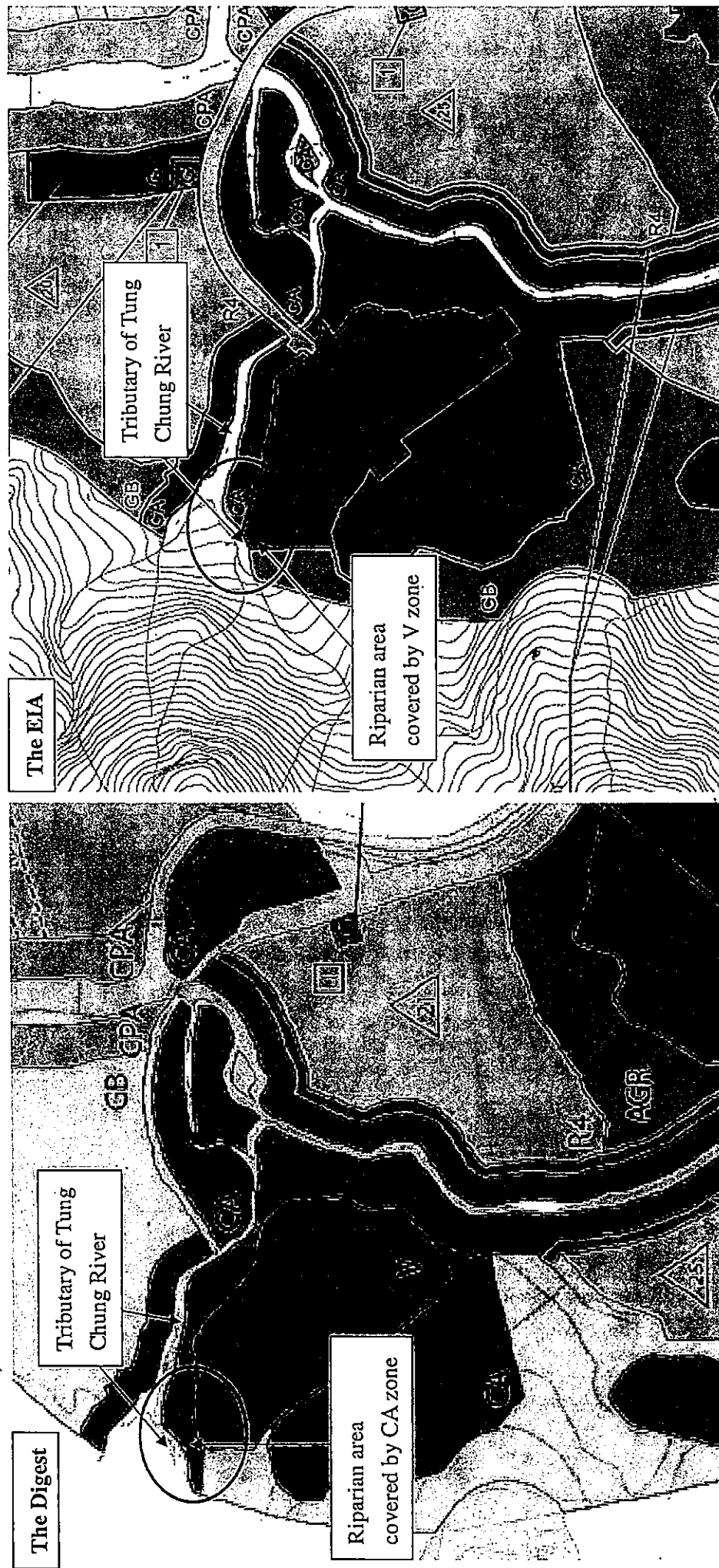


Figure 2. Habitat map extracted from the EIA shows that the area to the northwest of Ngau Au Village is covered with mature woodland.

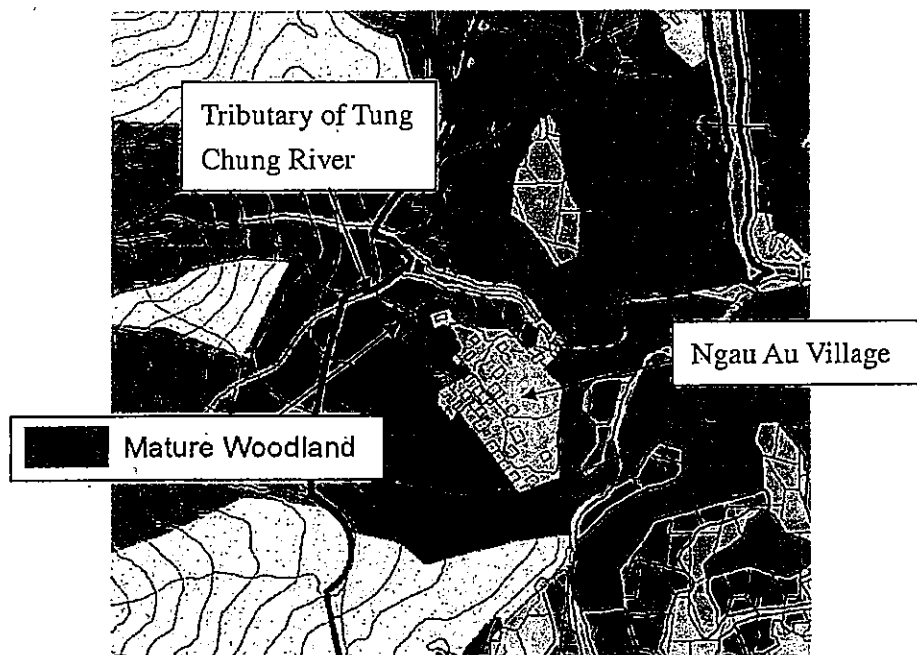


Figure 3. Aerial photograph taken in August 2015 showing Ngau Au Village and its well vegetated surroundings.

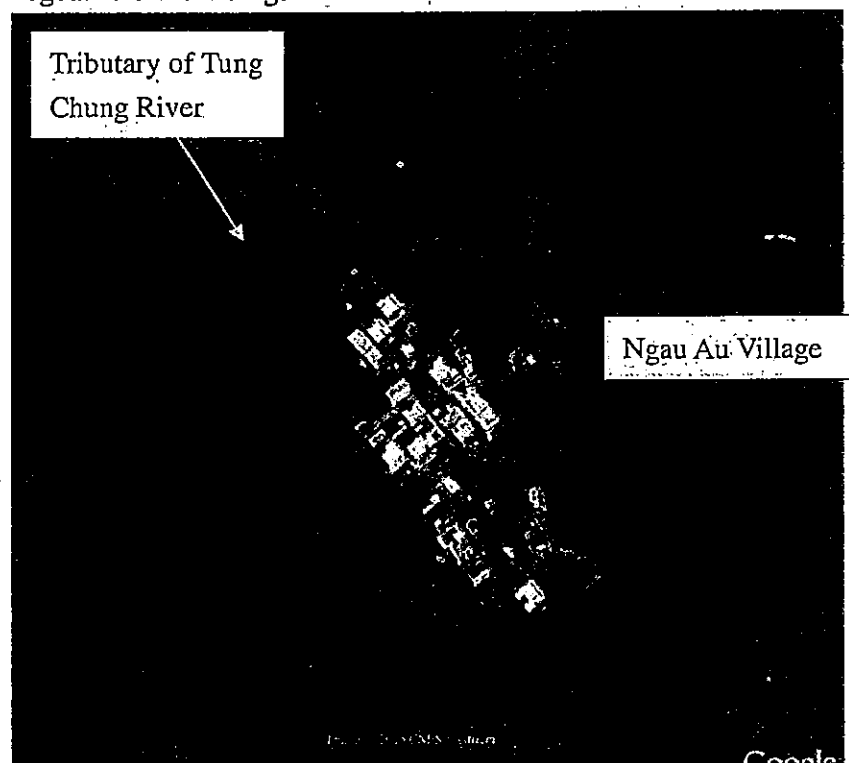


Figure 4. On-site photograph showing the well-vegetated riparian area at Ngau Au Village (taken in December 2015).



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).

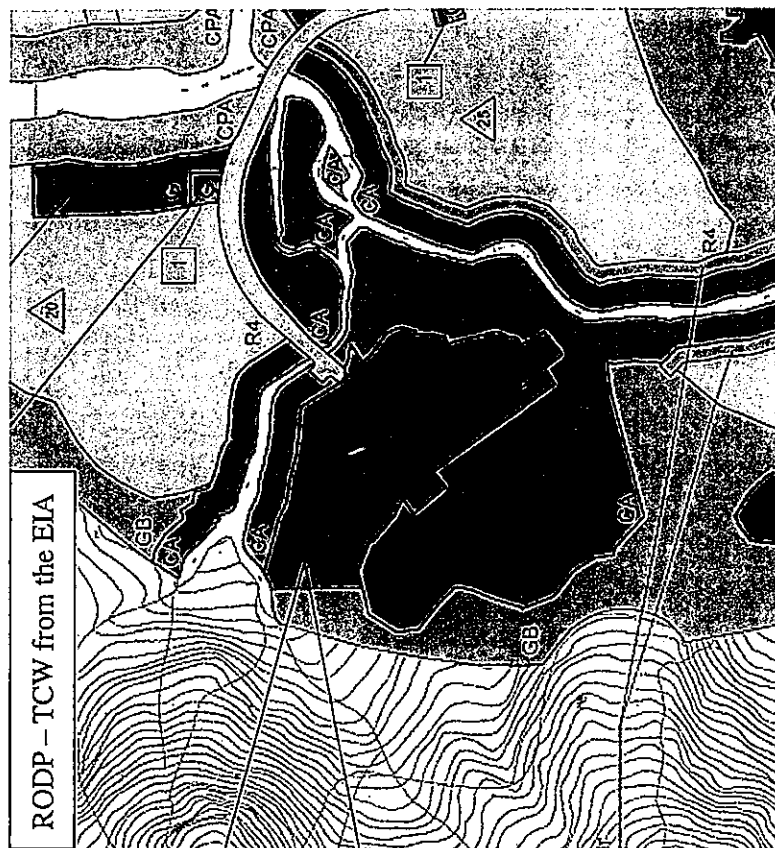
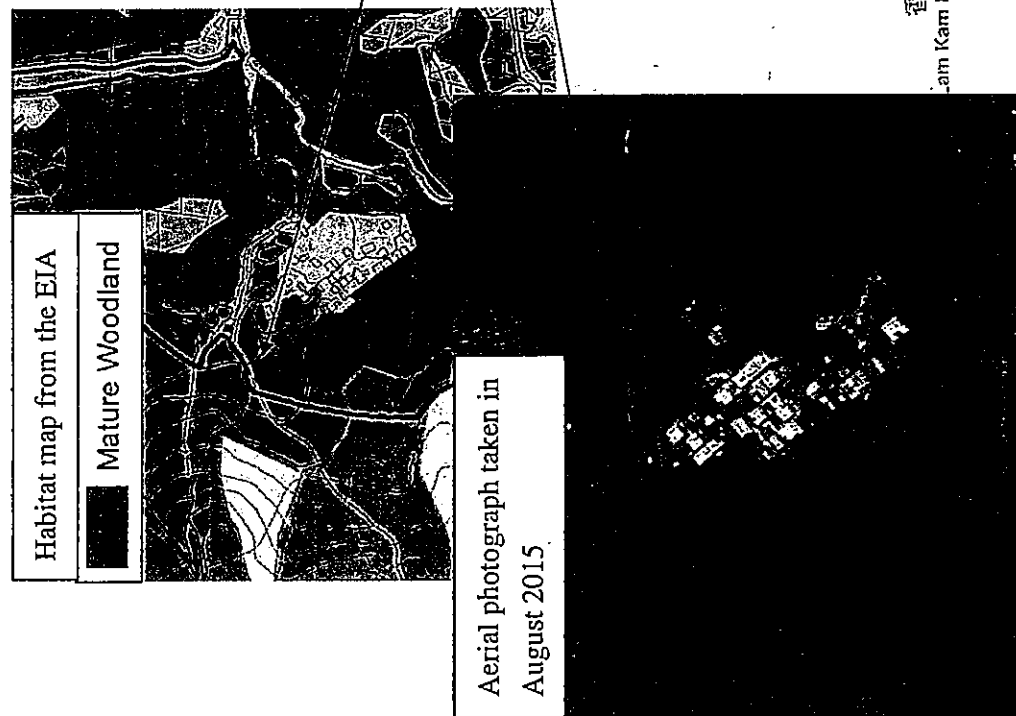


Figure 6. Sensitive habitats (not including those at Ngau Au Village, mentioned above) that are now included in the V zones (indicated approximately by the white line) under the EIA's proposal (approximately marked by the arrows)

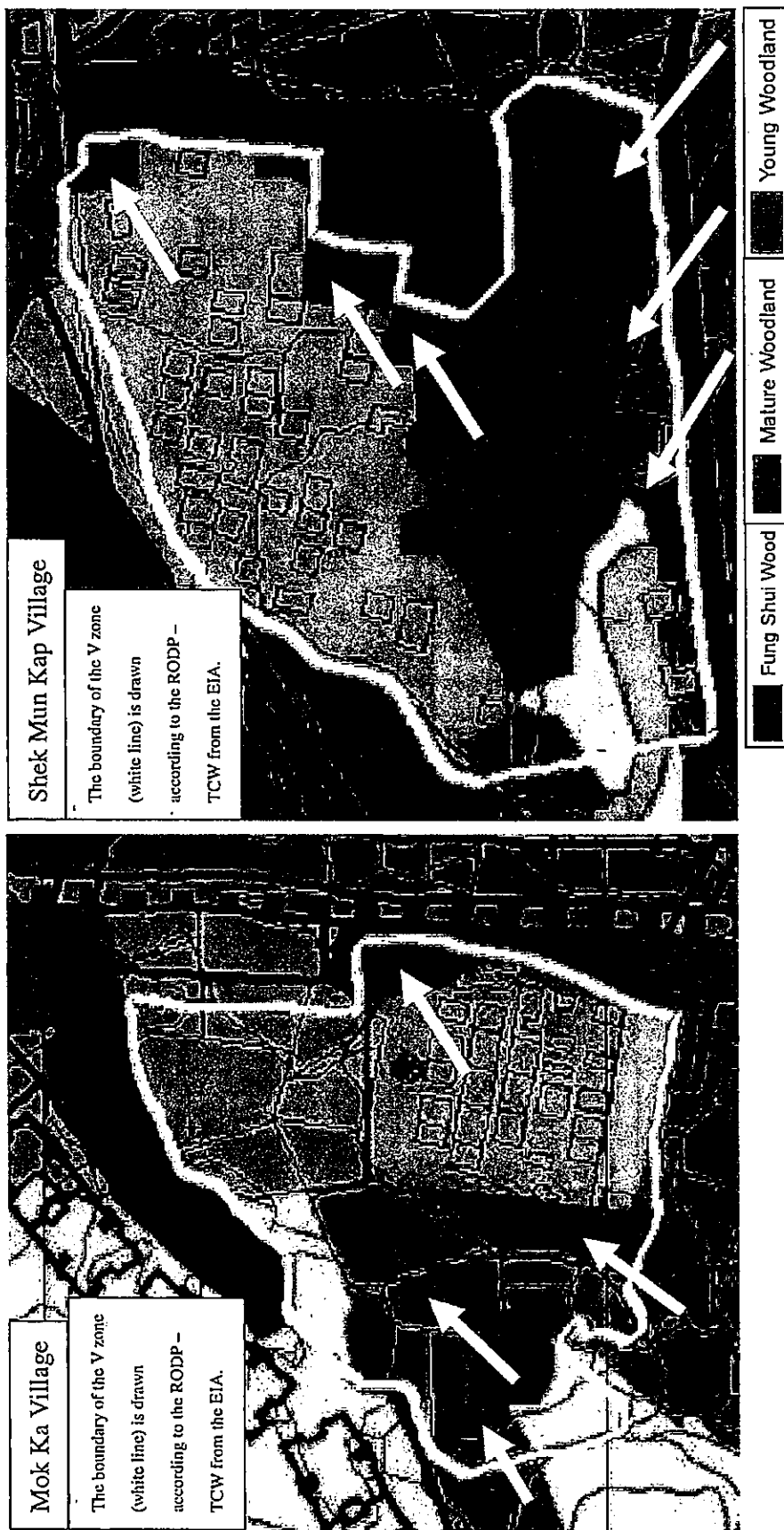


Figure 7. Sensitive habitats were excluded from the proposed V zones in the DRODP in the Digest of the Stage 3 public engagement consultation exercise

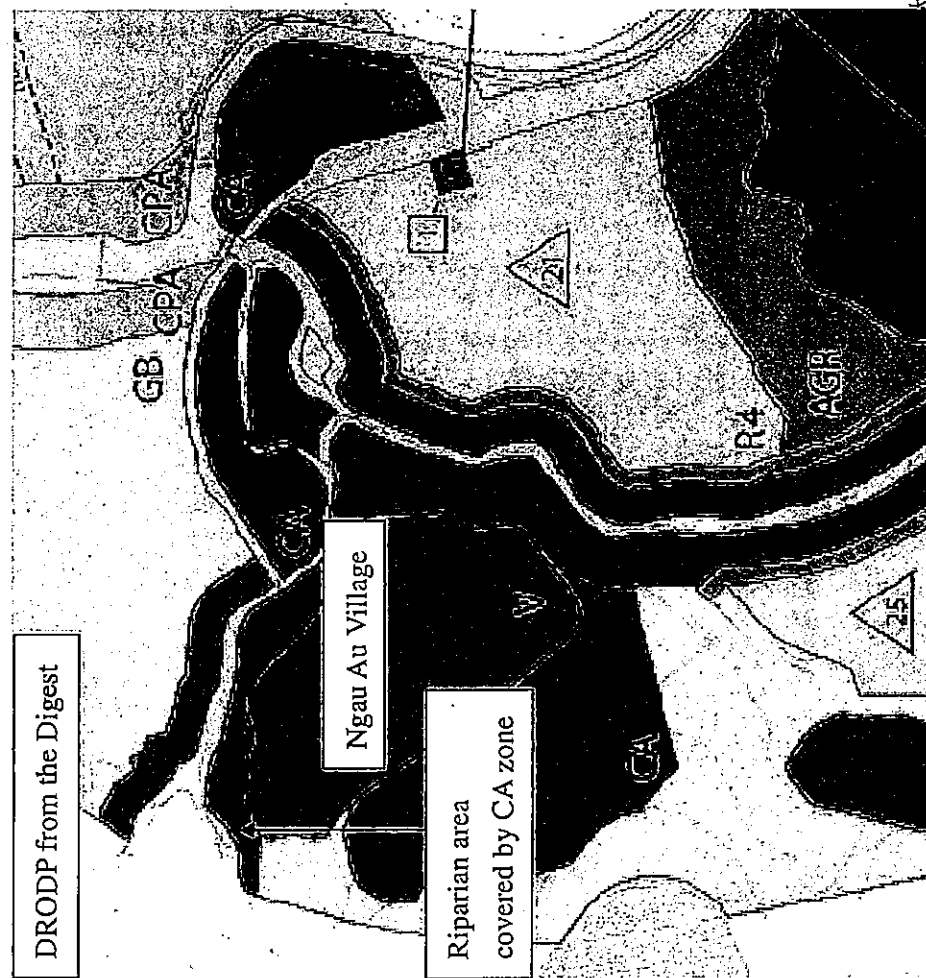


Figure 8. Sensitive habitats within or very close to the proposed V zones.

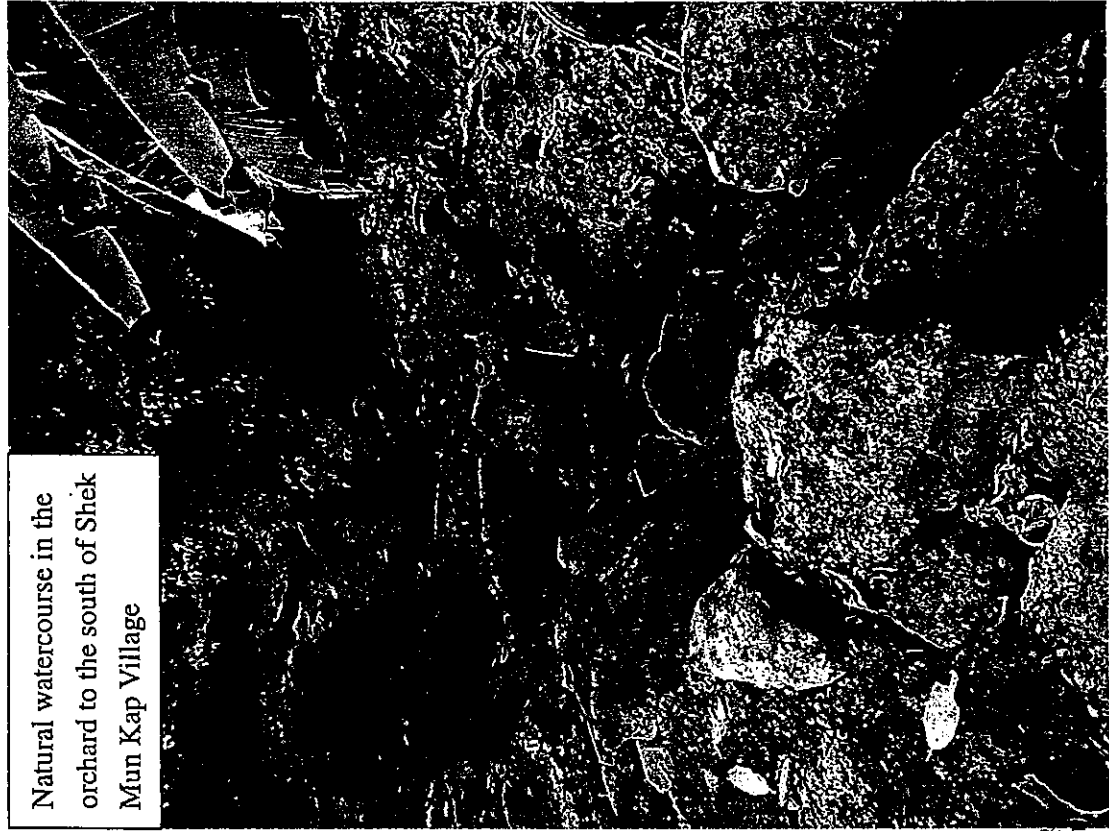
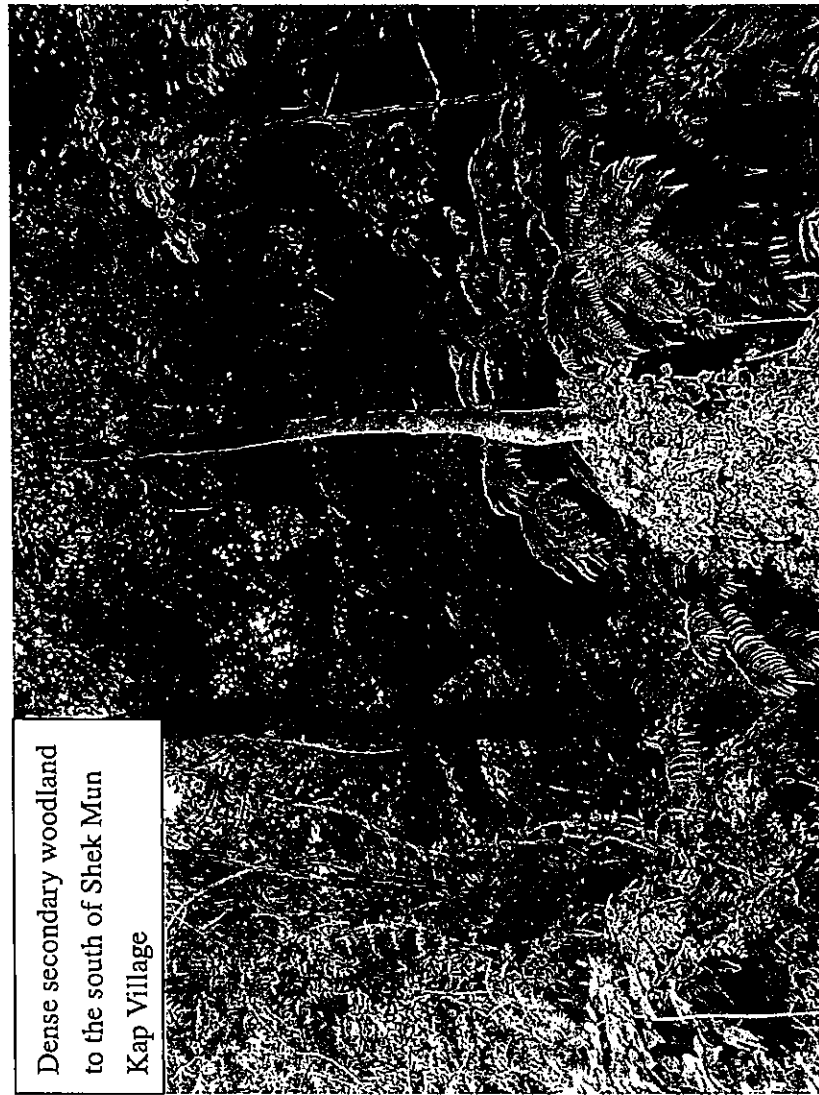


Figure 8. Con't

Dense *Fung Shui* woodland to
the west of Mok Ka Village

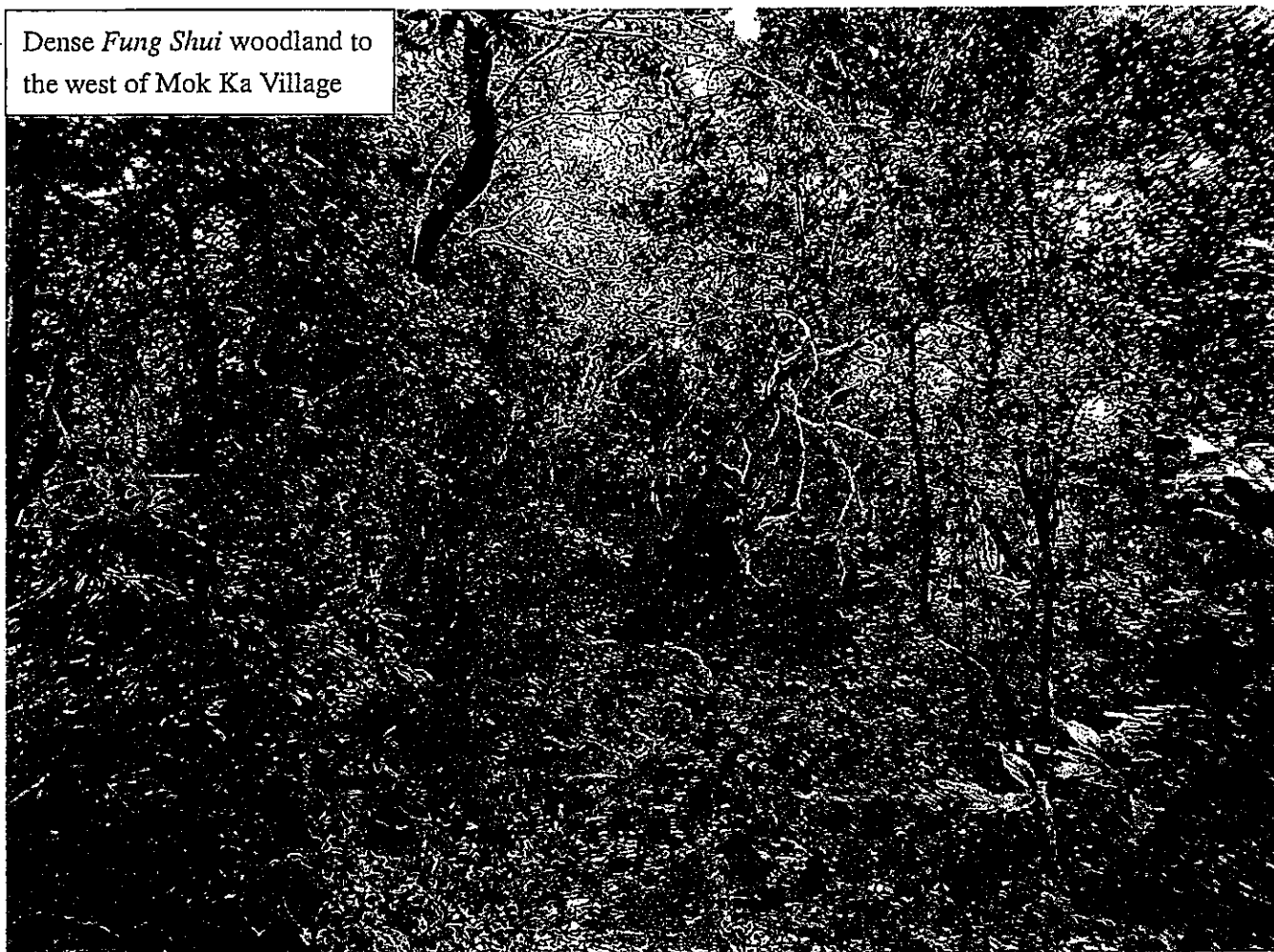
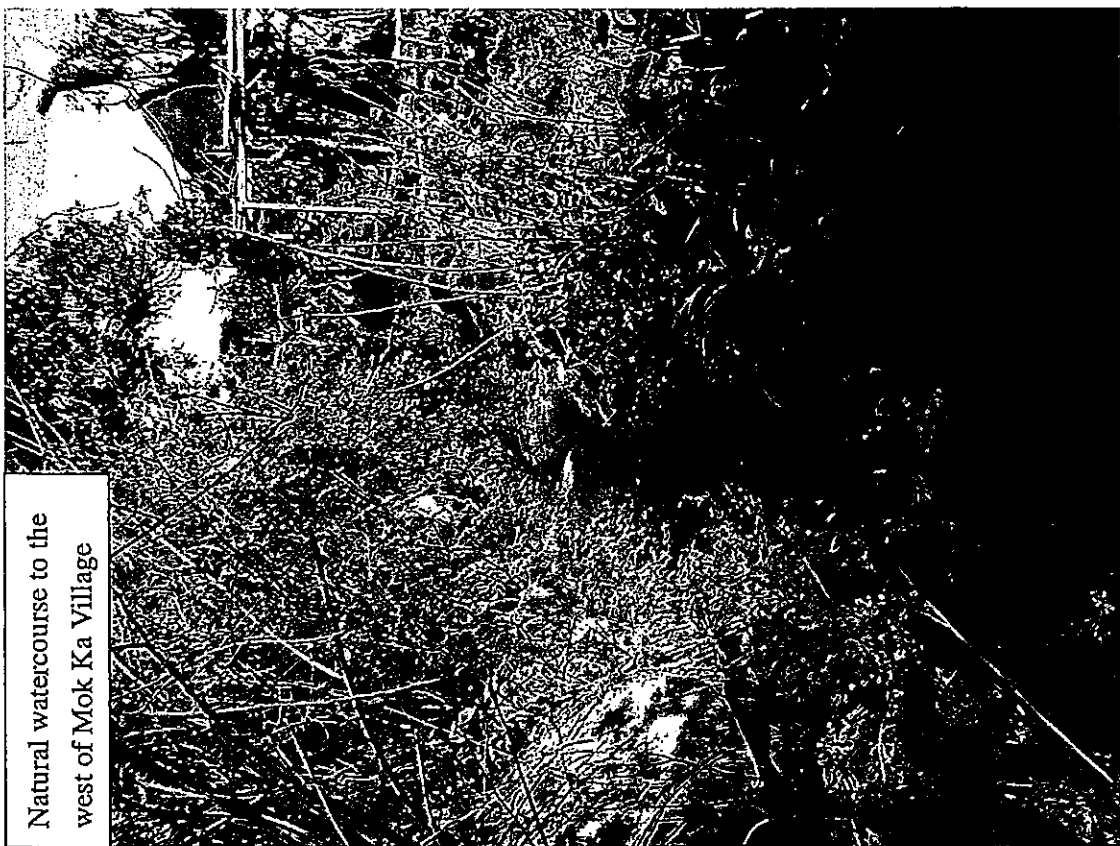
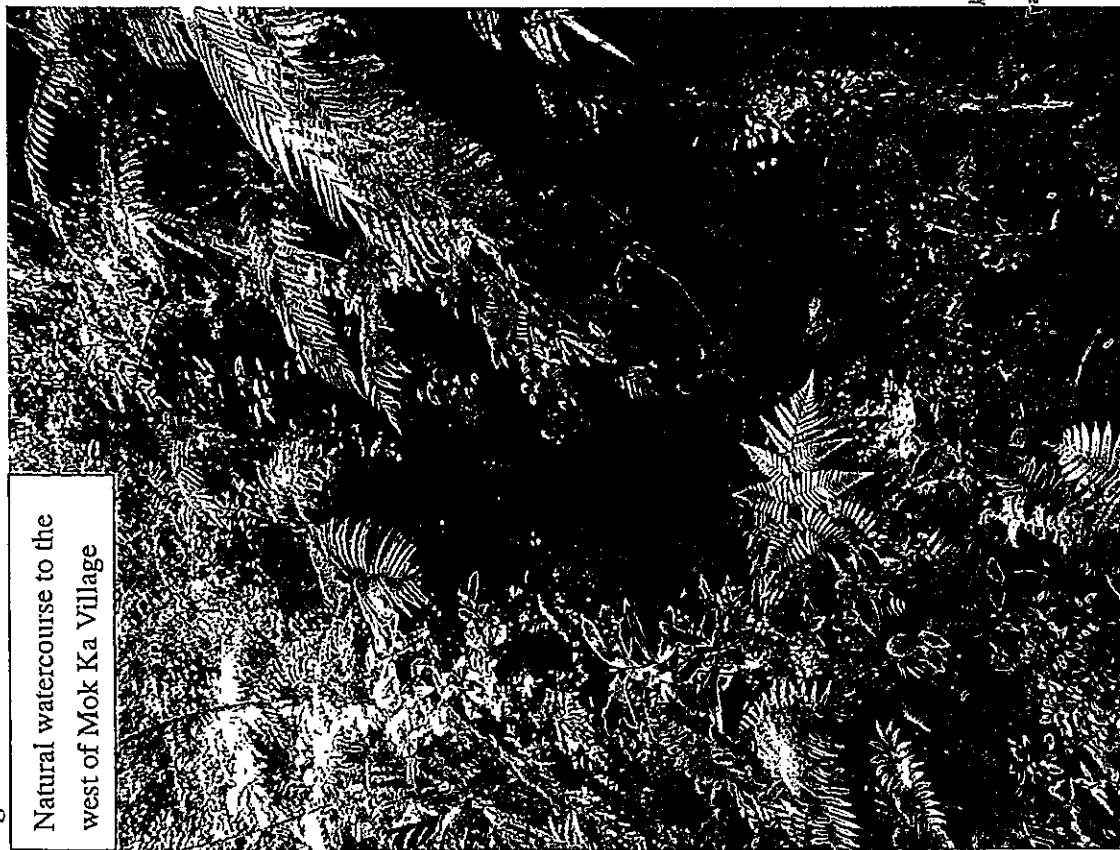


Figure 8. Con't

Natural watercourse to the west of Mok Ka Village



Natural watercourse to the west of Mok Ka Village

大井
 New
 Tape

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

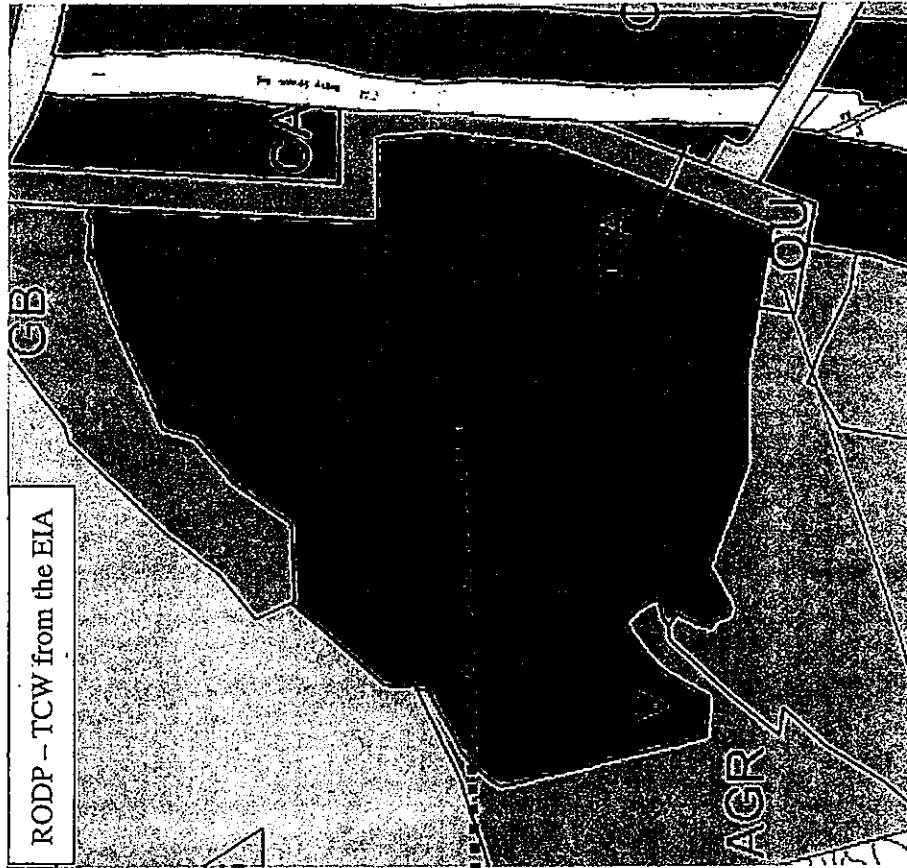
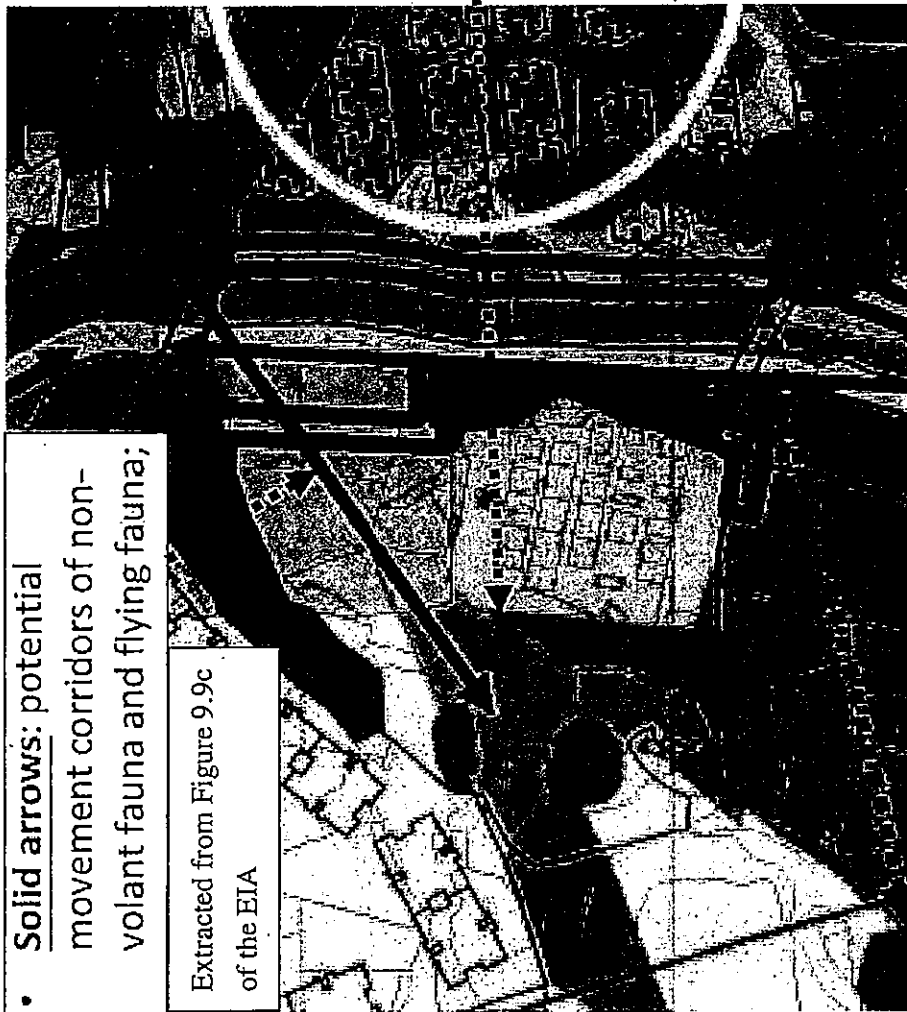


Figure 10. Valid movement corridor (solid arrow) with conservation zonings recommended by KFBG (approximately indicated by the green rectangle with dotted boundary) adjacent to Mok Ka Village.



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.

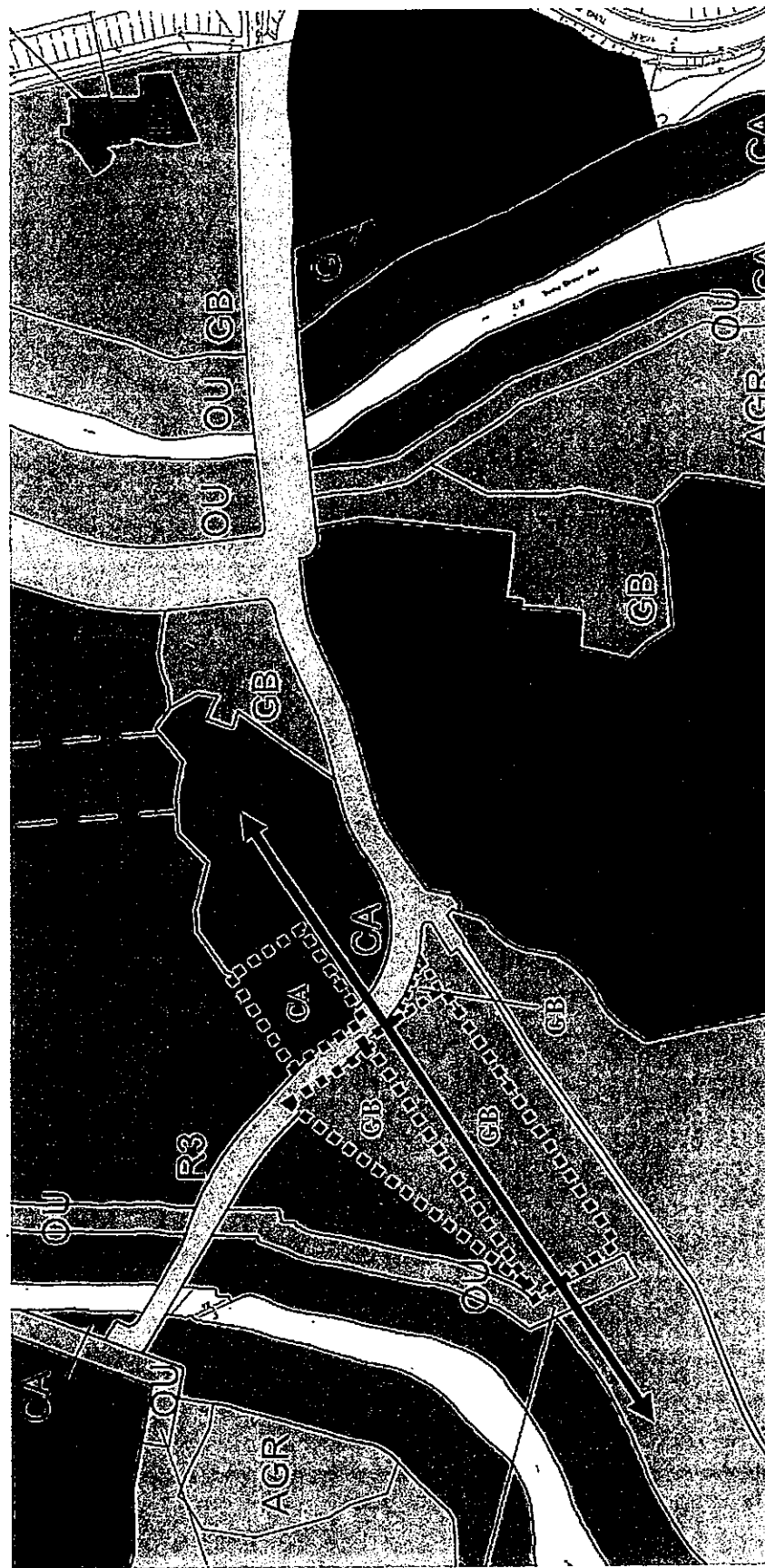


Figure 12. Many of the predicted movement corridors (arrows) intersect with the proposed new roads network (white lines).



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.

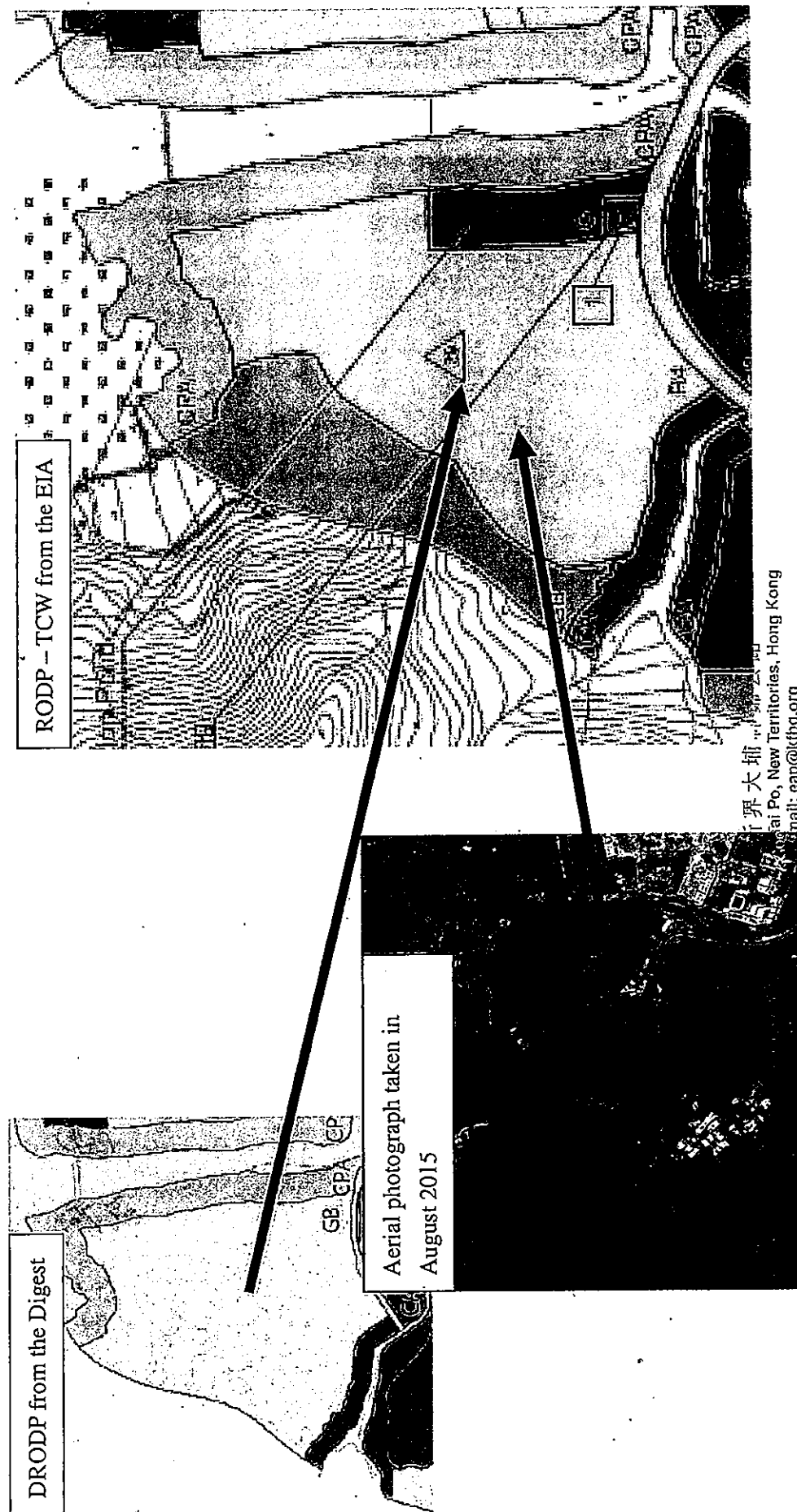


Figure 14. Fung Shui woodlands identified in the KFBG's Technical Report covered with proposed GB and V zones (approximately indicated by the blue arrows).

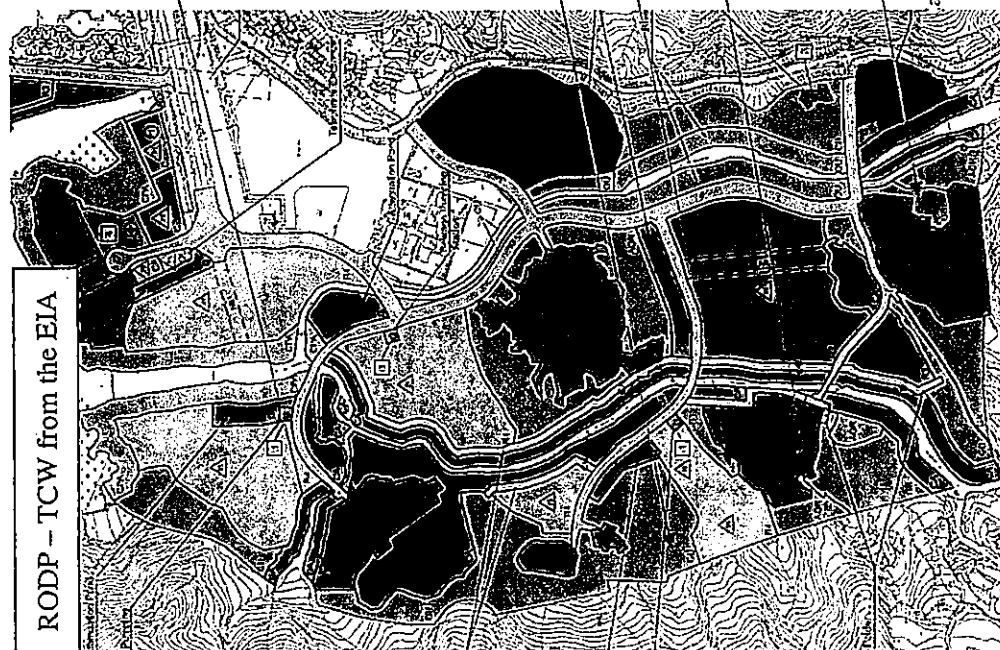


Figure 7. Fung Shui Woodlands at Tung Chung (approximately marked by the red line)

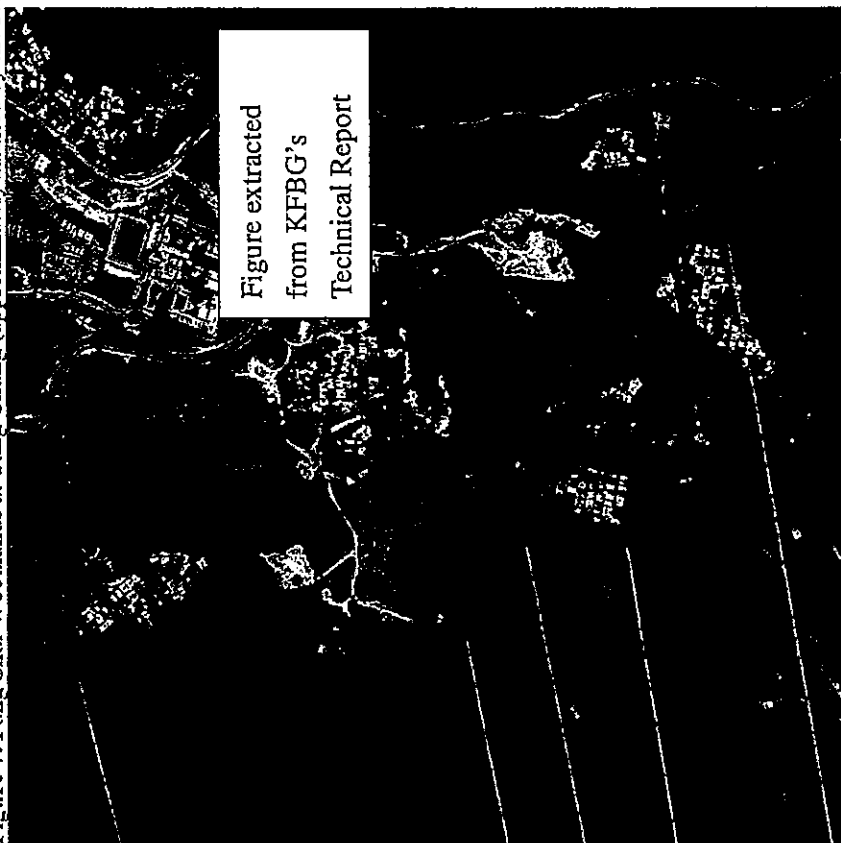


Figure 15. Mudflat and mangrove habitats covered by the proposed Regional Open Space (RO) zone under the RODP – TCW.

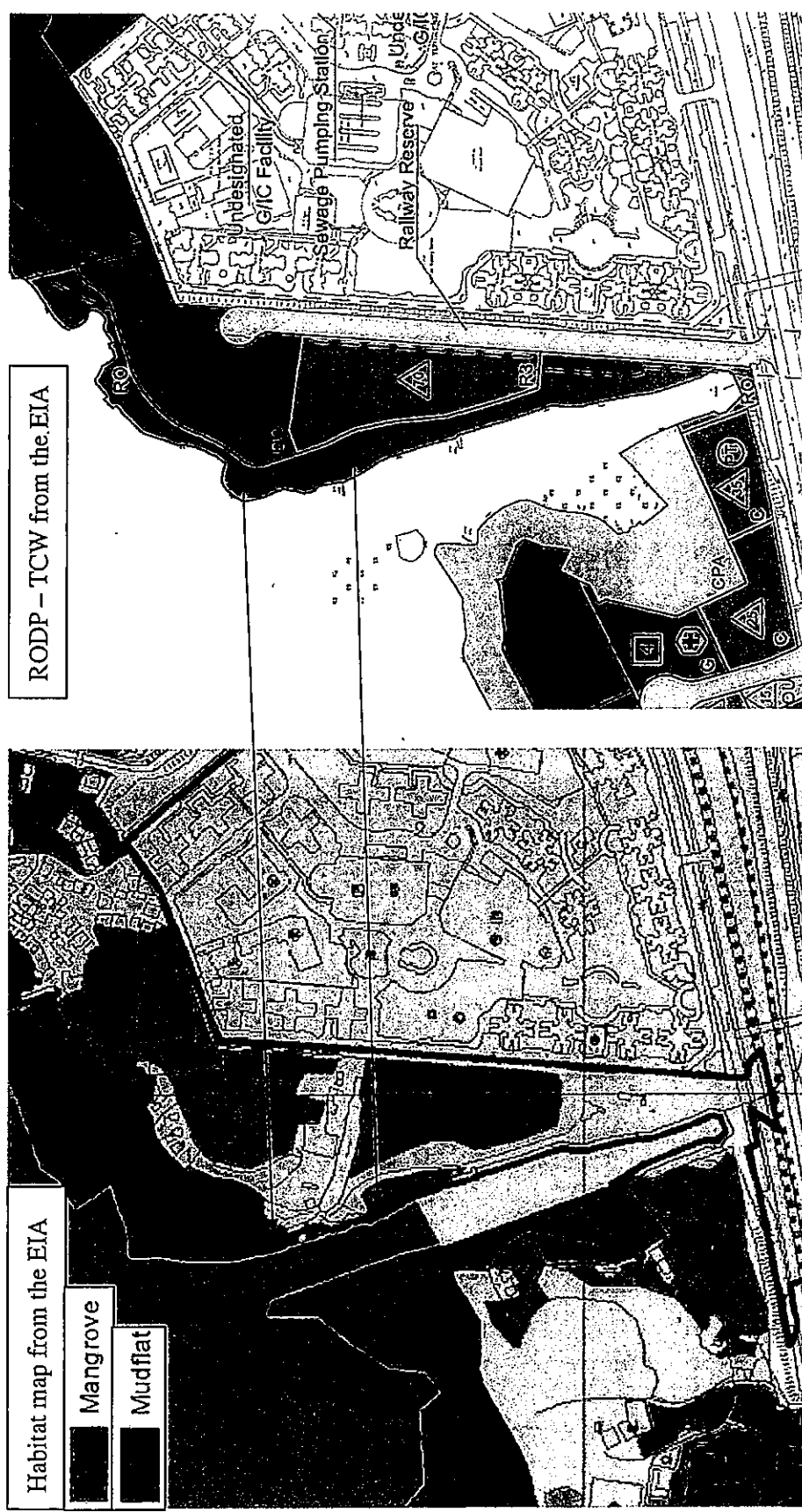


Figure 16. Suspected illegal bridges constructed across Tung Chung streams.

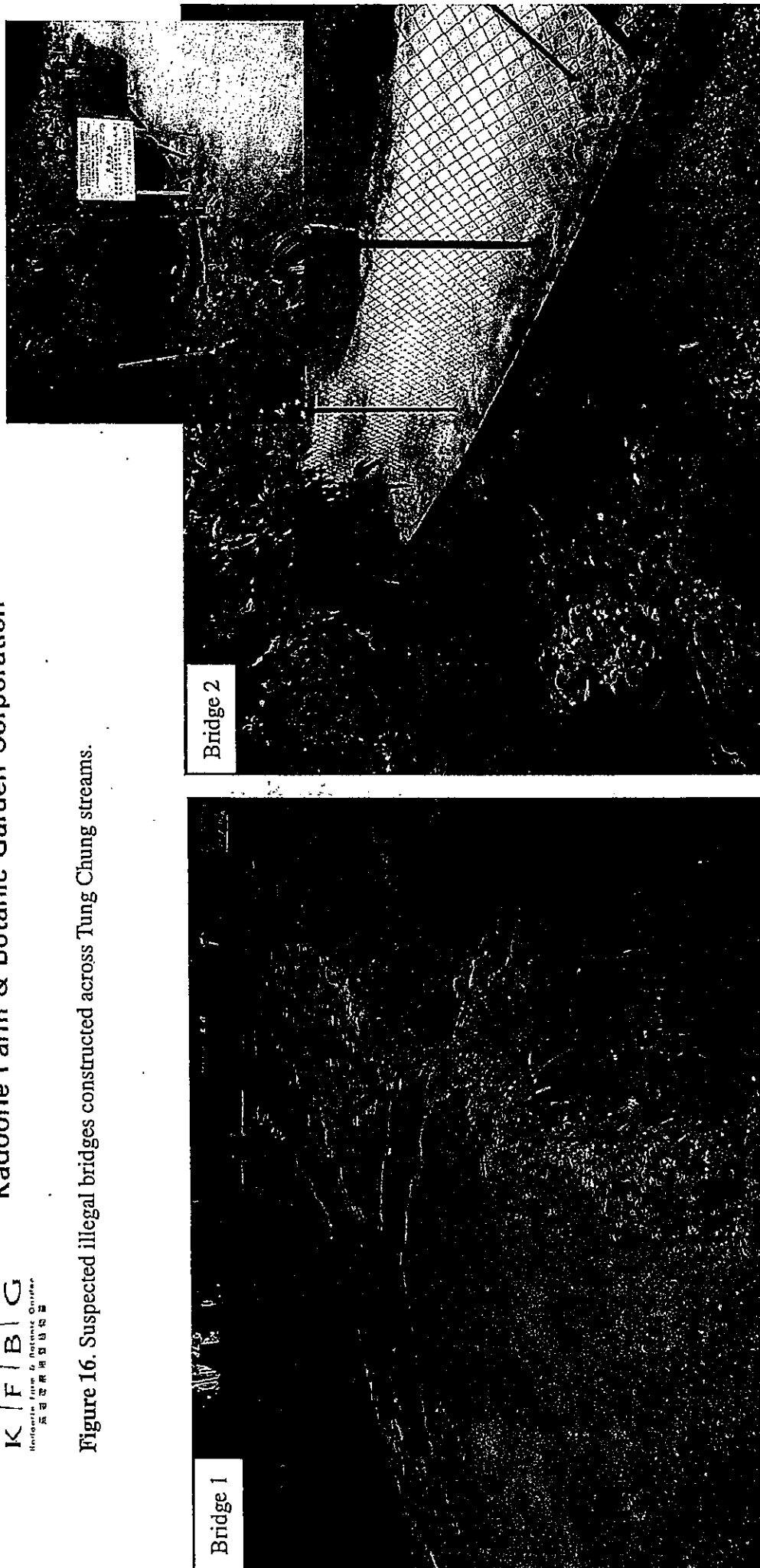


Figure 17. Polluted runoff discharging into the Tung Chung Stream from a drain observed in December 2015

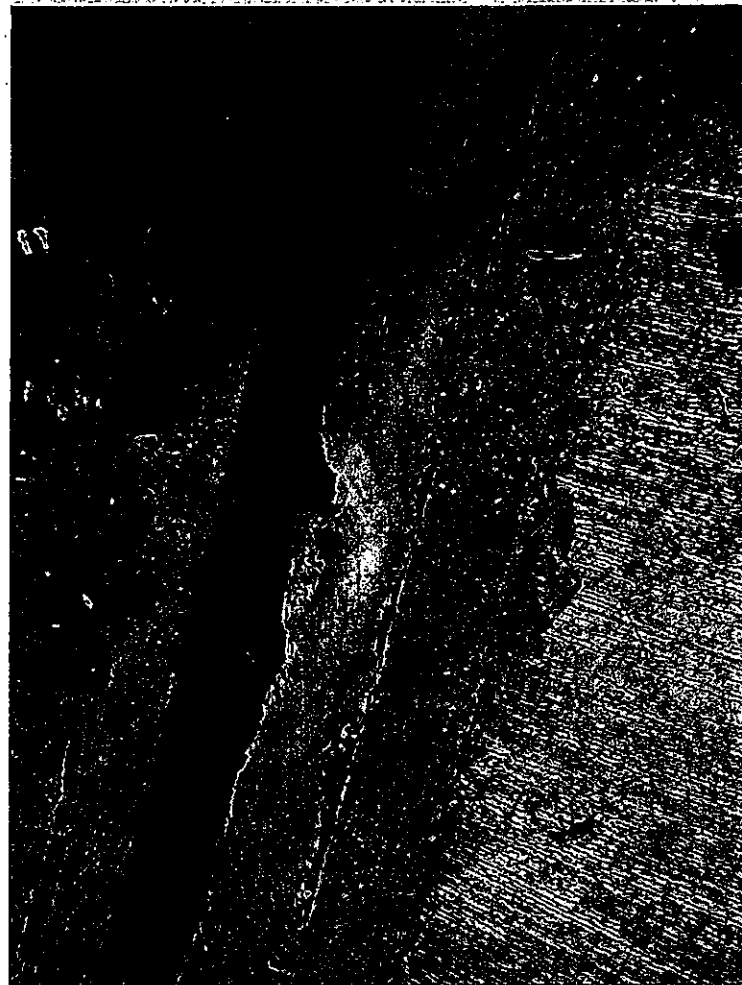
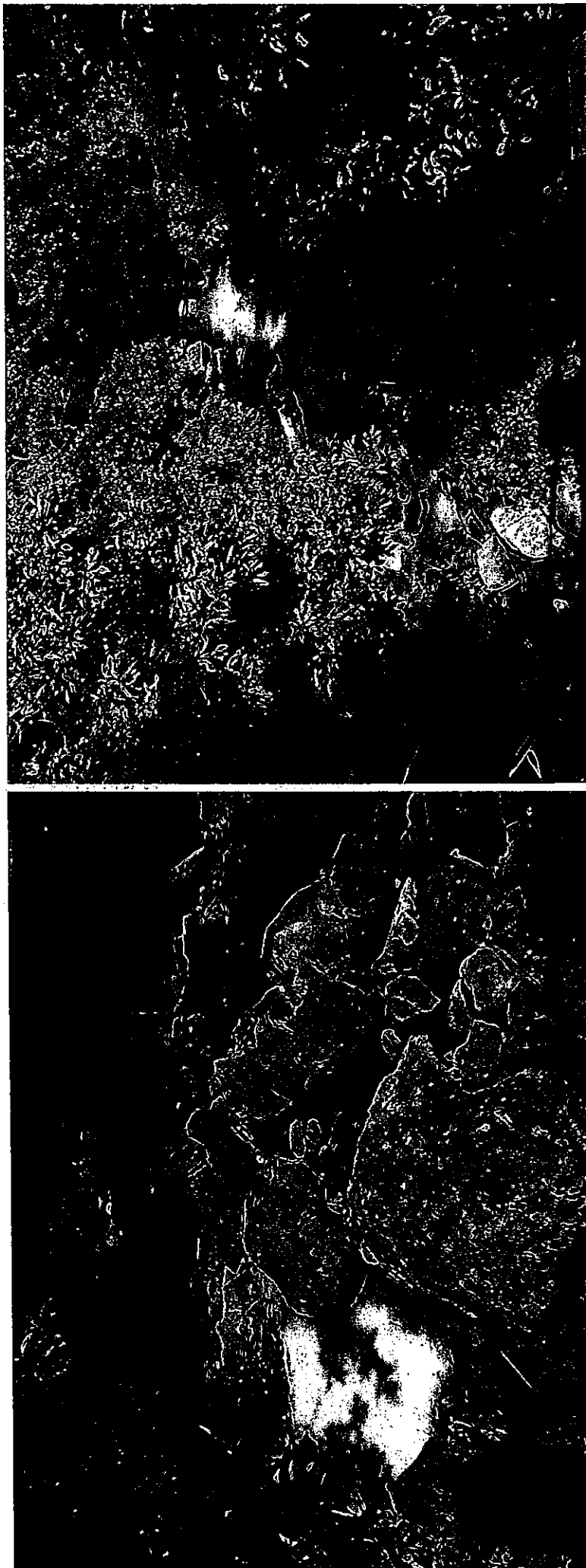


Figure 17. Con't



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寄件日期: 08日03月2016年星期二 14:57
收件者: tpbpd
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主旨: 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

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磡頭、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疚病，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，現時東涌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种隱憂和弊端，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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主旨: 反對 S/I-TCE/1號 東涌擴展區分區計劃大綱草圖
附件: 東涌擴展區_意見書_2.0_20160308.pdf

TPB/R/S/I-TCE/1-57

附上環保觸覺之意見書

請看附件



致 城市規劃委員會

有關：東涌擴展區分區計劃大綱草圖 S/I-TCE/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。因應政府計劃於東涌一帶作新發展以提供房屋供應，城規會制訂上述分區計劃大綱圖，要於東涌東填海逾 120 公頃，成為「東涌擴展區」。本會現就草圖提出意見如下：

1. 過去大嶼山北面已進行大型工程，有必要讓自然休養生息

填海位置於東涌以東、大嶼山北面，非常接近港珠澳大橋的口岸人工島。口岸人工島工程已嚴重污染該海域，對海洋生物帶來極大影響，問題可見於香港海豚保育學會的統計數字，在該海域生活中華白海豚的數字由工程前接近 20 條，至今已近沒有。本會十分擔心東涌東填海會進一步破壞當地生態，更認為從恰當的規劃著眼，當年既批出人工島工程，犧牲了環境，今日就應先讓自然休養生息，使當日受破壞的自然回復到一定水平，再考慮進行其他工程。

2. 大量工程船隻進出「大小磨刀海岸公園」，破壞海岸公園，違反設立公園原意

特別是擴展區涉及填海，須有工程船隻將大量填海及工程物料及工具運輸到該帶。因填海規模大，船隻需來回多次，而且該等船隻更無可避免要穿過「大小磨刀海岸公園」，或於公園內停泊、將物料轉至駁船等等。航行及工程活動會製造噪音及污染，令海域不宜海洋生物生活。當初港珠澳大橋得到各部門及城規會同意，其中就是相信該工程的環評所提議的「大小磨刀海岸公園」可作生態補償。但如今天當局及城規會又容許另一工程影響海岸公園的環境，令海岸公園未能發揮生態補償功能，是明顯違反當年的規劃理據，亦顯示當局規劃自相矛盾。

3. 填海至大蠔灣出海口，影響具特殊科學價值地點生態

草圖包括填海至大蠔灣出海口，以興建公路及單車公園。但過去該處港珠澳大橋連接北大嶼山公路的工程已騷擾環境多時，現在又再規劃填海，將會更加影響大蠔灣及大蠔河出海口的生態。大蠔擁有全港僅餘不多的天然出海口及濕地環境，亦為具特殊科學價值地點，必須加以保護。當局應研究如何避免大蠔灣對出的填海工程。

4. 人口超出地區承載力

政府現時規劃東涌東、中及擴展區未來增加單位 5 萬個、近 15 萬人口，交通及設施將會不敷應用。儘管規劃署的「資料」顯示發展後，該區交通及設施可以承受，但本會不認同單憑數據可以計算及解釋困局。因為實際情況是，以交通為例，現時於平日返工及放工時段，地鐵東涌線已人頭湧湧，逢假日東涌更是迫滿本港及各地遊客，一旦發展後人口由今天約 8 萬增至 20 多萬，道路、鐵路及巴士服務卻無可能作相應倍數增加。居民實際感受跟數據有明顯差距，如當局漠視民意再強加超出承載力的人口於地理位置偏遠的東涌，預期會社區壓力大增及遭到巨大民意反彈。

5. 惡劣空氣對健康的影響

東涌的空氣質素長居香港最差頭幾位。現時提議的擴展區兩邊被公路包圍，空氣質素除背景污染，更受汽車排放影響。雖然當局所做的環境評估聲稱第三條跑道及公路汽車排放可以接受，但其中有嚴重問題：

- (1)第三跑的環評仍受司法覆核挑戰，內容被質疑出錯，不可參考及作準；
- (2)第三跑環評中亦沒有計算「臭氧」等影響，而「臭氧」結合其他環境污染物會產生致癌污染，當局未有完善處理及考慮這點的話，是未有盡力保障東涌居民健康；
- (3)當局正收緊空氣質素指標，現時環評及提議的措施是否符合即將更新的空氣質素指標要求；



(4)當局稱「可接受的空氣質素」有極大部分依賴中港減排成功，但中港減排沒有法定效力，香港單方面亦沒法保證會成功，大幅擴展是置更多市民於極高健康風險中。城規會必須仔細考慮東涌十多萬人口，到底是否真可以生活於一個健康空氣的環境。

6. 地區填海過多，海洋生態不應再作破壞

政府提出此項東涌規劃的同時，應承諾不會再於小蠔灣及陰澳填海。

本會強調房屋問題，不只是土地供應的問題，乃是欠人口規劃及人口政策出錯的後果。每一個地方都有其承載力上限，我們現時已將過多人口置於各個社區之中，過於壓縮生活空間，天水圍、將軍澳等就是規劃失效的例子。城規會於審核圖則的同時，應負責任地討論、檢視及反映增加社區人口為社會帶來壓力的後果。

最後，填海是「不可逆轉」的工程，海洋面積一旦被填料代替，將永遠無法變回海洋，所以本會一直提議當局應先使用市區軍營及棕土等已有土地資源。根據早前有民間團體發表了的研究報告，有部份新界的棕地接近已興建基礎設施的地區，當局實在須要考慮善用現有的土地資源以代替東涌填海計劃。

基於以上各點，本會反對是項分區計劃大綱草圖。

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

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

Our ref: T&ESD/TS&SE/EnvE/L741

2 March 2016

By Post and Fax
(Fax no.: 2877 0245 / 2522 8426)

Dear Sir/Madam,

**Representation on the Draft Tung Chung Extension Area Outline Zoning Plan
(No. S/I-TCE/1)
Rail Operation Noise Concern**

While the Corporation has, in general, no objections to the captioned Outline Zoning Plan, we note that certain proposed residential developments within the Tung Chung Extension Area will be situated relatively close to the existing Tung Chung Line (TCL) and the Airport Express (AEL). Future occupants at these sites might be subjected to noise impacts.

It was noted in Sections 7.1.11 and 8.6.3 of the Explanatory Statement that: *"The commercial developments in Areas 57, 113, 129 and 130 should provide noise screen from railway [...] noise from TCL [...]. Timely implementation of these commercial developments should be required to facilitate the residential developments planned to the further north within the Area."* and *"...as the site is subject to noise impact from [...] TCL, the layout of the development should be carefully designed with commercial blocks with adequate BH and length to function as a noise screen for the residential uses in the remaining parts of the sites. Future development of the sites should be governed by Master Layout Plan (MLP) submission, as an administrative measure under the lease, by the project proponent to the satisfaction of the Director of Lands to ensure proper design of the developments before the development proceeds"*.

In addition to the above, it is recommended that, should a programme mismatch occur between the implementation of the commercial developments and occupation of the residential sites, supplementary noise reviews shall be conducted by the future property development proponent(s) for the concerned residential sites, subject to the satisfaction of the Environmental Protection Department (EPD), to ensure interim compliance with statutory regulations.

Apart from the proposed commercial blocks as noise screens, it is recommended that the future property development proponent(s) conduct detailed noise review regarding the potential impacts from the TCL and AEL when there is more information on the development, and implement appropriate mitigation measures, including building setback design, use of non-sensitive building as screening, single-aspect building design, architectural fins, and/or double-glazed fixed windows at the future development sites, at their own cost and to the satisfaction of EPD, in order to ensure that the future residents will not be exposed to noise impacts exceeding relevant noise limits.

We respectfully urge the Town Planning Board gives due consideration to our concerns and impose related development requirements through Planning Briefs, statutory plans and/or land administration documents.

Should you have any enquiries, please feel free to contact our Environmental Engineering Manager, Ms. Catherine Leung at 2993 4127.

Yours sincerely,



Philip Wong
General Manager – Technical & Engineering Services

c.c. Mr. K.F. Tang – Assistant Director (Environmental Assessment) of EPD
Mr. David Lo – Chief Engineer/Islands of CEDD

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

東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1

該申述所關乎 的在有關草圖內的特定事項

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；

商業的總面積 7.38 公頃，卻沒有食環街市，不利民生；

該申述的性質及理由、對有關草圖作出的建議

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。

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。

PEMS Comment on Representation

TPB/R/S/I-TCE/1-C1

就草圖的申述提出意見
Comment on Representation Relating to Draft Plan

參考編號

Reference Number:

160512-004750-62675

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 00:47:50

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-TCE/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-TCE/1-1 及 TPB/R/S/I-TCE/1-5 8	現時東涌東部填海工程是否有凌駕性需要仍然存有大量疑問，例如人口需求等。如對是份草圖予以不反對，乃默認了填海工程的必要性，而相關申述人士提出檢討商業用地需求及關注噪音影響的建議，也未能有效紓解在東涌東部填海所衍生的一連串社區及環境問題
TPB/R/S/I-TCE/1-2	建議的遊艇會設施應予以取消，讓整個海濱空間回歸公眾人士所有，開放的空間以容納各式各樣的不同活動

寄件者: Mark Mak [mark@greensense.org.hk]
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
附件: 東涌三草圖_環保觸覺意見書_20160513.pdf

TPB/R/S/I-TCE/1-C2

To: Town Planning Board

Please find attached Green Sense's comment.

Regards
Green Sense

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



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

寄件者: Vanessa Leung [REDACTED]
寄件日期: 12日05月2016年星期四 15:21
收件者: tpbpd@pland.gov.hk
副本: 'Megan Inglis-Davies'
主旨: RE: Water Sports Facilities in Tung Chung
附件: 0300_001.pdf

TPB/R/S/I-TCE/1-C3

Dear Sirs/Madam,

Another Support Proposals enclosed

Thanks

Vanessa Leung
Administration Manager
Locations Limited | Licence C-065228
1608 Tung Che Commercial Centre, 246 Des Voeux Road West, Sai Ying Pun, Hong Kong
P [REDACTED]
M [REDACTED]



Locations
22 17 N, 114 9 E

mailto:[REDACTED]
<http://locations.com.hk>

From: Vanessa Leung [mailto:[REDACTED]]
Sent: Thursday, May 12, 2016 2:54 PM
To: 'tpbpd@pland.gov.hk' <tpbpd@pland.gov.hk>
Cc: 'Megan Inglis-Davies' <[REDACTED]>
Subject: Water Sports Facilities in Tung Chung

Dear Sirs/Madam,

Enclosed a Support Proposals for Water Sports Facilities in Tung Chung Town area for your record, please find.
Thanks

Vanessa Leung
Administration Manager
Locations Limited | Licence C-065228
1608 Tung Che Commercial Centre, 246 Des Voeux Road West, Sai Ying Pun, Hong Kong
P + [REDACTED]
M + [REDACTED]



Locations
22 17 N, 114 9 E

mailto:Vanessa.leung@locations.com.hk
<http://locations.com.hk>



To : Secretary Town Planning Board
(deadline 13 May 2016)

Fax 2877 0245 or 2522 8426
e-mail tpbpd@pland.gov.hk

Comment in relation to Representations TPB/R/S/I-TCE/1-2 and TPB/R/S/I-TCTC/21-5 from the Hong Kong Water Sports Council

Proposals for Water Sports Facilities in the existing Tung Chung Town area and in the Proposed Tung Chung East new reclamation area

I wish to support the proposals from the Hong Kong Watersports Council to provide sites in Tung Chung for water sports. The reasons for this support are :-

本人希望支持香港水上活動議會擬議東涌區應劃分土地予公眾進行水上活動。本人支持的原因如下：

1. There is no provision for water sports facilities in Tung Chung at present and these should be properly planned and implemented;

目前，東涌並沒有水上活動設施。如有合適的規劃，可有效地落實及執行有關計劃。

Existing Tung Chung

2. There is an urgent need to provide active sports facilities for young people in Tung Chung and the proposed site next to the Yat Tung Estate would be an ideal site for a Water Sports Centre as it is readily accessible to a large number of people and has good access to the waters of Tung Chung Bay;

東涌現況

東涌急切需要提供運動設施予區內的年輕人，擬議的逸東邨選址是一個適當的地點。逸東邨的交通配套完善，而且鄰近東涌灣，方便公眾往來並進行水上活動。

Tung Chung East Reclamation Area

3. The proposal to provide artificial beaches and water sports facilities in the new reclamation area is supported. It is important to provide a high quality living environment with a full range of recreational facilities for the future resident of this area.

東涌東填海區

計劃在新填海區提供人工沙灘及水上活動設施是一個很好的主意。配合東涌的發展，為將來的區內住客提供高質素的生活環境及全面的康體設施著實重要。

4. The locality is ideally suited for water sports and a site for a Water Sports Centre is fully supported as the area is suitable for small rowing, sailing boats, wind surfing, and canoes.

東涌區的地理位置是一個理想的環境，適合興建水上活動中心，進行各類型的水上活動，包括賽艇、帆船航行、滑浪風帆及獨木舟。

5. Additional Comments:

My children currently travel from Tung Chung to either Middle Island or Sha Tin to row in a Double skull. They recently competed for YMCACCHK Secondary School situated in Tung Chung in the Secondary School Rowing Regatta and came fourth. They were the only rowers from Tung Chung and did very well given this was the first regatta.

If they could be involved and the school supports this, close to Tung Chung then enormous benefit would be found to them, their student colleagues and the community. Disabled rowers and elderly and infirm could be taught skills and enjoy the outdoors.

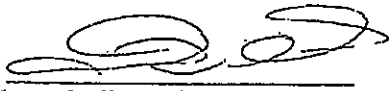
On another note the environment is wonderful and underused. More people could enjoy exercise and learn new skills


It would provide fantastic opportunities for youth and disabled people in the Lantau Area

The sheltered area proposed is a wonderful place for all people to enjoy and for sports such as Rowing and canoeing to flourish without impact to the environment. Its safe and easy to access for all.

Please give consideration to this submission and lets hope Hong Kong wins Gold in the future with a water sports team.

Signature


Megan Inglis Davies



寄件者:
寄件日期:
收件者:
主旨:
附件:

Miffy Ng [REDACTED]
13日05月2016年星期五 20:41
tpbpd
DHK Comment on Representation of Draft Tung Chung Outline Zoning Plan No. S/I-TCV/1,S/I-TCE/1&S/I-TCTC/21
20160513 DHK Tung Chung OZP_Comment on Representation.pdf

TPB/R/S/I-TCE/1-C10

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

城規會東涌未來發展聲明書

Reference List:

http://www.info.gov.hk/tpb/ic/plan_making/Attachment/20160422/S_I-TCTC_21_gist_of_representations_eng_chi.pdf
http://www.info.gov.hk/tpb/ic/plan_making/Attachment/20160422/S_I-TCE_1_gist_of_representations_eng_chi.pdf
http://www.info.gov.hk/tpb/ic/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,
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,
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

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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TPB/R/S/I-TCE/1-C78

就草圖的申述提出意見
Comment on Representation Relating to Draft Plan

參考編號
Reference Number: 160427-074058-06449

提交限期
Deadline for submission: 13/05/2016

提交日期及時間
Date and time of submission: 27/04/2016 07:40:58

提出此份意見的人士 (下稱「提意見人」)
Person Making This Comment 先生 Mr. Jim Benson
(known as "Commenter") hereafter:

與意見相關的草圖
Draft plan to which the comment relates: S/I-TCE/1

意見詳情
Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
200 children plus 200 adults playing or supervising rugby every weekend for Tung Chung Rugby Club in Tung Chung.	Tung Chung Rugby Club (TCRC) supports the development of 2 No. full sized rugby fields (120m by 80m) in the development. Our players are 50% Hong Kong Chinese, 40% female and we represent every race, culture and religion in Tung Chung. For more information please contact the President of TCRC - Jim Benson.

定 稿

離島區議會會議記錄

日期：2016 年 2 月 1 日(星期一)

時間：下午 2 時正

地點：香港中環統一碼頭道 38 號海港政府大樓 14 字樓

離島區議會會議室

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議員

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余麗芬女士

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秘書

陳心心女士	離島民政事務處 高級行政主任(區議會)
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XV. 《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》、
《東涌谷分區計劃大綱草圖編號 S/I-TCV/1》及
《東涌市中心地區分區計劃大綱草圖編號 S/I-TCTC/21》
(文件 IDC 17/2016 號)

129. 主席歡迎講解文件的嘉賓：規劃署西貢及離島規劃專員譚燕萍女士、高級城市規劃師/離島胡明儀女士及城市規劃師/離島區宇欣女士；以及土木工程拓展署總工程師/離島盧國中先生。

130. 譚燕萍女士簡述文件的背景。接着，胡明儀女士利用電腦投影片逐一介紹三份分區計劃大綱草圖的內容。

131. 周浩鼎議員表示，不少居民期待東涌市鎮公園早日落成，他詢問當局有否施工時間表。

132. 郭平議員詢問，東涌西的規劃有否預留土地興建文娛康樂設施(例如室內體育館和表演場地)，因為現時東涌西及逸東邨附近缺乏相關設施，未能配合青少年的發展。

133. 樊志平議員提出的意見如下：

- (a) 不少東涌鄉郊土地(例如黃龍坑一帶)被劃為「綠化地帶」和「自然保育區」，影響私人土地的價值及發展。他詢問政府會否為受影響私人土地業權提供補償。
- (b) 東涌沒有河流，只有一條水道(“坑”)。在發展東涌西時，他希望政府落實改善東涌舊區各鄉村連接道路的建議。
- (c) 促請政府利用發展機會，為東涌舊區鄉村改善排污系統，取代化糞池，以改善環境衛生。

134. 黃文漢議員表示，東涌擴展區分區計劃大綱草圖顯示，白芒至北大嶼山公路之間有一幅土地，他詢問該土地的未來用途。他希望政府提供合適的交通配套，方便梅窩三鄉居民往來擬議東涌東鐵路站(東涌東站)。

135. 譚燕萍女士綜合回覆如下：

- (a) 在社區設施方面，在進行東涌新市鎮擴展研究(東涌研究)公眾諮詢時，研究團隊備悉地區人士認為東涌西較缺乏社區設施，尤其是體育設施，因此在諮詢相關政府部門及考慮東涌東、東涌市中心及東涌西的土地用途後，署方提出現時的規劃建議。在東涌第39區旁已預留土地用作興建室內康樂中心。此外，署方建議在逸東邨對出的「休憩用地」劃出部分土地用作露天劇場，以舉辦文娛康樂活動。
- (b) 東涌溪是具重要生態價值的河溪，需要保育。東涌西在生態價值較高的地點，署方建議劃作「自然保育區」及「綠化地帶」，以保存自然生態環境及鄉村特色。另一方面，規劃署亦盡量在東涌西物色合適土地，例如生態價值較低的地方(包括荒廢的農地和果園等)，建議作低密度的住宅發展，以地盡其用，希望東涌西的發展，盡量在生態保育和地區發展之間，取得平衡。

136. 盧國中先生綜合回覆如下：

- (a) 關於梅窩三鄉的连接道路，現時計劃興建的 P1 號公路，將透過小蠔灣西面的交通交匯處連接北大嶼山公路，將來三鄉居民可透過該交通交匯處進出北大嶼山公路。此外，現時在該段北大嶼山公路下有一條行人隧道，署方建議將該行人隧道伸延至新填海區及接駁 P1 號公路，方便三鄉居民日後使用行人隧道前往東涌東發展區及地鐵站。
- (b) 至於東涌谷的鄉村道路，土木工程拓展署會按大綱草圖的規劃興建鄉村道路。
- (c) 受東涌新市鎮擴展影響的鄉村，該署會安排為這些鄉村鋪設污水渠。至於樊志平議員希望政府一併為沒有受計劃影響的鄉村鋪設污水渠一事，署方會聯絡環保署，探討為東涌舊區未有污水渠接駁的鄉村改善設施的可行性。
- (d) 在市鎮公園方面，土木工程拓展署負責為東涌擴展區興建基建設施，包括土地平整、填海造地、排水及供水工程等，而其他政府設施(例如市鎮公園)則由相關部門負責。該署會繼續與相關部門商討如何落實興建各項政府設施。待有進展，便會向區議會匯報。

137. 鄧家彪議員提出的意見如下：

- (a) 東涌擴展區分區計劃大綱草圖
 - 他詢問由 P1 公路至大蠔的單車徑公園，將會由發展局/土木工程拓展署，還是民政事務局/康樂及文化事務署負責興建。
 - 關於在東涌東填海區設立遊艇會所及進行水上活動的建議，他詢問政府如何確保污水排放不會影響大蠔的良好水質環境。
 - 他詢問，部分無需填海造地的規劃建議可否在 2023 年之前實施，例如興建大蠔單車徑。

(b) 東涌市中心地區分區計劃大綱圖的擬議修訂

- 規劃署建議將東涌第 32 區逸東邨以北及馬灣涌村西鄰一幅用地，劃為「休憩用地」地帶。據他所知，該處有數間牌照屋現時仍有人居住，他詢問政府有何收地安排，以及有否評估建議對當地居民的影響。
- 他建議興建行人路，方便逸東邨居民日後步行至東涌第 39 區的公屋及東涌谷河畔公園。他希望當局在規劃階段詳細考慮，不要興建行人天橋連接，以免對景觀造成影響。
- 他詢問政府會否在東涌西沿海興建單車徑，以便逸東邨居民踏單車沿舊海岸往東涌市中心。
- 他詢問東涌第 107 區的未來用途。

(c) 東涌谷分區計劃大綱草圖

- 他詢問政府在區內擁有多少土地，可用作住宅發展用途。
- 因應部分環保團體及居民的期望，政府有否計劃擴建河畔公園。
- 現時房屋供應不足，他詢問政府有否考慮增加區內住宅發展的密度，例如由「住宅(丙類)」提升至「住宅(乙類)」，以增加房屋供應。
- 他詢問第 38A、38B 及 38C 區規模較少而又有建築物高度限制的「商業」用地，政府建議用作甚麼商業用途。
- 政府有否預留土地興建市政街市或用作燒烤場地。

138. 樊志平議員提出的意見如下：

- (a) 他認為東涌東的規劃完善，但東涌西的規劃布局失衡，區內以公營房屋為主，但欠缺政府及社區設施，令居民甚為不便。

- (b) 隨着東涌第 39 區的公屋落成，他關注現時的道路及交通配套不足，難以應付東涌西人口增加的需求。他要求運輸署改善東涌鄉事委員會至龍井頭的一段東涌道，擔心將來會有不少行人和車輛利用黃家圍的路口進出第 39 區，容易發生交通意外。他建議運輸署開放裕東路至松仁路的道路，供公眾使用，以疏導交通。
- (c) 第 39 區公屋入伙及港珠澳大橋通車後，將會帶來大量交通流量，但現時馬灣涌村內只有四個泊車位，根本無法應付需求。他促請政府落實發展計劃時，必須盡快增建馬灣涌村的泊車位。

139. 張富議員建議貫通相關道路以連接東涌道，以改善交通及疏導車輛，否則他反對有關規劃。

140. 周浩鼎議員知悉政府計劃興建 P1 公路，但認為仍未能解決三鄉村內的交通連接。

141. 譚燕萍女士綜合回應如下：

土地用途

- (a) 就東涌第 107 區的土地用途，建議劃為「政府、機構或社區」用地。有關用地鄰近東涌第 39 區的公營房屋及未來的東涌西鐵路站，除部分土地預留興建室內康樂中心外，其餘土地暫未有計劃用途。
- (b) 由於東涌西有不少自然景觀具有高生態價值，署方在規劃時，必須審慎考慮適當的發展密度和高度，希望在發展的同時，不會影響鄉郊環境和自然生態。署方在考慮各項因素後，建議部分生態價值較低的地點作住宅發展，這些地點座落於現有村落附近，以 3 層高村屋為主。若附近土地用作「住宅(乙類)」發展，興建十多層樓高的住宅，並不合適，因此建議劃為「住宅(丙類)」用途，以進行低密度的住宅發展。
- (c) 就東涌第 38 區的商業用地，現時東涌西有不少原居民鄉村，區內的商業設施不多，規劃署建議在鄰近鐵路站旁預留土地，用作發展地區性的商場(以小商鋪為主)，為居民提供便捷的日常生活所需。

- (d) 在進行東涌研究時，規劃署曾徵詢食環署的意見，得悉該署並無計劃在東涌興建市政街市，故是次規劃並沒有預留土地作相關用途。不過，東涌第 39 區的公營房屋發展項目內將會興建濕貨街市。

燒烤及社區設施

- (e) 在「休憩用地」設置燒烤設施，屬經常准許的用途。
- (f) 東涌西侯王廟附近有一幅土地，建議劃為「政府、機構或社區」用地，預留日後作興建社區或政府設施之用。另外在馬灣涌附近有一幅劃為「政府、機構或社區」的用地，部分會用作進行馬灣涌計劃的改善工程，餘下則預留作日後其他政府、機構或社區用途。

道路

- (g) 關於東涌第 39 區至裕東路的連接道路，規劃署已多次作出解釋，有關道路已納入東涌第 39 區的公營房屋發展計劃內，房屋署會在有關發展的詳細設計時，考慮相關的道路設計和安排。
- (h) 在進行東涌西的整體規劃時，除考慮上述道路外，亦建議其他道路，連接東涌西及東涌市中心。

142. 盧國中先生綜合回應如下：

單車徑

- (a) 在興建單車徑方面，政府計劃在馬灣涌碼頭附近興建海濱長廊，當中部分路段會闢設單車徑，以便市民前往東涌市中心。就興建沿海單車徑連接大蠔的建議，由於興建 P1 公路及東涌東填海工程均需徵用海堤上的維修通道作為工地，因此未能在目前階段興建單車徑，以免阻礙填海工程。署方希望盡快分期完成東涌東填海工程，以便早日開展東涌至小蠔灣的單車徑的工程。
- (b) 至於負責興建單車公園的部門，須在詳細設計完成後才作決定。

水質問題

- (c) 在進行東涌研究時，署方知悉東涌灣及大蠔灣屬水環境敏感地區，故此東涌擴展區會是本港首次採用特別的排污系統，不論在任何情況，例如泵房發生故障，污水亦不會排入海中。所有東涌東的污水會被泵至小蠔灣污水處理廠作綜合處理。

河畔公園

- (d) 逸東邨至河畔公園的接駁方案，在詳細設計階段才能確定。
- (e) 就擴展河畔公園的規模一事，研究團隊在考慮多項因素後，包括環境因素及土地用途，才提出現時的規劃建議，暫時沒有擴展空間。他解釋，在東涌溪東的支流，生態環境已被干擾，地段亦較近路邊，而附近農地亦已被荒廢耕，因此整體布局較適合建設為公園。至於東涌溪西的支流，由於有常耕農地，河道也較狹窄，因此不宜作公園用途。

馬灣涌停車場

- (f) 就馬灣涌設置停車場，署方會於詳細設計階段盡早落實施工時間表。

143. 鄧家彪議員表示，現時未有預留街市用地，但若政府改變政策，他詢問應在「政府、機構或社區」用地或是「商業」用地興建街市，以及有關用地的地點。

144. 譚燕萍女士回覆，規劃署在東涌西預留兩幅「政府、機構或社區」用地，即第 24A 區及第 36A 區，暫時未有確實用途。如日後有需要(包括興建街市)，政府部門可考慮使用有關用地。

145. 主席請政府考慮議員的意見。

(李桂珍議員、何潤勝先生及黃偉宏先生在是項議題討論期間離開會場。)

(胡明儀女士及區宇欣女士在是項議題討論完畢後離開會場。)

申述的摘要及規劃署的回應

申 述 編 號 S/I-TCE/1-	申 述 的 理 據 / 建 議	規 劃 署 的 回 應
R 1	<p>(a) 大致支持《東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1》(下稱「草圖」)，並提出多項建議，以期更善用土地資源及更有效落實整體的土地用途。</p> <p>(b) 該草圖欠缺有力理據支持劃設大量商業區。</p> <p>(c) 鑑於該區域現有及日後的零售用地供應相當充裕(例如機場島北商業區(下稱「機場北商業區」)、港珠澳大橋香港口岸上蓋(下稱「港珠澳大橋香港口岸」)，東涌市中心現有的東薈城及其毗鄰正在施工的新商場)，政府應認真檢討是否有需要在該區域劃設 163 300 平方米土地作區域零售用途，又或應從宏觀的角度仔細研究該區的市場定位。</p> <p>(d) 政府應考慮在該區發展其他用途(例如科學園及工業邨，供電影製作、創意媒體廣告等創新工業之用)，而非在該區發展大型辦公室樞紐及區域商場。</p>	見城市規劃委員會(下稱「城規會」)文件第 6.11 至 6.13 段。

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	(e) 東涌擴展區需要更全面的規劃概念，以鞏固其作為東涌新市鎮門廊的功能定位。「都會中心區」須在空間及時間方面與周邊地區更為融合。政府可對發展創新科技產業多作考慮。	
R 2	<p>(a) 該草圖無甚考慮水土之間的關係。其實，這是一個大好良機，可利用水土之間的互動來設計優質的康樂及體育設施，供該區日後的居民享用。</p> <p>(b) 歡迎及全力支持闢設遊艇停泊處的建議，因這建議既可增加目前供應短缺的停泊位，令海傍多一個有趣的焦點，亦可創造商機及就業機會。該遊艇停泊處還會成為日後居民的重要康樂設施。然而，其設計及布局須予改善。該區是進行水上運動的理想地方，加建人工海灘可為區內居民提供大型的公眾康樂設施。</p> <p><u>建議</u> 建議兩個土地用途方案：</p> <p><u>方案1：</u> — 擴展規劃區的範圍，以涵蓋申述人建議的遊艇停泊處用地，並把該用地劃為「其他指定用途」註明</p>	見城規會文件第 6.14 至 6.15 段。

申 述 編 號 S/I-TCE/1-	申 述 的 理 據 / 建 議	規 劃 署 的 回 應
	<p>「遊艇停泊處」地帶，以及把原本建議的遊艇停泊處改劃為「休憩用地」地帶，以興建更大的海濱公園。</p> <ul style="list-style-type: none">— 擴大位於第144區的「其他指定用途」註明「遊艇會所、船隻修理及遊艇停泊處發展有關的商業設施」地帶。— 把位於第143區的「其他指定用途」註明「遊艇會所、船隻修理及與遊艇停泊處發展有關的商業設施」地帶改劃為「其他指定用途」註明「水上運動中心」地帶。— 把海旁的兩個地方劃為「其他指定用途」註明「公眾海灘」地帶。 <p><u>方案2：</u></p> <ul style="list-style-type: none">— 把擬議的遊艇停泊處用地納入規劃區的範圍內，劃為「其他指定用途」註明「遊艇停泊處」地帶。— 把位於第143區的「其他指定用途」註明「遊艇會所、船隻修理及與遊艇停泊處發展有關的商業設施」地帶改劃為「其他指定用途」註明「水上運動	

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>中心」地帶。</p> <p>一 把海旁的兩個地方劃為「其他指定用途」註明「公眾海灘」地帶。</p>	
R 3	反對擴展東涌。規劃應配合居民的需要及顧及環境。	見城規會文件第 6.16 至 6.19 段。
R 4	反對進一步發展東涌各區及納入新地區作住宅發展。	見城規會文件第 6.16 至 6.19 段。
R 5 至 R 7	<p>(a) 東涌是其中一個空氣污染嚴重的地區，進一步填海及興建 P1 公路會令東涌的霧霾問題惡化。</p> <p>(b) 東涌沒有食物環境衛生署(下稱「食環署」)營運的街市，這對市民來說十分不便。</p> <p>(c) 住宅用地主要用作私人住宅發展。</p> <p>(d) 遊艇停泊處擬設於海濱休憩用地會把公共空間私有化。</p> <p>(e) 反對擬議的填海工程，因為填海區十分接近大小磨刀海岸公園(建設此海岸公園是要為港珠澳大橋計劃所造成的環境影響作出補償)。在施工階段，會有約</p>	<p>見城規會文件第 6.16 至 6.32、6.39 至 6.42 段及下列補充回應：</p> <p><u>施工高峯期與同期進行的計劃重疊</u></p> <p>機場三跑道系統和東涌新市鎮擴展區計劃的施工高峯期沒有重疊。此外，進入機場三跑道系統填海地點的工作船隻是取道西邊前往，而進入東涌填海地點的工作船隻則會取道東邊前往。東涌新市鎮擴展區只會在填海工程的施工高峯期(為期約一年半)才會出現每天有 42 至 56 艘船隻進出的情況。在餘下期間，每日進出的船隻數目會大大減少，介乎</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>42至52艘工程躉船進入該區，加上填海工程的施工期會與機場三跑道系統的填海工程重疊，故此進入大嶼山東北海域的船隻數目會更多。這情況會嚴重干擾在擬議大小磨刀海岸公園棲息的海洋生物(尤其是中華白海豚)的生境。</p> <p>(f) 應在東涌闢建特殊學校，改善有關學童長期跨區上學的問題。</p> <p>(g) 缺乏單車設施。以單車代步可減少碳排放及保護環境，亦有助推廣大嶼山的旅遊業。應闢設連接東涌和機場的大嶼山環島單車徑。</p> <p>(h) 反對清拆現有的白芒碼頭，因為該碼頭是珍貴的公共空間，應加以善用。</p> <p>(i) 政府應按「低碳城市」及「以人為本」的概念規劃東涌擴展區。</p>	<p>10艘以下至30艘以下。</p> <p><u>對中華白海豚的影響</u></p> <p>漁護署的海洋哺乳動物長期監察計劃始於一九九五年，計劃推行至今已二十年，提供了為數最多的一批中華白海豚數據，監察年期是香港歷來最長。監察結果得出的結論是，海豚一直甚少在東涌區出沒，近年以至香港口岸施工前的早年情況均如是。因此，東涌水域對中華白海豚的棲息重要性較低。</p> <p>土木工程拓展署就三個於西部水域具潛力的近岸填海地點進行的累計性環境影響評估(下稱「累計性環評」)研究於二零一五年完成。是項研究評估三項填海建議的生態影響時，考慮了海豚專家 Bernd Wursig 教授和 Thomas A Jefferson 博士在該等地點近岸水域進行中華白海豚實地調查的結果。在小蠔灣的填海地點，經常錄得中華白海豚在初擬填海範圍的深水水域(即海圖深度基準面下5米或更深的海床水平)出沒。因此，是</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
		<p>項研究建議填海範圍應局限在較淺水的水域(即海床水平高於海圖深度基準面下 5 米)。東涌東的擬議填海範圍水深普遍為海圖深度基準面下 3 米的海床水平，符合累計性環評研究提出應局限在較淺水水域進行填海的建議。</p> <p>此外，除三跑道系統計劃的環評研究及累計性環評研究外，當局收集了聲學數據，作為海豚晝夜出沒情況的補充資料。聲學數據顯示在一些調查地點，如香港國際機場三跑道系統計劃涵蓋的機場北部及累計性環評研究涵蓋的小蠔灣，海豚夜間較日間更為活躍。然而，這些地點日間的海豚活動也不少，故全被定為海豚棲息地。</p> <p>此外，根據漁護署涵蓋香港口岸施工前後期間的同一批長期監察數據，欣澳並非海豚的重要棲息地。累計性環評報告並無建議在當地進行陸上調查，惟當局進行了聲學調查，在欣澳進行水底聲學監測，收集日間和夜間的聲學數據，以</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
		<p>核實當地夜間海豚會否甚是活躍。聲學監測結果顯示，夜間情況並無顯著不同，海豚無論晝夜也很少使用有關水域。因此，當局總結認為，海豚甚少或僅偶爾使用欣澳水域。這些監測結果可作為參考資料，以評估海豚甚少使用之水域的夜間海豚出沒情況。</p> <p>自一九九五年漁護署推行海洋哺乳動物長期監察計劃以來，海豚一直甚少在東涌區出沒，而東涌東填海區的水域對海豚而言水深太淺，故東涌東填海區並非海豚的重要棲息地。參照累計性環評結果，海豚夜間活躍於該區水域的可能性也被認為低。</p> <p><u>減少海上交通建議／工程船隻航線計劃書</u></p> <p>日後承建商須提交「減少海上交通建議」和「工程船隻路線計劃書」，取得批准後才可展開工程。在提交的資料中，承建商須證明已探討所有或可減少海上交通的方案，並會採取審慎的管制</p>

申 述 編 號 S/I-TCE/1-	申 述 的 理 據 / 建 議	規 劃 署 的 回 應
		措施，管理工程船隻的航線、船速和其他所需操作。實施這些措施後，預料填海工程對香港的中華白海豚種羣的剩餘影響並不顯著，可以接受。
R8 及 R9	<p>(a) 東涌是其中一個空氣污染水平高的地區，進一步填海及興建P1公路，會令霧霾問題惡化。</p> <p>(b) 反對擬議的填海工程，因為填海工程範圍鄰近擬議的大小磨刀海岸公園。在施工階段，進入工程範圍的工程躉船約有42至52架次，加上填海工程與機場三跑道系統工程計劃的施工期會重疊，進入大嶼山東北面水域的船隻數目增加，會嚴重干擾擬設海岸公園的海洋生境，特別是中華白海豚。</p> <p>(c) 把擬議的遊艇停泊處設於海濱休憩用地，會把海濱的公共空間私有化。</p> <p>(d) 政府應按「低碳城市」及「以人為本」的概念規劃東涌新市鎮擴展區。</p>	見城規會文件第 6.16 至 6.32 段及上文另對 R5 至 R7 有關同期進行的工程項目施工高峯期重疊、中華白海豚所受影響及減少海上交通建議／工程船隻路線計劃書的回應。
R10 及 R11	(a) 住宅用地主要用作私人住宅發展。	見城規會文件第 6.16 至 6.32 段及上文另對 R5 至 R7 有關同期進行的工程

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>(b) 把擬議的遊艇停泊處設於海濱休憩用地，會把公共空間私有化。</p> <p>(c) 反對擬議的填海工程，因為填海工程範圍鄰近擬議的大小磨刀海岸公園。在施工階段，進入工程範圍的工程躉船約有42至52架次，加上填海工程與機場三跑道系統工程計劃的施工期會重疊，進入大嶼山東北面水域的船隻數目增加，會嚴重干擾擬設海岸公園的海洋生境，特別是中華白海豚。</p>	<p>項目施工高峯期重疊、中華白海豚所受影響及減少海上交通建議／工程船隻路線計劃書的回應。</p>
R12, R59	<p>(a) 東涌是其中一個空氣污染水平高的地區，進一步填海及興建P1公路，會令霧霾問題惡化。</p> <p>(b) 沒有由食物環境衛生署(下稱「食環署」)營運的街市，不利民生。</p> <p>(c) 反對擬議的填海工程，因為填海工程範圍鄰近擬議的大小磨刀海岸公園。在施工階段，進入工程範圍的工程躉船約有42至52架次，加上填海工程與機場三跑道系統工程計劃的施工期會重疊，進入大嶼山東北面水域的船隻數目增加，會嚴重干擾擬設海岸公園的海洋生境，特別是中華白海豚。</p>	<p>見城規會文件第 6.16 至 6.23、6.39、6.40 段及上文另對 R5 至 R7 有關同期進行的工程項目施工高峯期重疊、中華白海豚所受影響及減少海上交通建議／工程船隻路線計劃書的回應。</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	(d) 東涌應引入特殊學校，以改善東涌有關學生長期須跨區上學的問題。	
R13	<p>(a) 住宅用地主要用作私人住宅發展。</p> <p>(b) 把擬議的遊艇停泊處設於海濱休憩用地，會把公共空間私有化。</p> <p>(c) 東涌欠缺單車設施。以單車代步可減少碳排放，保護環境，並可推動大嶼山的旅遊業發展。應闢設連接東涌和機場的大嶼山環島單車徑。</p> <p>(d) 反對清拆現有的白芒碼頭，因為白芒碼頭是珍貴的公共空間，應加以善用。</p> <p>(e) 政府應按「低碳城市」及「以人為本」的概念規劃東涌新市鎮擴展區。</p>	見城規會文件第 6.16 至 6.32、6.38、6.41 及 6.42 段。
R14	<p>(a) 住宅用地主要用作私人住宅發展。</p> <p>(b) 把擬議的遊艇停泊處設於海濱休憩用地，會把公共空間私有化。</p>	見城規會文件第 6.16 至 6.32 及 6.41 段。

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>(c) 東涌欠缺單車設施。以單車代步可減少碳排放，保護環境，並可推動大嶼山的旅遊業發展。應闢設連接東涌和機場的大嶼山環島單車徑。</p> <p>(d) 政府應按「低碳城市」及「以人為本」的概念規劃東涌新市鎮擴展區。</p>	
R15 至 R27	<p>(a) 反對擬議的填海工程及該草圖。</p> <p>(b) 擬議的填海工程會進一步威脅中華白海豚及其生境，工程範圍有可能是海豚夜間活動的範圍。</p> <p>(c) 擬議的填海工程範圍與擬設的大小磨刀海岸公園相距約 1 200 米，工程躉船會影響擬設海岸公園的生境。</p> <p>(d) 擬議的填海工程會影響大鰲河河口及「具特殊科學價值地點」的生態。</p> <p>(e) 欠缺人口政策。東涌人口增加，會令交通和社區設施不勝負荷。</p> <p>(f) 考慮到填海工程會造成不良影響，政府應善用其他</p>	<p>見城規會文件第 6.16 至 6.28、6.34 至 6.38 段及上文另對 R5 至 R7 有關同期進行的工程項目施工高峯期重疊、中華白海豚所受影響及減少海上交通建議／工程船隻路線計劃書的回應。</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	土地資源，例如使用棕地而不是在東涌填海。	
R 28	<p>(a) 反對該草圖。</p> <p>(b) 擬議增加的人口過多，該區的承受力成疑。</p> <p>(c) 東涌擴展區十分接近機場和港珠澳大橋的人工島，這會增加居民受空氣污染影響的機會，亦會加重醫療開支。</p> <p>(d) 擬議的填海會影響大蠔河河口和具特殊科學價值地點的生態。</p> <p>(e) 擬議的填海會進一步威脅中華白海豚和牠們的生境，而填海區有可能是海豚夜間活動的水域。</p> <p>(f) 擬議填海區與擬議大小磨刀海岸公園相距約 1 200 米，工程躉船往來會影響擬議大小磨刀海岸公園的生境。</p>	見城規會文件第 6.16 至 6.28、6.29 至 6.33 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 29	<p>(a) 反對該草圖。</p> <p>(b) 擬議的填海會進一步威脅中華白海豚和牠們的生</p>	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻航

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>境，而填海區有可能是海豚夜間活動的水域。</p> <p>(c) 擬議填海區與擬議大小磨刀海岸公園相距約 1 200 米，工程躉船往來會影響擬議大小磨刀海岸公園的生境。</p> <p>(d) 擬議的填海會影響大蠔河河口和「具特殊科學價值地點」的生態。</p>	<p>線計劃書的回應。</p>
R 30	<p>(a) 反對該草圖。</p> <p>(b) 擬議的填海會進一步威脅中華白海豚和牠們的生境，而填海區有可能是海豚夜間活動的水域。</p> <p>(c) 擬議填海區鄰近擬議大小磨刀海岸公園，工程躉船往來會影響擬議大小磨刀海岸公園的生境。</p> <p>(d) 政府應善用其他土地資源(例如棕地)，以代替在東涌填海。</p>	<p>見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。</p>
R31 至 R32	<p>(a) 根據香港海豚保育學會的調查，大嶼山東北面記錄到的海豚數目由 2001 年平均每天 20 條下降至 2014 年平均每天 1 條。擬議的填海會進一步影響中</p>	<p>見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受</p>

申 述 編 號 S/I-TCE/1-	申 述 的 理 據 / 建 議	規 劃 署 的 回 應
	<p>華白海豚和牠們的生境，而填海區有可能是海豚夜間活動的水域。</p> <p>(b) 擬議填海區與擬議大小磨刀海岸公園相距約 1 200 米，施工期間，進入填海區的工程躉船約有 42 至 52 艘次，而填海工程施工期會與三跑系統工程施工期重疊。進出大嶼山東北海域的船隻數目增加，會嚴重干擾擬議大小磨刀海岸公園的海洋生境，尤其是中華白海豚的生境。</p> <p>(c) 根據民間團體的一項調查，新界約有 1 192 公頃棕地，部分在已落成的基礎設施附近。</p> <p>(d) 政府應善用其他土地資源(例如棕地)，而不是在東涌填海。</p>	<p>影響和減少海上交通建議／工程船隻路線計劃書的回應。</p>
R 33	<p>(a) 中華白海豚的數目持續下降，擬議填海工程會進一步威脅中華白海豚和牠們的生境，而填海區有可能是海豚夜間活動的水域。</p> <p>(b) 填海作業的工程躉船會影響擬議大小磨刀海岸公園的生境。</p>	<p>見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	(c) 香港約有 1 192 公頃的棕地。政府應善用其他土地資源(例如棕地)，以代替在東涌填海。	
R 3 4	<p>(a) 填海工程會對環境造成不良影響，亦會影響中華白海豚的生境。</p> <p>(b) 填海工程與三跑道系統計劃其中一項工程的施工期重疊，駛進大嶼山東北海域船隻的數量增加，會嚴重干擾附近擬議的大小磨刀海岸公園的海洋生境(尤其中華白海豚)。</p> <p>(c) 香港棕地面積超過 1 000 公頃，有部分位於已落成的基建設施附近。政府應善用現有棕地，減少環境影響。</p>	見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 3 5	<p>(a) 在施工階段，擬議的大小磨刀海岸公園附近的填海地區會有約 42 至 52 艘工程躉船進內，加上港珠澳大橋香港口岸人工島的工程正在進行，會對海洋、水污染及海上交通流量增加方面造成累積影響，進一步影響中華白海豚。</p> <p>(b) 政府應善用其他土地資源，例如使用棕地，以代替</p>	見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響及減少海上交通建議／工程船隻路線計劃書的回應。

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	在東涌填海。	
R 3 6	<p>(a) 反對擬議的填海工程，因為會對北大嶼山水域的中華白海豚的生態造成不良影響，最近在北大嶼山水域所見的海豚數量減少。</p> <p>(b) 擬進行填海的地方鄰近擬議的大小磨刀海岸公園，在該處亦會同時進行多項工程計劃，結果會對海豚造成極大干擾。</p> <p>(c) 根據一項由社區組織所作的研究，本港棕地的面積有 1 192 公頃。政府應善用其他土地資源，例如使用棕地，而不是在東涌填海。</p>	見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 3 7	<p>(a) 反對擬議的填海工程，認為政府應檢討有關填海計劃。</p> <p>(b) 填海範圍有可能是海豚夜間活動的範圍，擬議的填海工程會威脅中華白海豚的生境。</p> <p>(c) 擬進行填海的地方鄰近擬議的大小磨刀海岸公園，因此填海工程會影響生態和水質，亦會削弱擬設的</p>	見城規會文件第 6.20 至 6.28 段及上述另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	大小磨刀海岸公園的保育效果。	
R 38	(a) 反對擬議的填海工程。 (b) 擬議的填海工程會干擾環境及威脅中華白海豚。 (c) 工程躉船會影響擬議的大小磨刀海岸公園的生境	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 39	(a) 大型填海工程會威脅中華白海豚及其生境，而填海範圍有可能是海豚夜間活動的範圍。 (b) 擬進行填海的地方鄰近擬議的大小磨刀海岸公園，在施工階段，會有約 42 至 52 艘工程躉船進內填海範圍，而填海工程與三跑道系統計劃工程的施工期又重疊。海上交通量增加，會進一步干擾大小磨刀海岸公園內中華白海豚的活動，亦會削弱擬設的大小磨刀海岸公園的保育效果。	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 40	(a) 填海工程會進一步威脅中華白海豚，現時中華白海豚在北大嶼山出現的數目持續下跌。填海範圍有可能是海豚夜間活動的範圍，擬議的填海工程會威脅中華白海豚及其生境，導致有 145 公頃中華白海豚	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>的生境因填海而消失。</p> <p>(b) 擬進行填海的地方與擬議的大小磨刀海岸公園相距約 1 000 米，工程躉船會干擾擬議大小磨刀海岸公園的生態。</p> <p>(c) 填海工程與三跑道系統計劃工程的施工期重疊，預料會有 200 艘工程躉船駛進擬議的大小磨刀海岸公園。</p> <p>(d) 在擬議的大小磨刀海岸公園附近進行大型基建工程會造成累積影響，政府應檢討該項擬議的填海工程。</p>	
R 41	<p>(a) 擬議的海工程對中華白海豚的生態有直接和間接的不良影響。</p> <p>(b) 假如擬進行填海的地方鄰近擬議的大小磨刀海岸公園，會對保護區內的海豚造成極大干擾。</p> <p>(c) 在附近地區會同時進行多項工程計劃，這樣可能削弱擬設的大小磨刀海岸公園的保育效果。</p>	<p>見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。</p>

申 述 編 號 S/I-TCE/1-	申 述 的 理 據 / 建 議	規 劃 署 的 回 應
R 4 2	<p>(a) 不贊同擬議的填海工程。</p> <p>(b) 填海範圍有可能是海豚夜間活動的範圍，同時將有 145 公頃的海牀及中華白海豚的生境因進行擬議的填海工程而消失。</p> <p>(c) 擬進行填海的地方與擬議的大小磨刀海岸公園相距不足兩公里，因工程而引致的交通流量和噪音會影響中華白海豚的生境。</p>	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 4 3	<p>(a) 不支持擬議的填海工程。</p> <p>(b) 在北大嶼山進行大型基建工程會使中華白海豚的生境面積減少，填海範圍有可能是海豚夜間活動的範圍，擬議的填海工程會威脅中華白海豚。</p> <p>(c) 假如擬進行填海的地方鄰近擬議的大小磨刀海岸公園，船隻數量的增加及工程的進行會進一步干擾中華白海豚，令牠們使用擬議大小磨刀海岸公園的機會減少。</p>	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 4 4	<p>(a) 反對擬議的填海工程。</p>	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>(b) 擬議的填海範圍鄰近大小磨刀海岸公園，會對保護區內的海豚造成重大干擾。</p> <p>(c) 每天最多約有 42 至 56 艘次工程船隻駛經擬議的大小磨刀海岸公園，為期一年半。因此，海洋環境會更擠迫，令海豚被船隻撞倒的機會增加。</p>	影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 4 5	<p>(a) 反對東涌東的填海計劃。</p> <p>(b) 填海工程會令海豚的重要夜間生境消失。</p> <p>(c) 附近地區有多項工程同期進行。那些工程亦會令公認的海豚的重要生境減少。</p> <p>(d) 香港有 1 192 公頃棕地。政府使用其他會對環境造成更大影響的方法(例如填海)前，應考慮發展棕地。</p>	見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 4 6	<p>(a) 不贊同擬議的填海工程。</p> <p>(b) 擬議的填海工程會進一步威脅中華白海豚和牠們的棲息地。</p>	見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>(c) 填海工程會令海面更窄。擬議填海工程與附近同期進行工程的施工期重疊，令海上交通增加。這會令中華白海豚被船隻撞傷的機會大增。</p> <p>(d) 香港有 1 192 公頃棕地。政府應考慮發展棕地，而不是在東涌填海。</p>	<p>線計劃書的回應。</p>
R 4 7	<p>(a) 填海會對中華白海豚的生態造成直接和間接的負面影響。</p> <p>(b) 香港海豚保育學會曾進行多項研究，發現在北大嶼山水域看到的中華白海豚數目，近年急劇下降。東涌擴展區的填海工程會令海豚的重要夜間生境消失。</p> <p>(c) 香港有 1 192 公頃棕地。政府應考慮發展棕地，而不是在東涌填海。</p>	<p>見城規會文件第 6.16 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。</p>
R 4 8	<p>(a) 不贊成擬議的填海工程。</p> <p>(b) 擬議的填海工程會進一步威脅中華白海豚和牠們的棲息地。</p>	<p>見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	(c) 附近有基礎設施工程同期進行，大量工程船隻會令海底噪音增加，干擾中華白海豚的日常生活。	
R 49	(a) 反對擬議的填海工程。 (b) 擬議的填海工程或會令水質下降，令生境進一步消失。 (c) 每天最多有 42 至 56 艘次工程船隻駛經有關水域。海上交通頻繁會干擾北大嶼山地區的中華白海豚，對牠們造成負面影響。	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 50	反對擬議的填海工程，因為工程會對海岸線、海洋環境和東涌河造成負面影響。	見城規會文件第 6.20 至 6.28 段。
R 51	拯救中華白海豚。反對東涌的填海計劃。	見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。
R 52	(a) 關注規劃人口增加對東涌整體承受力的影響，特別是在空氣質素、就業機會、陸上及海洋生態基線研	見城規會文件第 6.16 至 6.38 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>究和生物多樣性這幾方面的影響。</p> <p>(b) 大嶼山發展諮詢委員會建議了一連串的發展計劃。政府應全面規劃大嶼山的發展。</p> <p>(c) 應把整個大嶼山納入陸上及海洋生態基線研究，也應考慮建議在擴展區外進行的發展及其他工程計劃。東涌新市鎮擴展區計劃與其他在東涌或東涌周圍的擬議工程計劃缺乏協調。</p> <p>(d) 《生物多樣性公約》(下稱「《公約》」)的適用範圍自二零一一年五月起延伸至香港。任何會影響環境的工程計劃都應符合《公約》所訂的原則。政府部門評估生態價值時，應全面評估河流系統。</p> <p>(e) 東涌面對許多發展限制，包括差劣的空氣質素，增加任何發展都會加劇該區的空氣污染。政府應採用世界衛生組織新的空氣質素指引來評估東涌新市鎮擴展區計劃對東涌現時和日後居民所造成的累積影響，並因應增長的入口，建議改善東涌新市鎮市區空氣質素的措施。</p> <p>(f) 擬議的填海會使 145 公頃的海域永久消失。根據小</p>	<p>影響和減少海上交通建議／工程船隻路線計劃書的回應。對生態海岸線和全面規劃大嶼山發展的問題詳細回應如下：</p> <p><u>生態海岸線</u></p> <p>累積環境影響評估亦有就在北大嶼山水域可能進行填海的一些地區建造生態海岸線進行研究。當局會制訂詳細的生態海岸線實施計劃，介紹為改善其生態、景觀、視覺及其他功能而設計的生態海岸線、詳細的管理安排及訂明成功指標的監察計劃。該實施計劃會先提交環保署署長審批，獲批准後才展開生態海岸線建造工程。建造生態海岸線並不是未經試驗的全新措施，事實上，已有多個海外地區(例如澳洲的悉尼海港及新加坡的實馬高島)建造了生態海岸線，而在本地亦有採用類似的環保設計的例子，由此可證明生態海岸線措施有效可行。</p> <p><u>全面規劃大嶼山發展</u></p> <p>根據大嶼山發展策略的空間規劃概念，</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p>蠔灣的聲學監測研究，這一帶海域有可能是重要的海豚夜間棲息地。據環評報告所述，環評研究是在遠離擬議填海地點的欣澳進行。另外，二零一三年和二零一四年對海豚在該區活動所作的基線研究資料則受到港珠澳大橋興建工程影響。由於環評報告未能恰當評估環境影響，實不宜繼續審批該草圖。</p> <p>(g) 擬議進行填海的地方與擬議大小磨刀海岸公園相距不足兩公里。根據環評報告，在二零一八年年中至二零一九年年中的施工高峯期，每日駛過擬議大小磨刀海岸公園的工程躉船會有 42 至 56 艘次。當局應禁止東涌新市鎮擴展區計劃的工程躉船進出擬議大小磨刀海岸公園。另外，當局應在二零一九年前把西大嶼山大澳對開的水域劃作海岸公園，補償因填海而失去的生境。這個海岸公園連同其他四個海岸公園(即沙洲及龍鼓洲、大小磨刀、西南大嶼山和第三條跑道附近水域)，將組成海洋保護區網絡，保護海豚。</p> <p>(h) 東涌擴展區工程施工期有部分時間與機場三跑系統工程重疊，屆時每日會有多達 200 艘船在這一帶海域航行，嚴重干擾海洋生境，減低中華白海豚重返</p>	<p>整個大嶼山會按五個主要建議進行發展，分別是(i)北大嶼山走廊集中發展策略性經濟及房屋(包括東涌新市鎮擴展、機場三跑道系統、亞洲國際博覽館擴展、機場北商業區、港珠澳大橋香港口岸上蓋發展及小蠔灣發展)；(ii)東北大嶼山發展休閒、娛樂及旅遊；(iii)東大嶼都會作長遠策略性增長區；(iv)大嶼山大部分地區作保育、休閒、文化及綠色旅遊；以及(v)善用政府土地及開發岩洞。當局已於二零一六年一月尾至四月尾就發展策略舉辦公眾參與活動，為期三個月。政府現正整理和分析在公眾參與活動期間收到的意見，目標在二零一六年年底前公布大嶼山發展藍圖。</p>

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
	<p data-bbox="465 309 725 347">棲息地的意欲。</p> <p data-bbox="383 405 1368 539">(i) 擬議的生態海岸線是未經測試的全新措施，對紓減海豚棲息地和擬議大小磨刀海岸公園受到的影響作用不大。</p> <p data-bbox="383 596 1368 833">(j) 反對闢設私人遊艇停泊處。把東涌東的東北部劃為「其他指定用途」註明「遊艇會所、船隻修理及與遊艇停泊處發展有關的商業設施」地帶，供私人遊艇會使用，將使該處的碼頭被私有化。當局應闢設避風塘供小型船隻及水上活動使用。</p> <p data-bbox="383 890 1368 1024">(k) 擬議「住宅(甲類)」地帶和「住宅(乙類)」地帶會使東涌和「政府、機構及社區」地帶內擬建的學校所在之處空氣質素惡化。</p> <p data-bbox="383 1082 1368 1318">(l) 申述人關注到，當局並沒有保證在連綿的公園網絡和主要街道沿途計劃闢設的地區零售設施是為當地居民闢設，也不保證會把設施租予當地居民。在現時的東涌新市鎮闢設地區市集，由獲授權的小販經營，會更適合當地居民。</p>	

申 述 編 號 S/I-TCE/1-	申 述 的 理 據 / 建 議	規 劃 署 的 回 應
R 53	<p>(a) 反對該草圖所劃設的土地用途地帶，現劃設的土地用途地帶未能解決其關注填海對生態造成影響的問題。</p> <p>(b) 擬議填海地點距離二零一六年年底成立的擬議大小磨刀海岸公園不足兩公里。二零一八年年中至二零一九年年底間將有 42 至 56 艘工程躉船在擬議大小磨刀海岸公園範圍內或一帶水域航行。</p> <p>(c) 該計劃與三跑道系統計劃的部分施工期重疊，海上交通繁重會嚴重干擾擬議大小磨刀海岸公園範圍內和一帶水域的海洋生境，減低中華白海豚返回該棲息地的意欲。成立擬議的大小磨刀海岸公園，是要為興建港珠澳大橋所造成的環境影響作出補償，海洋生境受干擾會削弱該公園的功能。東涌新市鎮擴展區計劃的工程躉船應禁止駛入擬議大小磨刀海岸公園。當局應在二零一九年前把西大嶼山大澳對開的水域劃作海岸公園，補償因填海而失去的生境。聯同另外四個海岸公園(即沙洲及龍鼓洲海岸公園、大小磨刀海岸公園、大嶼山西南海岸公園，以及三跑道附近的海岸公園)，將可為海豚構建一個海洋保護區網絡。</p>	<p>見城規會文件第 6.20 至 6.28 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。對生態海岸線的問題詳細回應如下：</p> <p><u>生態海岸線</u></p> <p>累積環境影響評估亦有就在北大嶼山水域可能進行填海的一些地區建造生態海岸線進行研究。當局會制訂詳細的生態海岸線實施計劃，介紹為改善其生態、景觀、視覺及其他功能而設計的生態海岸線、詳細的管理安排及訂明成功指標的監察計劃。該實施計劃會先提交環保署署長審批，獲批准後才展開生態海岸線建造工程。建造生態海岸線並不是未經試驗的全新措施，事實上，已有多個海外地區(例如澳洲的悉尼海港及新加坡的實馬高島)建造了生態海岸線，而在本地亦有採用類似的環保設計的例子，由此可證明生態海岸線措施有效可</p>

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	(d) 擬議的生態海岸線是在本港未經測試的措施，應先經過測試才採用。	行。
R 54	<p>(a) 對該草圖及擬議填海工程對海洋環境可能造成的影響深表關注。</p> <p>(b) 約有 145 公頃的海牀將因填海而消失，惟卻沒有建議緩解或補償措施，以紓減直接生境損失的影響。</p> <p>(c) 計劃涵蓋範圍的鄰近水域(即擬議大小磨刀海岸公園、大蠔灣及小蠔灣等)均為中華白海豚的棲息地，惟重要程度各異。然而，由於過去和現在的填海工程對海豚的威脅不斷升級，加上環境質素持續下降，並有傾倒廢料和興建各種設施的活動，船隻交通亦日益頻繁，連同水質和噪音污染的問題，北大嶼山水域的海豚數目因而大幅銳減。</p> <p>(d) 擬議填海工程與若干大型填海工程項目(即港珠澳大橋及三跑道系統)的施工期重疊，累積影響所及，會失去大量海洋生境，對中華白海豚造成干擾。這些珍貴的海洋哺乳動物重返擬議大小磨刀海岸公園棲息繁衍的機會渺茫。</p>	<p>見城規會文件第 6.20 至 6.32 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。對水底噪音影響評估及中華白海豚夜間活動的水底聲學監測、生態海岸線、漁業、懸浮固體含量超標、雙層淤泥屏障的問題詳細回應如下：</p> <p><u>水底噪音影響評估及中華白海豚夜間活動的水底聲學監測</u></p> <p>參照累計性環評結果，海豚夜間活躍於東涌東水域的機會也不大。除三跑道系統計劃的環評研究及累計性環評研究外，當局收集了聲學數據，作為海豚晝夜出沒情況的補充資料。聲學數據顯示在一些調查地點，如香港國際機場三跑道系統計劃涵蓋的機場北部及累計性環評研究涵蓋的小蠔灣，海豚夜間較日間</p>

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	<p>(e) 近來錄得有個別海豚由北大嶼山和西北大嶼山的水域遷往大澳和分流一帶水域棲息生活，相信是受港珠澳大橋工程影響和海上交通量增加所致。</p> <p>(f) 擬議大小磨刀海岸公園將於二零一六年年年底成立，作為港珠澳大橋香港口岸發展計劃的補償措施。施工高峯期間，每天將約有 42 至 56 艘船隻來往該區。倘三跑道系統計劃延誤推行，令擬議填海工程與三跑道系統計劃的施工高峯期重疊，每天往來的工程船隻可多達 236 艘，二零一七至一八年間的海上交通將極為繁忙。當局應在二零一九年前把西大嶼山大澳對開的水域劃作海岸公園，補償因填海而失去的生境。只有形成一個有效管理的龐大海岸公園網絡，才可確保所有重要的海豚生境均受到保護，令為數不斷減少的地豚得以繁衍種羣。</p> <p>(g) 大量船隻在擬議大小磨刀海岸公園一帶往來頻繁，會對地豚造成重大干擾，並會削弱擬議大小磨刀海岸公園的保育效果。東涌新市鎮擴展區計劃的工程躉船應禁止駛入擬議大小磨刀海岸公園。</p> <p>(h) 沒有進行研究調查因海上交通量(包括行駛及停泊的船隻)增加而產生的水底噪音所造成干擾的程度。海</p>	<p>更為活躍。然而，這些地點日間的地豚活動也不少，故全被定為地豚棲息地。此外，根據漁護署涵蓋香港口岸施工前後期間的同一批長期監察數據，欣澳並非地豚的重要棲息地。累計性環評報告並無建議在當地進行陸上調查，惟當局進行了聲學調查，在欣澳進行水底聲學監測，收集日間和夜間的聲學數據，以核實當地夜間地豚會否甚是活躍。聲學監測結果顯示，夜間情況並無顯著不同，地豚無論晝夜也很少使用有關水域。因此，當局總結認為，地豚甚少或僅偶爾使用欣澳水域。這些監測結果可作為參考資料，以評估地豚甚少使用之水域(如東涌東水域)的夜間地豚出沒情況。</p> <p><u>生態海岸線</u></p> <p>累積環境影響評估亦有就在北大嶼山水域可能進行填海的一些地區建造生態海岸線進行研究。當局會制訂詳細的生態海岸線實施計劃，介紹為改善其生態、景觀、視覺及其他功能而設計的生態海</p>

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	<p>上交通量增加亦會構成阻礙海豚利用聲音和回音通訊的危機，同時干擾海豚用回音定位。船隻發出的高噪音會使海豚受傷或受滋擾，這可從牠們行為的改變及發出的聲音訊號反映出來。因此，應進行水底噪音影響評估。</p> <p>(i) 環評中沒有進行調查，實地考察海豚的夜間活動，就中華白海豚所作的影響評估並不全面，而且具誤導性。應在工程計劃範圍進行一系列為期至少半年的被動聲學偵測，以確定中華白海豚是否不常於晚間在該範圍活動。</p> <p>(j) 強烈反對劃設「其他指定用途」註明「遊艇會所、船隻修理及與遊艇停泊處發展有關的商業設施」地帶。往來船隻數量上升，水底噪音增大，都會干擾附近海豚的生境，亦會導致海豚的行為改變，令牠們離開其主要生境。設置遊艇停泊處令船隻數量增加，這亦可能增加海豚被殺或受傷的機會。環評報告沒有清楚顯示及提供理據證明有需要在東涌設置可容納 95 艘遊艇的遊艇停泊處。</p> <p>(k) 對生態海岸線的保育效果和成本效益存疑。有關生態海岸線只會視作為改善措施而非緩解措施。在人</p>	<p>岸線、詳細的管理安排及訂明成功指標的監察計劃。該實施計劃會先提交環保署署長審批，獲批准後才展開生態海岸線建造工程。建造生態海岸線並不是未經試驗的全新措施，事實上，已有多個海外地區(例如澳洲的悉尼海港及新加坡的實馬高島)建造了生態海岸線，而在本地亦有採用類似的環保設計的例子，由此可證明生態海岸線措施有效可行。</p> <p><u>漁業</u></p> <p>已根據東涌新市填擴展區的環評進行漁業影響評估，而該環評報告已在二零一六年四月獲環境保護署核准。根據 2006 年捕魚作業及生產調查，地圖上方格涵蓋的擬議填海範圍內的漁產量屬於低至極低。該區每年漁產量的損失最多僅為約 15 公噸，與二零一四年約 160 000 公噸的漁產量相比，影響幅度不算很大，因為有關地區的漁產量根本不多。</p>

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	<p>工海堤築建生態海岸線，很大機會須額外犧牲 16 公頃的海床。應先就現有人工斜面海堤進行人工海岸線的試驗性研究，以便在採用有關生態海岸線作為任何發展計劃的緩解措施前，對不同的設計及其保育功能和效果進行測試。</p> <p>(l) 關注數項大型填海工程的施工期重疊所造成的累積影響，因為會導致該區失去大量海洋生境，亦會對中華白海豚造成干擾，亦會削弱擬設的大小磨刀海岸公園的保育效果，尤其是因為累計懸浮固體含量超標。</p> <p>(m) 漁業影響評估有欠公平。應重新計算在香港及大嶼山水域經常有捕魚活動的捕魚區總面積，並重新評估工程對漁民作業有何影響及其影響程度。</p> <p>(n) 過量的沉積物將會削弱此等保育措施的作用，亦會減低保護及恢復漁業資源和供給中華白海豚的食物方面的成效。應在東涌東採用雙層淤泥屏障，以及每月在擬設的大小磨刀海岸園抽取海水樣本化驗。</p>	<p><u>懸浮固體含量超標</u></p> <p>根據東涌新市鎮擴展計劃已核准的環評報告，大小磨刀洲懸浮固體含量超標的原因是採用了保守的假設，考慮沙洲以東的污泥坑的環境許可證所訂明的污泥棄置量上限(即每日 600 公噸)，而非每日 158 公噸的實際棄置量。因此，根據環評報告，不大可能會出現有關的超標情況。東涌新市鎮擴展計劃已核准的環評報告顯示，在懸浮固體量當中，來自有關工程計劃的僅佔約 2%，因此不大可能對水質造成不良影響。</p> <p><u>雙層淤泥屏障</u></p> <p>根據東涌新市鎮擴展計劃已核准的環評報告，裝設淤泥屏障的建議及採用良好的管理方法足以把擬議填海工程可能對水質造成的影響減至可接受水平(即符合既定標準)。</p>
R 55	(a) 反對進行擬議的填海工程。	見城規會文件第 6.16 至 6.32 段及上文另對 R5 至 R7 有關同期進行的工程

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	<p>(b) 環評有很多不足之處，而且環評所進行的評估就是不足。</p> <p>(c) 擬議的填海工程涵蓋東涌以東約 145 公頃的海床，會使該區永久失去鄰近的沿岸地區。大嶼地區有多種具保育價值的水生物種，即馬蹄蟹及香魚。這些物種可以利用將進行填海工程的沿岸淺水地區存活。應充分處理及有效地緩解填海工程可能對香魚、馬蹄蟹及中華白海豚造成的影響。</p> <p>(d) 由於填海地點會有很多住宅區，因此區內的總體人口將激增。該區的生態質素會因為人類活動有所增加而受到影響。</p> <p>(e) 施工期內，海上交通流量將有所增加，對北大嶼水域及擬議的大小磨刀海岸公園的海豚棲息地構成壓力。海上交通有所增加會對中華白海豚造成長遠的影響，例如水底噪音、與船隻發生碰撞及視覺受到干擾等。沿岸海上棲息地面積減少及海上交通有所增加會損害擬議的大小磨刀海岸公園的保育功能。</p> <p>(f) 其他進行中／已規劃的計劃(例如機場三跑道系統及</p>	<p>計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。</p>

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	<p>港珠澳大橋)或會使海豚從東北大嶼水域絕跡。</p> <p>(g) 擬議的填海工程違反《生物多樣性公約》所訂的原則。政府應充分尊重、承諾和執行《生物多樣性公約》的原則。</p> <p>(h) 擬議的低至中密度住宅發展不能有效地解決房屋問題。</p> <p>(i) 一份近期的報告泛指香港有 1 192 公頃棕地可供使用。應善用現有的土地資源，而不是以填海的方式不斷增加土地供應。</p>	
R 56	<p>(a) 東涌的環境及周邊水域的生態、社區設施及就業機會，以及交通設施的負荷能力。應在擴展區及鄰近逸東邨的地區指定更多「政府、機構或社區」用地，以便提供東涌居民已爭取多年的街市、墟市及市政大廈。關注擬在東涌擴展區設置的商場的設計主要是為遊客提供服務，不能滿足居民需要的問題。</p> <p>(b) 東涌擴展區有大量高密度的住宅發展，而且鄰近港珠澳大橋及機場跑道。空氣質素欠佳會嚴重損害居</p>	<p>見城規會文件第 6.16 至 6.38、6.40 段及上文另對 R5 至 R7 有關同期進行的工程計劃施工高峯期重疊、中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。</p>

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	<p>民的健康。應檢討擬議的填海區，並降低東涌擴展區的發展密度，以確保東涌市中心的空氣質素。</p> <p>(c) 施工期內，區內會有多達 42 至 56 艘船。萬一擬議的填海工程與機場三跑道系統計劃的施工期重疊，便會有超過 200 艘船駛進西北大嶼山的海域。擬在建議填海區附近設立的大小磨刀海岸公園是要為港珠澳大橋所造成的環境影響作出補償。擬議的填海工程會對擬議的大小磨刀海岸公園的生態構成威脅。</p> <p>(d) 應刪除擬議的遊艇停泊處，讓公眾在無障礙的環境享用海濱的設施。</p> <p>(e) 當局應進行基線調查及策略性環境影響評估，以評估每項在大嶼山進行的填海項目對周邊環境的累積影響。</p> <p>(f) 當局應進行檢討，審視東涌道路網、北大嶼山公路，以及屯門至赤蠟角連接路在東涌擴展區的發展完成後的車流量，以及東涌線的負荷。</p>	

申述編號 S/I-TCE/1-	申述的理據／建議	規劃署的回應
R57	<p>(a) 反對該草圖。</p> <p>(b) 香港海豚保育學會錄得該區的海豚數目減少。擬議的填海工程會進一步威脅中華白海豚及其生境。</p> <p>(c) 擬議的大小磨刀海岸公園是要為港珠澳大橋計劃所造成的環境影響作出補償。擬議的填海工程會令海上交通流量增加，嚴重影響鄰近擬設的大小磨刀海岸公園的生態及其效益。</p> <p>(d) 為興建公路及單車公園所進行的擬議填海工程會伸展至大蠔河河口，影響該區及「具特殊科學價值地點」的生態。</p> <p>(e) 東涌的空氣質素差，雖然環評報告指機場三跑道系統工程及汽車廢氣的排放量可以接受，但機場三跑道系統工程計劃的環評報告仍處於司法覆核階段，有關內容不應用作參考。三跑道系統工程計劃的環評報告並沒有包括臭氧評估。政府現正收緊空氣質素指標的標準，現有的環評報告及建議的緩解措施須符合經檢討的空氣質素指標。</p> <p>(f) 東涌未來的人口會令該區的承受力不勝負荷(交通和</p>	<p>見城規會文件第 6.16 至 6.28、6.33 至 6.38 段及上文另對 R5 至 R7 有關中華白海豚所受影響和減少海上交通建議／工程船隻路線計劃書的回應。對機場三跑道系統工程計劃的臭氧評估及小蠔灣和欣澳填海的問題回應如下：</p> <p><u>機場三跑道系統工程計劃的臭氧評估</u></p> <p>環境保護署表示，擬議的機場三跑道系統工程計劃的經核准環評報告的空氣質素評估，內容已涵蓋臭氧。正如環評報告所解釋，機場運作所排出的一氧化氮，在光化學過程中會與臭氧產生作用，形成二氧化氮，令附近受體的臭氧濃度減低。因此，臭氧並不是環評研究中值得進一步評估的主要空氣污染物。</p> <p><u>在小蠔灣和欣澳填海</u></p> <p>規劃署總城市規劃師／策略規劃表示，根據大嶼山發展諮詢委員會所提出策略的空間規劃概念，在小蠔灣填海會形成「北大嶼山走廊」，作策略性經濟及房屋發展；而在欣澳填海會發展作「東北</p>

申 述 編 號 S/I-TCE/1-	申 述 的 理 據 / 建 議	規 劃 署 的 回 應
	<p>設施不敷應用)。東涌的空氣質素差，會危害居民的健康。當局應相議和檢討人口增加對社區帶來壓力的問題。</p> <p>(g) 不應再於小蠔灣及欣澳填海。</p> <p>(h) 政府應善用現有的土地資源，例如使用市區的軍營用地及棕地，以取代於東涌填海。</p>	<p>大嶼發展休閒、娛樂及旅遊」。土木工程拓展署委聘顧問公司進行西部水域三個近岸填海地點的累計性環境影響評估研究，該項研究於二零一五年完成，從策略層面探討可能填海地點(包括小蠔灣及欣澳)的工程及西面水域其他施工中和已承諾／規劃／建議的發展項目對生態可能造成的累積影響。</p>
R 58	<p>不反對該草圖，但就消滅現有東涌線和機場快線對附近擬議住宅發展項目的鐵路噪音影響的措施提出意見。倘商業發展項目的興建進度(如隔音設施)與住宅發展項目的入伙時間不能配合，日後的物業發展倡議者應(i)為有關的住宅用地另進行噪音檢討；此外，(ii)就東涌線和機場快線可能造成的影響進行詳細的噪音檢討。規劃大綱、法定圖則及／或土地行政文件應訂明這些要求。</p>	<p>見城規會文件第6.43段。</p>

對申述的意見的摘要及規劃署的回應

意見編號 S/I-TCE/1-	意見的理據／建議	規劃署的回應
C1	<p>(a) 質疑是否有需要填海；認為R1有關檢討「商業」地帶的建議和R58有關消減噪音措施的建議不能解決填海帶來的社區和環境問題。</p> <p>(b) 認為應取消遊艇停泊設施，還海濱於公眾，讓公眾可在海濱進行各種活動。</p>	見城市規劃委員會(下稱「城規會」)文件第 6.11 至 6.13、6.16 至 6.38 及 6.43 段。
C2	<p>(a) 反對R2的申述，認為擬議的遊艇停泊處會令更多船隻進出該海域，影響海洋生境，故應取消該設施。</p> <p>(b) 認同R52的申述，特別是他們要求把整個大嶼山納入陸上和海洋生態基線研究範圍。</p>	見城規會文件第 6.14 至 6.23、6.27 至 6.38 段。
C3 to C9	<p>(a) 支持R2的建議，在東涌撥出用地供水上運動之用。</p> <p>(b) 現時東涌並無水上運動設施，實有迫切需要為東涌的年輕人提供動態運動設施。</p> <p>(c) 毗鄰逸東邨的擬議用地是闢設水上運動中心的理想地方，因為該地點交通便利，可供大量人流出入，而該處的屏蔽水域亦適合進行水上運動。</p>	見城規會文件第 6.14 及 6.15 段。

	<p>(d) 支持在新填海區闢設人工海灘和水上活動設施的建議。</p> <p>(e) 東涌是進行水上運動的理想地方，支持劃定水上活動中心用地。</p>	
C10	<p>(a) 支持R5至R11、R13和R14的申述，反對闢設遊艇停泊處，因為這會把公共空間私有化。</p> <p>(b) 草圖須訂明避風塘及供公眾使用的周邊土地。</p>	見城規會文件第 6.16 至 6.23、6.29 至 6.32 段。
C11	<p>(a) 支持R3至R57的申述。</p> <p>(b) 應建立地區經濟。</p> <p>(c) 反對把農地改作其他用途，並要求把農地保留作農業用途。</p>	見城規會文件第 6.16 至 6.42 段。
C12及C66	<p>(a) 支持R3至R57的申述。</p> <p>(b) 應保護東涌的自然環境。</p>	見城規會文件第 6.16 至 6.42 段。
C13、C26、 C38、C41、 C52、C61、 C62、C69、	<p>(a) 支持R3至R57。</p> <p>(b) 有需要在東涌興建由食物環境衛生署(下稱「食環署」)營運的街市。</p>	見城規會文件第 6.16 至 6.42 段。

C72		
C14	<p>(a) 支持R3至R57的申述。</p> <p>(b) 有需要在東涌興建由食環署營運的街市。</p> <p>(c) 政府應進行有關在東涌興建水路交通設施的研究。</p>	見城規會文件第 6.16 至 6.42 段。
C15	<p>(a) 支持R3至R57的申述。</p> <p>(b) 有需要在東涌興建由食環署營運的街市。</p> <p>(c) 反對「領展」出售物業及反對大型連鎖店的發展。</p>	見城規會文件第 6.16 至 6.42 段。
C16、C18、 C20、C21、 C23、C24、 C25、C29、 C30、C32、 C36、C39、 C40、C42至 C45、C47至 C50、C53至 C57、C60、 C63、C65、 C67、C68、	支持 R3 至 R57 的申述。	見城規會文件第 6.16 至 6.42 段。

C71、C73至C75		
C17	(a) 支持R3至R57的申述。 (b) 應改善及增加連接該區和香港國際機場的小巴服務。	見城規會文件第 6.16 至 6.42 段。
C19	(a) 支持R3至R57的申述。 (b) 有需要在東涌興建至少一個由食環署營運的街市。 (c) 計算東涌的交通容量時，應採用較低的飽和點。	見城規會文件第 6.16 至 6.42 段。
C22	(a) 支持 R3至R57 的申述。 (b) 應盡快落實東涌西鐵路站的工程。 (c) 應保留東涌灣。	見城規會文件第 6.16 至 6.42 段。
C27	(a) 支持 R3至R57 的申述。 (b) 應保護郊區。	見城規會文件第 6.16 至 6.42 及 7.2 段。
C28	(a) 支持 R3至R57 的申述。 (b) 有需要在東涌興建市政大廈。	見城規會文件第 6.16 至 6.42 段。

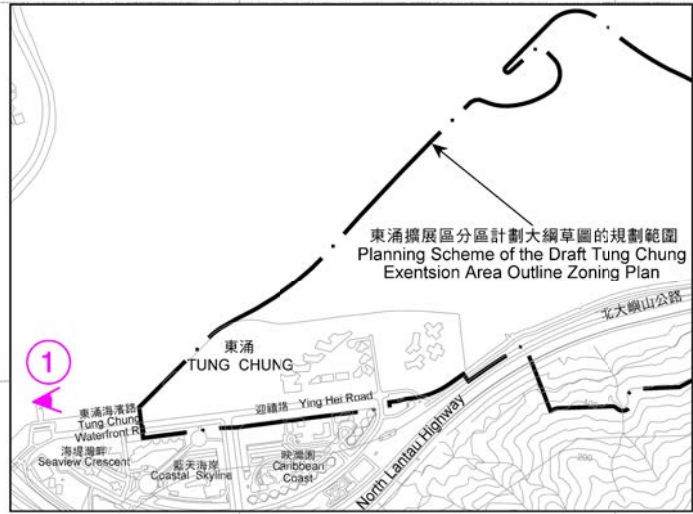
C31	(a) 支持 R3 至 R57 的申述。 (b) 反對發展東涌。	見城規會文件第 6.16 至 6.42 段。
C33	(a) 支持 R3 至 R57 的申述。 (b) 不必有由領展房地產投資信託基金營運的街市。	見城規會文件第 6.16 至 6.42 段。
C34	(a) 支持 R3 至 R57 的申述。 (b) 反對填海。 (c) 首要工作應是完善東涌的社區設施。 (d) 需要就東涌新市鎮擴展區作進一步討論。	見城規會文件第 6.16 至 6.42 段及下列補充回應： 當局進行東涌研究時，已完成三個階段的公眾參與活動，當時曾就是否有需要拓展東涌新市鎮擴展區進行討論，有關的公眾意見亦已適當納入東涌研究提出的建議發展大綱圖。
C35	(a) 支持 R3 至 R57 的申述。 (b) 官商與村民謀取利益。	見城規會文件第 6.16 至 6.42 段。

C37	<p>(a) 支持R3至R57的申述。</p> <p>(b) 東涌需要一個完善的綠化規劃。</p> <p>(c) 應提供充足的本地就業支援。</p> <p>(d) 有需要闢設租金較低廉的街市，以及改善該區的治安和環境衛生。</p>	<p>見城規會文件第 6.16 至 6.42 段及下列補充回應：</p> <p>當局已為東涌市中心和東涌新市鎮擴展區闢設和規劃全面的休憩用地網絡，並進行綠化和美化市容。</p>
C46	<p>(a) 支持R3至R57的申述。</p> <p>(b) 應保留地區特色。</p>	<p>見城規會文件第 6.16 至 6.42 段。</p>
C51	<p>(a) 支持R3至R57的申述。</p> <p>(b) 不應在東涌興建任何商場、展覽中心和度假中心，以及連接內地的橋。</p> <p>(c) 為拯救粉紅海豚，不應進行填海工程。</p>	<p>見城規會文件第 6.16 至 6.42 段。</p>
C58	<p>(a) 支持R3至R57的申述。</p> <p>(b) 有需要在東涌興建由食環署營運的街市。</p> <p>(c) 應降低發展密度。</p>	<p>見城規會文件第 6.16 至 6.42 段。</p>

C59	<p>(a) 支持R3至R57的申述。</p> <p>(b) 有需要在東涌興建由食環署營運的街市。</p> <p>(c) 不應進行沒有理據支持的發展。</p>	見城規會文件第 6.16 至 6.42 段。
C64	<p>(a) 支持R3至R57的申述。</p> <p>(b) 有需要在東涌興建由食環署營運的街市及熟食中心。</p>	見城規會文件第 6.16 至 6.42 段。
C70	<p>(a) 支持R3至R57的申述。</p> <p>(b) 市民的重大需求是在東涌闢建單車徑、大型公園、休憩用地及由食環署營運的街市，而不是發展商業及私人住宅。</p>	見城規會文件第 6.16 至 6.42 段。
C76	<p>(a) 支持R3至R57的申述。</p> <p>(b) 有需要在東涌興建由食環署營運的街市。</p> <p>(c) 不應破壞林地區域。</p> <p>(d) 應改善區內的交通連接。</p>	見城規會文件第 6.16 至 6.42 及 7.2 段。

C77	<p>(a) 支持R3至R57的申述。</p> <p>(b)有需要在東涌興建由食環署營運的街市。</p> <p>(c) 市民對闢設深夜營業的食肆有需求。</p>	<p>見城規會文件第 6.16 至 6.42 段。</p> <p>「食肆」用途可在個別的土地用途帶提供，例如在該分區計劃大綱草圖的「商業」、「住宅（甲類）」、「其他指定用途」註明「商業及住宅發展暨公共交通交匯處」及「其他指定用途」註明「遊艇會所、船隻修理及與遊艇停泊處發展有關的商業設施」地帶。不過，闢設食肆須遵從相關規例，申請人亦須就對周邊地方的影響徵詢政府部門的意見。</p>
C78	<p>(a) 與所有申述無關。支持在該區興建欖球場。</p>	<p>見城規會文件第 7.3 段。</p>

插圖 INSET



擬議填海範圍
PROPOSED RECLAMATION AREA

擬議遊艇停泊處及有關設施
PROPOSED MARINA AND ASSOCIATED FACILITIES

MARINA CLUB, BOAT REPAIRING AND COMMERCIAL FACILITIES
ASSOCIATED WITH MARINA DEVELOPMENT

Tuen Mun - Chek Lap Kok Link (under construction)
屯門至赤鱗角連接路 (施工中)

白芒碼頭
PAK MONG PIER

建議的大橋交匯處
PROPOSED TAI HO INTERCHANGE

路口 (有待詳細設計)
ROAD JUNCTION
(SUBJECT TO DETAILED DESIGN)

大鵬灣
TAI HO WAN

北大嶼郊野公園 (擴建部分)
LANTAU NORTH (EXTENSION) COUNTRY PARK

支持的申述個案編號
SUPPORTIVE REPRESENTATION No. R2
負面的申述個案編號
ADVERSE REPRESENTATIONS No. R3-R57&R59
申述個案編號 R1及R58 沒有指明特定地點
(相關意見 C1)
REPRESENTATIONS No. R1 & R58
DOES NOT INDICATE ANY SPECIFIC SITE
(RELATED COMMENT No. C1)
意見編號 C78 與申述個案無關
COMMENT No. C78
DOES NOT RELATE TO ANY REPRESENTATION

申述個案 Representation No.	相關意見 Related Comment No.
R2	C1-C9
R3-R4,R12, R15-R51, R53,R57 R59	C11-C77
R5-R7,R13	C10-C77
R8-R11,R14 R54-R56 R52	C10-C77 C11-C77 C2,C11-C77

1 實地照片的觀景點 (參閱圖H-3a至H-3b)
VIEWING POINT OF SITE PHOTOS
(REFER PLANS H-3a TO H-3b)

本摘要圖於2016年9月13日擬備，
所根據的資料為2016年1月8日
展示的分區計劃大綱圖編號S/I-TCE/1
EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON OUTLINE ZONING PLAN No.
S/I-TCE/1 EXHIBITED ON 8.1.2016

位置圖 LOCATION PLAN
就東涌擴展區分區計劃大綱草圖編號S/I-TCE/1提出的申述個案編號R1-R59號
以及相關意見個案編號C1-C78作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R59
AND RELATED COMMENTS No. C1 - C78
DRAFT TUNG CHUNG EXTENSION AREA OUTLINE ZONING PLAN No. S/I-TCE/1

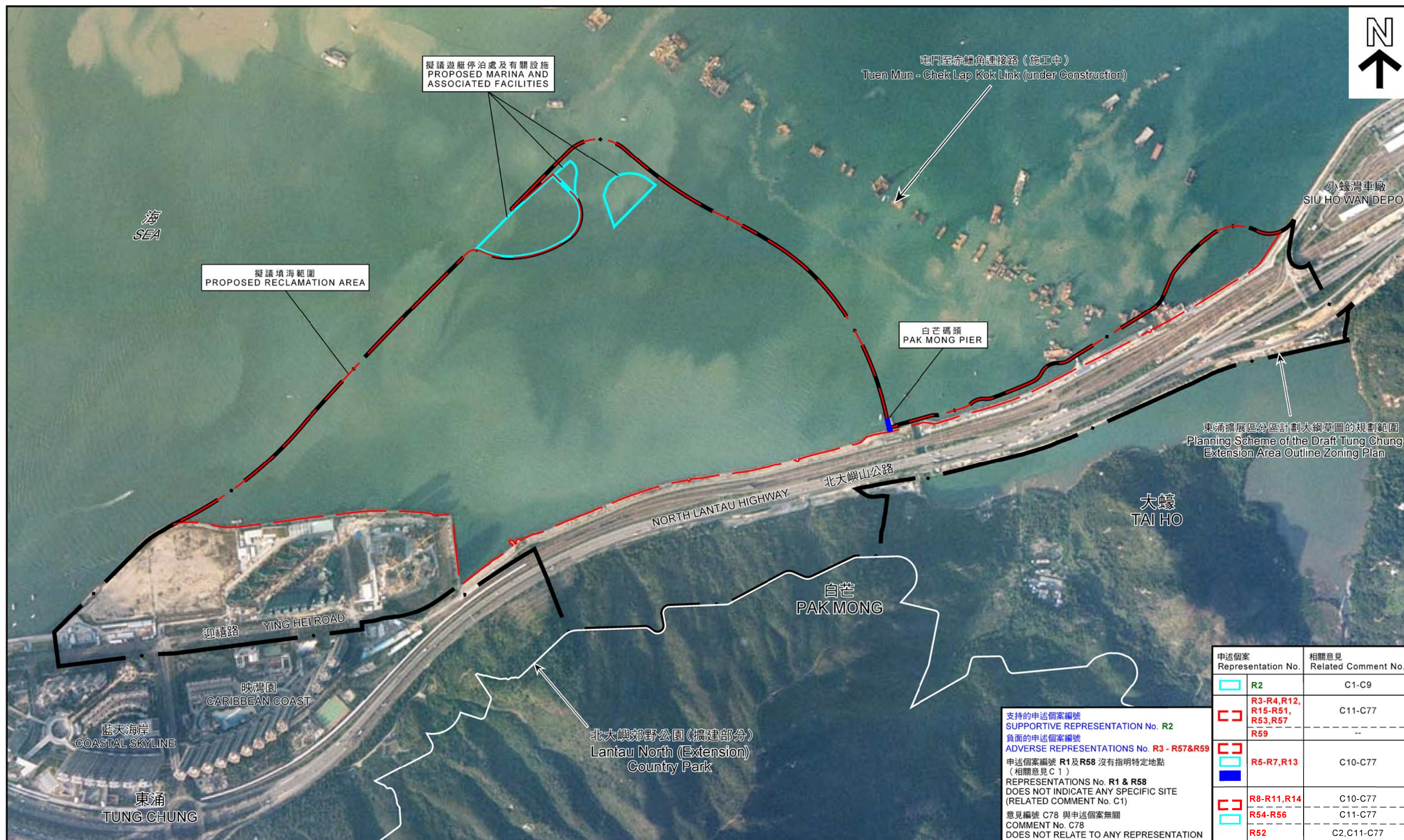
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規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCE/1-1 to 59

圖 PLAN
H - 1



支持的申述個案編號
SUPPORTIVE REPRESENTATION No. R2
負面的申述個案編號
ADVERSE REPRESENTATIONS No. R3 - R57&R59
申述個案編號 R1及R58 沒有指明特定地點
(相關意見 C1)
REPRESENTATIONS No. R1 & R58
DOES NOT INDICATE ANY SPECIFIC SITE
(RELATED COMMENT No. C1)
意見編號 C78 與申述個案無關
COMMENT No. C78
DOES NOT RELATE TO ANY REPRESENTATION

申述個案 Representation No.	相關意見 Related Comment No.
R2	C1-C9
R3-R4,R12, R15-R51, R53,R57 R59	C11-C77 --
R5-R7,R13	C10-C77
R8-R11,R14 R54-R56 R52	C10-C77 C11-C77 C2,C11-C77

本摘要圖於2016年9月13日擬備，
所根據的資料為地政總署於2014年12月16日
拍得的航攝照片編號CW110981

EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON AERIAL PHOTO No. CW110981
TAKEN ON 16.12.2014 BY
LANDS DEPARTMENT

航攝照片 AERIAL PHOTO

就東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 提出的申述個案編號 R1 - R59 號
以及相關意見個案編號 C1 - C78 作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R59
AND RELATED COMMENTS No. C1 - C78
DRAFT TUNG CHUNG EXTENSION AREA OUTLINE ZONING PLAN No. S/I-TCE/1

規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCE/1-1 to 59

圖 PLAN
H - 2

觀景點 VIEWING POINT 1



觀景點 VIEWING POINT 2



實地照片 SITE PHOTOS

就東涌擴展區分區計劃大綱草圖編號 S / I - T C E / 1 提出的申述個案編號 R 1 - R 5 9 號
以及相關意見個案編號 C 1 - C 7 8 作出考慮

CONSIDERATION OF REPRESENTATIONS No. R1 - R59 AND RELATED COMMENTS No. C1 - C78
DRAFT TUNG CHUNG EXTENSION AREA OUTLINE ZONING PLAN No. S/I-TCE/1

規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCE/1-1 to 59

圖 PLAN
H - 3a

本圖於2016年9月13日擬備，
所根據的資料為攝於2016年7月的實地照片
PLAN PREPARED ON 13.9.2016
BASED ON SITE PHOTOS TAKEN IN JULY

屯門至赤鱗角連接路（施工中）
Tuen Mun - Chek Lap Kok Link (under Construction)

觀景點 VIEWING POINT 3



屯門至赤鱗角連接路（施工中）
Tuen Mun - Chek Lap Kok Link (under Construction)

觀景點 VIEWING POINT 4



申述個案編號 R 5 - R 7 及 R 1 3 號
REPRESENTATIONS No. R5 - R7 & R13

實地照片 SITE PHOTOS

就東涌擴展區分區計劃大綱草圖編號 S / I - T C E / 1 提出的申述個案編號 R 1 - R 5 9 號
以及相關意見個案編號 C 1 - C 7 8 作出考慮

CONSIDERATION OF REPRESENTATIONS No. R1 - R59 AND RELATED COMMENTS No. C1 - C78
DRAFT TUNG CHUNG EXTENSION AREA OUTLINE ZONING PLAN No. S/I-TCE/1

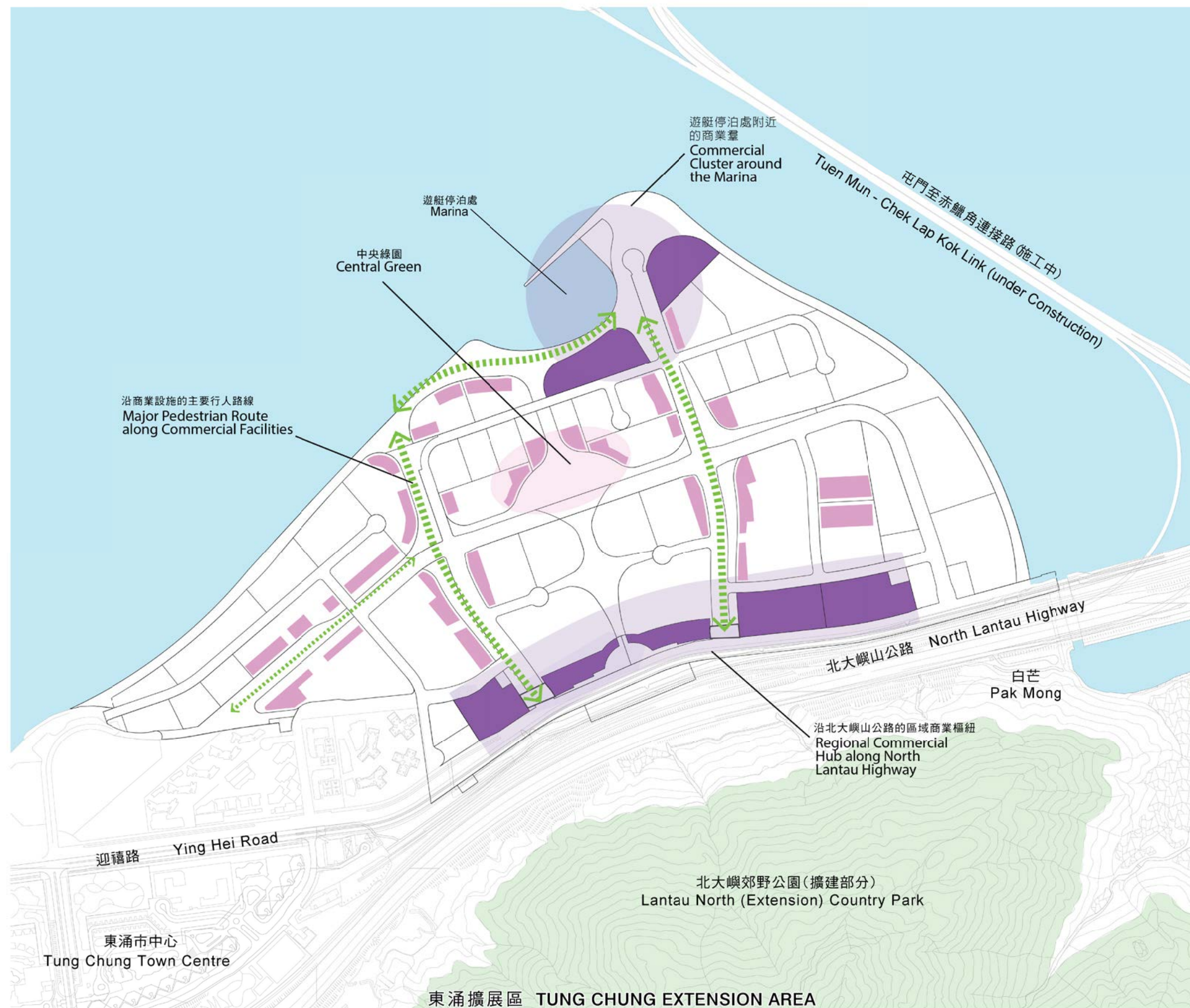
規 劃 署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCE/1-1 to 59

圖 PLAN
H - 3b

本圖於2016年8月11日擬備，
所根據的資料為攝於2016年7月的實地照片
PLAN PREPARED ON 11.8.2016
BASED ON SITE PHOTOS TAKEN IN JULY



圖例 LEGEND

- 區域商業設施
REGIONAL COMMERCIAL FACILITIES
- 地區商業設施
LOCAL COMMERCIAL FACILITIES
- 沿商業設施的主要行人路線
MAJOR PEDESTRIAN ROUTE
ALONG COMMERCIAL FACILITIES

只作顯示用途
FOR INDICATIVE PURPOSE ONLY

商業設施概念 COMMERCIAL FACILITIES CONCEPT

就東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 提出的申述個案編號 R1-R59 號
以及相關意見個案編號 C1-C78 作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R59
AND RELATED COMMENTS No. C1 - C78
DRAFT TUNG CHUNG EXTENSION AREA OUTLINE ZONING PLAN No. S/I-TCE/1

規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/S/I-TCE/1-1 to 59

圖 PLAN
H - 4

本摘要圖於2016年8月19日擬備，
所根據的資料為東涌新市鎮擴展研究
EXTRACT PLAN PREPARED ON 19.8.2016
BASED ON TUNG CHUNG NEW TOWN EXTENSION STUDY



圖例 LEGEND	
	擬議主要行人路線 PROPOSED KEY PEDESTRIAN ROUTE
	擬議次要行人路線 PROPOSED SECONDARY PEDESTRIAN ROUTE
	現有/已計劃的行人路線 EXISTING / PLANNED PEDESTRIAN ROUTE
	擬議單車路線 PROPOSED CYCLING ROUTE
	現有/已計劃的單車路線 EXISTING / PLANNING CYCLING ROUTE
	鐵路車站 RAILWAY STATION
	鐵路車站外的500米半徑範圍 500M RADIUS FROM RAILWAY STATION
	公共運輸交匯處 PUBLIC TRANSPORT INTERCHANGE
	擬議行人天橋 PROPOSED FOOTBRIDGE

只作顯示用途
FOR INDICATIVE PURPOSE ONLY

行人和單車徑網絡概念 PEDESTRIAN AND CYCLING NETWORK CONCEPT

就東涌擴展區分區計劃大綱草圖編號 S / I - T C E / 1 提出的申述個案編號 R 1 - R 5 9 號
以及相關意見個案編號 C 1 - C 7 8 作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R59
AND RELATED COMMENTS No. C1 - C78
DRAFT TUNG CHUNG EXTENSION AREA OUTLINE ZONING PLAN No. S/I-TCE/1

本摘要圖於2016年8月19日擬備，
所根據的資料為東涌新市鎮擴展研究
EXTRACT PLAN PREPARED ON 19.8.2016
BASED ON TUNG CHUNG NEW TOWN EXTENSION STUDY

規劃署
PLANNING DEPARTMENT



參考編號
REFERENCE No.
R/I-TCE/1-1 to 59

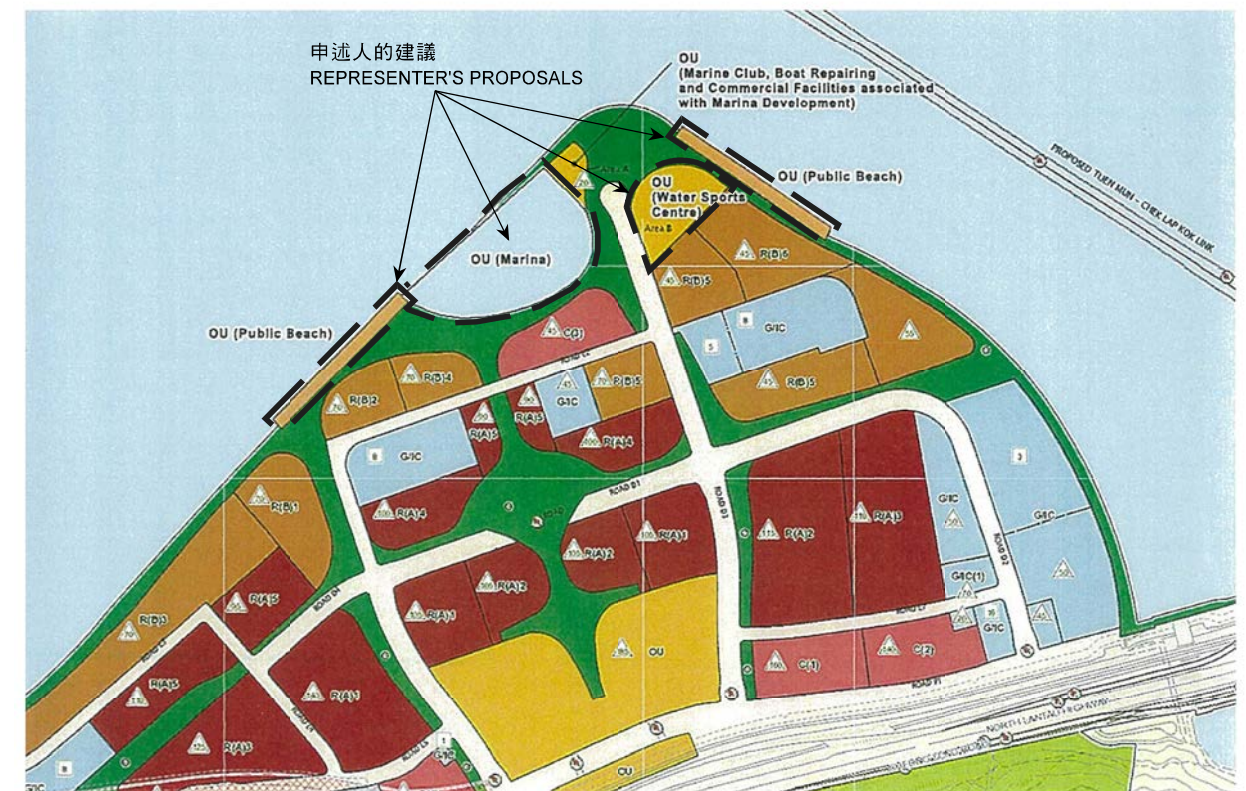
圖 PLAN
H - 5



現存的東涌擴展區分區計劃大綱圖
EXISTING TUNG CHUNG EXTENSION AREA OZP



方案 OPTION 1



方案 OPTION 2

