就草圖作出申述
Representation Relating to Draft Plan

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

參考編號
Reference Number: 160207-111721-28810

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

提交日期及時間
Date and time of submission: 07/02/2016 11:17:21

提出此宗申述的人士
Person Making This Representation: 南嶺村村代表李康庭、石榴埔村村代表羅維洪 及 石榴埔村村民

申述詳情
Details of the Representation :

與申述相關的草圖
Draft plan to which the representation relates: S/I-TCV/1

申述的性質及理由
Nature of and reasons for the representation:

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

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

001

敬啓者:

就有關於《東涌谷分區計劃大綱圖 S/I-TCV/1》提出申述

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

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

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

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

此致：
城市規劃委員會

南輋村發展及管理團體
南輋村村代表李康庭、石榴埔村村代表羅維洪 及 石榴埔村村民 敬上
電郵：[redacted]
二零一六年二月十一日

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2016 FEB 12 P 4:26
TOWN PLANNING BOARD

002

敬啟者：

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

本人關偉安，為東涌稔園村原居民代表。

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

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

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

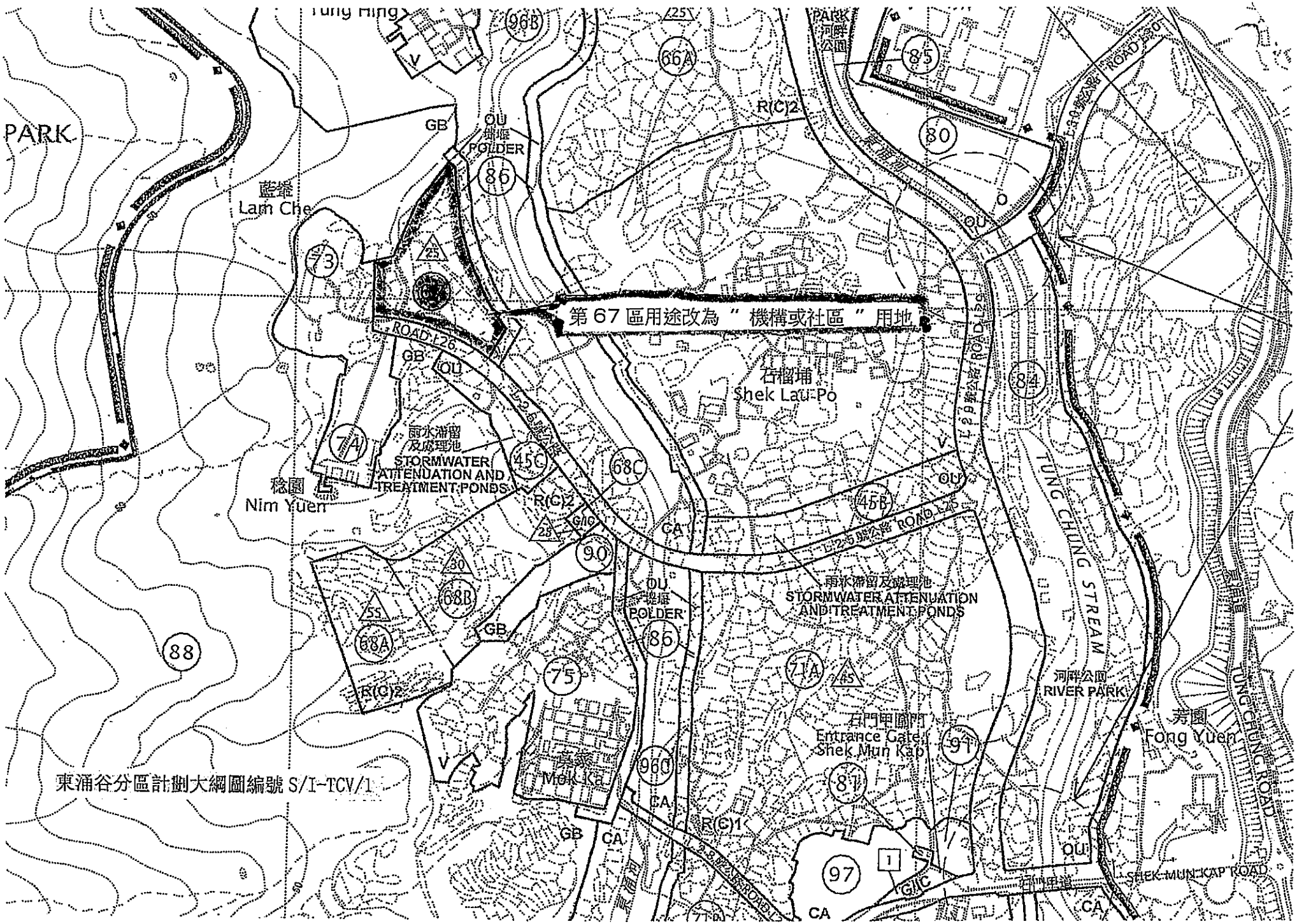
有見及此，本人希望貴會能體會地區實際所需，將第 67 區的土地規劃用途修改成：機構或社區用地，實感德便。

此致
城市規劃委員會秘書

東涌稔園村原居民代表關偉安
暨
村民 上

聯絡電話：[redacted]

2016 年 3 月 1 日


第67區用途改為"機構或社區"用地
藍塘
Lam Che
石榴埔
Shek Lau Po
稔園
Nim Yuen
雨水滯留及處理池
STORMWATER ATTENUATION AND TREATMENT PONDS
OU
堤堰
POLDER
GB
CA
R(C)2
R(C)1
G/IC
ROAD L26
ROAD L25
TUNG CHUNG STREAM
東涌河
河畔公園
RIVER PARK
芳園
Fong Yuen
石門甲圓門
Entrance Gate
Shek Mun Kap
SHEK MUN KAP ROAD
東涌谷分區計劃大綱圖編號 S/I-TCV/1

敬啟者：

有關東涌谷分區計劃大綱圖編號 S/I-TCV/1

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

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

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

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

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

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- 8 MAR 2016
Town Planning Board

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

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

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

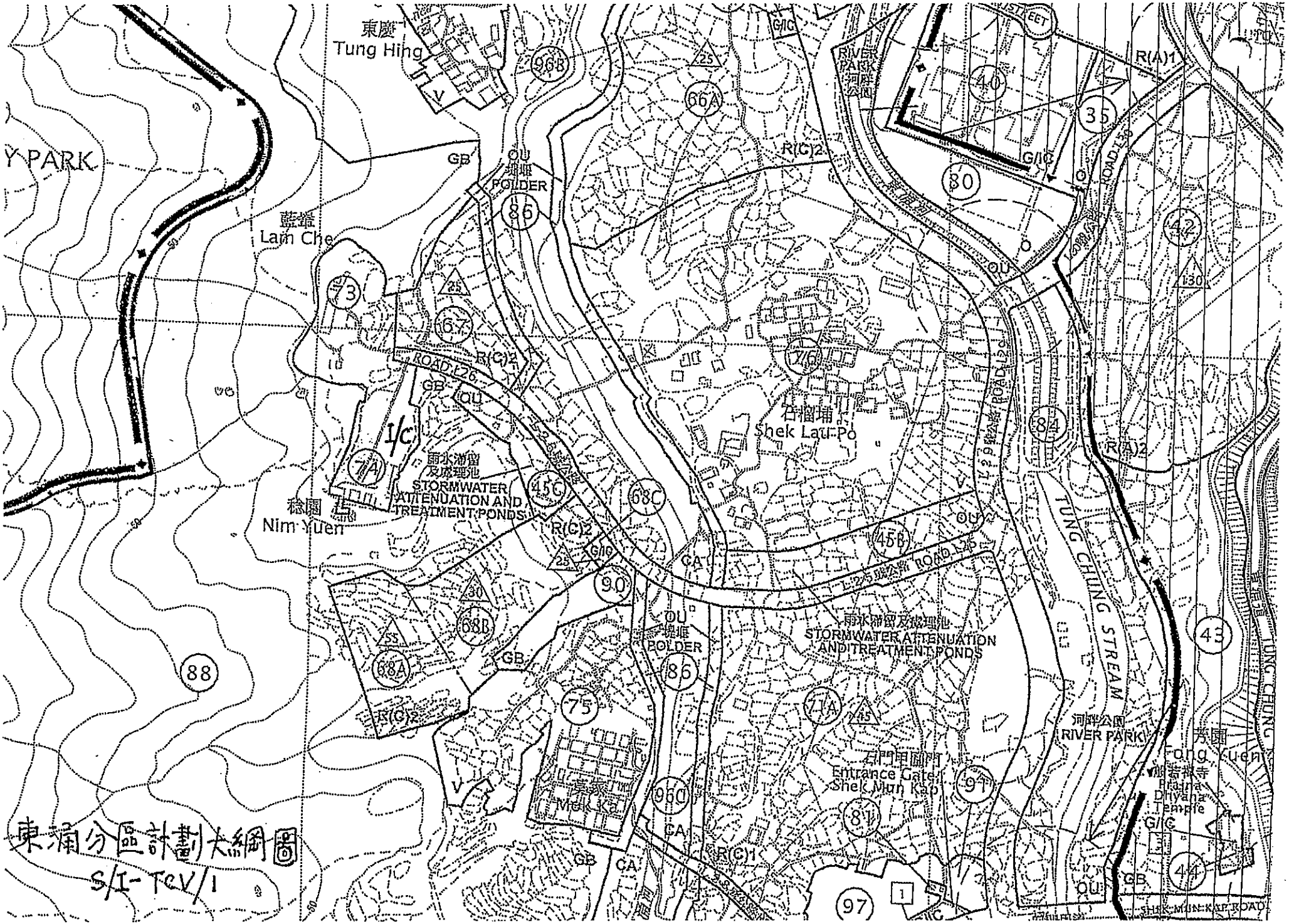
此致
城市規劃委員會秘書

東涌稔園村原居民代表關偉安
及該鄉村 暨村民上

2016 年 2 月 29 日

（聯絡電話：[redacted]）

附表名冊



東涌分區計劃大綱圖

S/I-TCV/1

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

	姓名	香港身份證號碼	簽署
035	甘兆基	[redacted]	
	李家柱		
	葛位仁		
	胡滔泰		
	葉耀森		
	AU WAI KEI		
	Poon Sau Mei		
	CHEUNG HOI WAN		
	MAN TSZ KEE CHLOE		
	徐鈺棠		
	黃延林		
046	簡善全		

035 -046

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
吳湘濤	[redacted]	吳湘濤
Cheung Mai Chi		
劉惠芝		
Sara Chiu		
黃中正		
何金娣		何金娣
鍾志強		
陳佩珊		
莫炳光		莫炳光
劉妙蘭		蘭
李富榆		
戴士		

047 - 058

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
鄭國斌	[redacted]	Jacky
鄭國成		
鄧子峰		
陳桂英		
鄧慧儀		
鄭國權		
黃意彬		
黃明雲		
黃民強		
黃家泉		
黃創良		
廖朝金		

059-070

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
張日強	[redacted]	
黃錦金		
鄧志偉		
程志強		
冼華有		
陳慧雅		
林妹妹		林妹妹
張松為		張松為
張保安		
張劍輝		
何志雄		
陳嘉欣		

071-082

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
黃志偉	[redacted]	
羅秀英		
曾性福		
王美賢		
蔡小姐		
何典田		
陳嘉欣		
吳卓雨		
區海鳳		
黃宇航		
張婷		

083-094

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
吳志鵬	[redacted]	
溫勁澄		
李惠珠		
黃鎌進		
林偉樂		
謝永軒		
吳俊龍		
彭志豪		
周嘉華		
山本崇		
彭嘉偉		
張德斌		

095-106

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
吳國鋒	[redacted]	
吳仲		
陳錦泉		
張祥森		
許志鳥		
陳偉國		
張德應		
陳鏡泠		
吳寶珠		
陳伯妃		
范鄺仲		
蔡鏡卿		

107-118

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
李彩霞	[redacted]	
謝才強		
梁志仁		
陳月娟		
梁蓮娣		
黃偉業		
區江珍		
陳桂好		
劉敏		
王敏		
高錦華		
陳小蘭		

119-130

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
131	[redacted]	

131-142

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
朱國榮	[redacted]	
梁訓賢		
周偉業		
張洪廷		
黃家豪		
張偉俊		
黃偉成		
吳志傑		
曾發軒		
潘相豪		
胡兆峰		
任立儒		

143-154

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
張玉珍	[redacted]	
蔡有富		
何妙娟		
黃冠允		
林力行		
陳幼玲		
尹东南天		
鄧富正		
鄧炎杰	[redacted]	
何修毅		
趙文謙		
陳振華		

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
吳洪昆	[redacted]	吳洪昆
李有興		
江思旭		
甘孝婷		
楊[illegible]		
黃俊輝		
施[illegible]律		
陳		
鄭文傑	[redacted]	
鄭天強		
劉文傑		
張仕光		

167-178

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
林素清	[redacted]	
林惠忠		
梁誠洪		
張達良		
鄭有亮		
翠香兰		
黃旺七		
李金采		
陳秀環		
李紅艳		
駿昌发		
陳偉森		

179 - 190

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
周浩軒	[redacted]	
麥榮輝		
張嘉賢		
邵康民		
黎梓山	[redacted]	
鳥勝棋		
黃佐恩		
彭祥興		
李康華	[redacted]	
吳均儒		
李家強		
黃桂培		

191-202

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
李徵文	[redacted]	
黃德昆		
李淑賢		
陳東富		
譚婉徵文		
馮嘉倫		
曉宜		
張秋念		
朱淑琴		
許秀玉		
張梓娟		
陳可兒		

203-214

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
李鵬業	[redacted]	
黃振業		
黃紀達		
鍾慧遠		
王有銘		
陳鈞		
黃世信		
黃德暉		
何宏珍		
高幼田		
高冰		
陳錦波		

215-226

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
袁俊豪	[redacted]	
袁俊傑		
陳元九		
盧維祖		
李耀基		
李耀坤		
何雪梁		
何声宇		
何銳明		
許俊豪		
麥自良		
劉錦豐		

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
周界業	[redacted]	
曾伯明		
徐泰森		
李玉潤		
徐詠萱		
徐振華		
梁燕威		
簡偉真		
陳天明		
楊傲鏘		

239 - 248

敬啟者：

有關東涌谷分區計劃大綱編號 S/I-TCV/1

東涌石榴埔村羅豫德堂、羅豫成祖及羅芳圃祖於東涌藍巷村附近持有土地：

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

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

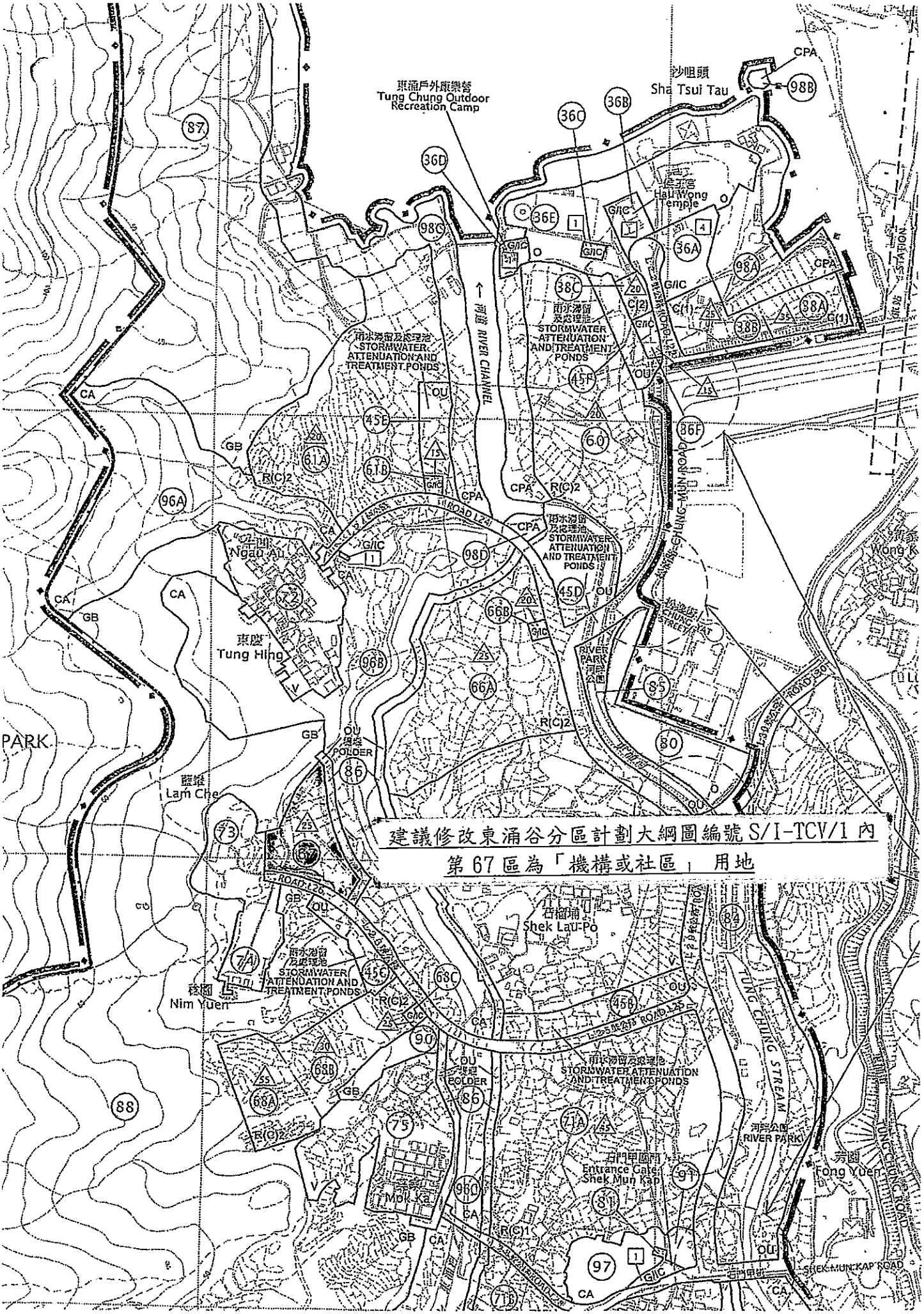
此致
城市規劃委員會秘書

石榴埔村居民代表羅禮詞
暨村民上
2016年3月7日

(聯絡電話：[redacted])

簡圖

249 15



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

敬啟者：

有關東涌谷分區計劃大綱圖編號 S/I-TCV/1 意見

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

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

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

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

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

此致
城市規劃委員會秘書

石榴埔村居民代表羅禮詞
暨村民上
2016 年 3 月 7 日

RECEIVED
- 8 MAR 2016
Town Planning Board

(聯絡電話：[redacted])

附件:
簽名冊

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
陳[illegible]	[redacted]	
[illegible]		
[illegible]		
[illegible]		
[illegible]		
[illegible]	[redacted]	
[illegible]		
[illegible]		
[illegible]		
[illegible]		
[illegible]	[redacted]	
[illegible]		
[illegible]		

250

261

250 - 261

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
羅錦洋	[redacted]	
陳艷蘭		
鄧仲培		
陳珮怡		
陳慧怡		
黎國禾		
鄧秋強		
鄧仲雄		
梁詩敏		
陳嘉豪		
區TONY		
區嘉驥		

262 - 273

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
鄭春梅	[redacted]	鄭
鄧根清		鄧
冼少明		冼
孔穎冷		孔
譚偉健		譚
譚[illegible]		[illegible]
陳[illegible]		[illegible]
黎[illegible]		[illegible]
張家[illegible]		[illegible]
黃財發		黃
劉秉樂		劉
張[illegible]		張

274-285

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
286 WONG NO	[redacted]	
文[illegible]		
邱[illegible]		
[illegible]		
[illegible]		
[illegible]		
[illegible]		
[illegible]		
吳明輝		
[illegible]	[redacted]	
[illegible]		
[illegible]		
297 陳[illegible]		

286-297

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
298 IP CHUN KIT	[redacted]	
NG PAK LUN		
Ho Tsz Man		
YUEN Chun Yin		
LAI WAI PAN		
Chow Ho Leung Eric		
Kwok Yuk Fung		Sandy
CHOW KA MING		
羅凌菊		
龍穗剛		
葉秋秋		
309 鍾素英		

298-309

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
黃永泉	[redacted]	黃永泉
馮銀蘭		馮銀蘭
張寶儀		
賴青		賴
Wong Kam Fai		
陳鑄		

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
322 袁健榮	[redacted]	
馮紹源		
郭偉傑		
李德超		
梁展意		
倫玉雯		
梁有安		
黃志強		
盧志輝		
吳子弘		
郭振		
333 馬元弘		

322-333

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
334		

334-345

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
鄭志昌	[redacted]	
廖順宜		
鄭德文		
戴海物		
鄧秋枝		
伍芷芯		
周泰喬		
吳志恒		
鄧景源		
鄧永權		
馬寶芝		
鄧漢勇		

346-357

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
358 鄭志輝	[redacted]	
梁慧欣		
陳益琳		
張潤發		
余植堂		
方治和		
吳德志		
張力強		
孫紫霞		
吳偉明		
王善詩		
林楊娟		

358-369

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
吳國成	[redacted]	
莫文超		
鄭嘉林		
王建順		
梁肇鏘		
陳惠成		
吳宇傑		
盧國枝		
曾桂平		
趙貴足		
葉文錦		
陳國華		

370-381

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
張德威	[redacted]	
郭麗欣		
陳永安		
李丹		
黃錦明		
吳仲揚		
鍾俊洪		
謝鎖光		
范岐峰		
文李婉		
陳敏		
區淑嫻		

382-393

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
馬惠貞	[redacted]	
鄭汉強		
張秀云		
羅志安		
趙石光華		
任兆億		
俞高春		
林偉		
林惠平		
吳艷美		
林陳清		
陳鈺		

394 - 405

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
黃[illegible]	[redacted]	
王[illegible]		
曾浩[illegible]		
羅[illegible]		
王萬昌		
劉[illegible]		
[illegible]		
[illegible]		
[illegible]		
張[illegible]		
張春艷		

406-417

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
甘晓雪	[redacted]	
彭錦輝		
梁宝珠		
林桂龍		
[illegible]		
陳金泉		
陳红蓮		
簡轉文		
[illegible]		
[illegible]		
[illegible]		
黃鵬飛		
黃敬孚		

418-429

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
[illegible]	[redacted]	[illegible]
謝福生		[illegible]
[illegible]		[illegible]
[illegible]		[illegible]
[illegible]		[illegible]
[illegible]		[illegible]
王貝蓮		王貝
[illegible]		[illegible]
[illegible]		[illegible]
[illegible]		[illegible]
[illegible]		[illegible]
[illegible]		[illegible]

430-441

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
442 麥滿發	[redacted]	
陳志雄		
馮煥文		
溫不曲		
吳仕豐		
吳俊龍		
442 吳翠婷		

442 - 448

支持東涌稔園村發展合法私營骨灰龕

及

支持於東涌谷分區計劃大綱圖編號 S/I-TCV/1 內規劃稔園土

地為 I/C「機構或社區」用途

簽名

姓名	香港身份證號碼	簽署
449 SZE MAN HO	[redacted]	
林華辭		
楊家豪		
CHUI YIM LIN		
陳珀璇		
李穗欣		
455 梁炯燊		

449-455

致：城市規劃委員會秘書處

敬啟者：

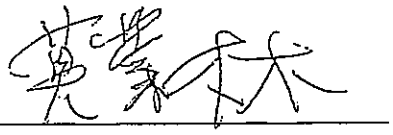
有關東涌谷分區計劃大綱圖編號：S/I-TCV/1 意見

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

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

固此，我們認為應該支持，俾便提供骨灰位，迎合廣大市民對骨灰位的需求。

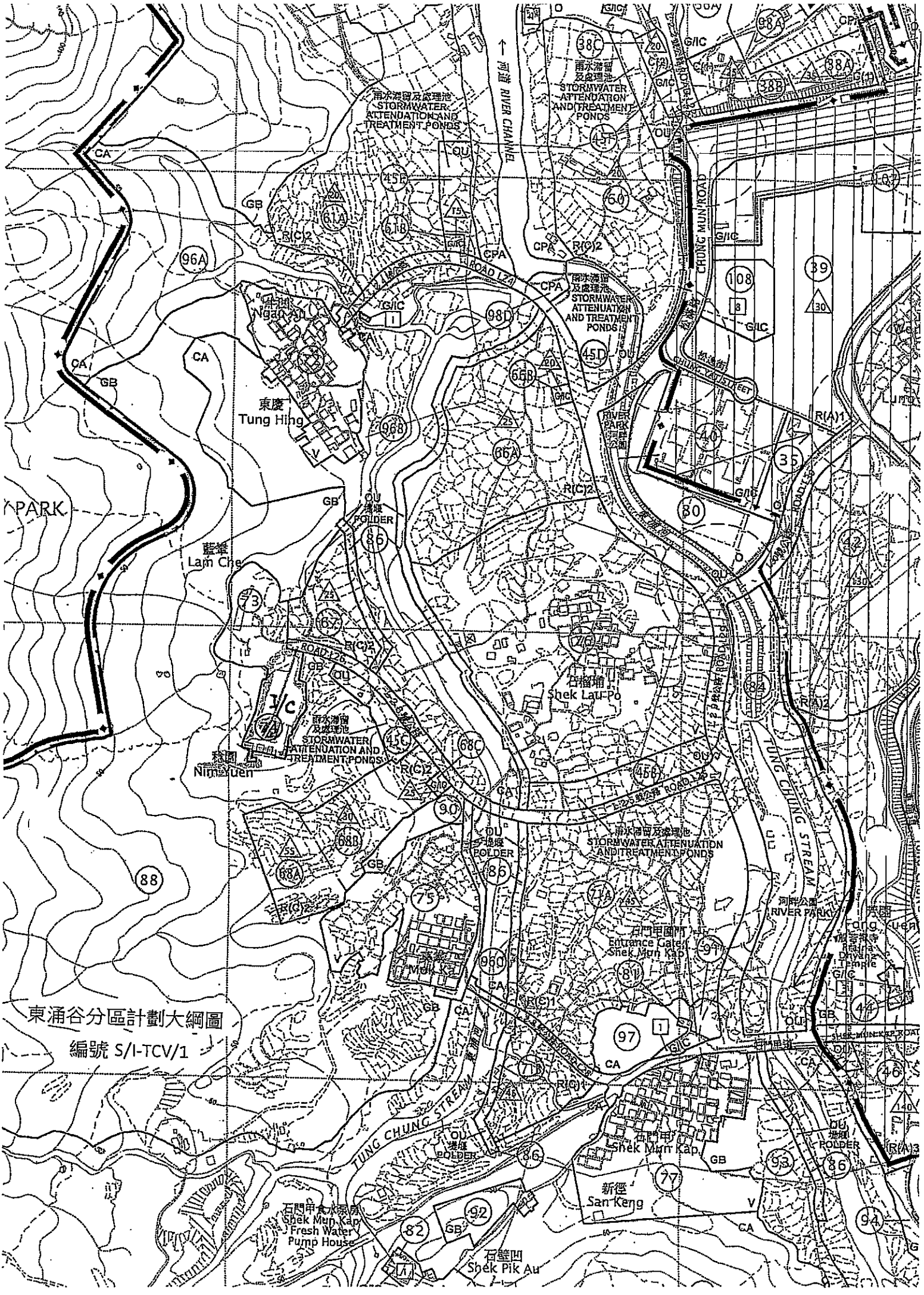
再者，村民亦支持有關發展商，向貴會建議修改上述大綱圖內稔園村土地為 'I/C'，即「機構或社區」用途。



前任東涌莫家村原居民代表莫業林
暨村民上

（聯絡電話：[redacted]）

2016 年 3 月 5 日


東涌谷分區計劃大綱圖
編號 S/I-TCV/1
RIVER CHANNEL
CHUNG MUN ROAD
TUNG CHUNG STREAM
TUNG CHUNG ROAD
SHEK MUN KAP ROAD
CHUNG YAN STREET
ROAD L2A
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ROAD L2C
ROAD L2D
ROAD L2E
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ROAD

香港新界大嶼山東涌

東涌鄉事委員會

TUNG CHUNG RURAL COMMITTEE

TUNG CHUNG, LANTAU ISLAND, N.T.HONG KONG
地址：大嶼山東涌上嶺皮村壹號
電話：29888228　傳真：29888924

RECEIVED
- 8 MAR 2016
Town Planning Board

敬啟者：

有關東涌谷分區計劃大綱圖編號 S/I-TCV/1

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

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

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

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

此 致
城市規劃委員會秘書

TUNG CHUNG RURAL COMMITTEE 大嶼山東涌鄉事委員會

樊志平

東涌鄉事委員會主 席：樊志平

日期：2016 年 3 月 4 日

寄件者: Ermine Li [redacted]
日期: 08日03月2016年星期二 14:41
收件者: tpbpd@pland.gov.hk
主旨: Re: Representation on draft Tung Chung Valley Outline Zoning Plan No. S/I-CV/1
附件: AS017'13'REDE'IV'15.pdf

Dear Sir/Madam,

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

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

Best regards,
Ermine Li

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

Disclaimer:

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

(Est. 1995)

ALBERT SO SURVEYORS LTD.

Your Ref. : TPB/R/DPA/I-TCV/1-R644
Our Ref. : AS017/13/REDE/IV/15

8th March 2016

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

By Email & hand

Dear Sir/Madam,

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

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

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

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

Albert So
Managing Director

Encl.
c.c. Client
AS/el
\\Ermine\2013\AS01713\Redevelopment\AS017'13'REDE'IV'15.doc

估價、租賃、規劃及發展顧問 產業總經理・蘇維邦 地產代理（公司牌照號碼：C-007868）
Regulated by RICS 香港九龍旺角彌敦道[illegible]號[illegible]室 電話：(852) 2882 3183 圖文傳真：(852) 2882 2810
Unit H2, 17/F., MG Tower, 133 Hoi Bun Road, Kwun Tong, Kowloon, Hong Kong ~~Street, Hung Hom, Kowloon, Hong Kong~~ Tel: (852) 2882 3183 Fax: (852) 2882 2810 Email: mail@assl.com.hk
VALUERS, ESTATE AGENTS, PLANNING & DEVELOPMENT CONSULTANTS *Managing Director : ALBERT SO* BSC, MBA, FRICS, FHKIS, [redacted]

Form No. S6
表格第S 6號

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

根據《城市規劃條例》（第131章）第6(1)條就草圖作出申述

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

1. 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。

2. Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at http://www.info.gov.hk/tpb/.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The 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爲不曾提出論。

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

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

1. TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
2. UNI-CREATION INVESTMENTS LIMITED

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

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

ALBERT SO SURVEYORS LIMITED

3. Details of the Representation
申述詳情

Draft plan to which the representation relates 與申述相關的草圖	S/I-TCV/1

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

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

Nature of and reasons for the representation 申述的性質及理由

Subject matters@ 有關事項@	Are you supporting or opposing the subject matter? 你支持還是反對有關事項？	Reasons 理由
Zoning of Nim Yuen Village	☐ support 支持 ☑ oppose 反對	Please refer to the attached letter.
Zoning of Existing Nim Yuen Columbarium	☐ support 支持 ☑ oppose 反對	Please refer to the attached letter.
	☐ support 支持 ☐ oppose 反對	

Any proposed amendments to the draft plan? If yes, please specify the details.
對草圖是否有任何擬議修訂？如有的話，請註明詳情。

Please refer to the attached letter.

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

Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」
「✓」at the appropriate box 請在適當的方格內加上「✓」號

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/繪圖爲彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

.....

.....

.....

5. Signature 簽署

Signature 簽署 .....

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

SO CHUN HIN, ALBERT
Name in Block Letters 姓名（以正楷填寫）

Managing Director
Position (if applicable) 職位（如適用）

Professional Qualification(s) 專業資格

~~Member 會員~~ / Fellow 資深會員 * of
☐ HKIP ☐ HKIA ☑ HKIS ☐ HKIE ☐ HKILA

Others 其他 FRICS, MRTPI

on behalf of 代表 ALBERT SO SUVEYORS LIMITED

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

Date 日期 8 March 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，其地址爲香港北角渣華道333號北角政府合署15樓。

* Delete as appropriate
Please fill "NA" for inapplicable item
「✓」at the appropriate box

* 請刪去不適用者
請在不適用的項目填寫「不適用」
請在適當的方格內加上「✓」號

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

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

By Email and Hand

8 March 2016

Dear Sir/Madam,

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

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

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

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

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

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

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

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

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

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

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

Authorized Signature(s)

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

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

Authorized Signature(s)

(Est. 1995)

ALBERT SO SURVEYORS LTD.

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

22nd October 2015

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

By Fax (2877 0245) and Email

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

Dear Sir/Madam,

We refer to captioned representation.

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

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

Albert So
Managing Director

encl
c.c. Clients, KLY
AS/dt
\\Dickson\2013\AS017'13'Rede\AS017'13'Rede'II'75

Regulated by RICS
Unit H2, 17/F., MG Tower, 133 Hoi Bun Road, Kwun Tong, Kowloon, Hong Kong
Tel: (852) 2882 3183 Fax: (852) 2882 2810 Email: mail@assl.com.hk
VALUERS, ESTATE AGENTS, PLANNING & DEVELOPMENT CONSULTANTS, Managing Director: ALBERT SO BSC, MBA, FRICS, FHKIS, [redacted]

Form No. S6
表格第S 6號

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

根據《城市規劃條例》（第131章）第6(1)條就草圖作出申述

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

1. 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。

2. Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at http://www.info.gov.hk/tpb/.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引。指引可向委員會秘書處（香港北角渣華道333號北角政府合署15樓，電話：2231 4810或2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.
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1. Person Making This Representation (known as "Representer" hereafter)
提出此宗申述的人士（下稱「申述人」）

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

(1) UNI-CREATION INVESTMENTS LIMITED

(2) TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED

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

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

ALBERT SO SURVEYORS LIMITED

3. Details of the Representation
申述詳情

Draft plan to which the representation relates 與申述相關的草圖	DPA/I-TCV/1

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

3. Details of the Representation (Continued) (use separate sheet if necessary)
申 述 詳 情 （續）（如 有 需 要，請 另 頁 說 明）

Nature of and reasons for the representation 申述的性質及理由

Subject matters@ 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
1. Paragraph 6.1 and 7.4 of Explanatory Statement 2. Annex A of the Notes of the Plan	☐ support 支持 ☑ oppose 反對	Please refer to the attached letter.
	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ oppose 反對	

Any proposed amendments to the draft plan? If yes, please specify the details.
對草圖是否有任何擬議修訂？如有的話，請註明詳情。

Please refer to the attached letter.

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

Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」
「✓」at the appropriate box 請在適當的方格內加上「✓」號

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/繪圖爲彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

N/A

5. Signature 簽署

Signature 簽署 .....

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

SO CHUN HIN, ALBERT
Name in Block Letters 姓名（以正楷填寫）

Managing Director
Position (if applicable) 職位（如適用）

Professional Qualification(s) 專業資格

Member 會員 / Fellow 資深會員 * of
☐ HKIP ☐ HKIA ☑ HKIS ☐ HKIE ☐ HKILA

Others 其他 FRICS, MRTPI

on behalf of 代表 ALBERT SO SURVEYORS LIMITED
Company/Organization Name and Chop (if applicable)
公司 / 機構名稱及蓋章（如適用）

Date 日期 22-October-2015

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this representation will be used by the Secretary of the Board and Government departments for the following purposes:
   (a) the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and
   (b) facilitating communication between the "representer" and the Secretary of the Board/Government departments
   in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.
   委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：
   (a) 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及
   (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。
2. The personal data provided by the "representer" in this representation may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.
   「申述人」就這宗申述提供的個人資料，或亦會向其他人士披露，以作上述第1段提及的用途。
3. A "representer" has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap. 486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/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，其地址爲香港北角渣華道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

22nd October 2015

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

By Fax (2877 0245) and Email

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

Dear Sir/Madam,

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

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

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

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

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

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

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

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

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

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

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

.....
Authorized Signature(s)

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

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

.....
Authorized Signature(s)

(Est. 1995)
ALBERT SO SURVEYORS LTD.

Our Ref. : AS017/13/Col/12 6th May 2015

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

By fax (2868 4530) and post

Dear Sir/Madam,

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

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

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

Name of Columbarium : Tung Chung Nim Yuen (東涌念園)
Location: Lot Nos.2754, 2755, 2756, 2757, 2758, 2760 &2761 in D.D.1 at Nim Yuen, Tung Chung, Lantau Island
Land Owner: Uni-Creation Investments Limited
Columbarium Operator: Tung Chung Nim Yuen Cultural Institution Limited

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

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

Regulated by RICS Unit H2, 17/F, MG Tower, 133 Hoi Bun Road, Kwun Tong, Kowloon, Hong Kong tel: (852) 2802 9188 Fax: (852) 2802 2810
Room 1804, Chuang's Tsingtom Plaza, tel: (852) 2812 1183 Fax: (852) 2812 2810 Email: mail@asyl.com.hk
VALUERS, ESTATE AGENTS, PLANNING & DEVELOPMENT CONSULTANTS Managing Director : ALBERT SO

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

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

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

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

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

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

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

ALBERT SO SURVEYORS LTD.

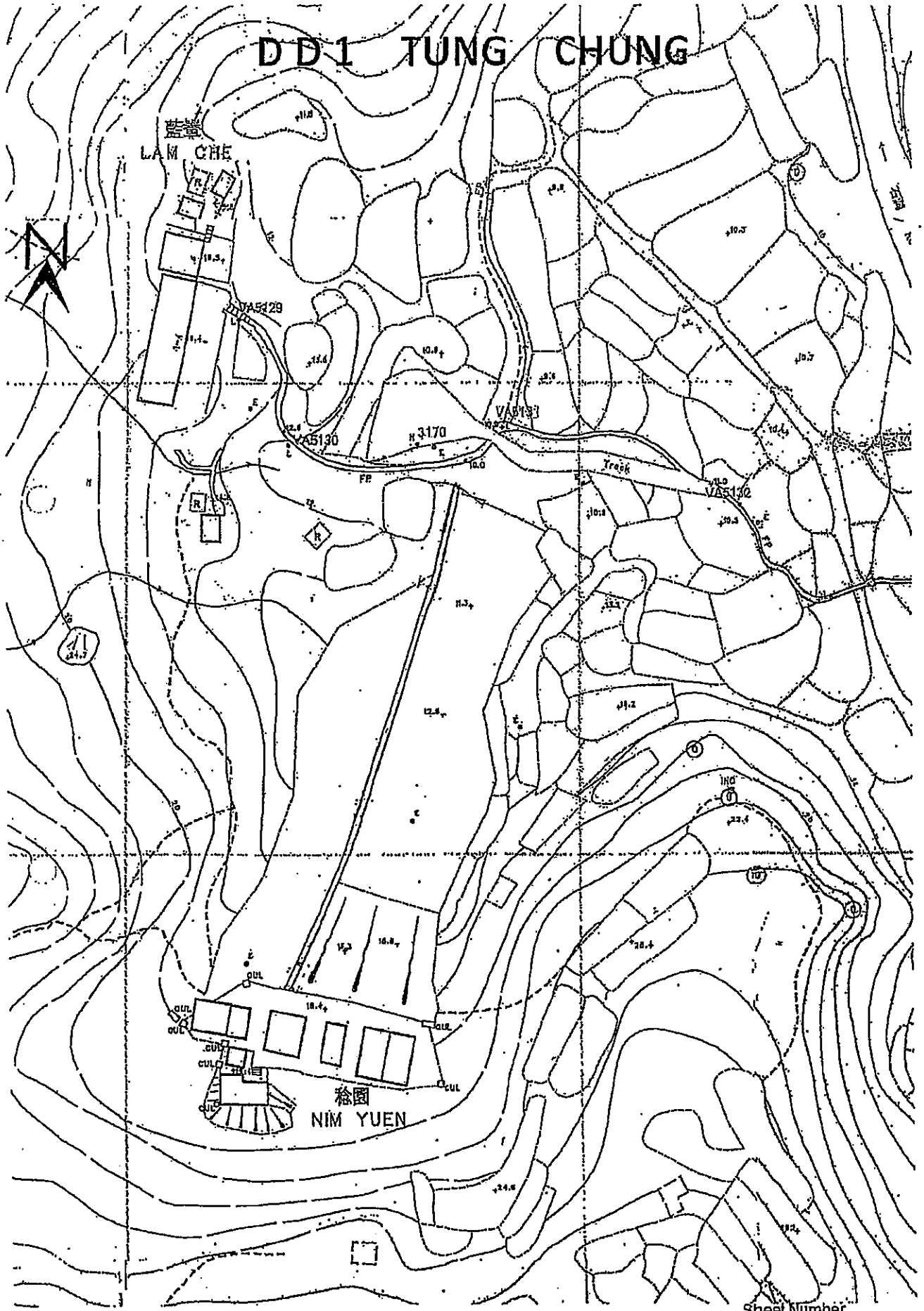
Yours faithfully,
For and on behalf of
ALBERT SO SURVEYORS LTD.

Albert So
Managing Director

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

AS/dt
\\Dickson\2013\IS039'13'Col'12

DD 1 TUNG CHUNG



Date: 09-Jun-2015
Lands Administration Office, DLO/Islands
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SCALE 1:1000

Sheet Number
9-SE-12B 9-SE-13A
9-SE-12D 9-SE-13C

(Est. 1995)

ALBERT SO SURVEYORS LTD

Your Ref. : TPB/R/DPA/I-TCV/1-R644
Our Ref. : AS017/13/REDE/IV/15

8th March 2016

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

By Email & hand

Dear Sir/Madam,

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

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

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

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

Albert So
Managing Director

Encl.
c.c. Client
AS/el
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RECEIVED
- 8 MAR 2016
Town Planning Board

估價、租賃、規劃及發展顧問 香港測量師學會・產業測量師 地產代理(公司牌照號碼：C-007868)
Regulated by RICS 香港九龍紅磡馬頭涌道83號冠士工業大廈1362室 電話：(852) 2882 3183 圖文傳真：(852) 2882 2810
Unit H2, 17/F, MG Tower, 133 Hoi Bun Road, Kwun Tong, Kowloon, Hong Kong ~~Street, Hung Hom, Kowloon, Hong Kong~~ Tel: (852) 2882 3183 Fax: (852) 2882 2810 Email: mail@assl.com.hk
VALUERS, ESTATE AGENTS, PLANNING & DEVELOPMENT CONSULTANTS Managing Director: ALBERT SO BSC, MBA, FRICS, FHKIS, [redacted]

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

1. 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。

2. Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at http://www.info.gov.hk/tpb/.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引，這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The 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爲不曾提出論。

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

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

1. TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
2. UNI-CREATION INVESTMENTS LIMITED

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

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

ALBERT SO SURVEYORS LIMITED

3. Details of the Representation
申述詳情

Draft plan to which the representation relates 與申述相關的草圖	S/I-TCV/1

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

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

Nature of and reasons for the representation 申述的性質及理由

Subject matters@ 有關事項@	Are you supporting or opposing the subject matter? 你支持還是反對有關事項？	Reasons 理由
Zoning of Nim Yuen Village	☐ support 支持 ☑ oppose 反對	Please refer to the attached letter.
Zoning of Existing Nim Yuen Columbarium	☐ support 支持 ☑ oppose 反對	Please refer to the attached letter.
	☐ support 支持 ☐ oppose 反對	

Any proposed amendments to the draft plan? If yes, please specify the details.
對草圖是否有任何擬議修訂？如有的話，請註明詳情。

Please refer to the attached letter.

@ Please describe the particular matter in the plan to which the representation relates. Where the representation relates to an amendment to a plan, please specify the amendment item number provided in the Schedule of Amendments.
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「✓」at the appropriate box 請在適當的方格內加上「✓」號

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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/繪圖爲彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

.....

.....

.....

5. Signature 簽署

Signature 簽署 .....

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

SO CHUN HIN, ALBERT
Name in Block Letters 姓名（以正楷填寫）

Managing Director
Position (if applicable) 職位（如適用）

Professional Qualification(s) 專業資格

~~Member 會員~~ / Fellow 資深會員 * of
☐ HKIP ☐ HKIA ☑ HKIS ☐ HKIE ☐ HKILA
Others 其他 FRICS, MRTPI

on behalf of 代表 ALBERT SO SUVEYORS LIMITED

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

Date 日期 8 March 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
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* Delete as appropriate
Please fill "NA" for inapplicable item
「✓」at the appropriate box

* 請刪去不適用者
請在不適用的項目填寫「不適用」
請在適當的方格內加上「✓」號

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

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

By Email and Hand

8 March 2016

Dear Sir/Madam,

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

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

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

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

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

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

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

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

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

Yours faithfully,
For and on behalf of
UNI-CREATION INVESTMENTS LIMITED
For and on behalf of
UNI-CREATION INVESTMENTS LIMITED
建世投資有限公司
Albert Cheng
Authorized Signature(s)

Yours faithfully,
For and on behalf of
TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
For and on behalf of
TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED
東涌念園文化機構有限公司
Authorized Signature(s)

(Est. 1995)

ALBERT SO SURVEYORS LTD

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

22nd October 2015

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

By Fax (2877 0245) and Email

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

Dear Sir/Madam,

We refer to captioned representation.

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

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

Albert So
Managing Director

encl
c.c. Clients, KLY
AS/dt
\\Dickson\2013\AS017'13'Rede\AS017'13'Rede'II'75

估價、租賃、規劃及地產顧問 英聯德經理：蘇振騏 地產代理（公司牌照號碼：C-007868）
Regulated by RICS Unit H2, 17/F., MG Tower, 133 Hoi Bun Road, Kwun Tong, Kowloon, Hong Kong 電話：(852) 2882 3183 傳文傳真：(852) 2882 2810
Room 1302, Chuang's Hunghom Plaza, [illegible] Tel: (852) 2882 3183 Fax: (852) 2882 2810 Email: mail@assl.com.hk
VALUERS, ESTATE AGENTS, PLANNING & DEVELOPMENT CONSULTANTS Managing Director : ALBERT SO BSC, MBA, FRICS, FHKIS, [illegible]

Form No. S6
表格第S 6號

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

根據《城市規劃條例》（第131章）第6(1)條就草圖作出申述

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

1. 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。

2. Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at http://www.info.gov.hk/tpb/.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引，這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The 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爲不曾提出論。

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

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

(1) UNI-CREATION INVESTMENTS LIMITED

(2) TUNG CHUNG NIM YUEN CULTURAL INSTITUTION LIMITED

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

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

ALBERT SO SURVEYORS LIMITED

3. Details of the Representation
申述詳情

Draft plan to which the representation relates. 與申述相關的草圖	DPA/I-TCV/1

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

3. Details of the Representation (Continued) (use separate sheet if necessary) 申述詳情（續）(如有需要，請另頁說明)		
Nature of and reasons for the representation 申述的性質及理由		
Subject matters@ 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
1. Paragraph 6.1 and 7.4 of Explanatory Statement 2. Annex A of the Notes of the Plan	☐ support 支持 ☑ oppose 反對	Please refer to the attached letter.
	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ oppose 反對	

Any proposed amendments to the draft plan? If yes, please specify the details.
對草圖是否有任何擬議修訂？如有的話，請註明詳情。

Please refer to the attached letter.

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

Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」
「✓」at the appropriate box 請在適當的方格內加上「✓」號

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/繪圖爲彩圖或超過A3大小，須一式90份。至於其他補充文件（例如：影響評估報告），則須一式90份。

N/A

5. Signature 簽署

Signature 簽署 .....

SO CHUN HIN, ALBERT
Name in Block Letters 姓名（以正楷填寫）

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

Managing Director
Position (if applicable) 職位（如適用）

Professional Qualification(s) 專業資格

Member 會員 / Fellow 資深會員 * of
☐ HKIP ☐ HKIA ☑ HKIS ☐ HKIE ☐ HKILA

Others 其他 FRICS, MRTPI

on behalf of 代表 ALBERT SO SURVEYORS LIMITED

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

Date 日期 22-October-2015

Statement on Personal Data 個人資料的聲明

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

   (a) the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and

   (b) facilitating communication between the "representer" and the Secretary of the Board/Government departments

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

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

   (a) 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及

   (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

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

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

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

   根據《個人資料（私隱）條例》（第 4 8 6 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，其地址爲香港北角渣華道 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

22nd October 2015

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

By Fax (2877 0245) and Email

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

Dear Sir/Madam,

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

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

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

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

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

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

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

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

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

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

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

Authorized Signature(s)

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

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

Authorized Signature(s)

(Est. 1995)

ALBERT SO SURVEYORS LTD.

Our Ref. : AS017/13/Col/12

6th May 2015

By fax (2868 4530) and post

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

Dear Sir/Madam,

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

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

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

Name of Columbarium : Tung Chung Nim Yuen (東涌念園)
Location: Lot Nos.2754, 2755, 2756, 2757, 2758, 2760 &2761 in D.D.1 at Nim Yuen, Tung Chung, Lantau Island
Land Owner: Uni-Creation Investments Limited
Columbarium Operator: Tung Chung Nim Yuen Cultural Institution Limited

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

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

Regulated by RICS Unit H2, 17/F, MG Tower, 133 Hoi Bun Road, Kwun Tong, Kowloon, Hong Kong Tel: (852) 2882 3183 Fax: (852) 2882 2810 Email: info@assl.com.hk
Room 1502, Chatang's Hing Yon Place, [illegible]
VALUERS, ESTATE AGENTS, PLANNING & DEVELOPMENT CONSULTANTS Managing Director : ALBERT SO BSC, MBA, FRICS, FHKIS, [illegible]

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

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

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

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

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

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

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

ALBERT SO SURVEYORS LTD.

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

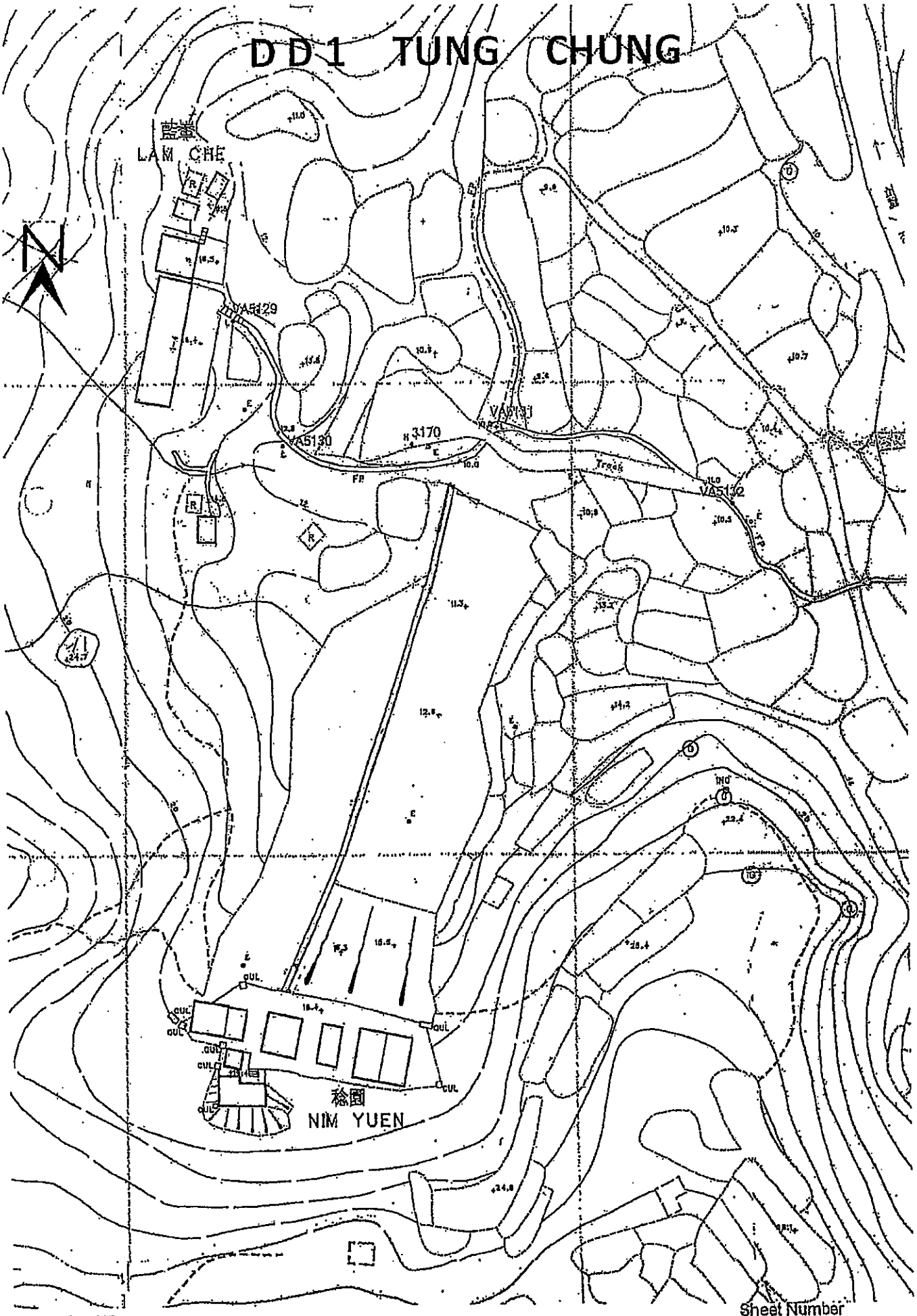
Albert So
Managing Director

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

AS/dt
\\Dickson\2013\IS039'13'Col'12

Annex B

DD 1 TUNG CHUNG



Date: 09-Jun-2015
Lands Administration Office, DLO/Islands
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SCALE 1:1000

Sheet Number
9-SE-12B 9-SE-13A
9-SE-12D 9-SE-13C

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

Your Ref.: TPB/R/OZP/I-TCV/1
Our Ref.: UCH/08032016/TC

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

By Fax and Hand

8 March 2016

Dear Sir,

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

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

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

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

031

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

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

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

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

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

.....
Authorised Signature(s)

Authourised Signatory

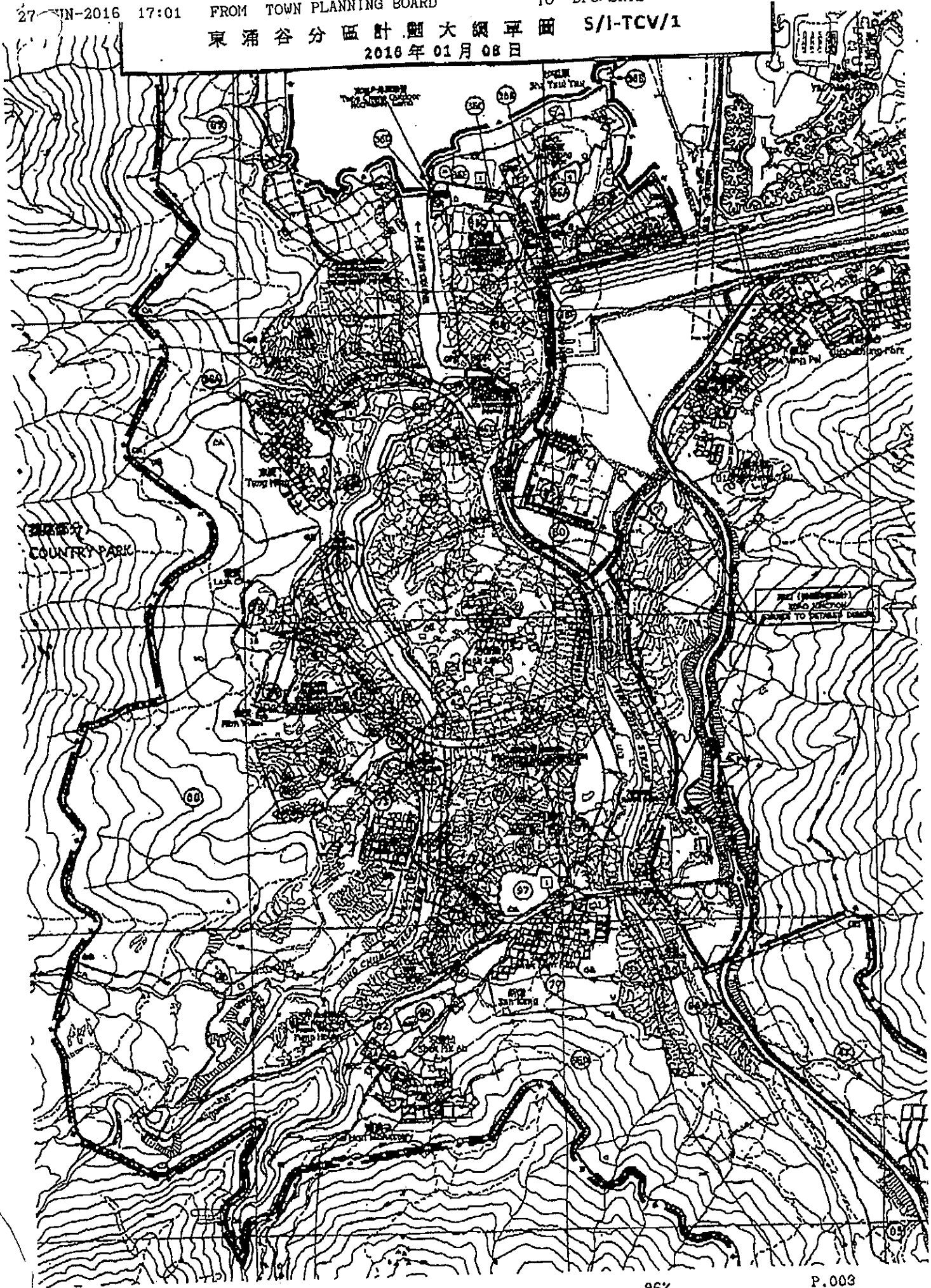
Encl.

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

08-MAR-2016 13:20 97% P.002
27-JUN-2016 17:03 + 852 2522 8426 98% P.002

東涌谷分區計劃大綱草圖 S/I-TCV/1

2016年01月08日



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

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

** Civil Celebrant of Marriages
婚姻監禮人

ALAN HO & CO., Solicitors
何 伯 華 律 師 行

YAU MA TEI BRANCH

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

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

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

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

URGENT

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

BY FAX (2877 0245) & BY HAND

RECEIVED
- 8 MAR 2016
Town Planning Board

Dear Sirs,

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

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

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

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

1. Our client owned the Lands are not intended to develop and/or to build any structural, residential Property and/or any permitted use/ may be permitted use categories under a class of Village type Development on the Lands;

2. The Lands is currently use for a purpose of sincerity park and columbarium was built for more than decades; no residential building is/are within the Lands;

3. To protect and conserve the buildings built on the Lands; and

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

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

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

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

Yours Faithfully,

Alan Ho & Co.,
AH/kc
c.c. Lands Department (by fax (2850 5104) only)
Ref: (13) in L DLO/IS 18/LMLC/2007 Pt.3

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

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

7 March 2016
Our Ref. MP/TCV/2

By Hand

RECEIVED
2016 MAR -7 P 2:32
TOWN PLANNING BOARD

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

Dear Sir,

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

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

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

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

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

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

Yours faithfully,

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

Cc Client

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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

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

Forestside Limited

March 2016

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

Executive Summary

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Appendix A: Ecological Survey and Assessment Report

CONSULTANTS

AEC Limited
Masterplan Limited

Executive Summary

S.1. This representation is submitted in relation to the Draft Tung Chung Valley (TCV) Outline Zoning Plan (OZP) No. S/I-TCV/1. This submission is intended to provide planning inputs to contribute to the good planning and design of the Tung Chung Valley.

S.2. This representation proposes a minor change to rationalise OZP boundary to follow private lot boundary and to include the mangrove area so that the coastal land is under protection by appropriate planning controls. It also proposes to adopt the TOD planning concept by slightly increasing the development land area within 500m from the future railway station.

S.3. Huge investment in infrastructure is needed for the engineering works for the development of TCV. While the preservation of heritage and conservation of the natural environment are respected, a reasonable level of development should be pursued.

S.4. An ecological survey has been undertaken, the proposals put forwarded in this representation have been carefully considered to balance the good planning practice of benefiting more people in terms of increasing accessibility to public transport and community facilities, while observing conservation concerns.

S.5. This representation proposes to enlarge the G/IC sites at Sha Tsui Tau. This would help create a community focal point for the Tung Chung Valley community. The new G/IC site is proposed with two Non-building areas to preserve the view of Hau Wong Temple and better protect the mangrove area. A consistent approach of including "Flat" as a Column 2 use of the G/IC zones as in the other two Tung Chung OZPs should be adopted. This will provide more land use flexibility, but the ultimate control is still with the TPB.

S.6. This representation also proposes to relocate a stormwater attenuation and treatment pond to free the land for residential development. This is in line with government policy to increase land supply for housing. Putting the pond underneath an open space site which lies adjacent to the River Park is considered feasible. This is a sensible way to optimise the use of valuable land.

行政摘要

一、 本申述書是關於東涌谷分區計劃大綱草圖編號 S/I-TCV/1。它的目的是提供規劃觀點及意見以促進東涌谷的規劃和設計。

二、 這申述書提出一個小的改動，以糾正大綱圖的邊界，使其遵循私人地段的邊界及涵蓋紅樹林區域，令沿海土地得到適當的規劃限制的保護。它還建議採用交通導向規劃理念, 輕微增加未來的火車站 500 米之內的開發用地。

三、 東涌谷的發展工程需要巨額基礎設施的投資。在尊重文化遺產和保護自然環境的情況下，應該追求一個合理的發展水平。

四、 申述人已進行生態調查，這申述書提出的建議的規劃方案都是經過精心考慮，在使更多人得到方便的公共交通和社區服務以及保育自然環境兩方面, 取得平衡。

五、 這申述書建議擴大在沙咀頭的「政府、機構或社區」(G / IC) 地盤,將有助於創造東涌谷一個社區焦點。而 G/ IC 用地內包含了兩個非建築用地, 以尊重及保護侯王古廟的視野，並更好地保護紅樹林區域。東涌另外兩幅大綱圖的 G / IC 用地將「樓宇」置於第 2 欄用途, 東涌谷的大綱圖應採納一致的做法。這將提供更多利用土地的靈活性，但城規會仍有最終控制權。

六、 申述書建議釋放一個雨水滯留和處理池作住宅用地，這符合政府政策以增加對住房的土地供應。把該池置於毗鄰河公園的休憩用地之下是可行的。這是優化利用寶貴土地明智的方法。

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

1 Introduction

1.1 This representation is submitted in relation to the Draft Tung Chung Valley (TCV) Outline Zoning Plan (OZP) No. S/I-TCV/1. This submission is intended to provide planning inputs to contribute to the good planning and design of the Tung Chung Valley. It is made to object to land uses proposed within about 500m from the future railway station.

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

2 The Representor

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

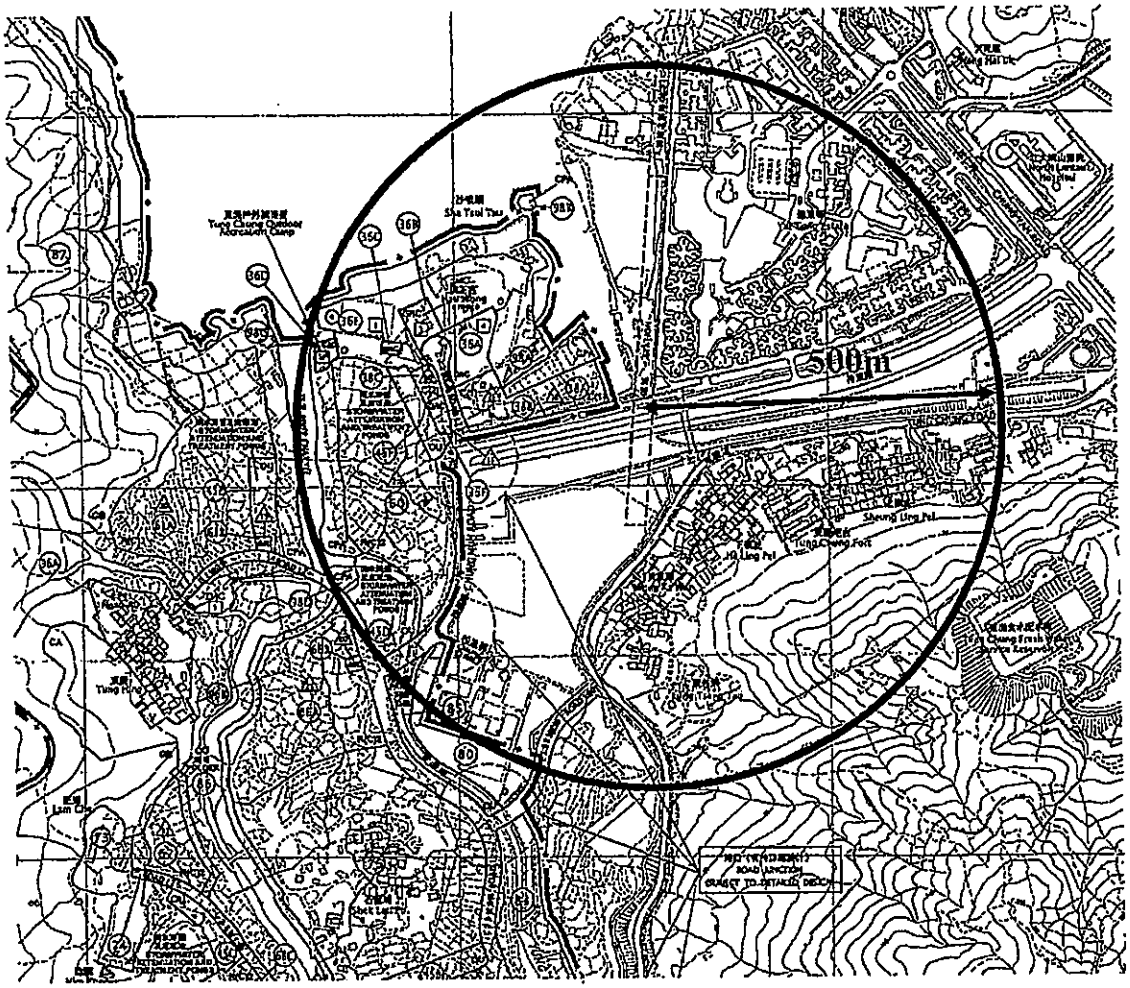


Figure 1: The circle encompasses land within about 500m from the future railway terminus station. The Representor has some land interest in the area.

3 Representation Sites

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

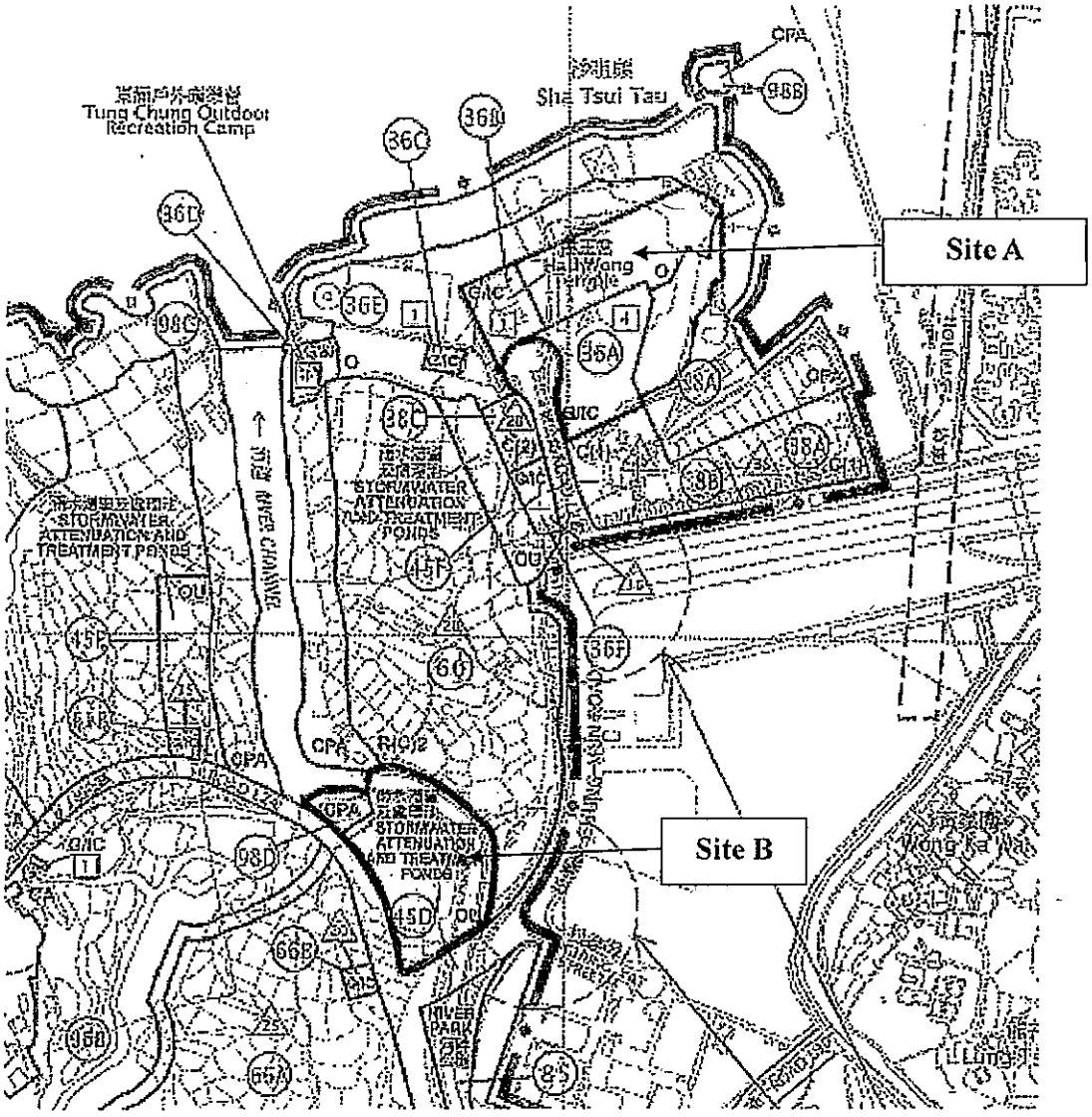


Figure 2: The Representation Sites, Site A and Site B (in red) shown on the Tung Chung Valley OZP No. S/I-TCV/1

4 Background

Planning Area of Tung Chung Valley Outline Zoning Plan

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

Tung Chung New Town Extension Study

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

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

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

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

5 Government Housing Policies

5.1 Recent Policy Addresses

5.1.1 The 2013 Policy Address has put forward various measures to increase supply of land for housing. There has been substantial coverage on the same topic in Policy Addresses of the following years. Some of the measures are as follows:

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

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

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

5.2 Long Term Housing Strategy

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

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

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

6 Planning Principles and Practices

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

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

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

6.2 Appropriate Development Density

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

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

6.3 Transport Orientated Development

6.3.1 TOD is a prevailing international design concept which has been successfully adopted in Hong Kong. It promotes high density development within about 500m from major public transport nodes to enable a higher level of accessibility and convenience be provided to more people. Hong Kong has a proven record of achieving internationally recognised TOD around many MTR stations, where intense development is built above and around the stations.

6.3.2 Very often, TOD helps create a focal point or activity node to provide vitality, vibrancy and diversity to an area. This will help create character and identity for the community.

REASONS FOR REPRESENATION

7 Tung Chung New Town Extension Study (TC Study)

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

7.1 Arbitrary OZP boundary

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

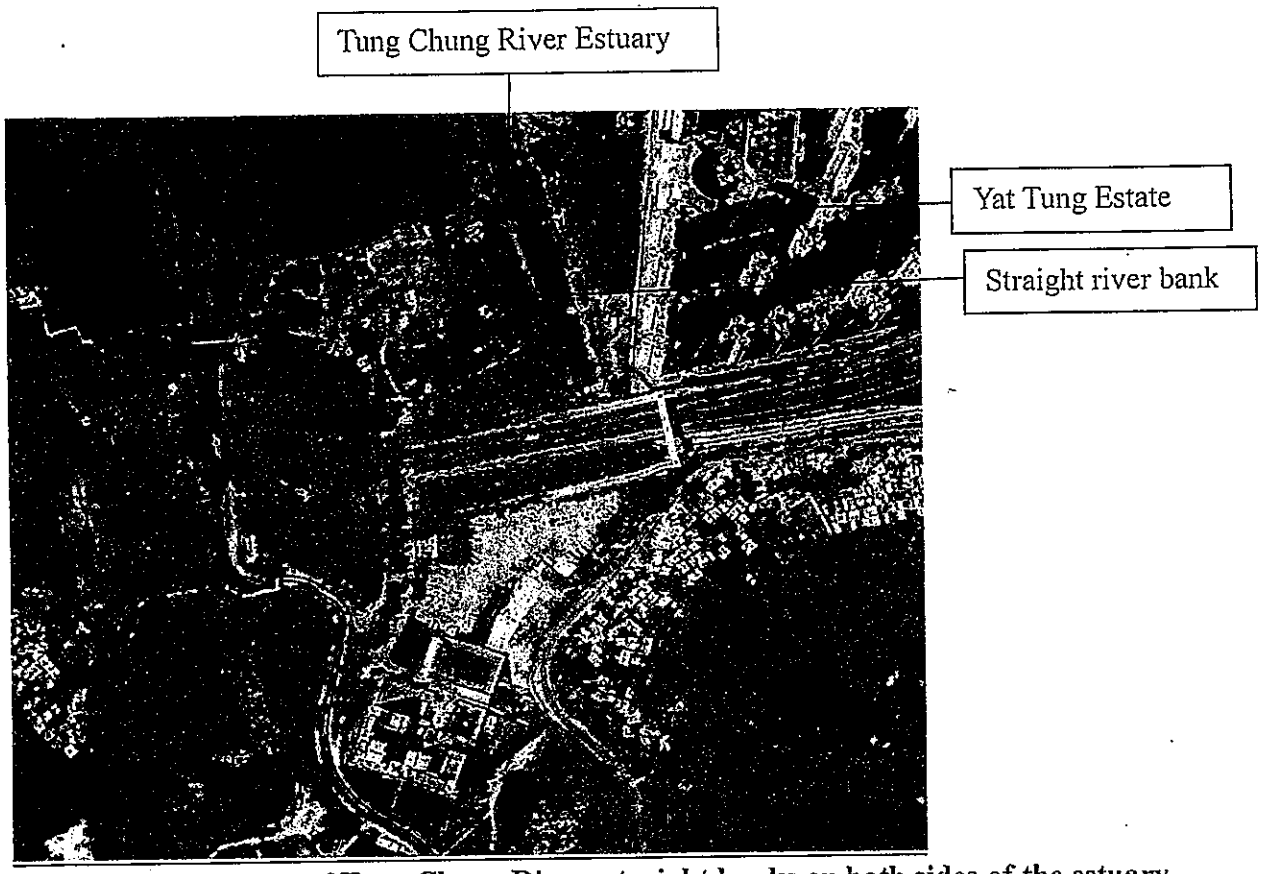


Figure 3: The estuary of Tung Chung River: straight banks on both sides of the estuary

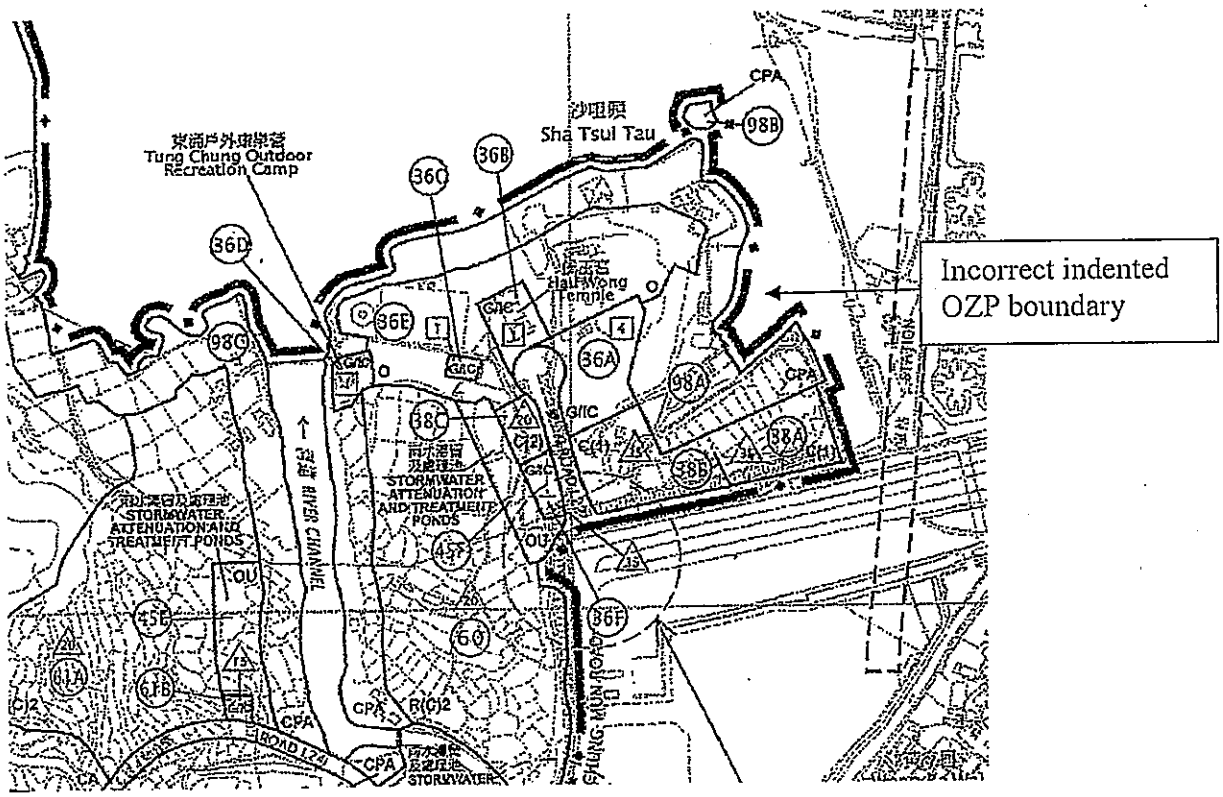


Figure 4: An incorrect indentation on the western bank of estuary of Tung Chung River (Extracts of TCV OZP)

7.2 Development Densities too Low

7.2.1 The development densities proposed for housing sites are generally too low. The plot ratio (PR) of all the housing sites now covered by the TCV OZP are either 1 or 1.5. Two other sites proposed in the TC Study are now covered by the TCTC OZP, and are plot ratio 6.4 (Area 42) and 5.4 (Area 46).

7.2.2 According to the Island District Council Paper No. 74/2015 (IDC Paper), prepared in September 2015, which reports on the progress of the TC Study, the total flat production of TCE and TCW is 49,400, only slightly higher than the annual supply of 48,000 set by the LTHS. The TC Study took four years to complete. The study process is long; the implementation will be even longer. However, the flat production is so low.

7.2.3 The Government is making every effort to find land for housing development as stated in Paras 5.1 and 5.2 above, yet the above development densities are generally very low, especially when TCW will be served by a terminus railway station. This low density of development is under-utilization of scarce land resources which will be serviced by all relevant services and transport infrastructure.

7.3 Transport Oriented Development Not Followed

7.3.1 The Tung Chung Line will be extended with the terminus station located to the west of Yat Tung Estate and in the vicinity of Yu Tung Road. No doubt, this station will provide much convenience to the existing and future residents of Yat Tung Estate, Area 39 and those residents of Tung Chung West. However, under the TC Study, most of the highest density TCW development sites are located in the far south of the planning area which are more than 500m away from the station. Please see **Figure 1** for the 500m catchment of the proposed railway station. Land close to the station is of very low population density or no residential development at all. As such, the TCW is planned in a way that most of the future population will be deprived of easy access to the convenient public mass transit facility.

7.3.2 Para 7.11 of the Explanatory Statement attached to the TCV OZP states that

"To capitalize on the enhanced accessibility to mass public transport, the sites near the proposed railway station and along Tung Chung Road will have higher PRs which are in line with the TOD concept"

7.3.3 Firstly, the two representation sites shown in **Figure 2** are located within 500m from the future railway station. Part of Site A is for G/IC use and the rest is non-development land use. Site B is for non-development land use. These violate the TOD concept. Secondly, the TOD concept relates to transport nodes rather than a road. As such, the above statement is an incorrect application of this planning principle.

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

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

7.5 Imbalance Housing Mix

7.5.1 The total flat production of TCW proposed under the TC Study is only 8,600 units, comprising 5,200 subsidized and 3,400 private ones. The public to private housing mix of the new flat production is about 60% to 40%. But these figures do not reflect the real future social situation of the western part of Tung Chung.

7.5.2 Even though the boundary of the OZPs has been demarcated so that Yat Tung Estate, Area 39, Area 42 and Area 46 are included in the TCTC OZP, there is no doubt that residents of these developments will use the terminus station instead of the present Tung Chung Station, upon completion of the new station.

7.5.3 From the socio-economic consideration, the TCW community would comprise residents of these four public housing estates and those of the private residential developments in TCV. The Executive Summary of TC Study estimates the public to private housing mix of the TCW area to be 87% to 13%.

7.5.4 The TC Study has not taken the opportunities to address the over-concentration of public housing due to the large Yat Tung Estate and committed public housing development at Area 39, but perpetuates it.

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

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

7.7 Undesirable Development Profile of Tung Chung West

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

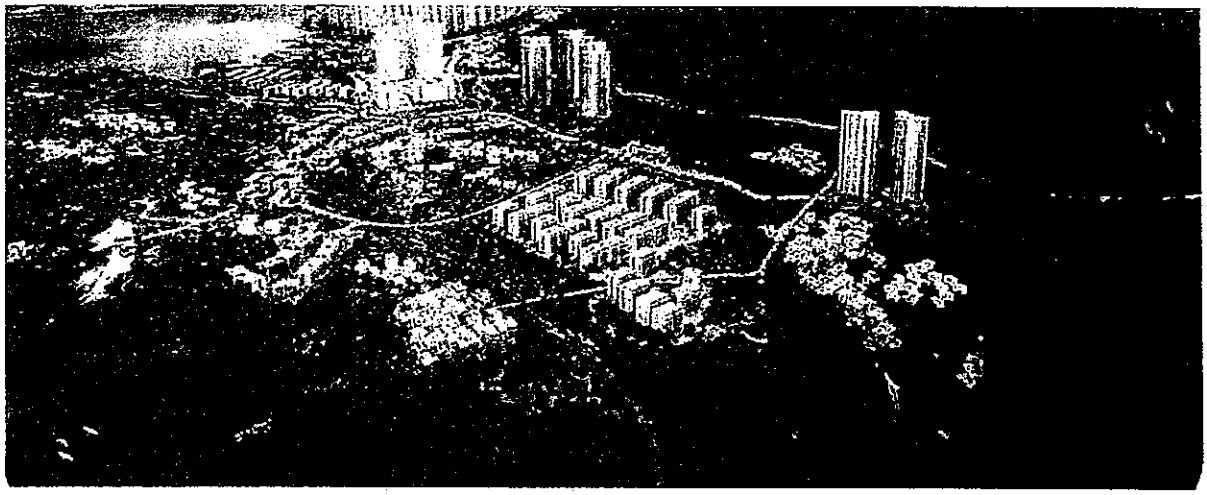


Figure 5: Asymmetric Development Profile: The foreground low rise development lies on the western part of the valley while high rise public housing development in Area 39, Area 42 and Area 46 are on the eastern side.
(Extracts of the Stage 3 Public Engagement Consultation Document of TC Study)

7.8 Good Planning Practices Ignored

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

7.9 Land Extensive Drainage System

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

PROPOSALS TO MEET THE REPRESENTATION

8 Ecological Values of the Representation Sites and their Vicinity

8.1 An ecological survey has been undertaken for area around the Representor's land. With some buffer area, Representation Sites A and B (shown in **Figure 2**) were considered suitable for development.

8.2 Significant area of the CPA and "O" zones within Site A is *Lucaena leucocephala* woodland which is of Very Low Ecological Value. *Lucaena leucocephala* is an exotic and invasive woody tree species that has the potential to pose a long-term threat to natural habitats (by invasion) and poses a long-term maintenance liability (leaving aside its ecologically invasive nature), it is highly prone to typhoon damage, hence may present a hazard to adjacent public areas. It is sensible to extend the GIC zone to cover this area.

8.3 Site A has avoided the ecologically sensitive area with mangrove and mangrove mix vegetation. With some buffer for the ecologically sensitive area, the site is generally suitable for development.

8.4 Regarding Site B, the Tung Chung Stream passes through its eastern and northern sides. The rest of the site is an orchard and the fruit trees have little ecological value. With some buffer area from the river bank, the site is suitable for development.

8.5 A habitat map of Sha Tsui Tau is shown in **Figure 6.** It shows there is a large mangrove colony in the indented area not covered by OZP. Please refer to the full Ecological Survey and Assessment Report in **Appendix A.**

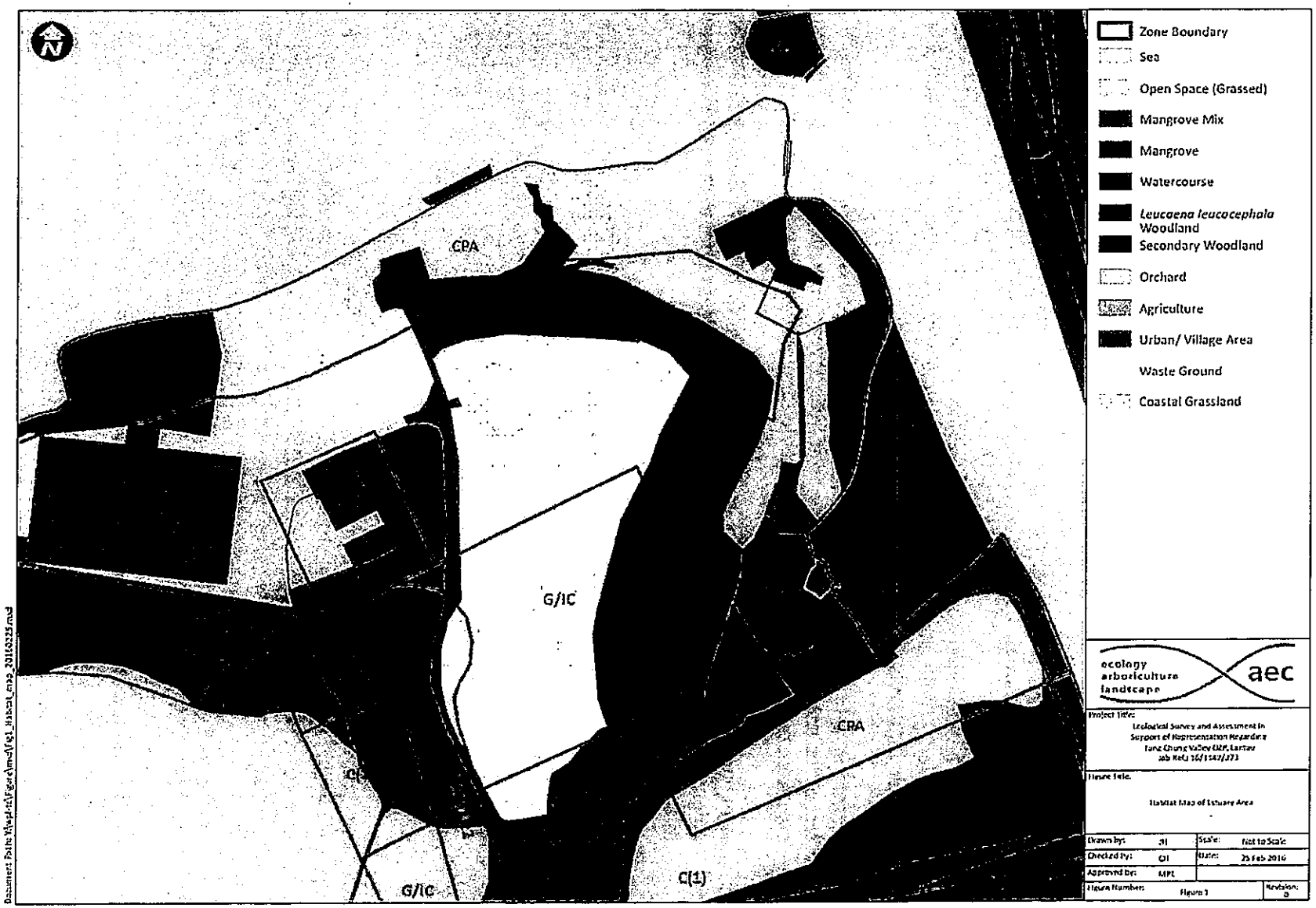


Figure 6: Habit Map of Sha Tsui Tau

9 Realignment of OZP Boundary

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

10 Proposed G/IC Zoning for Site A

Proposed Changes to the G/IC Zone Boundary

10.1 It is proposed the G/IC zoning that covered part of Site A be extended to the whole site. That is to adjust the boundary of "O" and CPA land to G/IC to reflect the existing ecological condition of this area. To safeguard the scenic view from Hau Wong Temple towards Tung Chung Bay, a strip of land (about 10m in width), along the northern boundary of the proposed G/IC zone is designated as "Non-building area" (NBA).

10.2 Another NBA of width approximately 10m is also proposed to act as buffer to protect the mangrove/mangrove mix area and streamcourse from the future development on the G/IC site. Within this NBA the establishment of a shelterbelt of appropriate native tree and shrub species, forming an ecological and visual barrier between the developed area and the habitats in the CPA zone, should be required.

10.3 The enlarged G/IC zone will exclude the woodland of *Lucaena leucocephala* which is an exotic and invasive woody tree species that has the potential to pose a long-term threat to natural habitats and safety issue to adjacent public area from the CPA zone. This woodland is also considered of low ecological value and suitable for development. The proposed NBA adjacent to the CPA zone in fact will better protect the coastal area. **Figure** 7 shows the proposed new zoning boundary for Site A and the NBAs on the OZP with the new boundary.

Proposed Changes to the Notes of G/IC Zone

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

10.5 Flat development at G/IC sites will still require application to the TPB. As such, the TPB will have the ultimate control on the actual use of the G/IC sites on the TCV OZP.

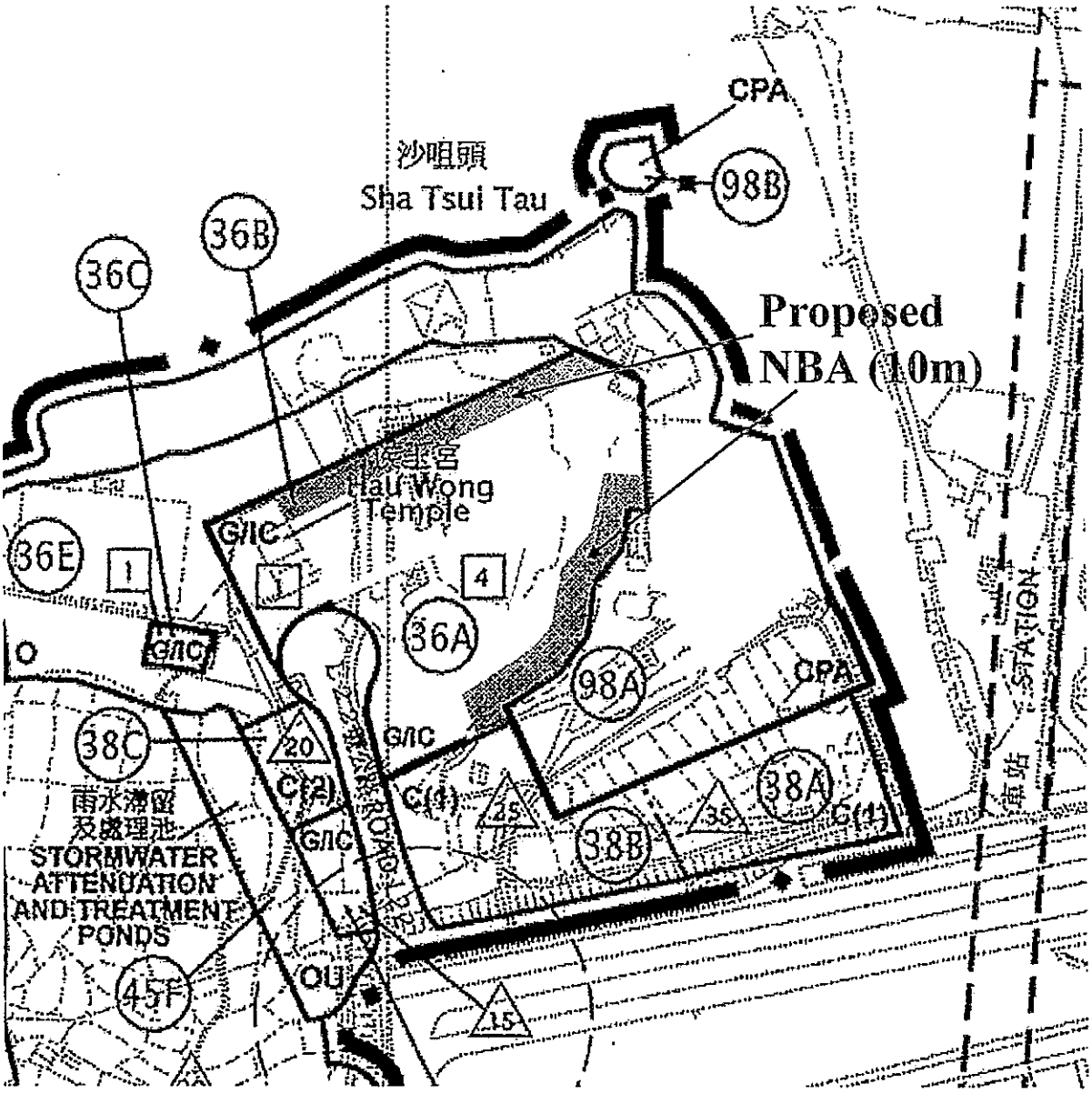


Figure 7: Proposed new OZP boundary of the western bank of the Tung Chung Estuary and G/IC zoning for Site A. The Site has two NBAs to protect the views of Hau Wong Temple towards the sea and act as buffer of the CPA.

GOVERNMENT, INSTITUTION OR COMMUNITY

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

Planning Intention

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

(Please see next page)

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

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

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

Proposed Changes to the Explanatory Statement

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

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

Sha Tsui Tau as a Community Focal Point

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

11 Proposed Changes related to Site B

Site B for Residential Development

11.1 Site B is located in Area 45D and within 500m from the future railway station. Under the TOD concept, the site should be planned for high density development. The site is presently zoned CPA and OU(Stormwater Attenuation and Treatment Ponds). The site should be planned for residential development so that more people can enjoy the good accessibility to the future MTR station, and the stormwater attenuation ponds can be relocated to another suitable site.

11.2 Balancing the TOD concept and the conservation approach adopted for the development of TCV, it is considered that excluding the stream and some buffer areas along the banks, the rest of Site B is suitable for residential development. It is proposed that Site B be partly zoned as OU(River Park) and partly zoned as Residential Group (C)2 [R(C)2] with PR at 1. Please refer to **Figure 9**.

11.3 The minor changes will slightly increase the provision of private housing in the TCW which is currently dominated by public housing development including Yat Tung Estate and developments in Area 39, Area 42 and Area 46. This will help alleviate the social imbalance, albeit to a very limited extent.

Underground Attenuation Pond underneath Open Space Site

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

Minor changes to the Notes of the OZP

11.5 Minor changes to the Notes for "O" is sufficient to cater for the "Stormwater Attenuation and Treatment Ponds" use and is shown in **Figure 10**. This arrangement will respect the character of TCV and better utilise the valuable land which is well served by infrastructure.

11.6 Regarding the Building Height Restrictions (BHRs) for Site B, it is proposed that the BHR be set at 20mPD which is identical to the residential site to its north and south.

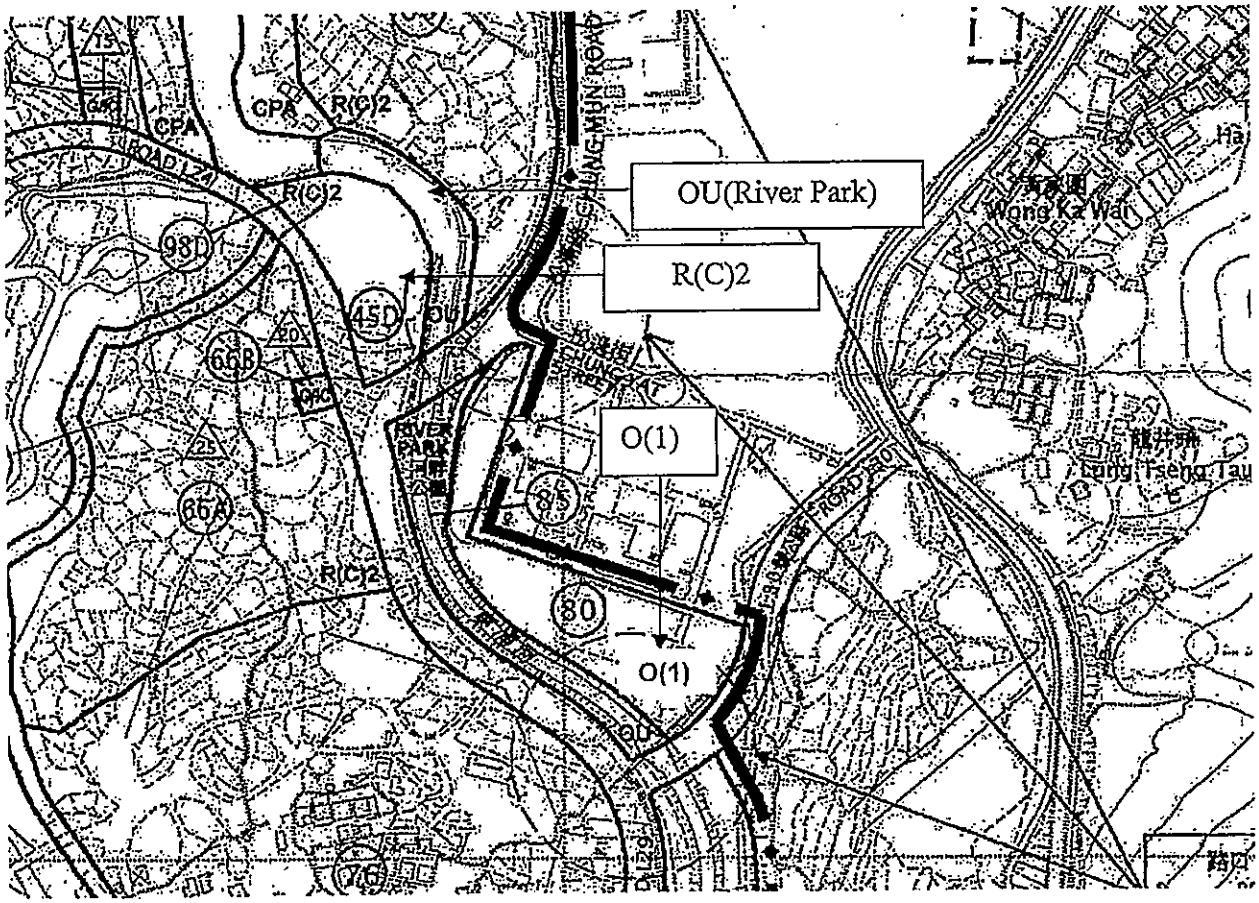


Figure 9: Proposed New Zonings of Site B and the Open Space on the east bank of Tung Chung Stream

OPEN SPACE

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

Planning Intention

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

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

Minor changes to the Explanatory Statement of the OZP

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

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

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

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

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

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

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

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

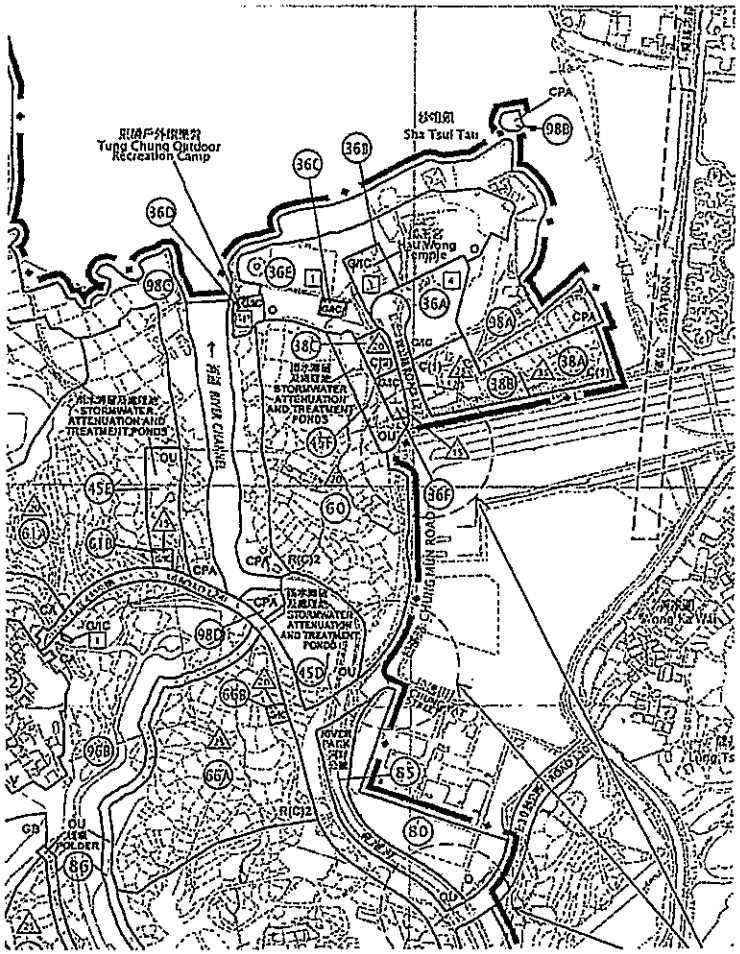
12 Overall Summary of Changes to the Plan and Notes

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

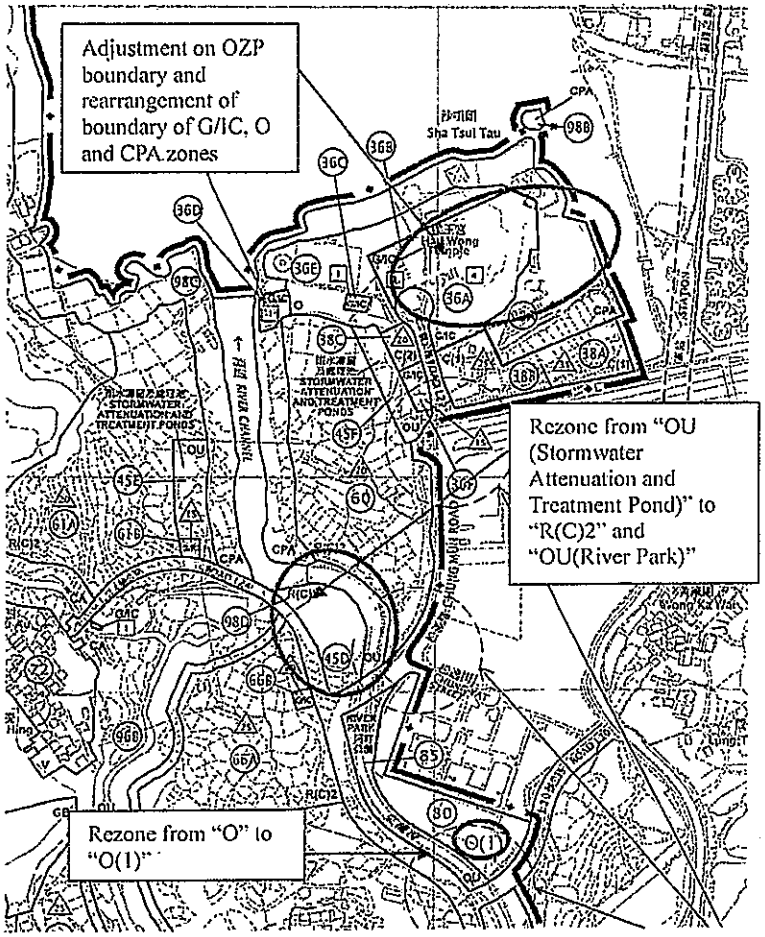
a) adjustment of the OZP boundary covering the western bank of the estuary;
b) Site A: rearrangement of boundary of G/IC, O and CPA zones at Sha Tsui Tau;
c) Site B: rezone from OU (Stormwater Attenuation and Treatment Pond) to R(C)2 and OU(River Park);
d) Rezone from the "O" site in Area 80 to "O(1)";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

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

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



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



Proposed Changes to the Draft Tung Chung Valley OZP

Figure 11: A comparison of the Draft Tung Chung Valley OZP and the Proposed Changes (highlighted in red) to meet the Representation

13 Conclusions

13.1 Huge investment in infrastructure is needed for the engineering works for the development of TCV. While the preservation of heritage and conservation of the natural environment are respected, a reasonable level of development should be pursued.

13.2 This representation proposes a minor change to rectify the awkward OZP boundary to include a private lot and the coastal mangrove area. The minor change is to ensure the coastal land is under protection by appropriate planning controls. It also proposes to adopt the TOD planning concept by slightly increasing the development land area within 500m from the future railway station.

13.3 An ecological survey has been undertaken, the proposals put forward in this representation have been carefully considered to balance the good planning practice of benefiting more people in terms of increasing accessibility to public transport and community facilities and conservation concerns.

13.4 The extended G/IC site at Sha Tsui Tau would help create a community focal point for the Tung Chung Valley community. A consistent approach of including "Flat" as a Column 2 Use as in the other two Tung Chung OZPs should be adopted. This will provide more land use flexibility, but the ultimate control on the use of G/IC sites is still with the TPB. Two NBAs are proposed for the site to respect heritage and nature conservation.

13.5 Relocating an attenuation and treatment pond to free the land for residential development is in line with government policy to increase land supply for housing. Putting the pond underneath an open space site which lies adjacent to the River Park is considered feasible. This is a sensible way to optimise the use of valuable land.

13.6 The changes proposed in this representation are minor, but would significantly enhance the planning of TCV and optimise the land use of the serviced land. The TPB is requested to give favourable consideration to the proposals.

Masterplan Limited
March 2016

Appendix A
Ecological Survey and Assessment Report

ecology
arboriculture
landscape

aec

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

Ecological Survey and Assessment Report

Job Ref.: 16/1147/373
Date: February 2016

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

Ecological Survey and Assessment Report

(Issue 1)

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1 INTRODUCTION

1.1 Background

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

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

1.2 The Study Area

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

1.3 Field Survey Methodology

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

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

1.3.3 Findings from surveys of the areas are detailed below.

2 ESTUARY AREA

Habitat and Flora

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

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

Agriculture

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

Coastal grassland

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

Leucaena leucocephala woodland

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

Mangrove

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

Mangrove Mix

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

Open space (Grassed)

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

Orchard

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

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

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

Secondary woodland

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

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

Urban / Village Area

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

Watercourse

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

Waste ground

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

2.1.16 An extensive, grassy area dominated by weedy creeper *Wedelia trilobata* with some saplings of *Dimocarpus longan* was also identified at the south within the waste ground.

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

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

Key Faunal Observations

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

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

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

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

2.1.18 No herpetofauna species was recorded within the Estuary Area.

2.1.19 One butterfly species were recorded within the Estuary Area: Indian Cabbage White *Pieris canidia* (**Table 2 of Appendix C**). It is assessed as Very Common in Hong Kong (Chan *et al.* 2011).

2.1.20 No dragonfly or aquatic fauna species were recorded.

2.1.21 No aquatic fauna species was recorded within the study area.

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

2.2 Evaluation of Baseline Ecological Value of the Estuary Area

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

Table 3 Ecological Evaluation of Agriculture

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

Table 4 Ecological Evaluation of Coastal grassland

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

Table 5 Ecological Evaluation of Leucaena leucocephala woodland

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

Table 6 Ecological Evaluation of Mangrove

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

Table 7 Ecological Evaluation of Mangrove Mix

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

Table 8 Ecological Evaluation of Open space (Grassed)

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

Table 9 Ecological Evaluation of Orchard

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

Table 10 Ecological Evaluation of Secondary woodland

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

Table 11 Ecological Evaluation of Urban/Village Area

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

Table 12 Ecological Evaluation of Watercourse

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

Table 13 Ecological Evaluation of Waste Ground

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

3 RIVERSIDE AREA

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

4 CONCLUSIONS AND RECOMMENDATIONS

4.1.1 The **Estuary Area** includes three habitat areas of Low to Moderate Ecological Value; mangrove, secondary woodland and coastal grassland. In addition, a further habitat area, currently classed as mangrove mix, has the potential to develop into a habitat area of similar Low to Moderate Ecological Value if this is undisturbed. Zoning of these areas as Coastal Protection Area (CPA) is supported from an ecological perspective and accords with the objective of maintaining and conserving biodiversity where this is feasible and in accordance with the overall planning intention.

4.1.2 However, the proposed CPA zone does not accord well with the actual location of the mangrove habitat. A significant area of mangrove (c. 0.34 ha) is located outside the CPA zone and is not covered by the Draft OZP (hence leaving it vulnerable to damage), whilst the proposed CPA zone also includes a significant area of *Lucaena leucocephala* woodland (c. 0.27 ha) of Very Low Ecological Value.

4.1.3 *Lucaena leucocephala* is an exotic and invasive woody tree species that has the potential to pose a long-term threat to natural habitats (by invasion) and poses a long-term maintenance liability (leaving aside its ecologically invasive nature, it is highly prone to typhoon damage, hence may present a hazard when adjacent to public areas).

4.1.4 Accordingly, it is recommended that the CPA zone be adjusted to include the mangrove area in the east and to exclude the *Lucaena leucocephala* area in the west. It would be appropriate for this area excluded in the west to be incorporated in the adjoining G/IC zone.

4.1.5 Further, it is recommended that in order to protect the integrity of the coastal grassland and mangrove areas as well as the streamcourse in the revised G/IC zone an approximately 10m wide strip should be designated as a Non-building Area (NBA) within which the future development of the G/IC zone should be required to establish a shelterbelt of appropriate native tree and shrub species, forming an ecological and visual barrier between the developed area and the habitats in the CPA zone.

4.1.6 The **Riverside Area** entirely comprises orchard of Low Ecological Value. There are no ecological constraints to its redevelopment so long as appropriate measures are taken to ensure that there are no direct or indirect impacts on the Tung Chung River or its fauna.

Figure 1

Habitat Map

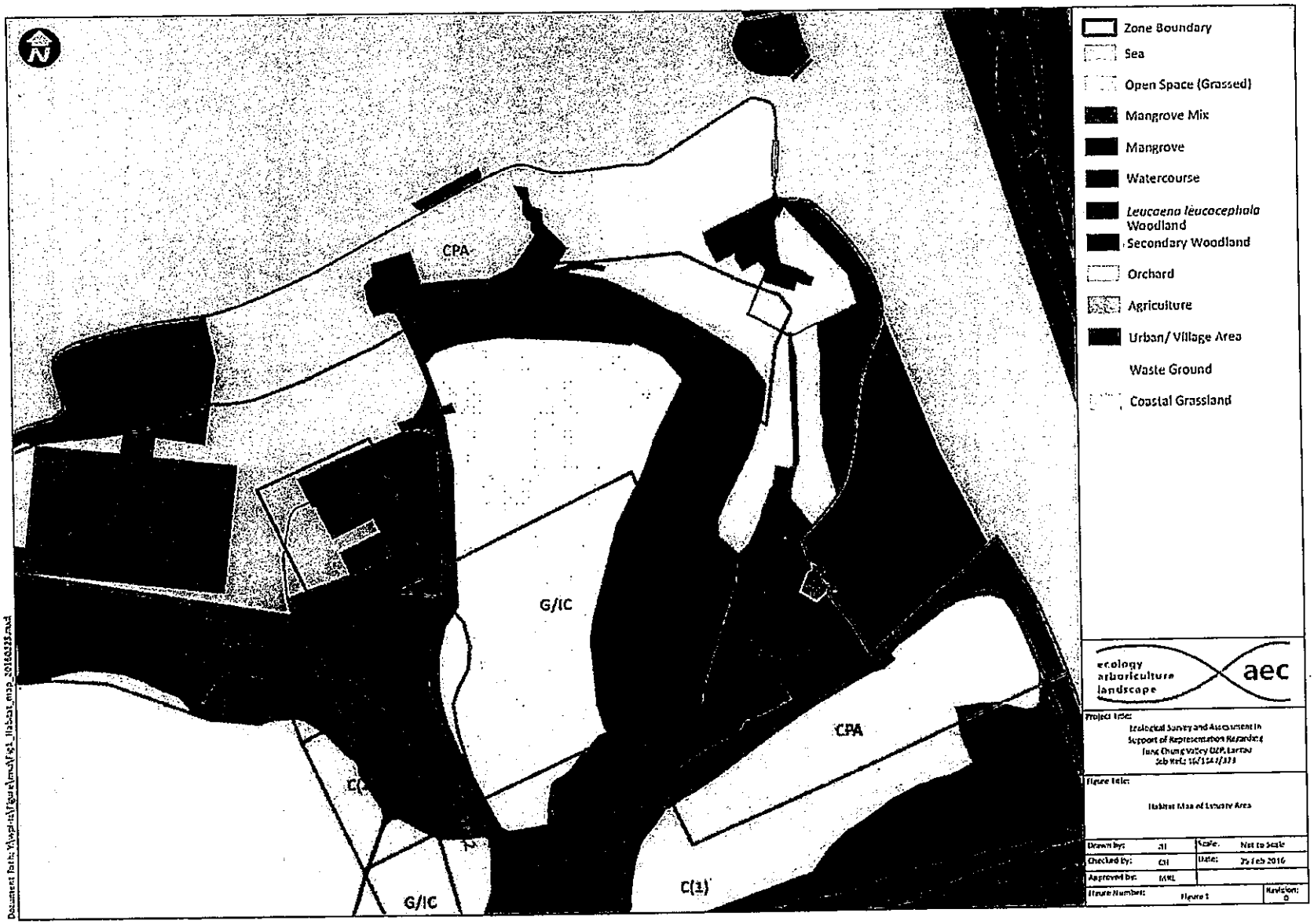
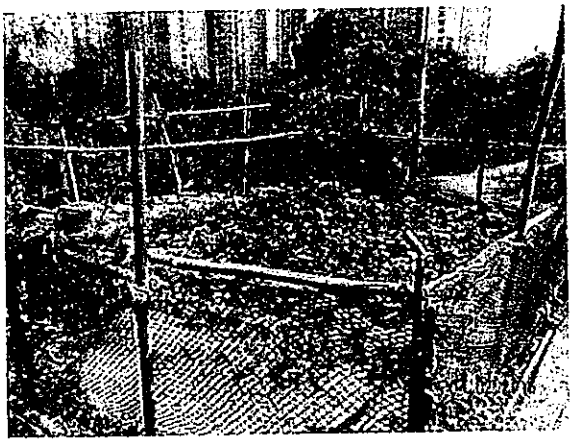

Zone Boundary
Sea
Open Space (Grassed)
Mangrove Mix
Mangrove
Watercourse
Leucaena leucocephala Woodland
Secondary Woodland
Orchard
Agriculture
Urban/ Village Area
Waste Ground
Coastal Grassland
CPA
G/IC
CPA
C(
G/IC
C(1)
ecology arboriculture landscape
aec
Project title:
Ecological Survey and Assessment in Support of Representation Regarding Tung Chung Valley OZP, Lantau
Job Ref.: 16/1147/373
Figure title:
Habitat Map of Survey Area
Drawn by: JH
Scale: Not to Scale
Checked by: CH
Date: 25 Feb 2016
Approved by: MRL
Figure Number: Figure 1
Revision: 0

Figure 1

Appendix A

Study Area and Habitat Photographs

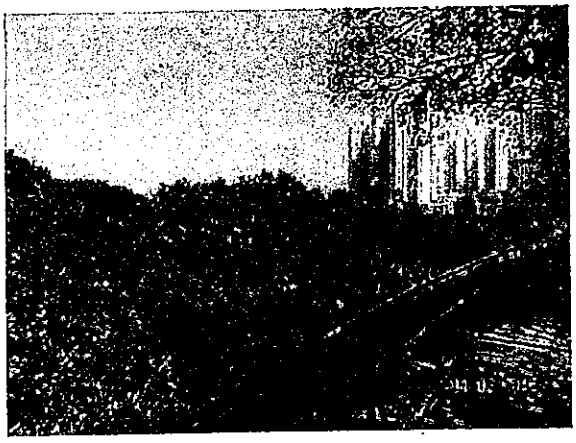


Agriculture

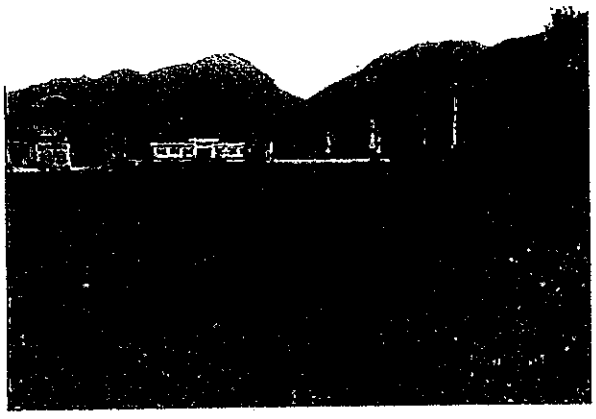
coastal grassland

Leucaena leucocephala woodland

Mangrove



Mangrove mix



Open space (Grassed)

Orchard

Secondary woodland

Urban/village area

Watercourse

Waste ground

Appendix B

List of Plant Species Recorded within the Study Area

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

Scientific name	Chinese name	Origin	Growth Form	Status in HK[2]	Habitat											
					Agriculture	Coastal/ Grassland	Leucaena leucocephala shrubland/ woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Urban/ Village Area	Waste ground	Watercourse
Abutilon indicum	磨盤草	Native	Herb	Restricted					.	*					
Acacia auriculiformis	耳果相思	Exotic	Tree	Widely cultivated		*	*	*	*		**	**		*	
Acanthus ilicifolius	老鼠簕	Native	Shrub	Common				***	***						*
Achyranthes aspera	土牛膝	Native	Herb	Common								*			
Aegiceras corniculatum	桐花樹	Native	Shrub/Tree	Common				**	***						
Ageratum conyzoides	藿香薊	Exotic	Herb	Common										*	
Alocasia macrorrhizos	海芋	Native	Herb	Very common								*			
Alysicarpus vaginalis	鏈莢豆	Native	Herb	Very common										*	
Amaranthus viridis	野莧	Native	Herb	Very common						*				*	
Aporusa dioica	銀柴	Native	Tree	Very common							*				
Artocarpus heterophyllus	菠蘿蜜	Exotic	Tree	Commonly planted for fruit			*				*	*		**	
Aster baccharoides	白舌紫菀	Native	Herb/Shrub	Very common		**	*			**					
Bambusa sp.	竹屬	-	Bamboo	-								***			
Bauhinia sp.	羊蹄甲屬	-	Tree	-								*			*
Bidens alba	白花鬼針草	Exotic	Herb	Very common	*	**	**	*	*	**	**	***	**	**	*
Bombax ceiba	木棉	Exotic	Tree	Cultivated										*	
Bothriochloa bladhii	臭根子草	Native	Herb	Very common						*				*	
Brachiaria mutica	巴拉草	Exotic	Herb	Very common			*							*	
Bridelia tomentosa	土蜜樹	Native	Shrub/Tree	Very common		*			*		*	*	*		
Bruguiera gymnorhiza	木欖	Native	Tree	Restricted		*		**	*						
Caesalpinia vernalis	春雲實	Native	Climber	Common								**			

Scientific name[1]	Chinese name	Origin	Growth Form	Status in HK[2]	Habitat										
					Agriculture	Coastal / grassland	*Leucaena leucocephala* woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Urban / Village Area	Waste ground	Watercourse
Cajanus scarabaeoides	蔓草蟲豆	Native	Climber	Common										**	
Callistemon viminalis	串錢柳	Exotic	Tree	Cultivated										**	
Canavalia maritima	海刀豆	Native	Climber	Common								*			
Cardamine flexuosa	碎米薺	Native	Herb	Common											*
Carica papaya	番木瓜	Exotic	Tree	Cultivated			*				*			*	
Casuarina equisetifolia	木麻黃	Exotic	Tree	Cultivated								*			
Catharanthus roseus	長春花	Exotic	Herb/Shrub	Common						*				*	
Celosia argentea	青葙	Native	Herb	Very common										**	
Celtis sinensis	朴	Native	Tree	Common and widely planted							*	**		*	
Celtis timorensis	棹葉朴	Native	Tree	Restricted			*				*				
Cerbera manghas	海芒果	Native	Tree	Common		*		*	*		*				*
Chloris barbata	孟仁草	Native	Herb	Very common		*				*				*	
Cinnamomum burmannii	陰香	Native	Tree	Common, also cultivated							*	*			
Citrus reticulata	桔	Exotic	Tree	Cultivated							*	*			
Clausena lansium	黃皮	Exotic	Tree	Cultivated				*			**	*	*		
Cleistocalyx nervosum	水翁	Native	Tree	Common				*	*					*	
Clerodendrum inerme	苦郎樹	Native	Climber/Shrub	Common				*				*			
Cocculus orbiculatus	木防己	Native	Climber	Common	*			**			*	**		*	*
Commelina diffusa	節節草	Native	Herb	Common								*			**
Conyza sumatrensis	蘇門白酒草	Exotic	Herb	Common							*			*	
Crotalaria pallida var. *obovata*	豬屎豆	Exotic	Herb/Shrub	Common						*				*	
Cynodon dactylon	狗牙根	Native	Herb	Very common						****				****	
Cyrtococcum patens	弓果黍	Native	Herb	Very common							**				

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

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

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

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

Scientific name	Chinese name	Origin	Growth Form	Status in HK[2]	Habitat										
					Agriculture	Coastal Grassland	*Leucaena leucocephala* woodland	Mangrove	Mangrove mix	Open space (Grassed)	Orchard	Secondary woodland	Village Area / Urban	Waste ground	Watercourse
cannabifolia															
Vitex rotundifolia	白背蔓荊	Native	Shrub	Common						*					
Wedelia trilobata	三裂葉蟛蜞菊	Exotic	Herb	Common, also widely cultivated		**	****	*	*	**	**	***	**	****	**
Youngia japonica	黃鵪菜	Native	Herb	Very common	*					*			*	*	*
Zanthoxylum nitidum	兩面針	Native	Climber/Shrub	Very common							*	*			
Total number of species recorded				131	7	24	22	27	22	29	54	51	20	59	19

Note:

1.Origin of plant species refer to AFCD (2012). Check List of Hong Kong Plants 2012. Agriculture, Fisheries and Conservation Department, HKSAR, Hong Kong.

2.Status follows Xing, F.W., Ng, S.C., Chau, L.K.C. 2000. Gymnosperms and angiosperms of Hong Kong. Memoirs of the Hong Kong Natural History Society 23: 21-136.

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Appendix C

Tables of Summaries of Fauna species Recorded in Study Area

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

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

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

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

Species	Scientific Name	Conservation Status[1]	Wasteland
Indian Cabbage White	*Pieris canidia*	-	1

[1]Conservation status refers to Fellowes *et al.* 2002.

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香港仲裁師學會會員
註冊專業測量師(產業測量)

Sung Shu Hung
宋樹鴻
MRICS MHKIS RPS(GP)
MAPFM MHIREA BSc(Hons)
英國特許測量師學會會員
香港測量師學會會員
註冊專業測量師(產業測量)
新加坡房產及設施管理學會會員
香港地產行政師學會會員
估值及物業管理(榮譽)學士

Lee Mo Yi
李霧儀
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香港註冊專業規劃師
城市設計及設計學碩士(澳洲)
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理學士

Ng Hang Kwong, BBS
吳恒廣
FRICS FHKIS MCIREA RPS(GP)
英國特許測量師學會資深會員
香港測量師學會資深會員
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註冊專業測量師(產業測量)

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

Pun How Wai
潘孝維
MRIBA
英國註冊師學會會員

By Hand

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

RECEIVED
8 MAR 2016
Town Planning Board

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

Dear Sir/Madam,

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

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

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

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

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

Lawson David & Sung

Encl.

033

c.c. Client

香港中環雪咸街1-3號南華大廈1601室
Room 1601, South China Building, 1-3 Wyndham Street, Central, Hong Kong. Tel: (852) 2877 1636 Fax: (852) 2524 0355
Email : LDSssung@LawsonSurveyors.com Website : www.LawsonSurveyors.com

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	Date Received 收到日期	

1. 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。

2. Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at http://www.info.gov.hk/tpb/.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道333號北角政府合署15樓 - 電話：2231 4810或2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The 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爲不曾提出論。

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

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

Form No. S6
表格第S 6號

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

根據《城市規劃條例》（第131章）第6(1)條就草圖作出申述

3. Details of the Representation (Continued) (use separate sheet if necessary)
申 述 詳 情 （續）（如 有 需 要，請 另 頁 說 明）

Nature of and reasons for the representation 申述的性質及理由

Subject matters@ 有關事項@	Are you supporting or opposing the subject matter? 你支持還是反對有關事項？	Reasons 理由
Please refer to the attached written representation	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ 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/繪圖爲彩圖或超過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 .....

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

Cannis Lee
Name in Block Letters 姓名（以正楷填寫）

Senior Town Planner
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 MPIA, 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 4 8 6 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，其地址爲香港北角渣華道 333 號北角政府合署 15 樓。

* Delete as appropriate * 請刪去不適用者
Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」
「✓」at the appropriate box 請在適當的方格內加上「✓」號

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

1. Introduction

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

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

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

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

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

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

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

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

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

2.3 Designation of area for more efficient use

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

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

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

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

2.5 Enhance internal and external connectivity

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

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

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

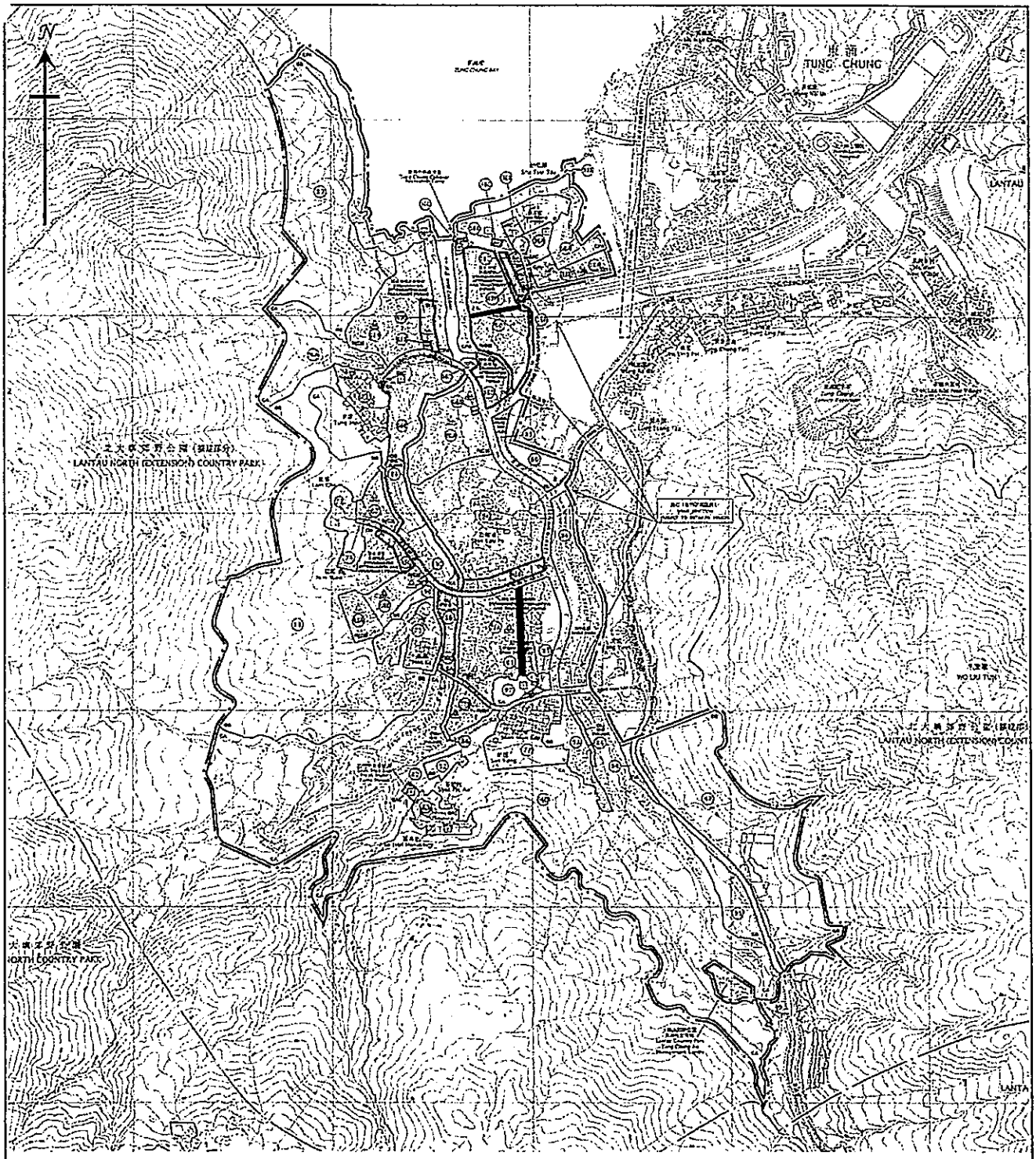
Since the proposed commercial nodes within 500m radius of the TCW MTR Station are not located within walking distance of most of the residential zones, residents will rely on local transportation to access the commercial nodes and Tung Chung Town Centre for their shopping needs. In line with the self-sustainable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

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

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

3. Conclusion

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



Legend:

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

Location Plan (Extracted from Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1) (For Reference Only)	Figure 1 Not to Scale	羅迅測計師行 Lawson David & Sung SURVEYORS LIMITED

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

Form No. S6 表格第S6號

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	Date Received 收到日期	

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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。

2. Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at http://www.info.gov.hk/tpb/.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓，電話：2231 4810 或 2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The 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*)

牛凹村居民代表 楊志豪
牛凹村原居民代表 羅志剛

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

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

不適用

3. Details of the Representation
申述詳情

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

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

Parts 1, 2 and 3 第1、第2及第3部分

006

Form No. S6 表格第S6號

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

Nature of and reasons for the representation 申述的性質及理由

Subject matters@ 有關事項@	Are you supporting or opposing the subject matter? 你支持還是反對有關事項？	Reasons 理由
5.9 自然保育區	☐ support 支持 ☑ oppose 反對	有部份私人土地，被納入自然保育區內。
5.4 鄉村式發展（牛凹村）	☐ support 支持 ☑ oppose 反對	牛凹村原有可建屋範圍，被納入自然保育區內，導致沒有空間發展，損我原居民應有權利。
	☐ support 支持 ☐ oppose 反對	

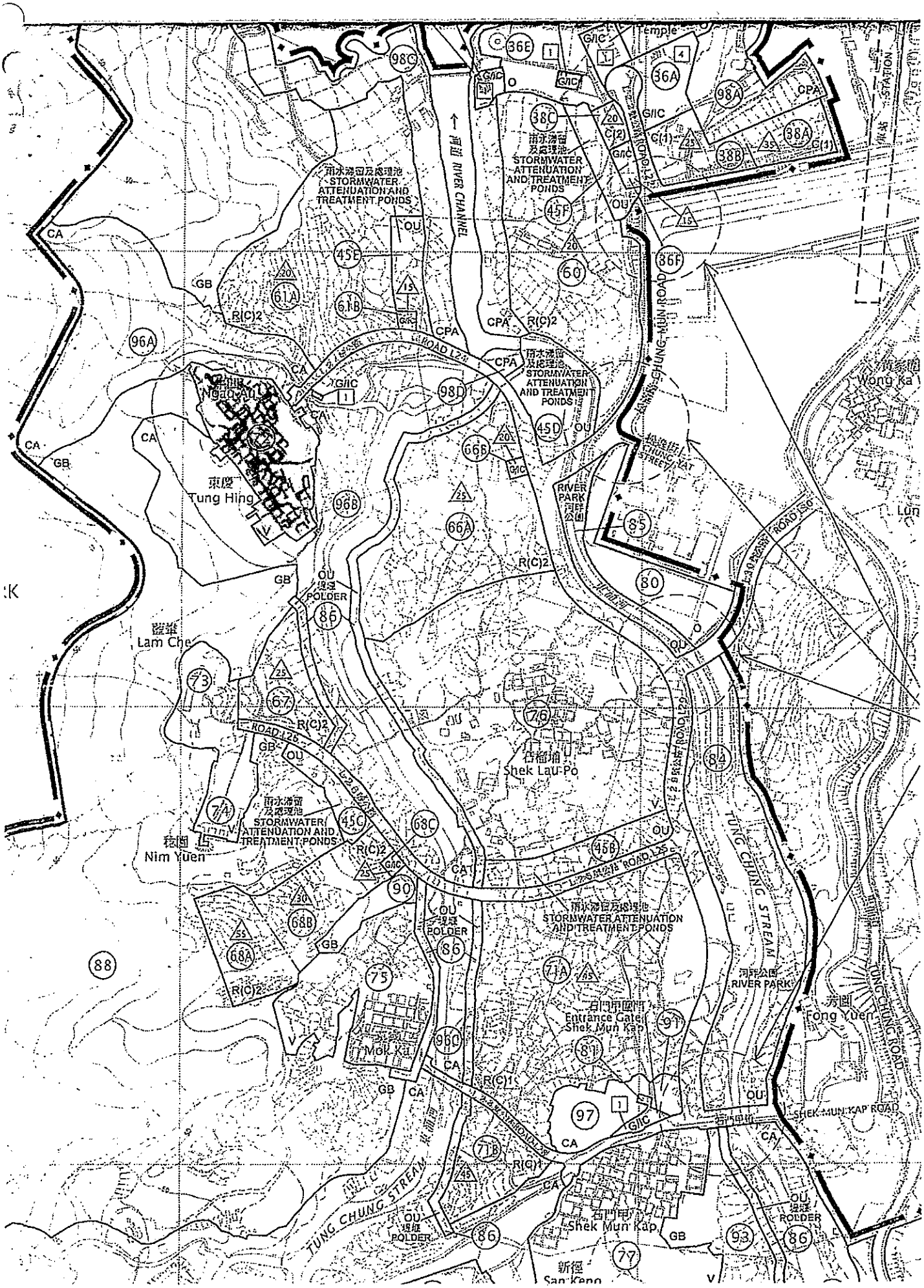
Any proposed amendments to the draft plan? If yes, please specify the details.
對草圖是否有任何擬議修訂？如有的話，請註明詳情。

擴闊牛凹村村界

另畫紅線

@ Please describe the particular matter in the plan to which the representation relates. Where the representation relates to an amendment to a plan, please specify the amendment item number provided in the Schedule of Amendments.
請形容草圖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


STORMWATER ATTENUATION AND TREATMENT PONDS
雨水滯留及處理池
RIVER CHANNEL
TUNG CHUNG ROAD
TUNG CHUNG STREAM
RIVER PARK
河畔公園
Tung Hing
東慶
Lam Che
Shek Lau Po
Nim Yuen
Mok Ka
Entrance Gate
Shek Mun Kap
Fong Yuen
Wong Ka
Lun
SHEK MUN KAP ROAD
ROAD L25
ROAD L26
ROAD L27
ROAD L30
ROAD L31
ROAD L32
ROAD L33
ROAD L34
ROAD L35
CHUNG YAT STREET
POLDER
GB
CA
CPA
R(C)1
R(C)2
G/IC
OU

Form No. S6 表格第 S 6 號

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

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

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

.....

.....

.....

5. Signature 簽署

Signature 簽署 楊志豪 羅志剛 / 楊志豪 羅志剛

Name in Block Letters 姓名（以正楷填寫）

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

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 .....

on behalf of 代表 .....

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

Date 日期 4 / 3 / 2016

Statement on Personal Data 個人資料的聲明

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

   (a) the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and

   (b) facilitating communication between the "representer" and the Secretary of the Board/Government departments

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

   委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城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，其地址爲香港北角渣華道 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

寄件者: Yam Paggie [redacted]
寄件日期: 08日03月2016年星期二 13:30
收件者: tpbpd@pland.gov.hk
主旨: Re : S/I-TCTO/21
附件: Appendix A - D.pdf

Re : S/I-TCTO/21

致: 城市規劃委員會秘書處

由於東涌為香港政府發展重點項目之一，本人黃樹有對東涌新發展有以下意見：

1. 黃泥屋村Zone V 擴大。（見附件A）

2. 候王宮擴大。（見附件B）

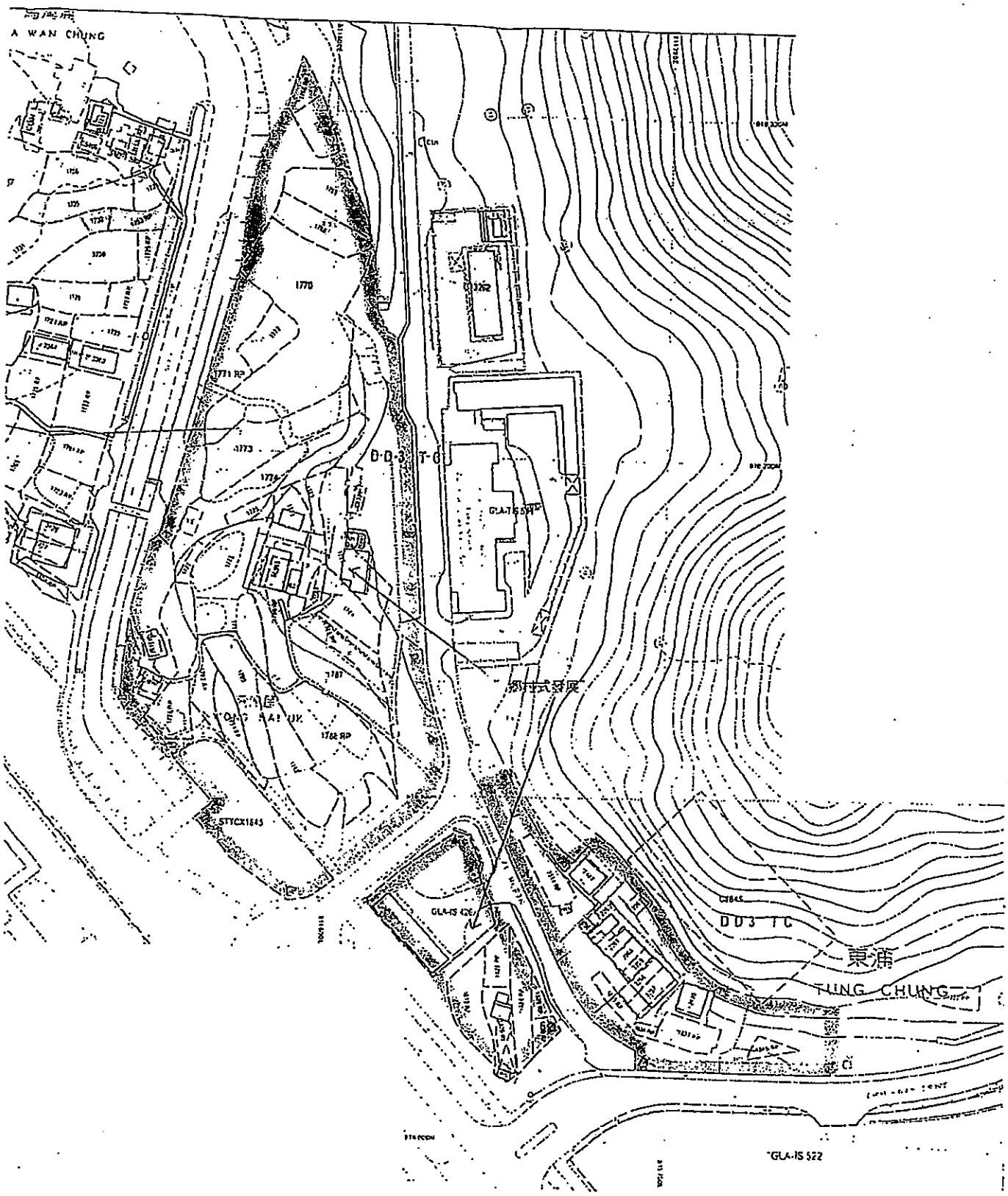
3. 東涌急速發展底下，土地之調配及原居民丁權問題仍未得到妥善解決，土地未盡其用，有見及此，本人提議擴大土地面積，以達致東涌居民之需求。（見附件C 及 D）

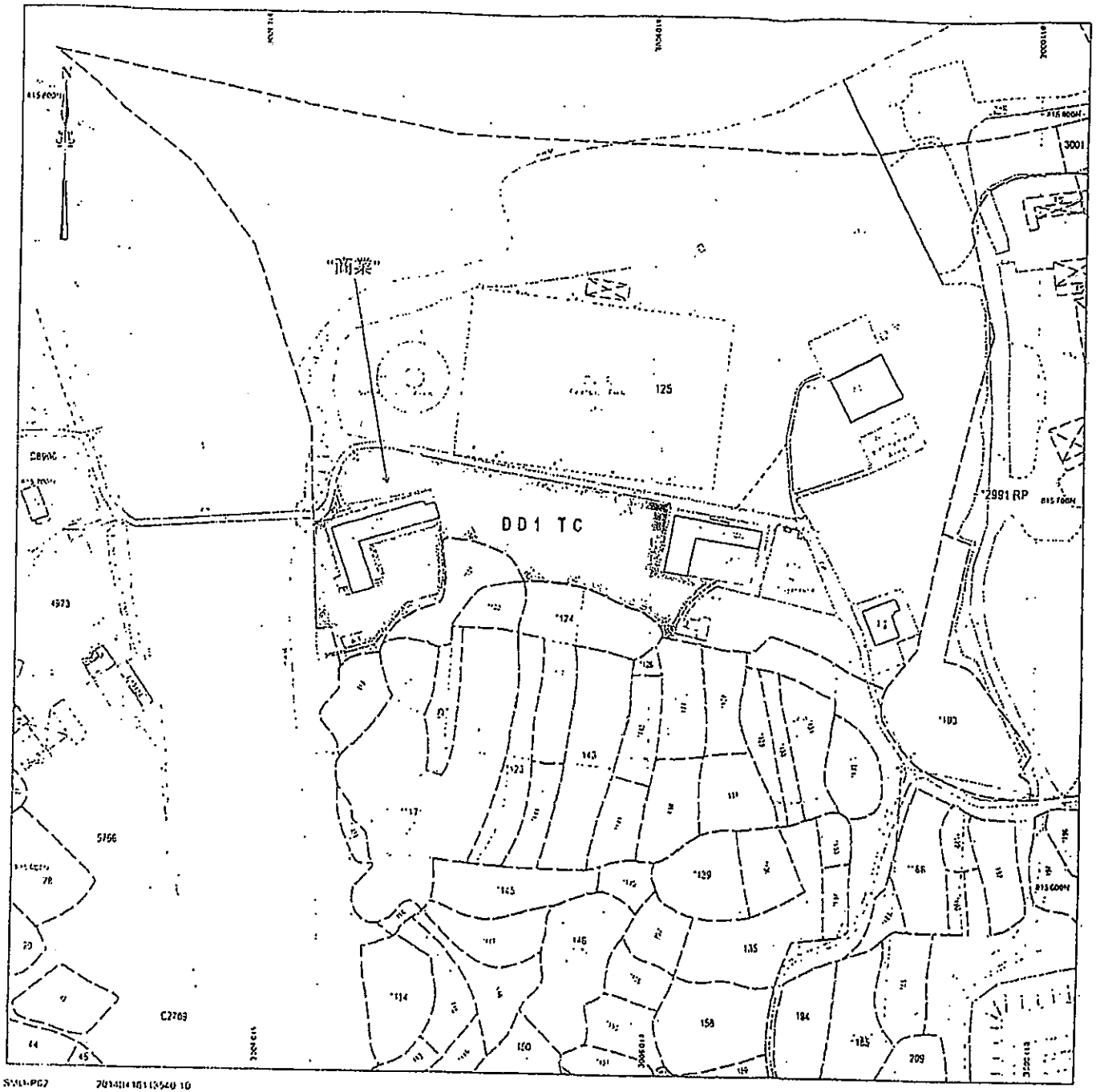
謝謝聽取意見!

黃樹有
(聯絡電話: [redacted]

08-Mar-2016

025


A WAN CHUNG
D·D·3 T·C
DD3 TC
TUNG CHUNG
東涌
GLA-IS 522



地段索引圖
LOT INDEX PLAN

免責聲明

本圖用作地段索引圖的複本，顯示地段界線的大概位置，包括根據政府批地、臨時政府用地、短期租約及政府土地租用許可而臨時佔用土地的位置。佔用土地的情況可基於短期通知而出現或終止，因此應向有關的分區地政專員核證。本圖所示的資料必須通過實地測量予以核實，若有更佳或新的地界證據時，地段索引圖可能會被修訂而無須事先通知。

Disclaimer

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

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

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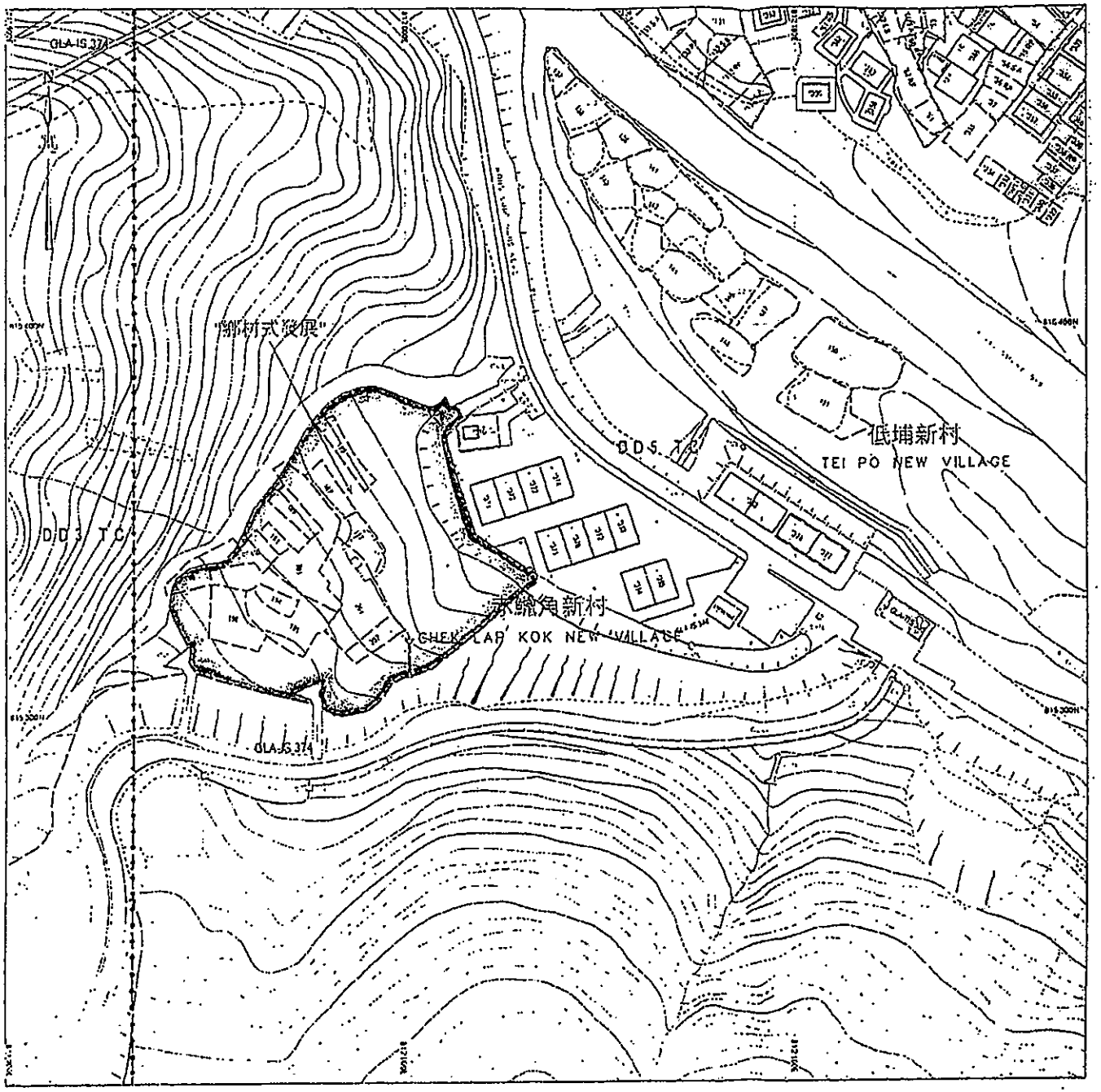
比例尺 SCALE 1 : 1 000

米 metres	10	0	10	20	30	40	50 米 metres

Locality : LANTAU
Lot Index Plan No. : ISO691042014
District Survey Office : Islands
Date : 16-Apr-2014
Reference No. : 9-SE-6C,9-SE-13A



地段索引圖
LOT INDEX PLAN

免責聲明

本圖則乃地段索引圖的複本，顯示地界線的大概位置，包括根據政府批地、臨時政府撥地、短期租約及政府土地租用條款而臨時佔用土地的位置。臨時佔用土地的情況可透過通知書終止或終止，因此應向有關的分區地政專員查證。本圖則所示的資料必須經過實地測量予以核實。當有更佳或新的地界證據時，地段索引圖可能會被修訂而無須事先通知。

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

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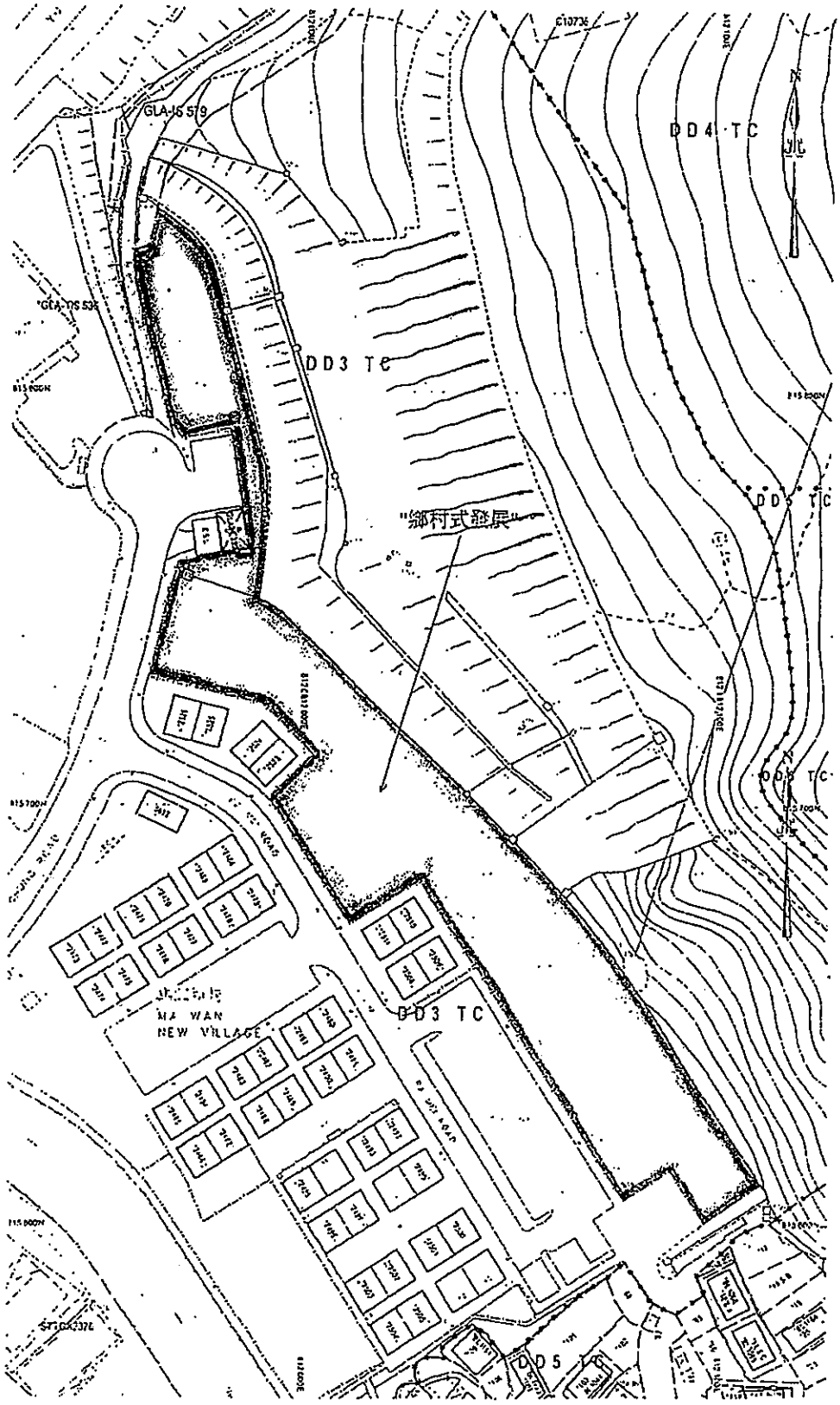
比例尺 SCALE 1 : 1 000

米 metres 10 0 10 20 30 40 50 米 metres

Locality : LANTAU	
Lot Index Plan No. :	IS0225102014
District Survey Office :	Islands
Date :	21-Oct-2014
Reference No. :	8-SE-13D,8-SE-14A


GLA-TS 519
DD4 TC
DD3 TC
"鄉村式發展"
DD5 TC
DD3 TC
MA WAN
NEW VILLAGE
DD5

就草圖作出申述
Representation Relating to Draft Plan

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

參考編號
Reference Number: 160307-174623-48444

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

提交日期及時間
Date and time of submission: 07/03/2016 17:46:23

提出此宗申述的人士
Person Making This Representation: 先生 Mr. 謝擎天(頭村原居民代表)

申述詳情
Details of the Representation :

與申述相關的草圖
Draft plan to which the representation relates: S/I-TCTC/21

申述的性質及理由
Nature of and reasons for the representation:

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

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

008

456 16

tpbpd

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

者: Yin Siu [redacted]
日期: 07日03月2016年星期一 22:58
件者: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk
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

城市規劃委員會主席及委員、規劃署署長、 土木工程拓展署署長及 渠務署署長，

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

東涌居民

馮小燕

011

馮小燕 東涌逸東邨居民

Email: [redacted]

Phone: [redacted]

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

不宜建低密度私人住宅

無助本區市民就業

(B) 該申述的性質及理由

東涌低技術勞工人口不少，尤其鄰近的逸東村

東涌河的新發展無助低下階層經濟

(C) 建議對有關草圖作出的修訂

-發展有機農業

-如塑原般，政府出錢買地讓市民發展農業

-農耕涉及低技術勞工，讓居民不再需要跨區工作，可照顧兒女

-在東涌當區及機場等地預留地方收集廚餘，減低購買肥料的成本

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

-減低本港依賴入口食物狀況及支持本地農業

寄: Yin Siu [redacted]
件日期: 08日03月2016年星期二 12:11
件者: [redacted]; enquiry@cedd.gov.hk; DSD HKSARG
副本:
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

[redacted]

[redacted]

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

不宜建低密度私人住宅

無助本區市民就業

(B) 該申述的性質及理由

東涌低技術勞工人口不少，尤其鄰近的逸東村

東涌谷的新發展無助低下階層經濟

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-如塑原般，政府出錢買地讓市民發展農業

-農耕涉及低技術勞工，讓居民不再需要跨區工作，可照顧兒女

-在東涌當區及機場等地預留地方收集廚餘，減低購買肥料的成本

將香港本地有機商品運到海外出售

-減低本港依賴入口食物狀況及支持本地農業

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

就東涌新市鎮擴展的意見

城市規劃委員會主席及委員、規劃署署長、 土木工程拓展署署長及 渠務署署長，

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TSE sai kit

TSE sai kit

[redacted]

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

不宜建低密度私人住宅

無助本區市民就業

(B) 該申述的性質及理由

東涌低技術勞工人口不少，尤其鄰近的逸東村

東涌河的新發展無助低下階層經濟

(C) 建議對有關草圖作出的修訂

-發展有機農業

-如塱原般，政府出錢買地讓市民發展農業

-農耕涉及低技術勞工，讓居民不再需要跨區工作，可照顧兒女

-在東涌當區及機場等地預留地方收集廚餘，減低購買肥料的成本

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

-減低本港依賴入口食物狀況及支持本地農業

寄件者: Hin tung Chan [redacted]
寄件日期: 07日03月2016年星期一 22:45
收件者: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk
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，東涌擴展區分區計劃大綱草圖編號S/I-TCE/1及工務計劃項目第7786CL號地政總署工務計劃項目第7786CL號東涌新市鎮擴展提出意見。
附件: 東涌河 陳衍彤.docx; 反對東涌東填海_陳衍彤.docx; 東涌中發展-陳衍彤.docx

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

東涌富東邨市民：陳衍彤
電話：[redacted]
電郵：

一、東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

1.1 在東涌河兩邊的區域劃作低密度私人住宅；

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

(B) 該申述的性質及理由

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

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

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

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

2.6 地貌被改建為停車場土地用途，是不合理的安排；

2.7 若河岸保育區會變為消費的河谷，對河的環境污染造成很壞的影響；

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

(C) 建議對有關草圖作出的修訂

3.1 發展有機農業區及成為香港第一個無廢新市鎮

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

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

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

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

總括而言

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

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

3.2 建立本地有機商品品牌

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

3.3 本地經濟及原區就業

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

3.3.2 減低本港依賴入口食物狀況及支持本地農業；

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

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

3.4 建立低碳社區

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

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

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寄件日期: 08日03月2016年星期二 22:54
件者: tpbpd@pland.gov.hk
主旨: 愛護東涌西 - 珍惜自然環境，建立友善及低碳社區

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

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3.1.3 鄰近東涌住宅區的有機商品能以便捷及快速運送到區內的个同屋苑販賣，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。

括而言

在東涌當區及機場等地預留地方收集廚餘，實踐源頭減廢；

廚餘經處理後供東涌谷附近的有機農場；

有機商品在東涌原區各地出售，生產本地食物、發展本地社區經濟及鼓勵本地就業。

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

3.2 建立本地有機商品品牌

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3.3 本地經濟及原區就業

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

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

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

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

3.4 建立低碳社區，友善單車政策

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

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

二、 東涌市中心地區分區計畫大綱核准編號 S/I - TCTC/20

A. 該申述所關乎 的在有關草圖內的特定事項

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

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

B 及 C. 該甲述的性質及理由、對有關草圖作出的建議

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

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

剔出規劃區的理據不明，會否將其地區納入其他計畫大綱仍為未知之數。

2.2 反對 C 項的改劃 - 劃作鄉村式發展、住宅

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

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

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

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

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

2.5 反對 E1 項的改劃 - 把海堤灣畔鄰近的休憩用地改劃為住宅

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

2.6 反對 F1 項的改劃 - 把水藍天岸鄰近的休憩用地改劃為住宅

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

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

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

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

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

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

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

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

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

2.11 反對 K 項的改劃 - 把東涌港鐵站 A 出口對開建成商業區

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

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

2.13 加強及善用東涌的渡海運輸交通。

三、東涌擴展區分區計畫大綱草圖編號 S/I-TCE/1

A. 該申述所關乎 的在有關草圖內的特定事項

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

1.2 商業的總面積 7.38 公頃，卻沒有食環街市，不利民生；

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

1.4 海傍的休憩用地開闢設遊艇停泊處，明顯是私有化我們的公共空間。

B 及 C. 該申述的性質及理由、對有關草圖作出的建議

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

1. 反對填海

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

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

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

2. 特殊教育

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

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

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

3. 環島單車徑

- 要求增設連接東涌及機場的環島單車徑

在有關東涌東填海工程，擔心工程會影響翔東路路面平坦，筆直，加上舖裝良好，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。

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: Chun Kei Lam [redacted]
寄件日期: 08日03月2016年星期二 2:35
收件者: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk
主旨: 對於大嶼山發展的意見
附件: 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

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
[redacted]

林俊麒

[redacted]

[redacted]

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

只是在河口沿河劃出 CPA 對保育作用不大。

(B) 該申述的性質及理由

東涌河的生態和價值應該考慮整個河流系統(由上游至下；游及兩岸的整個河谷)

若河岸保育區會變為消費的河谷，對河的環境污染造成很壞的影響；

(C) 建議對有關草圖作出的修訂

善用東涌谷的生態作教育、農地及果林生產本地農作物等本土經濟，這一些產業有助增加原區就業，減低本港依賴入口食物狀況及支持本地農業，訓練生態文化導賞員，教育大眾珍惜大自然的能源及資源。

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

就東涌新市鎮擴展的意見

城市規劃委員會主席及委員、規劃署署長、 土木工程拓展署署長及 渠務署署長，

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

Haster

Haster [redacted]

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎的在有關草圖內的特定事項

只是在河口沿河劃出 CPA 對保育作用不大。

(B) 該申述的性質及理由

東涌河的生態和價值應該考慮整個河流系統(由上游至下；游及兩岸的整個河谷)

若河岸保育區會變為消費的河谷，對河的環境污染造成很壞的影響；

(C) 建議對有關草圖作出的修訂

善用東涌谷的生態作教育、農地及果林生產本地農作物等本土經濟，這一些產業有助增加原區就業，減低本港依賴入口食物狀況及支持本地農業，訓練生態文化導賞員，教育大眾珍惜大自然的能源及資源。

tpbpd

寄者: Kwok Yu Hang [redacted]
件日期: 07日03月2016年星期一 22:37
收件者: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk
主旨: Proposal for Tung Chung Development
附件: 反對東涌東填海_郭裕恒.docx; 東涌中發展-郭裕恒.docx; 東涌河-郭裕恒.docx

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

Dear Sirs / Madams,

I am one of the Hong Kong resident live in Tung Chung,
After studying the government plan for Tung Chung develpment,
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
[redacted]

一、東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1
(A) 該申述所關乎 的在有關草圖內的特定事項
在東涌河兩邊的區域劃作低密度私人住宅；

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

(C) 建議對有關草圖作出的修訂
發展有機農業區
本土有機農作物有價有市；而且中國內地毒菜等問題，一直令港人憂心入口農產品的安全性。有見及此，支持發展一套安全及有保障的本土有機農業是一門符合長遠利益的產業；近年來政府積極推廣【源頭減廢】，而東涌區正正有大量廚餘可為本土有機農業提供有機肥料。比如：逸東邨、富東邨 、裕東苑 、映灣園 、海堤灣畔及機場等地區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；
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。

tp

寄件人: Alpha Wong [redacted]

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

件日期: 07日03月2016年星期一 20:47

收件者: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; enquiry@dsd.gov.hk

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，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。

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

一、東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

1.1 在東涌河兩邊的區域劃作低密度私人住宅；

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

(B) 該申述的性質及理由

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

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

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

的地方,不少專家報告指出,回到大自然是減低都市人精神病的方法，為了市民的健康和減低本港庫房的醫療開支，政府應保留自然河谷面貌及,鼓勵市民前往東涌河此類自然環境地方，尤其東涌河地理位置不(一)東涌港鐵站行十五分鐘便可到達；

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

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

2.6 地貌被改建為停車場土地用途，是不合理的安排；

2.7 若河岸保育區會變為消費的河谷，對河的環境污染造成很壞的影響；

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

(C) 建議對有關草圖作出的修訂

3.1 發展有機農業區及成為香港第一個無廢新市鎮

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

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

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

總括而言

1. 在東涌當區及機場等地預留地方收集廚餘，實踐源頭減廢；

2. 廚餘經處理後供東涌谷附近的有機農場；

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

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

3.2 建立本地有機商品品牌

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

3.3 本地經濟及原區就業

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

3.3.2 減低本港依賴入口食物狀況及支持本地農業；

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

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

3.4 建立低碳社區

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

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

二、 東涌市中心地區分區計劃大綱核准編號 S/I - TCTC/20

A. 該申述所關乎 的在有關草圖內的特定事項

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

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

B及 C. 該申述的性質及理由、對有關草圖作出的建議

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減，令空氣污染問題惡化，直接損害我們的健康。因此，本人建議保留休憩地方及按居民的需要而規劃，例如推行單車友善的政策，源頭減廢，建立友善社區，令東涌居民擁有一個舒適的家。

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

剔出規劃區的理據不明，會否將其地區納入其他計畫大綱仍為未知之數。

2.2 反對 C 項的改劃 - 劃作鄉村式發展、住宅

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

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

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

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

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

2.5 反對 E1 項的改劃 - 把海堤灣畔鄰近的休憩用地改劃為住宅

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

2.6 反對 F1 項的改劃 - 把水藍天岸鄰近的休憩用地改劃為住宅

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

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

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

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

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

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

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

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

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

2.11 反對 K 項的改劃 - 把東涌港鐵站 A 出口對開建成商業區

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

2.12 反對 R3 項的改劃 - 把馬灣新村東北面的土地由綠化地帶改劃作鄉村式發展
有數以十多萬市民輪候公屋，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」，建議改劃改劃為小型的公共房屋或公營長者屋。

2.13 加強及善用東涌的渡海運輸交通。

三、東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1
A. 該申述所關乎 的在有關草圖內的特定事項
1.1 東涌的空氣污染是全港最高之一，而該計劃大綱草圖建議填海 120.5 公頃，興建 P1 道路的填海約 8.6 公頃，令東涌的霧霾情況惡化；
1.2 商業的總面積 7.38 公頃，卻沒有食環街市，不利民生；
1.3 住宅總面積約 59.03 公頃，卻大部分土地建私樓，以人均佔用土地面積計算，約 7 至 8 成為私樓；
1.4 海傍的休憩用地開闢設遊艇停泊處，明顯是私有化我們的公共空間。
B 及 C. 該申述的性質及理由、對有關草圖作出的建議
對政府擬於東涌東北面約二百公頃的前濱及海床範圍內進行填海工程有以下的意見及建議:
1. 反對填海
東涌東擴展計劃的填海工程將填去 145 公頃海床，由於工程範圍鄰近即將興建的大小磨刀洲海岸公園。
- 施工期間進出填海範圍的工程躉船多達 42-56 架次，加上工程與機場第三條跑道部分施工重疊，若然兩項工程同時進行，每日將有多達二百艘高速船、工程船穿梭大嶼山東北部水域，產生巨大交通流量，嚴重干擾海岸公園內的海洋生物，特別是對聲音及水質敏感的中華白海豚。
大小磨刀洲海岸公園只是港珠澳大橋工程的附帶補償方案，若當局不加入緩解及補償措施，只會令海岸公園名存實亡。
2. 特殊教育
- 建議政府在東涌東填海項目中引入特殊學校，緩衝特殊學童長期要跨區上學的問題。
據社署資料顯示，東涌有 6 間針對弱能人士的服務中心，主要作為展能服務、嚴重弱智人士宿舍及特殊幼兒中心等，惟獨欠缺銜接中小學階段的特殊學校。
教育局於 2004 年曾表示有意於東涌興建特殊學校；而在 2011 年的立法會會議中，時任教育局局長孫明揚亦有回應訴求，表示「已初步揀選了適合的地點興建該特殊學校，正積極與各相關部門研究有關用地的可行性並進行各項技術研究。待有關研究完成後，我們會擬訂該特殊學校的細節安排，以便盡快落實有關的建校計劃。」但礙於社區阻力、擔心影響樓價等原因，至今仍未落實，不少學童長期要跨區上學。
3. 環島單車徑
- 要求增設連接東涌及機場的環島單車徑
在有關東涌東填海工程，擔心工程會影響翔東路路面平坦，筆直，加上舖裝良好，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。
4. 反對在海傍的休憩用地開闢設遊艇停泊處，把公共空間私有化。
總結：希望政府以「低碳城市」及「以人為本」作前提再思考東涌的擴展。
四、工務計劃項目第 7786CL 號 政總署工務計劃項目第 7786CL 號 東涌新市鎮擴展
意見：反對拆卸現有的白芒碼頭，因碼頭是原好的，是我們珍貴的公共空間，及應善用碼頭。
參考資料
1. 東涌擴展文件
http://www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_TC.pdf
http://www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_P1_TC.pdf
2. 東涌擴展區(填海)
http://www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_A1P_TC.pdf
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3. 東涌市中心

//www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_A3P_TC.pdf

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4. 東涌谷

http://www.districtcouncils.gov.hk/island/doc/2016_2019/tc/dc_meetings_doc/9962/IS_2016_017_A2P_TC.pdf

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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

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

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

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王進洋 東涌居民

[redacted]

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

(A) 該申述所關乎 的在有關草圖內的特定事項

破壞東涌河自然生態, 無助香港人身心健康發展

(B) 該申述的性質及理由

東涌谷是街坊及市民常去的地方，市民經東涌谷上昂坪、大澳，對東涌社區而言更是街坊可以在閒時可以換一換氣的晨運好去處，故不應將東涌谷的社區破壞; 東涌河谷此類的自然景觀所餘無幾，而且是市民，不論東涌或市區港人遠離繁囂、鬆馳神經的地方, 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；而石榴埔村附近的叢林在夏天可見四至五十隻螢火蟲，雖然石榴埔村被劃為 V，即留作村落發展，但若日後村民要建丁屋或出讓了丁權與地產商，仍會開墾螢火蟲的棲息地，破壞了寶貴的自然生態。

(C) 建議對有關草圖作出的修訂

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

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

就草圖作出申述
Representation Relating to Draft Plan

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

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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	This is an objection on the newly released planning for Tung Chung areas that is contained 92.93 hectares of land zoned for residential development. Tung Chung carries a lot of ecological value especially in Tin Sam, Tung Chung beach which is one of the most valuable and important a seagrass bed in Hong Kong. In 1994, this has been listed as Sites of Special Scientific Interest (SSSI), for the seagrass and Baker Halophila grass, seaweed, and marine invertebrates. According to Green Power, Ecological Education and Resource Center survey last year, there are numbers of Dragon and the hippocampusin 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. 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.

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		In 1960s and 1970s, Tung Chung has car ried a large number of the hippocampus, and later due to reclamation, overfishing, the number of seahorses decline. Hippoc ampus now infested about three varieties, there are around 12 species, distributed i n more than 10 locations in Sai Kung and Lantau. For this high-value ecological land, we n eed to protect; however, Government do nothing to protect or even provide the gr een light for illegal dumping, shovel and other acts. Indeed, this is a strong opposition for furt her development in Tung Chung areas.
Tung Chung Town Centre Area	反對 Oppose	This is an objection on the newly release d planning for Tung Chung areas that is c ontained 92.93 hectares of land zoned for residential development. Tung Chung car ries a lot of ecological value especially in Tin Sam, Tung Chung beach which is on e of the most valuable and important a se agrass bed in Hong Kong. In 1994, this h as been listed as Sites of Special Scientifi c Interest (SSSI), for the seagrass and Ba ker Halophila grass, seaweed, and marin e invertebrates. According to Green Power, Ecological E ducation and Resource Center survey last year, there are numbers of Dragon and th e hippocampusin in Tung Chung Bay. Hi ppocampus accustomed coral reefs or ma ngrove habitat, this provided a solid prov e that Tung Chung Bay is excellent ecolo gy, valuable ecologically. The Government Administration plans to develop Tung Chung River, this will furt her pollutants Tung Chung River which will bring the total number of hippocamp al decline. In 1960s and 1970s, Tung Chung has car ried a large number of the hippocampus, and later due to reclamation, overfishing, the number of seahorses decline. Hippoc ampus now infested about three varieties, there are around 12 species, distributed i n more than 10 locations in Sai Kung and

		Lantau. For this high-value ecological land, we n eed to protect; however, Government do nothing to protect or even provide the gr een light for illegal dumping, shovel and other acts. Indeed, this is a strong opposition for furt her development in Tung Chung areas.
Tung Chung Valley	反對 Oppose	This is an objection on the newly release d planning for Tung Chung areas that is c ontained 92.93 hectares of land zoned for residential development. Tung Chung car ries a lot of ecological value especially in Tin Sam, Tung Chung beach which is on e of the most valuable and important a se agrass bed in Hong Kong. In 1994, this h as been listed as Sites of Special Scientifi c Interest (SSSI), for the seagrass and Ba ker Halophila grass, seaweed, and marin e invertebrates. According to Green Power, Ecological E ducation and Resource Center survey last year, there are numbers of Dragon and th e hippocampusin in Tung Chung Bay. Hi ppocampus accustomed coral reefs or ma ngrove habitat, this provided a solid prov e that Tung Chung Bay is excellent ecolo gy, valuable ecologically. The Government Administration plans to develop Tung Chung River, this will furt her pollutants Tung Chung River which will bring the total number of hippocamp al decline. In 1960s and 1970s, Tung Chung has car ried a large number of the hippocampus, and later due to reclamation, overfishing, the number of seahorses decline. Hippoc ampus now infested about three varieties, there are around 12 species, distributed i n more than 10 locations in Sai Kung and Lantau. For this high-value ecological land, we n eed to protect; however, Government do nothing to protect or even provide the gr een light for illegal dumping, shovel and other acts.

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

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

就草圖作出申述
Representation Relating to Draft Plan

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

參考編號
Reference Number: 160227-105703-84823

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 10:57:03

提出此宗申述的人士
Person Making This Representation: 小姐 Miss Wong in ping

申述詳情
Details of the Representation :

與申述相關的草圖
Draft plan to which the representation relates: S/I-TCV/1

申述的性質及理由
Nature of and reasons for the representation:

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

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

003

tp

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

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

請救救白海豚，停止開發東涌區計劃！

009

tpbpd

寄件者:	Jkcheng [redacted]
寄件日期:	08日03月2016年星期二 14:36
收件者:	tpbpd@pland.gov.hk
副本:	sdev@devb.gov.hk; shoffice@ihb.gov.hk; sen@enb.gov.hk; kkling@pland.gov.hk; kclo@cedd.gov.hk; kklau@hyd.gov.hk; comr@td.gov.hk; edwintong@dsd.gov.hk
主旨:	S/I-TCV/1 & S/I-TCTC/21 Joint Green Groups Submission
附件:	(App1)JGG Tung Chung DPA (ver Oct2015)(Low Res)v3.jpg; (App2)Joint Statement_TC Valley and Coast 20120618.pdf; (App3) Degraded sites v2.pdf; (App4) TCV Aerial Photo12Nov2007-16Apr2015.jpg; JGG TCV & TCTC OZP Response 8Mar2016.doc

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

Dear Sir/Madam,

Please find the attached Green Group's Joint Submission in response to draft OZP No. S/I-TCV/1 and S/I-TCTC/21.

Please also note that NO appendices are attached in the fax submission.

Thank you for your kind attention.

Yours faithfully,

Cheng Lai Ki

On behalf of

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

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BY FAX AND BY EMAIL

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

8 March, 2016

Dear Sir/Madams,

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

Support the Promulgation of a Statutory Land Use Plan

1. The undersigned green groups jointly welcome the draft Tung Chung Valley Outline Zoning Plan No. S/I-TVC/1 (TCVOZP) gazetted on 8 January 2016. This OZP will introduce statutory land use control in most part of Tung Chung River Valley and Bay and help protect the rich and diverse ecology against incompatible developments, environmental vandalism and degradation.

2. In order to effectively preserve and manage the biodiversity, natural landscape and hydrology of Tung Chung River, Valley and Coast, green groups call for, as shown in Appendix 1,
   (a) Cover Tin Sam and Wong Lung Hang areas in new DPAs or Country Park extensions.
   (b) Establishing a River Nature Park for proactive management of natural riverine and estuarine ecology and landscape, and for flood regulation.
   (c) Early implementation of environmental protection and conservation landuses proposed in the TCVOZP in prior to other project works in Tung Chung area covering by OZP No. S/I-TCV/1, S/I-TCTC/21 and S/I-TCE/1.
   (d) Traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery, immediately.

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

3. Tung Chung River is one of the few remaining major streams in Hong Kong with "Excellent" water quality (according to EPD's monitoring results) and tranquil scenery. The Tung Chung River, which has not been overly affected by channelization, largely retains its natural state throughout from headwater to estuary. The Tung Chung River system is unique in the local context. Its headwaters flow from Hong Kong's second and third highest peaks, all the way to the shallow Tung Chung Bay without interruptions.

4. The high connectivity and continuity of the river system from the montane area to the estuary make it exceptionally rich in its aquatic and coastal biodiversity, including many rare and endangered species, e.g. Beijiang Thick-lipped Barb (*Acrossocheilus beijiangensis*) 北江光唇魚, Philippine Neon Goby (*Stiphodon atropurpureum*) 紫身枝牙鰕虎魚, Romer's tree frog (*Liuixalus romeri*) 盧氏小樹蛙, Chinese Horseshoe Crab (*Tachypleus tridentatus*) 中國鱟, Seaweed Pipefish (*Syngnathus schlegeli*) 舒氏海龍, Swinhoe's Egret (*Egretta eulophotes*) 黃嘴白鷺. Diverse types of habitats are also found in the surrounding land area supporting many ecologically important animal and plant species in Hong Kong, including Common Birdwing (*Troides helena*) 裳鳳蝶 and Eurasian Eagle Owl (*Bubo bubo*) 鵰鴞(refer to Appendix 2).

5. Tung Chung River is the second richest in freshwater species of any in Hong Kong, with a total of 23 species recorded, and listed as an Ecologically Important Stream (EIS)(No. 27) by Agricultural, Fishery and Conservation Department (AFCD). The mangroves on the intertidal mudflat at the Tung Chung River estuary is the largest on Lantau which is one of highest plant diversity sites. Tung Chung Valley and coast is also a butterfly hotspot which nurtures 148 species which comprises about 60% of Hong Kong's total, including two rare and two very rare species.

Green Groups' Recommended Development Permission Area Plan

6. Green groups' recommended Development Permission Area (DPA) Plan (version Oct 2015) for a sustainable planning for Tung Chung River, estuary, coastal areas and associated habitats is enclosed (Appendix 1).

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

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

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

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

Green Groups' General Response to the Draft TCVOZP

9. Green groups agree with *the general planning intention for the Area* (first part of Section 8.1 of EXPLANATORY STATEMENT, TCVOZP) is "*to conserve the ecologically sensitive areas, to protect the rural and natural character, to maintain the unique landscape character and cultural heritage of the Area*" and "*enforcement actions should be taken against any unauthorized development which would have impacts on the natural and rural character of the Area*".

10. In response to the PLANNING CONTROL(Section 17 of EXPLANATORY STATEMENT, TCVOZP), green groups are very concerned that the publication of the draft Recommended Outline Development Plan (RODP) of the future new town extension and associated increase in economic activities has allured incompatible and unauthorized land uses in Tung Chung Valley and Bay.

11. Over the past two decades green groups observed a proliferation of incompatible developments and vandalism in Tung Chung Valley. The ecologically degraded land areas increased from 4.8% in 2007 to approximately 13% in 2015 (Appendix 3 and 4). However, enforcement powers and protection were lacking due to the absence of a statutory land-use plan.

12. To address these problems, the Administration should commit, with the publication of TCVOZP for the Tung Chung River Valley and coast,

(a) to ensure the proposed land uses in the TCVOZP can be implemented,

(b) to ensure control over incompatible and/or unauthorized developments,

(c) to terminate existing vandalism and to stem potential vandalism in Tung Chung Valley and Coast; and

(d) to protect the ecology, hydrology and water quality of Tung Chung River and Bay, a major planning intention of the TCVOZP.

13. Regarding the draft TCVOZP, green groups welcome the zoning of Area 96D, south part of the planning scheme area, as "Conservation Area"("CA"). However, we insist that 30m on either side of river courses, banks and tributaries of Tung Chung River and Wong Lung Hang, Tung Chung River Estuary and Tung Chung Bay should be zoned as "Site of Special Scientific Interest"("SSSI")(Appendix 1)

14. We also welcome the existing *fung shui woods* in the Tung Chung Valley west to Ngau Au and north of Shek Mun Kap zoned as "CA" in the TCVOZP. However, we are disappointed that the remaining *fung shui woods* receive no proper zones against development and ecological vandalism. Therefore, we recommend that the remaining *fung shui woods* should also be zoned as "CA" for protection.

15. We advise that the tributaries of Tung Chung River flowing through Mok Ka, Lam Che and Nim Un should be protected by zoning its stream courses and banks as "SSSI".

Tin Sam and Wong Lung Hang Remained Unprotected

16. The signatory green groups urge the Government to cover Tin Sam and Wong Lung Hang areas in new DPAs (refer to Appendix 1) which otherwise will remain as enclaves or be without effective land use control.

17. The seagrass beds and nearby mangroves at San Tau (SSSI No.58) are one of only four sites where Dwarf Eel Grass (*Zostera japonica*) 矮大葉藻, and one of only five sites where Oval Halophila (*Halophila ovalis*)喜鹽草 are recorded in Hong Kong. Both species are rare in Hong Kong and are listed as of Local Concern status in China. San Tau mangroves is of high conservation value due to rich floristic diversity. San Tau, which is nearby Tin Sam, is a butterfly hotspot and Wong Lung Hang is an EIS listed by AFCD. Both areas require the preservation of local habitats.

18. Although the eastern part of Tung Chung Valley and Wong Lung Hang areas are covered in the in Amendment A1 in Tung Chung Town Centre Area OZP No. S/I-TCTC-21 (TCTCOZP), these areas have never been covered by any DPAs, and thus any incompatible developments or environmental vandalisms, such as diversion of Wong Lung Hang EIS, filling of land/pond or excavation of land, cannot be effectively controlled or enforced.

19. Green groups consider Tin Sam, Wong Long Hang and eastern part of Tung Chung Valley are integral parts of the whole Tung Chung River-*cum*-Bay hydrological and ecological system, and should receive stricter and more effective land use control to ensure a comprehensive management of flood regulation, water quality and nature conservation.

20. The Government should proactively protect the ecologically important Wong Lung Hang and Tin Sam areas by adequate, effective and enforceable statutory measures. Such measures should

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

Tung Chung Valley not Suitable for Residential Development

21. In view of the "Residential (Group C)" ("R(C)") zone (Section 9.2 of EXPLANATORY STATEMENT, TCVOZP) and the Area 42 and 46 zoned as "Residential(Group A)"("R(A)") (Section 7.2.6 and 7.2.7 of EXPLANATORY STATEMENT, TCTCOZP), we call for a reduction in development pressure and wide ranging measures to alleviate development impacts.

22. Much of Tung Chung Valley is allocated for residential development in above-mentioned OZPs. We consider that such planning is incompatible with the physical and ecological setting of Tung Chung Valley and the principles of the Convention on Biological Diversity. Under Article 8 of this Convention, each contracting party shall:

- Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;
- Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;
- Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;
- Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, *inter alia*, through the development and implementation of plans or other management strategies;
- Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.

23. We are highly concerned that the residential development (plot ratio 1 near the Tung Chung River estuary and up to 6.4 to the east of the valley) would affect the natural landscape, hydrology and ecology of Tung Chung River, threaten the inhabited wildlife and impact the water quality of Tung Chung River.

24. From the Hong Kong Observatory's past observation on and prediction of Hong Kong's future precipitation pattern, the scale and frequency of river floods is expected to increase. Tung Chung River is comparatively short and steep with an overall slope of 1: 4.9, (compared to Lam Tsuen River 1: 14.5, Kam Tin River 1: 14.4, Shing Mun River 1: 17.7, Tuen Mun River 1: 17.9).

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

25. Thus, in the long run, the Government must make early precaution and preventive measures in river land use planning through OZPs for Tung Chung River Valley, to decrease the threat posed by river floods due to climate change:

(a) Governments should avoid developing residential and industrial areas in Tung Chung River Valley, which are highly prone to flooding and landslide, to prevent risking the lives of residents and their properties.

(b) The government should allocate sufficient "permeable land use" by conserving vegetation and avoid covering large surface areas with concrete in Tung Chung Valley which helps allowing rainwater to infiltrate through the soil and alleviate flooding.

(c) Government should strengthen law enforcement on dumping, unauthorized vehicle access and developments on both sides of Tung Chung River or other activities which may affect drainage capacity of the rivers.

26. The large areas of "R(A)", "R(C)" and "Village Type Development"("V") zones in Tung Chung Valley also threaten the water quality, ecosystem and landscape of Tung Chung Valley, River and Bay area and violate the Convention on Biodiversity.

27. We agree "*to concentrate village type development within "V" zone for a more orderly development pattern, efficient use of land and provision of infrastructures and services*" (Section 9.3.1 of EXPLANATORY STATEMENT, TCVOZP).

28. We concur the "*general presumption against development*" for the planning intention in "Green Belt"("GB"), "CA" and "Coastal Protection Area"("CPA") zone.

Threat to Species of Global Conservation Value

29. The "Commercial" ("C") zone (Section 9.1 of EXPLANATORY STATEMENT, TCVOZP), especially Area 38A in which a public transport terminus and maximum building height of 35m is planned, is incompatible with the mangroves on the western bank of Wong Lung Hang estuary where a breeding population of dragonfly Mangrove Skimmer (*Orthetrum poecilops*) 斑灰蜻 was discovered in 2015 by local green group. Mangrove Skimmer is listed as "Vulnerable" by IUCN and locally rare.

30. We opine that these "C" zones in TCVOZP will threaten Mangrove Skimmer population and we recommend include its habitat in River Park or other proper conservation zoning are needed.

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

River Nature Park for Flood Control and Conservation as Public Interest

32. Section 18.3 of EXPLANATORY STATEMENT, TCVOZP mentions that "*the Government will resume and clear the private land for..... public developments.....and provide infrastructure.*" Therefore, we urge the Government to seriously consider the resumption of all private land lots in the Tung Chung River Valley to achieve a sustainable plan for *public developments* in Tung Chung Valley.

33. It is proposed that land is resumed *to provide flood prevention,environmental and conservation infrastructure* in the entire river valley, and estuary which is managed as a **River Nature Park** (separately or jointly by DSD, AFCD and/or LCSD), to safeguard and control the hydraulic, water quality and ecological properties of the river valley.

34. Designation of Tung Chung River Valley as a River Nature Park can be implemented by the Government as part of *public developments* in the Tung Chung New Town Extension (TCNTE).

35. Whereas the residential and road zones in the OZP will impose adverse and irreversible impacts on the ecology of Tung Chung River Valley and Bay, the proactive land use management by establishing a River Nature Park will help preserve natural resources for community use and enjoyment, habitat protection and fisheries intended under the RODP of TCNTE study and draft TCVOZP.

36. The resumption of land and the management as River Nature Park will make it possible to better conserve and enhance the ecological value and functions of Tung Chung River Valley. The park will provide a high quality nature experience for residents, improved flood control, and better conservation of the rich habitat of the river valley and estuary.

37. The estimated resumption cost for about 500 private land lots with a total area of 8.5 ha in green groups' proposed River Nature Park (Appendix1) is HK$370 million.

38. The Government should explore and assess the feasibility and potential impacts of different alternative options for flood prevention such as resuming lands along the riparian zones of Tung Chung River so as to serve as natural floodplain to retain floodwater.

Conservation First Before Development

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

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

40. Most of Hong Kong's major natural rivers are channelized and recipients of low quality water including run-off and effluent discharges from storm drain networks. These rivers often emit foul odour and are an urban blight degrading the living quality of Hong Kong, and impact our image as a well-developed and livable world class city. Tung Chung River must not follow the same fate of other channelized rivers of Hong Kong.

41. Once the TCNTE development commences according to the approved OZPs, the amount of construction waste generated according to the Environmental Impact Assessment Report could fill up the whole Tung Chung Valley and estuary. Unless dedicated efforts and proper phasing of works are made to protect the valley and bay, the invaluable river ecosystem and landscape will be irreversibly ruined. And this in turn, would jeopardize the government's carefully crafted comprehensive plan for the area.

42. The construction, the increase in population and the new economic activities close to these ecologically valuable resources will inevitably lead to destruction unless very strong and specific protection and management measures as proposed in TCVOZP are put in place. Already we have witnessed a proliferation of dumping of massive amounts of debris and construction waste in Tung Chung Valley (Appendix 3 and 4). Increasingly typical 'brown-field' uses are covering more areas in the valley, uses which thrive on the growing population and economic activities in north Lantau.

43. Moreover, The Tung Chung River, Estuary and Bay are a great opportunity to implement the "Water-friendly Culture and Activities" policy adopted by the Government in 2015.

44. We invite the Administration to set a good model for "conservation first before development" and to protect this natural river resource, and to consider incorporating the following measures for implementation of TCVOZP:

    (a) To first create the polders and to establish a River Nature Park covering the river, estuary and areas earmarked for conservation along the river well ahead of commencing the other infrastructure and development projects. By clearly demarcating the conservation areas as a park, and by ensuring management is in place, these areas designated for conservation can be protected from land filling, unauthorized dumping, destruction and other encroachment. At the same time this ensures that flood control and management measures are in place and the natural river courses can be protected from obstruction and diversion.

(b) The Sustainable Urban Drainage System (SUDS), storm water retention ponds and pump stations must be built before the commencement of any other development projects to avoid polluted water generated by construction works are discharged into the natural river course, deteriorating the water quality and threatening the ecosystem and landscape of Tung Chung River and the estuary.

(c) In order to protect the ecosystem and natural environment of the valley from air pollution and illegal dumping, large vehicles and construction trucks must be prohibited from entering the section of Tung Chung Road west of Ha Ling Pei. Vehicles that have sufficient reasons for entering need to seek formal approval from relevant authorities.

(d) No construction and civil engineering works should be allowed in the riverbed, riparian zone and estuary of Tung Chung River. Storm water and sewage water should not be discharged into the river courses and estuary of Tung Chung River.

Prevention of Water Pollution and Habitat Damages

45. Green groups concur that " *any diversion of streams, filling of land/pond or excavation of land, including that to effect a change of use to any of those specified in Column 1 and 2 above or the uses or developments always permitted under the covering NOTES....., shall not be undertaken or continued on or after the date of the first publication in the Gazette of the notice of the draft DPA plan without the permission from the TPB under section 16 of the Town Planning Ordinance*", which is stipulated in Remarks under "GB", Remarks (b) under "CA" and "CPA" in TCVOZP.

46. However, we opine that this planning measure should also stipulated other zones in TCVOZP, especially those the tributaries of Tung Chung River, whatever natural streams/rivers, irrigation or stormwater channels, flow through and waterways in mangroves, and including the tributaries flowing through Mok Ka, Lam Che and Nim Un. "*Filling of land/pond or excavation of land*" should be under the same planning control as "*diversion of streams*" and stipulated under Remarks (c) of "V" zones in TCVOZP.

47. For Section 17.2 of EXPLANATORY STATEMENT, TCVOZP, we opine that regarding "*uses or building which were in existence immediately before the first publication in the Gazatte of the notice of the draft DPA Plan, any material change of such use or any other development*" which may have adverse environment, drainage, traffic, ecology and hydrology of the Area should not be permitted. "*The alteration and/or modification works which may lead to an environmental* and ecological *improvement to the Area may be considered favourably by the Board.*"

48. For Section (2) of NOTES, TCVOZP, in order to avoid water pollution to Tung Chung River and Bay, any use or development that does not conform to Water Pollution Control Ordinance (Cap.358) should be terminated despite being in existence immediately before the first

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

49. For section (8)(b), (9)(a)(i) and 9(b) of NOTES, TCVOZP, "refreshment kiosk" should not be permitted on ecologically important areas, within 30 metres on either side of river/stream, which have been mostly zoned as "CA" and "CPA" and agricultural lands because it may generate wastewater and garbage that pollute the water bodies and degrade the habitats.

50. For section (8)(c) and (d), and (9)(a)(ii) of NOTES, TCVOZP, in order to avoid alteration of physical setting and damage to ecology of the natural streams and rivers (including its tributaries flowing through or by agricultural lands), diversion, excavation, shotcreting and paving of beds and banks should not be allowed for "*maintenance or repair of .....watercourse.....*" and "*.....drainage works.....*" without the permission of the relevant government authorities in charge of environmental protection and nature conservation.

51. For section (8)(e) of the NOTES, TCVOZP, the septic tanks of rebuilt New Territories Exemption Houses should not be constructed within 30 metres of either side of watercourse to avoid pollution of river water by the sewage.

52. For Section (11)(a) of the NOTES, TCVOZP, we concur that "*temporary use or development of any land or building*" should not be permitted in areas zoned "CA" and " CPA".

53. For Section (11)(b) of the NOTES, TCVOZP, we strongly urge that <u>open storage and port back-up landuses must be prohibited in the Planning Scheme Area</u> because these landuses
    (a) are not compatible with the environmental setting and landscape of Tung Chung River Valley,
    (b) breaches the planning intention of TCVOZP,
    (c) will encroach and interrupt the Tung Chung River which is designated as EIS, proposed River Park and SUDS,
    (d) will disturb and cause permanent and irreversible loss of habitats, such as river beds and banks, freshwater marsh, farmlands, by land filling, dumping of wastes and soil debris,
    (e) will cause land contamination with toxic substances, air and water pollution,
    (f) will trigger opening of private vehicular access and additional heavy-vehicle traffic that further disturb and destroy the habitats in Tung Chung River Valley and Bay.
    (g) are difficult to be reinstates to the origin habitats through planning measures.

<u>Adverse Impacts of Road Network</u>

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

55. In order to prevent uncontrollable and unenforceable vandalism in Tung Chung Valley and other potential adverse impacts of road access, we urge the Administration to review the proposed road network in the OZP and to impose traffic restriction in Tung Chung West, especially for construction trucks and machinery.

56. We insist that all non-essential roads access to ecologically sensitive areas such as natural coastlines, river banks, *fung shui woods* and other ecologically important sites is eliminated.

57. In the Section 7.1.7 and Figure 2 of EXPLANATORY STATEMENT, TCVOZP, "*two Non-Building Areas (NBA) of 20m and 30m wide are proposed in Area 60 and 71A respectively as breeżeway to promote better air ventilation and to enhance visual permeability*" and not shown in the draft TCVOZP, i.e.
    (a) an extension of Yu Tung Road through "R(C)2"(Area 60) to "CPA" on the eastern bank of Tung Chung River,
    (b) an "NBA" zone connecting "CA" with Road L25 through "R(C)1"(Planning Area No.71A) to the north of Shek Mun Kap,

    However, we worry that these NBAs will become road access that facilitate flytipping and threaten the adjoining "CPA" and "CA". Moreover, road access will generate air pollution from vehicles that contradicts the design concept of these NBAs.

58. We are highly concerned about the Road L28 connecting existing Shek Mun Kap Road to Mok Ka, which runs across an EIS designated by AFCD.

59. Also, the existing illegal road access across Tung Chung River in Area 84 must be removed because it is not compatible with the planned River Park. Moreover, such illegal structure threatening the water quality and ecology of Tung Chung River should not be accepted and rationalized in the statutory land-use plan.

60. We are also concerned that road access will initiate and ecological vandalism activities in ecologically important areas, e.g. the "CA" zone adjoining Ngau Au, and the "CA" zone between Shek Mun Kap Road and Area 71A.

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

Yours faithfully,

Cheng Luk Ki

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

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

Encl.
Appendix 1. Green Groups' recommended DPA Plan (version Oct 2015)
Appendix 2. Joint green groups' recommended DPA Plan for Tung Chung River, estuary, coastal areas and associated habitats (version Jun 2012)
Appendix 3. Map illustrating degraded site complaints and photos by green groups.
Appendix 4. Aerial photos of Tung Chung Valley taken in November 2007 and April 2015.

c.c.

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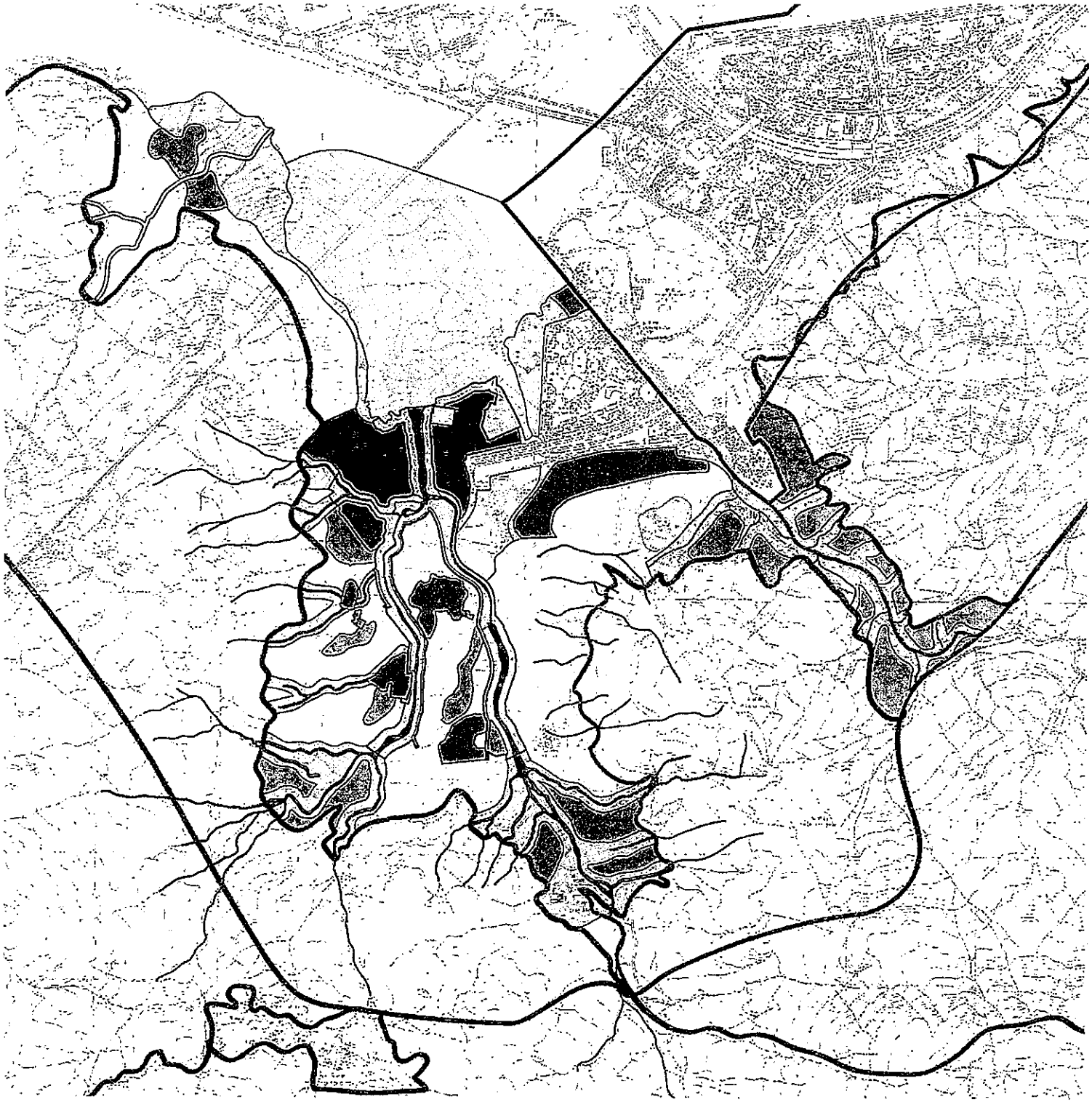
Appendix 1



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

2015年10月 October 2015

圖例
Legend

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

備註:
Note:

「具特殊科學價值地點」覆蓋東涌河河道、河濱(主河道每邊各30米, 支流每邊各20米)、河口和東涌灣
SSSI covers Tung Chung River courses, banks (30 metres on either side of major courses and 20 metres for tributaries), estuary and Tung Chung Bay.

「自然保育區」覆蓋高生態價值的林地和風水林、銅鼓石湖及東涌河區地河岸範圍
CA covers ecologically important woodlands and fung shui woods, Nei Lak Stream and upland catchment of Tung Chung River.

「海岸保護區」覆蓋東涌灣泥灘和海邊後灘
CPA covers mudflat and backshore of Tung Chung Bay.

Appendix 2 (Oct 2015)

19 June 2012

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

1. The undersigned groups are deeply concerned about the Government's plan to reclaim the Tung Chung River Valley and coastal areas for development under the "Planning and Engineering Study on the Remaining Development in Tung Chung", which will destroy Tung Chung River Valley's intact and integrated stream, riparian, estuarine and coastal ecosystems. These habitats support outstanding biodiversity. Tung Chung River is one of the few remaining major streams in Hong Kong which has not been overly affected by channelization or water pollution, and largely retains its natural state throughout the whole river course from headwater to estuary. The Tung Chung River system is unique in the local context. Its headwaters flow down from Hong Kong's second and third highest peaks, and run uninterrupted all the way to the shallow Tung Chung Bay. The high connectivity and continuity along its whole length from the montane area to estuary make it exceptionally rich in its aquatic and coastal biodiversity, including many rare and endangered species. The surrounding land area also contains diverse habitat types, supporting many ecologically important animal and plant species in Hong Kong.

2. We urge the Government to protect the Tung Chung River (both channelized and natural sections, and its tributaries), its estuary, the entire Tung Chung Bay and other remaining natural habitats within Tung Chung Valley, which are of high ecological, landscape, hydrological and cultural values, so as to preserve natural resources for nature conservation, community use and enjoyment, and fisheries. In addition, we have prepared a recommended Development Permission Area (DPA) plan incorporating our vision for a sustainable future for Tung Chung's remaining natural areas for Government's consideration.

3. Tung Chung has a special history and a unique setting. It has been settled since the fall of the Southern Sung Dynasty in 1279. The bay was the setting for a huge naval battle in 1810 when the Qing navy defeated the notorious pirate Cheung Po Tsai. The Tung Chung Fort and Tung Chung Battery dated from these times and are listed monuments. Lying between the forested slopes of Lantau Peak and Nei Lek Shan, the bay with the immensely photogenic fishing village on Ma Wan Chung, the historic Hau Wong Temple in its coastal setting, and the sea grass and mangrove stands, offers a unique panorama and insight for visitors and locals alike. These aspects would disappear if Tung Chung is further developed.

4. We would also note that the Convention on Biological Diversity was extended to Hong Kong with effect from 9 May 2011. The implication of the extension is a commitment to develop and implement best international practices for the conservation and sustainable use of biodiversity. There are now further obligations for our future development plans to effectively manage and protect our valuable ecological diversity within or outside the protected areas and ensure their conservation and sustainable use. Under Article 8 of this Convention, each contracting party shall:

- Establish a system of protected areas or areas where special measures need to be taken to conserve biological diversity;
- Develop, where necessary, guidelines for the selection, establishment and management of protected areas or areas where special measures need to be taken to conserve biological diversity;
- Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;
- Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;
- Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;
- Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, inter alia, through the development and implementation of plans or other management strategies;
- Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.

5. Therefore, compatible landuse should be extended to Tung Chung River, estuary, coastal areas and associated habitats which can serve as a green lung for the existing residents of Tung Chung. Our vision for the Tung Chung's remaining natural areas is as follows:

a. Protect and conserve high quality natural habitats which are of rich biodiversity and ecological value through conservation planning, management and monitoring. In particular, Tung Chung River, estuary, woodlands and the coast should not be exploited for any development and protected statutorily as "Site of Special Scientific Interest", "Conservation Area" and "Coastal

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

b. Promote compatible community use and enjoyment in the Tung Chung River Valley and the estuary through environmental education and passive recreation activities. Ecologically-friendly facilities which encourage the public to assess Tung Chung River and the estuary can be considered, for example, eco-trails, a riverside park, a nature education centre, resting places and look-out towers.

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

6. In order to further support the ecological value of Tung Chung River, estuary, coastal areas and associated habitats, a number of conservation groups have commenced ecological surveys in these areas. The results will be released and submitted to the Government to facilitate environmentally and socially sound planning for Tung Chung's remaining natural areas. The surveys cover a wide range of taxa groups and a summary of the results is presented below.

7. Tung Chung River and riparian zones

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

8. Tung Chung Estuary and Tung Chung Bay

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

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

9. Tung Chung Valley

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

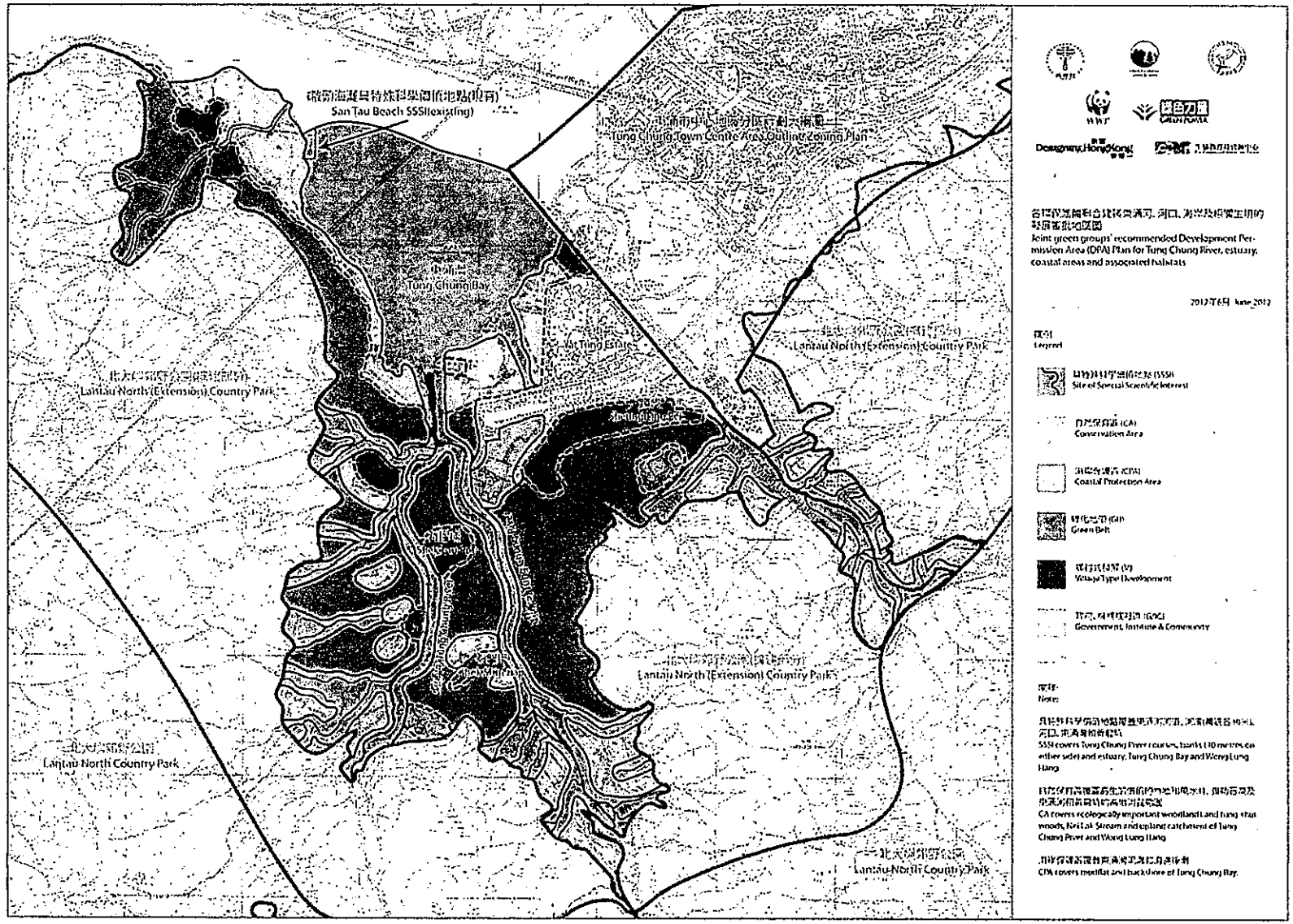
10. In view of the intactness, uniqueness and intricate ecology of Tung Chung River Valley, estuary and coastal areas and the social benefits of conserving these areas for public use and tourist attraction, any adverse impacts of development or incompatible uses in these areas must be avoided. Therefore, we strongly urge the government to:

a. Prohibit civil engineering work, channelization and reclamation in Tung Chung River courses and banks, estuary and the entire Tung Chung Bay.
b. Prohibit any discharge of effluents and connection of outfalls to Tung Chung River channels and esturary. Any landuse and activity that brings about water pollution must be removed from Tung Chung River banks and the shores of Tung Chung Bay.
c. Rehabilitate the channelized/ damaged artificial river sections.
d. Adopt our recommended DPA plan to guide a sustainable planning and development in Tung Chung.
e. Terminate the present planning and engineering study on the remaining development in Tung Chung and not to fast-track the landuse planning, engineering feasibility and EIA study processes. We consider that the present proposed plan to reclaim Tung Chung Bay, with new town development as the decided objective, pre-empts the landuse planning and EIA process.

Co-signed Groups

Designing Hong Kong
Eco-Education & Resources Centre
Green Lantau Association
Green Power
Hong Kong Bird Watching Society
The Conservancy Association
WWF-Hong Kong

Appendix 1: Green Groups' recommended DPA plan for a sustainable planning for Tung Chung River, estuary, coastal areas and associated habitats.



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

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

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

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

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

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

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

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

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

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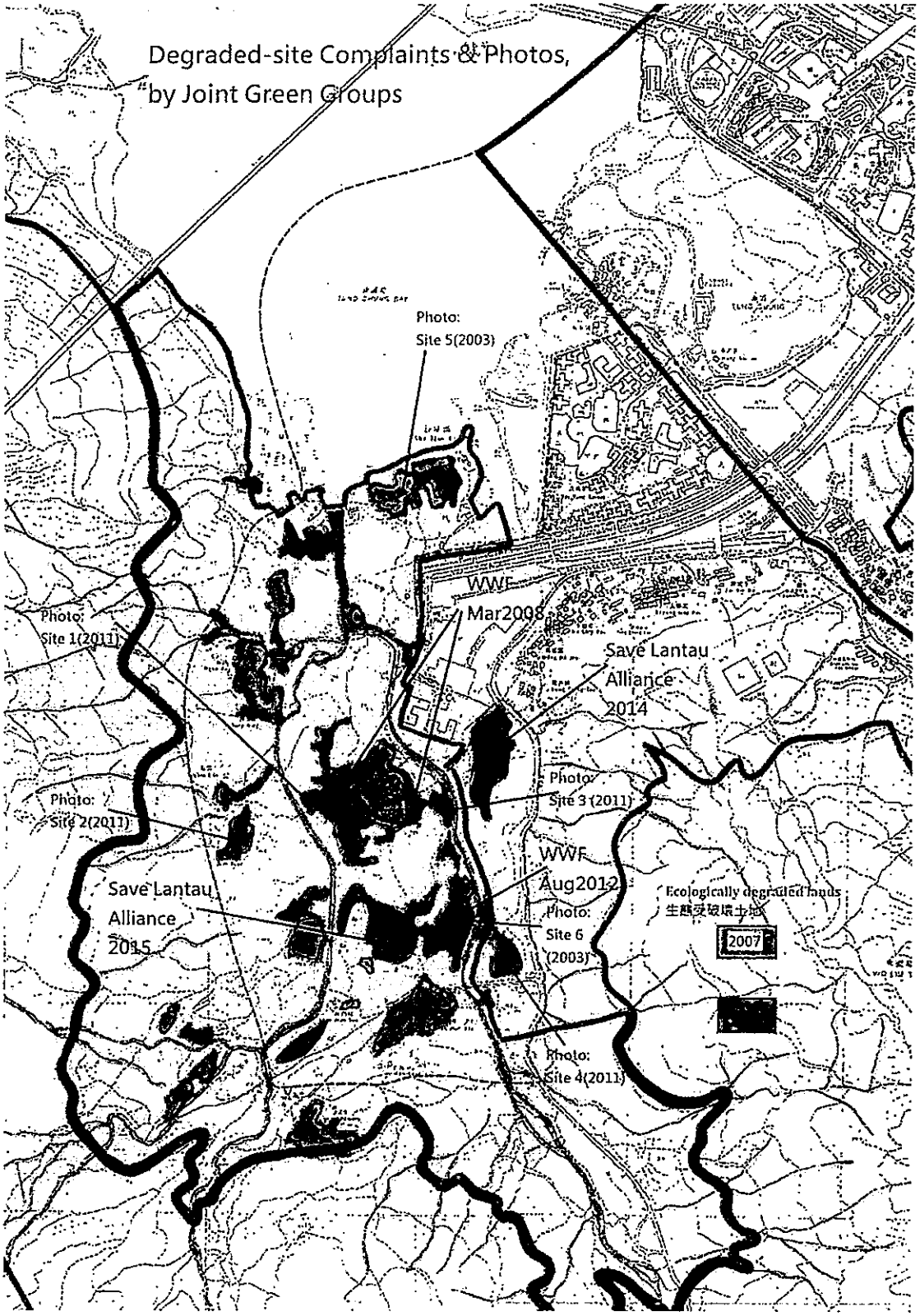
18 Yvonne Sadovy and Andrew Cornish. 2000. Reef Fishes of Hong Kong. Hong Kong University Press.

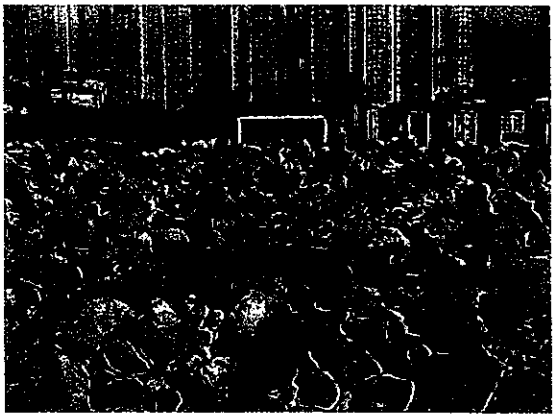
Appendix 3 (Oct 2015)



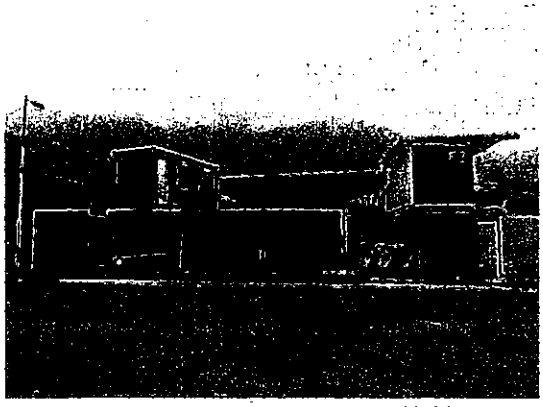
Degraded site_1_Shek Lau Po 石榴埔
(5May2011_綠色力量攝)

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

Degraded site_2
(5May2011_綠色力量攝)



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



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

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

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

Shek Lau Po 石榴埔_2008_2
(Credit to WWF)

Shek Lau Po 石榴埔_2008_1
(Credit to WWF)

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

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

tpbpd

寄: Miffy Ng [redacted]
寄件日期: 08日03月2016年星期二 23:55
收件者: tpbpd@pland.gov.hk
主旨:- DHK comment on Draft Tung Chung Outline Zoning Plans No. S/I-TCV/1, S/I-TCE/1 and S/I-TCTC/21
附件: 20160308 DHK Tung Chung New Town Extension OZP.pdf

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

Dear sirs,

Attached please find our comment on the captioned.

Miffy
Designing Hong Kong Limited
Tel: [redacted]
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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DesigningHongKong
香港 .com

Hong Kong, 8 March 2016

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

Dear Sirs,

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

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

- We are concerned with the overall capacity of Tung Chung area, and the planned increase from 82,000 to a population of 220,000. The area is facing a lot of development constraints including poor air quality and the increase in population and economic activities in close proximity to valuable natural resources may result in irreversible impacts.

- The expansion of Tung Chung Town can't be judged as an isolated event, in addition to the residential community there is a need for economic developments providing the necessary job opportunities. The Lantau Development Advisory Board has proposed a range of such developments, and the proposal is under public consultation. The government should provide a comprehensive plan for Lantau development, including Tung Chung new town extension instead of the current piecemeal approach.

- The terrestrial and marine baseline studies should cover the whole Lantau Island, including the Tung Chung New Town and Lantau South, and identify the habitats and ecology we can't lose. Proposed developments and other projects outside the extension area should also be considered. Coordination with other proposed projects in/around Tung Chung is missing.

- The Convention on Biological Diversity (CBD) has been extended to Hong Kong since May 2011. Projects which impact the environment should be in line with the CBD principle. Tung Chung River, Valley and estuary's ecosystem should be regarded as a whole and be evaluated in the assessment. The Tung Chung River includes several Ecological Important Streams (EIS) namely Wong Lung Hang and Tung Chung (Mok Ka and Shek Mun Kap). It forms an estuary with a rich ecology and diversity of species.

- Tung Chung is facing lots of development constraints including poor air quality. Any additional development will intensify the air pollution in the area. As we have mentioned in the comment of EIA report, the project should adopt the new Air Quality Guidelines (AQG) by the World Health Organization (WHO) to evaluate the cumulative impacts towards the existing and future residents in Tung Chung. Measures should be suggested to improve the air quality in town for the growing population.

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

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

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- We call for a new Development Permission Area Plan or Country Park extensions to include *Tin Sam* and *Wong Lung Hang* which otherwise will remain as enclaves without effective land use control.

- Tung Chung River has been recognized as an Ecologically Important Stream (No. 27) by Agricultural, Fishery and Conservation Department (AFCD). Spill over in various forms from the proposed development will impact the ecology of Tung Chung River and estuary.

- To ensure adequate management, the areas identified for conservation and hydraulic (flooding) uses along the Tung Chung River and streams, and estuary, should be resumed and managed as a park. Private and unallocated government land zoned for conservation and left without management in close proximity to significant development is unsustainable given current enforcement capabilities as can be witnessed throughout Hong Kong.

- Town Planning Board should recognize the proposal submitted by a coalition of green groups to Government to establish a River Nature Park and to protect the Tung Chung River and estuary by resuming private land lots in the proposed park. Simply zoning land for conservation uses is not enough. The landowners should be compensated and the land should be managed by Government as a River Nature Park. The resumption of land and the management as a park will make it possible to better conserve and enhance the ecological value and functions of the area. The park will provide a high quality nature experience for residents and improve flood control. Our proposal on land resumption has attached.

- We have serious concerns over incompatible developments and vandalism in Tung Chung River Valley. Over the past decades, green groups have observed a proliferation of these cases along the Valley. In 2015 approximately 13% of the land has been filled with waste and covered with unauthorized structures. With the proposed increase on construction waste disposal charges, the vandalism situation may get more serious. In the EIA report and Outline Zoning Plan, the road has been proposed to extend to Lam Che and Nam Yuen, which will certainly create more opportunities for vandalism.

- Some local organizations have found out new and extended dumping along Shek Mun Kap, which should be zoned as "Other Specified Uses (For "River Park" Only), and the previous land state of these lands before the gazettal of OZP should be active farmland or abandoned farmland.[1] The government should ensure the control over the existing and potential unauthorized uses and vandalism in the area. We urge the government to provide an early implementation of environmental protection and conservation land uses proposed in the TCVOZP in prior to other project works in Tung Chung area and implement traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery immediately which are proposed by the joint green groups.

- The human disturbance and development threat brought from the "Residential" zonings will impact the natural and rural landscape, hydrology and ecology of Tung Chung Valley. In addition, the Area 42 and 46 zoned as "Residential (Group A)" ("R (A)") in Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21 will block the breezeway and view corridor at Northeastern part of Tung Chung Valley. (Figure 2)

- The "V Zone" in Shek Lau Po has been extended and covered the surrounded "Agriculture" zones. This has not been justified in the EIA report. (Figure 1) According to the OZP paperNo.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 way from the proposed The Brother's 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,

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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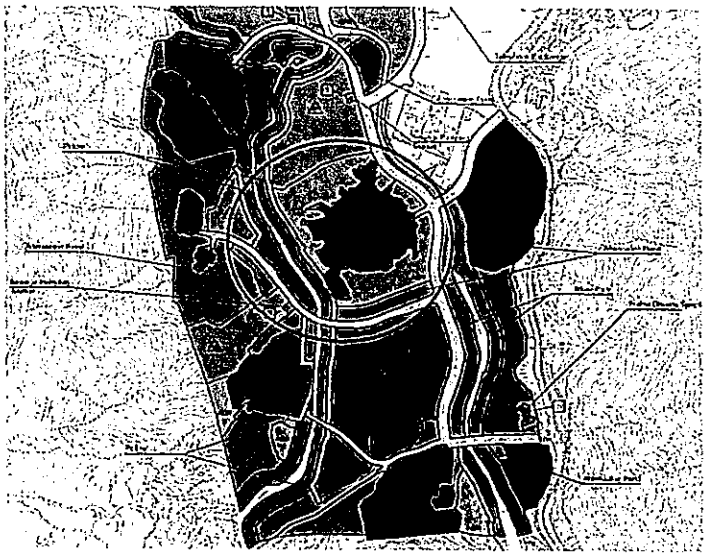
Figure 1

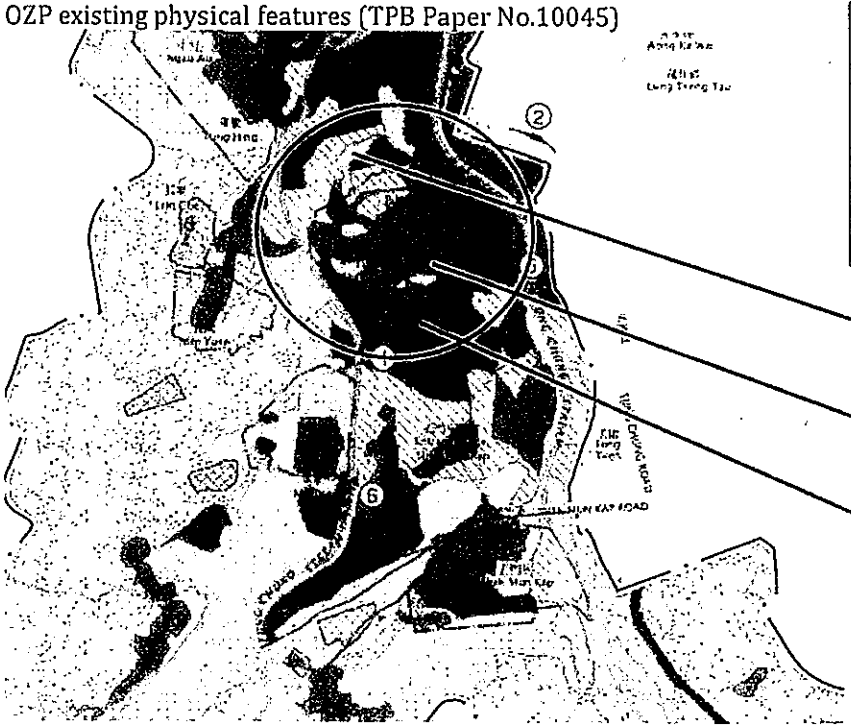
The Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCE/1

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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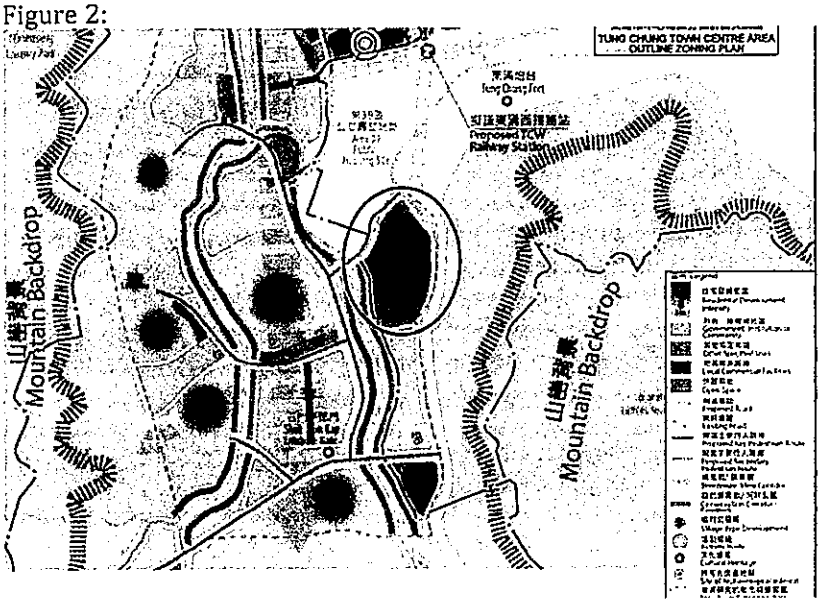
Figure 2:



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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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: lkcheng [redacted]
寄件日期: 08日03月2016年星期二 15:19
收件者: tpbpd@pland.gov.hk
副本: ken@erc.org.hk; Michelle Cheung
主旨: Re: Green Powr & ERC submission re TCV DPA
附件: GP ERC TCV OZP comments 8Mar2016 draft.doc

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

Dear Sir/ Madam,
Pls find the attached self-explanatory letter.
Thanks,
Yours faithfully,
CHENG Luk-ki
On behalf of GREEN POWER, ECO-EDUCATION & RESOURCES CENTRE

綠色力量 GREEN POWER 生態教育及資源中心 Eco-Education & Resources Centre

BY EMAIL ONLY

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

8 March, 2016

Dear Sir/Madams,

Green Power and Eco-Education & Resources Centre's Joint Comments on Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1, and Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21

Long-term Preservation of Tung Chung River-cum-Bay

1. Green Power and Eco-Education & Resources Centre jointly welcome the draft Tung Chung Valley Outline Zoning Plan (TCVOZP) gazetted on 8 January 2016. However, we consider that the present draft TCVOZP is deficient for the long-term conservation of Tung Chung River-*cum*-Bay system which is one of few natural rivers remaining in the territory, particularly with undisturbed estuaries (Appendix A).

2. We, as co-signed groups, concur to the joint letter date 8 March 2016 submitted to Town Planning Board regarding the above-captioned draft TCVOZP.

3. In order to effectively preserve and manage the biodiversity, natural landscape and hydrology of Tung Chung River, Valley and Coast, we call for
   (a) Cover Tin Sam and Wong Lung Hang areas with a new Development Permission Area (DPA) plan or Country Park extensions.
   (b) Establishing a River Nature Park for proactive management of natural riverine and estuarine ecology and landscape, and for flood regulation.
   (c) Zoning Tung Chung Bay as SSSI, as recommended by Green Groups' recommended DPA.
   (d) Early implementation of environmental protection and conservation landuses proposed in the TCVOZP in prior to other project works in Tung Chung area covered by OZP No. S/I-TCV/1, S/I-TCTC/21 and S/I-TCE/1.
   (e) Traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery, immediately.

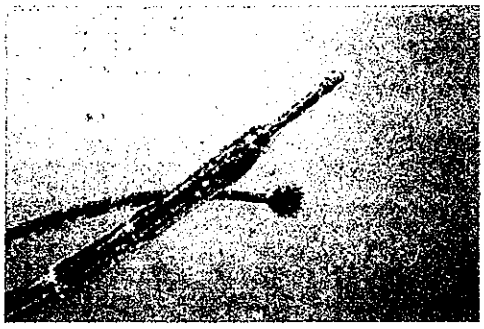
Fishery and Ecological Value of Tung Chung Bay

4. Green Power and the Eco-Education & Resources Centre conducted survey in Tung Chung Bay in 2012 and found that Tung Chung Bay is of high ecological importance for pipefish. Also, larvae of economic species were found including family Callionymidae, Clupeidae, Engraulidae, Gobiidae, Sciaenidae, Sillaginidae, Lutjanidae.

5. The Administration's ecological and fisheries survey findings also confirm that Tung Chung Bay is an important spawning and nursery ground for sea horses and other marine life, and a rich fisheries resources site.

6. Thus, the entire Tung Chung Bay is a significant spawning and nursery ground for economically valuable fishes and crustaceans, and diverse marine life that are supported by the intact Tung Chung River and undisturbed Tung Chung River estuary, Tung Chung Bay, mangroves and intertidal mudflat.

7. We are highly concerned about the impacts of any proposed Residential and Village Type Development zones in TCVOZP on the water quality and ecology of Tung Chung Bay.



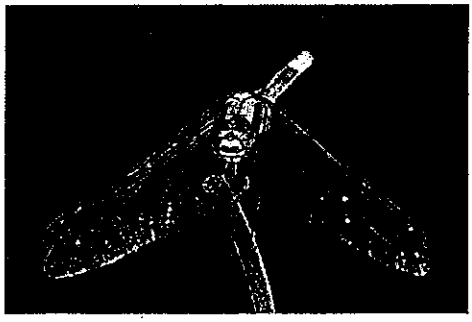
Pipefish 海龍

Preservation of Wong Lung Hang Mangroves

8. The "Commercial" ("C") zones in TCVOZP, especially Area 38A, in which a public transport terminus is planned, encroaches the mangroves on the western bank of Wong Lung Hang estuary where a breeding population of dragonfly Mangrove Skimmer (*Orthetrum poecilops*)斑灰蜻 was discovered in 2015 by Green Power. Mangrove Skimmer is listed as "Vulnerable" by IUCN and locally rare.

9. We urge that these "C" zones in TCVOZP will threaten Mangrove Skimmer population and we recommend include its habitat in River Park or other proper conservation zoning are needed.

10. The public transport terminus should be relocated in Area 107("GI/C") or Area 39 ("R(A)1") in S/I-TCTC/21 to link more efficiently with the planned underground railway station to the west of Yat Tung Estate.

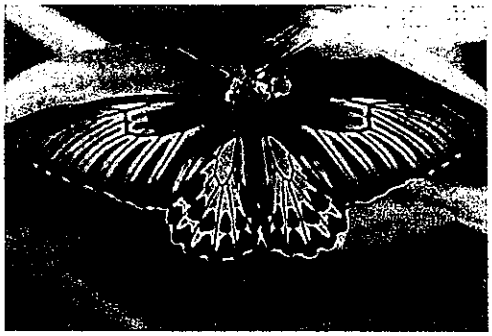


Mangrove Skimmer 斑灰蜻

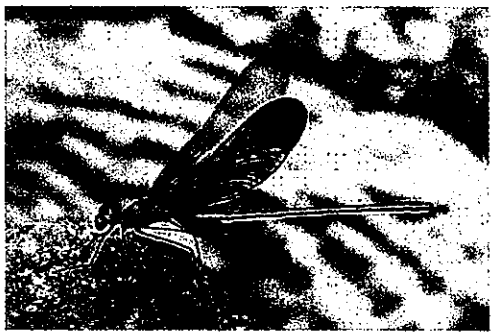
Ecological Value of Tin Sam and Wong Lung Hang

11. Seventy butterfly species are recorded in the Tung Chung Valley and San Tau (nearby Tin Sam), four of them are of conservation importance including Oriental Striped Blue (*Leptotes plinius*) 細灰蝶, Peacock Royal (*Tajuria cippus*) 雙尾灰蝶, Golden Birdwing (*Troides aeacus*) 金裳鳳蝶 and Common Birdwing (*Troides helena*) 裳鳳蝶.

12. Thirty-four species of dragonflies and damselflies, which comprise 27% of total species number of Hong Kong, were recorded in Wong Lung Hang by Green Power in 2015.



Common Birdwing 裳鳳蝶



Chinese Greenwing 華豔色蟌

13. <u>According to HKPSG, the principle of *"retain significant landscapes, ecological and geological attributes and heritage features as conservation zones"* (Sec. 2.2, Ch. 10) should be adopted</u> to preserve the ecologically important and biologically diverse San Tau, Tung Chung Bay and Wong Lung Hang, which should be implemented through coverage of these areas with a statutory DPA Plan.

The Basic Principles to Preserve Tung Chung River-cum-Bay System

14. Regarding the preservation of Tung Chung River and Tung Chung Bay, Green Power submitted a letter to the former Chief Executive of HKSAR, Mr. Donald Tsang Yam Kuen, on 21 September 2010 and the current Chief Executive, Mr. C. Y. Leung, on 8 January 2013, and Green Power and Eco-education & Resources Centre would like to reiterate that:
    (a) river works should be avoided as far as possible, the natural river courses and estuary should not be altered in any scale;
    (b) land-use planning for Tung Chung River basin and estuary should take into account of its permeability, natural landscape and ecology;
    (c) sufficient vegetation cover should be maintained in the basin; and
    (d) no sewage or stormwater of developed areas should be drained into Tung Chung River channel and Tung Chung Bay.

Wise and Sustainable Landuse for Tung Chung River Valley and Tung Chung Bay

15. The government should protect and conserve the natural resources in Tung Chung River Valley for compatible community use and enjoyment. Compatible landuse should also be recommended in TCVOZP and Tung Chung New Town Extension (TCNTE) Study for further enhancement of the ecological and cultural value of Tung Chung Valley and Tung Chung Bay such as:
    (a) an eco-tourist hub acting as an interchange and interconnection to connect different hiking and ancient trails in the area
    (b) an stream trekking base for stream trekkers to explore the scenic spots along Tung Chung River
    (c) open space and greening areas integrating original natural features such as river courses, estuary, mangrove and *fung shui woods*
    (d) provision of educational facilities such as museums with the theme of fishery, river, aquatic life and fish, natural history of Lantau, incense industry at Sha Lo Wan, Tung Chung's history, etc
    (e) a visitor centre can be provided in the non-sensitive part of Tung Chung Valley to help the public to admire the ecological importance of Tung Chung River-*cum*-Bay system, and facilitate hikers and stream trekkers
    (f) facilitating visitors to visit various tourist spots in the area, including: Ngong Ping Cable Car, Tian Tan Buddha Statue, Chek Lap Kok International Airport, Tung Chung Fort and etc, in an environmental-friendly way
    (g) making use of the existing Tung Chung River landscape and cultural heritage to enhance the tourist appeals of Tung Chung River Valley and promote passive recreational activities (e.g., eco-trails linking to the surrounding country parks, biking, leisure fishing, etc.)
    (h) Scientific research and education

16. However, such land uses have not proactively incorporated in the proposed River Park and other zonings in TCVOZP.

Foreseeable non-enforceable vandalism

17. Tung Chung West will be highly vulnerable to dumping of construction and demolition (C&D) waste generated in future development in Tung Chung because of the long transport distance to waste facilities such as landfills, and the charging for vehicles travelling through North Lantau Highway.

18. Filling of the river banks and wetlands with wastes and/or soil debris are continually reported in Tung Chung West, particularly Shek Lau Po and Shek Mun Kap. Such activities would destroy the natural habitats in Tung Chung River Valley and threaten the ecology and water quality of Tung Chung River.

19. We are particularly concerned about the following foreseeable environmental vandalism which, according to current judicial and enforcement framework, are extremely difficult to prevent, enforce and reinstate:
    (a) Discharge of domestic wastewater through stormwater drainage system to Tung Chung River-*cum*-Bay,
    (b) Connection of outfall of stormwater drainage system to Tung Chung River-*cum*-Bay,
    (c) Dumping, reclamation, eradication of vegetation in Tung Chung River-*cum*-Bay,
    (d) Incompatible developments in Tung Chung West

20. In addition to the draft TCVOZP which is preceded by the draft TCVDPA, feasible measures to prevent uncontrollable vandalism and incompatible land use activities from encroaching Tung Chung West and damaging Tung Chung-*cum*-Bay include
    (a) restriction of construction trucks and similar machineries access to sections of Tung Chung Road and Yu Tung Road to the west of Chung Yan Road,
    (b) mandatory collection of C&D wastes and provision of transportation of C&D wastes to other proper locations & facilities,

Tranquil Tung Chung River Valley

Illegal dumping near Wetland Park, Tin Shui Wai (Newspaper clipping)

Preservation of Hydrology

21. In order to preserve the water quality of Tung Chung River and Bay, land uses leading to direct discharge of stormwater drainage, treated or untreated sewage should not be allowed upstream or within the courses of "Ecologically Important Streams" in Tung Chung designated by AFCD[1].

22. A long-term, innovative and comprehensive drainage strategy and system should be formulated for Tung Chung West which must preserve the Tung Chung River intact. Completion of the construction of the "Sustainable Urban Drainage System" should be in prior to commencement of any other works.

Air Pollution

23. Ozone is the major air pollutant affecting Tung Chung's air quality which had the longest hours of Air Pollution Index reaching of exceeding 101 during 1999 to 2013, and Air Quality and Health Index reaching 10 or 10+ in 2014 and 2015 (Table 1 below). EPD also admitted in the media in February 2015 that Tung Chung is one of districts with highest health risk in terms of air quality[2].

24. We opine that land use zoning should not lead to deterioration of air quality of Tung Chung or expose the residents under air quality of high health risk.

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[1] Ecologically Important Streams, AFCD, HKSAR: https://www.afcd.gov.hk/english/conservation/con_wet/streams_rivers_hk/Con_NSR/Tung%20Chung%20Stream.pdf

[2] 「臭氣濃度新高 屯門元朗東涌重災」:明報 A14 ，2015 年 2 月 25 日

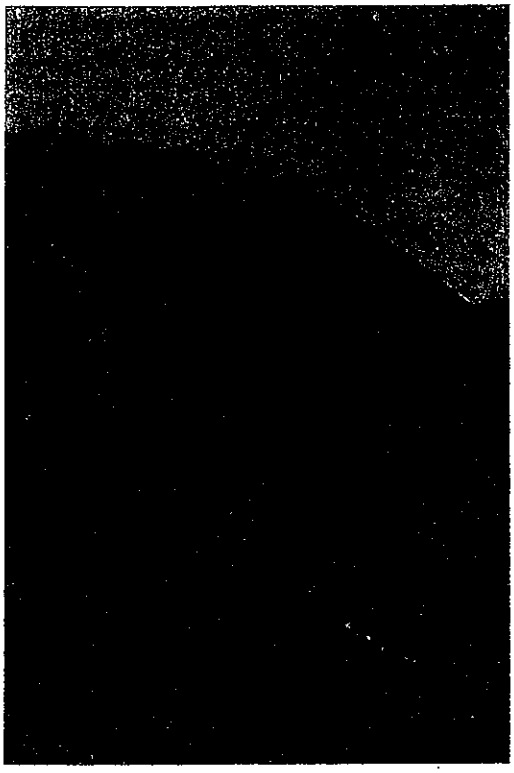
Table 1: The number of days with Air Quality & Health Index = 10 or 10+ for General Air Monitoring Stations.

Year	Central/ Western	Eastern District	Kwun Tong	Sham Shui Po	Kwai Chung	Tsuen Wan	Yuen Long	Tuen Mun	Tung Chung	Tai Po	Sha Tin	Tap Mun
2014	5	2	5	7	8	7	13	16		3	5	3
2015	9	6	10	6	5	6	8	9		5	4	3

Figures in , orange and yellow box are the first, second and third highest across the row.

Geotechnical Risks

25. We have grave concerns about the geotechnical aspects of the proposed high-rise residential development in Area 42 and 46 in Draft Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/21. In particular, the eastern slope of Nei Lak Shan to the west of Tung Chung River Valley is composed of the extensive mantle of colluviums. Major destructive landslide incidents occurred in Tung Chung area on 17 July 1992, 5 November 1993 and 7 June 2008. Therefore, land use planning in Tung Chung West must take into account of the geotechnical stability.



A Large-scale debris flow occurred in Tung Chung Valley in 2008

26. Green Power and Eco-Education & Resource Centre hope that Town Planning Board could address our environmental concerns stated above and should not compromise the remaining valuable natural Tung Chung River and Bay recklessly to ill-planned new town development. We recommends that the government should take a novel and environmental-friendly approach for TCVOZP and Outline Zoning Plan No. S/I-TCTC/21 to demonstrate how natural heritage and development can coexist in Hong Kong, as an advanced and green city.

For any enquiries and questions, please do not hesitate to contact me at Green Power (T: 3961 0223; F: 2314 2661; E-mail: lkcheng@greenpower.org.hk).

For and on behalf of
Green Power and
Eco-Education & Resources Centre,

Dr. Cheng Luk-ki
Division Head,
Scientific Research and Conservation
Green Power

Attachment:
Appendix A - Evaluation of Tung Chung River-*cum*-Bay ecosystem

Appendix A - Evaluation of Tung Chung River-*cum*-Bay ecosystem

Tung Chung River-*cum*-Bay is important habitat in the territory because it contains

1. mature native woodland larger than one hectare
2. undisturbed natural coastal area larger than one hectare or longer than 500 metres in linear measurement
3. intertidal mudflats larger than one hectare
4. established mangrove stands of any size
5. brackish or freshwater marshes larger than one hectare
6. established seagrass bed of any size
7. natural stream courses and rivers longer than 500 metres

Table A.1 Evaluating Tung Chung River-*cum*-Bay

Criteria	Remarks
Naturalness	Tung Chung River and Bay are highly valued because they are either truly natural habitats (e.g. Most segments of Tung Chung River courses and the entire intertidal mudflat and mangroves in Tung Chung Bay)
Size	The area of Tung Chung River Basin and Bay are significantly large which are 11.0 and 1.2 square kilometre respectively.
Diversity	The species assemblages and communities are diverse and of high conservation value.
Rarity	Natural undisturbed estuary of Tung Chung River is rare. (Refer to Table A2 below) Rare species are also present.
Re-creatability	Natural river courses, estuaries and intertidal mudflat are extremely difficult to be re-created artificially.
Fragmentation	High connectivity and continuity along Tung Chung River's whole length from the montane area to estuary and Tung Chung Bay.
Ecological linkage	Tung Chung River-cum-Bay ecosystem includes physically and functionally interrelated and interconnected habitats: River courses, estuary, intertidal mudflat, seagrass bed, woodlands and etc.

Potential value	With proper landuse planning and effective preservation measures, the ecological values of Tung Chung River-cum-Bay ecosystem will be further enhanced and so is its fishery resources.
Nursery/breeding ground	Tung Chung River-cum-Bay ecosystem is very important for the regeneration and long term survival of many organisms and their populations.
Age	Tung Chung River-cum-Bay ecosystem comprises ancient natural habitats.
Abundance/Richness of wildlife	Tung Chung River-cum-Bay ecosystem is rated high as it is supporting large variety and population of wildlife.

Therefore, Tung Chung River-cum-Bay ecosystem is of rare, unique and very high in ecological value.

Table A2

Stream Course	**Natural Section in Lower Course**	**Naturalness of Estuary**	**Water Quality at Lower Course in 2014 - E. Coli (cfu/100ml) (River Quality Monitoring Station)**	**Accessibility**
Tung Chung River	Small section - about 650m was channelised	Preserved (Tung Chung Bay)	48(TC1) 79(TC2)	Easy
Tuen Mun River	Completely channelised	Destroyed	2,400 (TN6)	N/A
Shan Pui River	Completely channelised; the estuary close to Ramsar Site still retain natural river bed	Preserved (Ramsar Site)	490,000(YL3)	Difficult
Kam Tin River			46,000(KT1) 200,000(KT2)	N/A
Lam Tsuen River	Completely channelised	Destroyed	33,000(TR12I)	N/A
Tai Po River	Completely channelised	Destroyed	12,000(TR13)	N/A
Shing Mun River	Completely channelised	Destroyed	1,300(TR19I)	N/A

tpbpa

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

寄 件 者: WOO Ming Chuan [redacted]
寄件日期: 08日03月2016年星期二 23:54
收件者: Town Planning Board
主旨: HKBWS's comments on the draft Tung Chung Valley OZP
附件: 20160308_TCV_OZP_HKBWS.pdf; Attachment1_JGG TCV & TCTC OZP Response 8Mar2016.pdf

Dear Sir/Madam,

Our letter regarding the captioned is attached.

Best Regards,

WOO Ming Chuan (Ms)
Conservation Officer
The Hong Kong Bird Watching Society
7C, V Ga Building, 532 Castle Peak Road, Lai Chi Kok, Kowloon, Hong Kong

This email has been sent from a virus-free computer protected by Avast.
www.avast.com

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

By email only

8 March 2016

Dear Sir/Madam,

香港觀鳥會
THE HONG KONG BIRD WATCHING SOCIETY
Since 1957 成立

BirdLife INTERNATIONAL PARTNER 國際鳥盟成員

Comments on the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1

The Hong Kong Bird Watching Society (HKBWS) would like to raise our concerns regarding the draft Tung Chung Valley Outline Zoning Plan (OZP).

Comparing the current OZP with the habitat map provided in Plan TCV-2 of the Town Planning Board (TPB) Paper No. 10045, the "Village Type Development" (V) zones (i.e. Ngau Au, Lam Che, Nim Yuen, Mok Ka and Shek Mun Kap) encroach into woodlands and tributaries of the Tung Chung River. Tree felling and vegetation clearance would be required during village development. We are concerned further habitat loss would be caused and lead to adverse impacts on some woodland dependent bird species of conservation concern, such as the Crested Goshawk *Accipiter trivirgatus* (which is a Class 2 protected animal of China and is listed in Appendix II of CITES) and Common Emerald Dove *Chalcophaps indica* (which is listed as rare in China Red Data Book). Village development immediately adjacent to the tributaries would also lead to water pollution in the Tung Chung River and increase in human disturbances.

The HKBWS considers that an "Ecosystem Approach", which is the primary framework for action under the Convention on Biological Diversity[1], should be adopted to protect the various sensitive habitats in the Tung Chung Valley area. The Tung Chung River is one of the few natural rivers in Hong Kong that almost the entire watercourse is still pristine. The Tung Chung Valley, together with the Tung Chung River and Tung Chung Bay, is part of the river ecosystem and with high biological diversity. We consider that all natural streams (including all their tributaries) should be protected by "Conservation Area" zoning of 30 metres along both sides of the banks. This buffer zone would protect the riparian vegetation and would also prevent pollutants created by nearby developments from contaminating the stream, the intertidal mudflats and the sheltered Tung Chung Bay. Woodlands, streams and wetlands should also be excluded from the V zones in the Plan to avoid loss of natural habitats with high ecological value.

[1] https://www.cbd.int/ecosystem/

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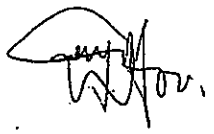
香港註冊成立的法定慈善機構及無股本擔保有限公司
A charitable organization incorporated in Hong Kong with limited liability by guarantee

A joint letter representing views from 9 Green Groups was submitted on 8 March 2016 (Attachment 1). The HKBWS respectfully requests the TPB would also fully address the concerns stated in the joint letter as well as ours as stated above. Thank you for your kind attention.

Yours faithfully,



Woo Ming Chuan
Conservation Officer
The Hong Kong Bird Watching Society

cc.
The Conservancy Association
Designing Hong Kong
Green Power
Kadoorie Farm and Botanic Garden
WWF – Hong Kong

BY FAX AND BY EMAIL

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

8 March, 2016

Dear Sir/Madams,

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

Support the Promulgation of a Statutory Land Use Plan

1. The undersigned green groups jointly welcome the draft Tung Chung Valley Outline Zoning Plan No. S/I-TVC/1 (TCVOZP) gazetted on 8 January 2016. This OZP will introduce statutory land use control in most part of Tung Chung River Valley and Bay and help protect the rich and diverse ecology against incompatible developments, environmental vandalism and degradation.

2. In order to effectively preserve and manage the biodiversity, natural landscape and hydrology of Tung Chung River, Valley and Coast, green groups call for, as shown in Appendix 1,
   (a) Cover Tin Sam and Wong Lung Hang areas in new DPAs or Country Park extensions.
   (b) Establishing a River Nature Park for proactive management of natural riverine and estuarine ecology and landscape, and for flood regulation.
   (c) Early implementation of environmental protection and conservation landuses proposed in the TCVOZP in prior to other project works in Tung Chung area covering by OZP No. S/I-TCV/1, S/I-TCTC/21 and S/I-TCE/1.
   (d) Traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery, immediately.

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

3. Tung Chung River is one of the few remaining major streams in Hong Kong with "Excellent" water quality (according to EPD's monitoring results) and tranquil scenery. The Tung Chung River, which has not been overly affected by channelization, largely retains its natural state throughout from headwater to estuary. The Tung Chung River system is unique in the local context. Its headwaters flow from Hong Kong's second and third highest peaks, all the way to the shallow Tung Chung Bay without interruptions.

4. The high connectivity and continuity of the river system from the montane area to the estuary make it exceptionally rich in its aquatic and coastal biodiversity, including many rare and endangered species, e.g. Beijiang Thick-lipped Barb (*Acrossocheilus beijiangensis*) 北江光唇魚, Philippine Neon Goby (*Stiphodon atropurpureum*) 紫身枝牙鰕虎魚, Romer's tree frog (*Liuixalus romeri*) 盧氏小樹蛙, Chinese Horseshoe Crab (*Tachypleus tridentatus*) 中國鱟, Seaweed Pipefish (*Syngnathus schlegeli*) 舒氏海龍, Swinhoe's Egret (*Egretta eulophotes*) 黃嘴白鷺. Diverse types of habitats are also found in the surrounding land area supporting many ecologically important animal and plant species in Hong Kong, including Common Birdwing (*Troides helena*) 裳鳳蝶 and Eurasian Eagle Owl (*Bubo bubo*) 鵰鴞(refer to Appendix 2).

5. Tung Chung River is the second richest in freshwater species of any in Hong Kong, with a total of 23 species recorded, and listed as an Ecologically Important Stream (EIS)(No. 27) by Agricultural, Fishery and Conservation Department (AFCD). The mangroves on the intertidal mudflat at the Tung Chung River estuary is the largest on Lantau which is one of highest plant diversity sites. Tung Chung Valley and coast is also a butterfly hotspot which nurtures 148 species which comprises about 60% of Hong Kong's total, including two rare and two very rare species.

Green Groups' Recommended Development Permission Area Plan

6. Green groups' recommended Development Permission Area (DPA) Plan (version Oct 2015) for a sustainable planning for Tung Chung River, estuary, coastal areas and associated habitats is enclosed (Appendix 1).

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

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

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

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

Green Groups' General Response to the Draft TCVOZP

9. Green groups agree with *the general planning intention for the Area* (first part of Section 8.1 of EXPLANATORY STATEMENT, TCVOZP) is "*to conserve the ecologically sensitive areas, to protect the rural and natural character, to maintain the unique landscape character and cultural heritage of the Area*" and "*enforcement actions should be taken against any unauthorized development which would have impacts on the natural and rural character of the Area*".

10. In response to the PLANNING CONTROL(Section 17 of EXPLANATORY STATEMENT, TCVOZP), green groups are very concerned that the publication of the draft Recommended Outline Development Plan (RODP) of the future new town extension and associated increase in economic activities has allured incompatible and unauthorized land uses in Tung Chung Valley and Bay.

11. Over the past two decades green groups observed a proliferation of incompatible developments and vandalism in Tung Chung Valley. The ecologically degraded land areas increased from 4.8% in 2007 to approximately 13% in 2015 (Appendix 3 and 4). However, enforcement powers and protection were lacking due to the absence of a statutory land-use plan.

12. To address these problems, the Administration should commit, with the publication of TCVOZP for the Tung Chung River Valley and coast,

(a) to ensure the proposed land uses in the TCVOZP can be implemented,

(b) to ensure control over incompatible and/or unauthorized developments,

(c) to terminate existing vandalism and to stem potential vandalism in Tung Chung Valley and Coast; and

(d) to protect the ecology, hydrology and water quality of Tung Chung River and Bay, a major planning intention of the TCVOZP.

13. Regarding the draft TCVOZP, green groups welcome the zoning of Area 96D, south part of the planning scheme area, as "Conservation Area"("CA"). However, we insist that 30m on either side of river courses, banks and tributaries of Tung Chung River and Wong Lung Hang, Tung Chung River Estuary and Tung Chung Bay should be zoned as "Site of Special Scientific Interest"("SSSI")(Appendix 1)

14. We also welcome the existing *fung shui woods* in the Tung Chung Valley west to Ngau Au and north of Shek Mun Kap zoned as "CA" in the TCVOZP. However, we are disappointed that the remaining *fung shui woods* receive no proper zones against development and ecological vandalism. Therefore, we recommend that the remaining *fung shui woods* should also be zoned as "CA" for protection.

15. We advise that the tributaries of Tung Chung River flowing through Mok Ka, Lam Che and Nim Un should be protected by zoning its stream courses and banks as "SSSI".

Tin Sam and Wong Lung Hang Remained Unprotected

16. The signatory green groups urge the Government to cover Tin Sam and Wong Lung Hang areas in new DPAs (refer to Appendix 1) which otherwise will remain as enclaves or be without effective land use control.

17. The seagrass beds and nearby mangroves at San Tau (SSSI No.58) are one of only four sites where Dwarf Eel Grass (*Zostera japonica*) 矮大葉藻, and one of only five sites where Oval Halophila (*Halophila ovalis*)喜鹽草 are recorded in Hong Kong. Both species are rare in Hong Kong and are listed as of Local Concern status in China. San Tau mangroves is of high conservation value due to rich floristic diversity. San Tau, which is nearby Tin Sam, is a butterfly hotspot and Wong Lung Hang is an EIS listed by AFCD. Both areas require the preservation of local habitats.

18. Although the eastern part of Tung Chung Valley and Wong Lung Hang areas are covered in the in Amendment A1 in Tung Chung Town Centre Area OZP No. S/I-TCTC-21 (TCTCOZP), these areas have never been covered by any DPAs, and thus any incompatible developments or environmental vandalisms, such as diversion of Wong Lung Hang EIS, filling of land/pond or excavation of land, cannot be effectively controlled or enforced.

19. Green groups consider Tin Sam, Wong Long Hang and eastern part of Tung Chung Valley are integral parts of the whole Tung Chung River-*cum*-Bay hydrological and ecological system, and should receive stricter and more effective land use control to ensure a comprehensive management of flood regulation, water quality and nature conservation.

20. The Government should proactively protect the ecologically important Wong Lung Hang and Tin Sam areas by adequate, effective and enforceable statutory measures. Such measures should

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

Tung Chung Valley not Suitable for Residential Development

21. In view of the "Residential (Group C)" ("R(C)") zone (Section 9.2 of EXPLANATORY STATEMENT, TCVOZP) and the Area 42 and 46 zoned as "Residential(Group A)"("R(A)") (Section 7.2.6 and 7.2.7 of EXPLANATORY STATEMENT, TCTCOZP), we call for a reduction in development pressure and wide ranging measures to alleviate development impacts.

22. Much of Tung Chung Valley is allocated for residential development in above-mentioned OZPs. We consider that such planning is incompatible with the physical and ecological setting of Tung Chung Valley and the principles of the Convention on Biological Diversity. Under Article 8 of this Convention, each contracting party shall:

- Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;
- Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;
- Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;
- Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, *inter alia*, through the development and implementation of plans or other management strategies;
- Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.

23. We are highly concerned that the residential development (plot ratio 1 near the Tung Chung River estuary and up to 6.4 to the east of the valley) would affect the natural landscape, hydrology and ecology of Tung Chung River, threaten the inhabited wildlife and impact the water quality of Tung Chung River.

24. From the Hong Kong Observatory's past observation on and prediction of Hong Kong's future precipitation pattern, the scale and frequency of river floods is expected to increase. Tung Chung River is comparatively short and steep with an overall slope of 1: 4.9, (compared to Lam Tsuen River 1: 14.5, Kam Tin River 1: 14.4, Shing Mun River 1: 17.7, Tuen Mun River 1: 17.9).

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

25. Thus, in the long run, the Government must make early precaution and preventive measures in river land use planning through OZPs for Tung Chung River Valley, to decrease the threat posed by river floods due to climate change:

(a) Governments should avoid developing residential and industrial areas in Tung Chung River Valley, which are highly prone to flooding and landslide, to prevent risking the lives of residents and their properties.

(b) The government should allocate sufficient "permeable land use" by conserving vegetation and avoid covering large surface areas with concrete in Tung Chung Valley which helps allowing rainwater to infiltrate through the soil and alleviate flooding.

(c) Government should strengthen law enforcement on dumping, unauthorized vehicle access and developments on both sides of Tung Chung River or other activities which may affect drainage capacity of the rivers.

26. The large areas of "R(A)", "R(C)" and "Village Type Development"("V") zones in Tung Chung Valley also threaten the water quality, ecosystem and landscape of Tung Chung Valley, River and Bay area and violate the Convention on Biodiversity.

27. We agree "*to concentrate village type development within "V" zone for a more orderly development pattern, efficient use of land and provision of infrastructures and services*" (Section 9.3.1 of EXPLANATORY STATEMENT, TCVOZP).

28. We concur the "*general presumption against development*" for the planning intention in "Green Belt"("GB"), "CA" and "Coastal Protection Area"("CPA") zone.

Threat to Species of Global Conservation Value

29. The "Commercial" ("C") zone (Section 9.1 of EXPLANATORY STATEMENT, TCVOZP), especially Area 38A in which a public transport terminus and maximum building height of 35m is planned, is incompatible with the mangroves on the western bank of Wong Lung Hang estuary where a breeding population of dragonfly Mangrove Skimmer (*Orthetrum poecilops*) 斑灰蜻 was discovered in 2015 by local green group. Mangrove Skimmer is listed as "Vulnerable" by IUCN and locally rare.

30. We opine that these "C" zones in TCVOZP will threaten Mangrove Skimmer population and we recommend include its habitat in River Park or other proper conservation zoning are needed.

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

River Nature Park for Flood Control and Conservation as Public Interest

32. Section 18.3 of EXPLANATORY STATEMENT, TCVOZP mentions that "*the Government will resume and clear the private land for..... public developments..... and provide infrastructure.*" Therefore, we urge the Government to seriously consider the resumption of all private land lots in the Tung Chung River Valley to achieve a sustainable plan for *public developments* in Tung Chung Valley.

33. It is proposed that land is resumed *to provide flood prevention,environmental and conservation infrastructure* in the entire river valley, and estuary which is managed as a **River Nature Park** (separately or jointly by DSD, AFCD and/or LCSD), to safeguard and control the hydraulic, water quality and ecological properties of the river valley.

34. Designation of Tung Chung River Valley as a River Nature Park can be implemented by the Government as part of *public developments* in the Tung Chung New Town Extension (TCNTE).

35. Whereas the residential and road zones in the OZP will impose adverse and irreversible impacts on the ecology of Tung Chung River Valley and Bay, the proactive land use management by establishing a River Nature Park will help preserve natural resources for community use and enjoyment, habitat protection and fisheries intended under the RODP of TCNTE study and draft TCVOZP.

36. The resumption of land and the management as River Nature Park will make it possible to better conserve and enhance the ecological value and functions of Tung Chung River Valley. The park will provide a high quality nature experience for residents, improved flood control, and better conservation of the rich habitat of the river valley and estuary.

37. The estimated resumption cost for about 500 private land lots with a total area of 8.5 ha in green groups' proposed River Nature Park (Appendix1) is HK$370 million.

38. The Government should explore and assess the feasibility and potential impacts of different alternative options for flood prevention such as resuming lands along the riparian zones of Tung Chung River so as to serve as natural floodplain to retain floodwater.

Conservation First Before Development

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

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

40. Most of Hong Kong's major natural rivers are channelized and recipients of low quality water including run-off and effluent discharges from storm drain networks. These rivers often emit foul odour and are an urban blight degrading the living quality of Hong Kong, and impact our image as a well-developed and livable world class city. Tung Chung River must not follow the same fate of other channelized rivers of Hong Kong.

41. Once the TCNTE development commences according to the approved OZPs, the amount of construction waste generated according to the Environmental Impact Assessment Report could fill up the whole Tung Chung Valley and estuary. Unless dedicated efforts and proper phasing of works are made to protect the valley and bay, the invaluable river ecosystem and landscape will be irreversibly ruined. And this in turn, would jeopardize the government's carefully crafted comprehensive plan for the area.

42. The construction, the increase in population and the new economic activities close to these ecologically valuable resources will inevitably lead to destruction unless very strong and specific protection and management measures as proposed in TCVOZP are put in place. Already we have witnessed a proliferation of dumping of massive amounts of debris and construction waste in Tung Chung Valley (Appendix 3 and 4). Increasingly typical 'brown-field' uses are covering more areas in the valley, uses which thrive on the growing population and economic activities in north Lantau.

43. Moreover, The Tung Chung River, Estuary and Bay are a great opportunity to implement the "Water-friendly Culture and Activities" policy adopted by the Government in 2015.

44. We invite the Administration to set a good model for "conservation first before development" and to protect this natural river resource, and to consider incorporating the following measures for implementation of TCVOZP:

    (a) To first create the polders and to establish a River Nature Park covering the river, estuary and areas earmarked for conservation along the river well ahead of commencing the other infrastructure and development projects. By clearly demarcating the conservation areas as a park, and by ensuring management is in place, these areas designated for conservation can be protected from land filling, unauthorized dumping, destruction and other encroachment. At the same time this ensures that flood control and management measures are in place and the natural river courses can be protected from obstruction and diversion.

(b) The Sustainable Urban Drainage System (SUDS), storm water retention ponds and pump stations must be built before the commencement of any other development projects to avoid polluted water generated by construction works are discharged into the natural river course, deteriorating the water quality and threatening the ecosystem and landscape of Tung Chung River and the estuary.

(c) In order to protect the ecosystem and natural environment of the valley from air pollution and illegal dumping, large vehicles and construction trucks must be prohibited from entering the section of Tung Chung Road west of Ha Ling Pei. Vehicles that have sufficient reasons for entering need to seek formal approval from relevant authorities.

(d) No construction and civil engineering works should be allowed in the riverbed, riparian zone and estuary of Tung Chung River. Storm water and sewage water should not be discharged into the river courses and estuary of Tung Chung River.

Prevention of Water Pollution and Habitat Damages

45. Green groups concur that " *any diversion of streams, filling of land/pond or excavation of land, including that to effect a change of use to any of those specified in Column 1 and 2 above or the uses or developments always permitted under the covering NOTES....., shall not be undertaken or continued on or after the date of the first publication in the Gazette of the notice of the draft DPA plan without the permission from the TPB under section 16 of the Town Planning Ordinance*", which is stipulated in Remarks under "GB", Remarks (b) under "CA" and "CPA" in TCVOZP.

46. However, we opine that this planning measure should also stipulated other zones in TCVOZP, especially those the tributaries of Tung Chung River, whatever natural streams/rivers, irrigation or stormwater channels, flow through and waterways in mangroves, and including the tributaries flowing through Mok Ka, Lam Che and Nim Un. "*Filling of land/pond or excavation of land*" should be under the same planning control as "*diversion of streams*" and stipulated under Remarks (c) of "V" zones in TCVOZP.

47. For Section 17.2 of EXPLANATORY STATEMENT, TCVOZP, we opine that regarding "*uses or building which were in existence immediately before the first publication in the Gazatte of the notice of the draft DPA Plan, <u>any material change of such use or any other development</u>*" <u>which may have adverse environment, drainage, traffic, ecology and hydrology of the Area should not be permitted</u>. "*The alteration and/or modification works which may lead to an <u>environmental</u> and ecological <u>improvement</u> to the Area may be considered favourably by the Board.*"

48. For Section (2) of NOTES, TCVOZP, in order to avoid water pollution to Tung Chung River and Bay, any use or development that does not conform to Water Pollution Control Ordinance (Cap.358) should be terminated despite being in existence immediately before the first

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

49. For section (8)(b), (9)(a)(i) and 9(b) of NOTES, TCVOZP, "refreshment kiosk" should not be permitted on ecologically important areas, within 30 metres on either side of river/stream, which have been mostly zoned as "CA" and "CPA" and agricultural lands because it may generate wastewater and garbage that pollute the water bodies and degrade the habitats.

50. For section (8)(c) and (d), and (9)(a)(ii) of NOTES, TCVOZP, in order to avoid alteration of physical setting and damage to ecology of the natural streams and rivers (including its tributaries flowing through or by agricultural lands), diversion, excavation, shotcreting and paving of beds and banks should not be allowed for "*maintenance or repair of ... ...watercourse... ...*" and "*... ... drainage works... ...*" without the permission of the relevant government authorities in charge of environmental protection and nature conservation.

51. For section (8)(e) of the NOTES, TCVOZP, the septic tanks of rebuilt New Territories Exemption Houses should not be constructed within 30 metres of either side of watercourse to avoid pollution of river water by the sewage.

52. For Section (11)(a) of the NOTES, TCVOZP, we concur that "*temporary use or development of any land or building*" should not be permitted in areas zoned "CA" and " CPA".

53. For Section (11)(b) of the NOTES, TCVOZP, we strongly urge that <u>open storage and port back-up landuses must be prohibited in the Planning Scheme Area</u> because these landuses
    (a) are not compatible with the environmental setting and landscape of Tung Chung River Valley,
    (b) breaches the planning intention of TCVOZP,
    (c) will encroach and interrupt the Tung Chung River which is designated as EIS, proposed River Park and SUDS,
    (d) will disturb and cause permanent and irreversible loss of habitats, such as river beds and banks, freshwater marsh, farmlands, by land filling, dumping of wastes and soil debris,
    (e) will cause land contamination with toxic substances, air and water pollution,
    (f) will trigger opening of private vehicular access and additional heavy-vehicle traffic that further disturb and destroy the habitats in Tung Chung River Valley and Bay.
    (g) are difficult to be reinstates to the origin habitats through planning measures.

<u>Adverse Impacts of Road Network</u>

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

55. In order to prevent uncontrollable and unenforceable vandalism in Tung Chung Valley and other potential adverse impacts of road access, we urge the Administration to review the proposed road network in the OZP and to impose traffic restriction in Tung Chung West, especially for construction trucks and machinery.

56. We insist that all non-essential roads access to ecologically sensitive areas such as natural coastlines, river banks, *fung shui woods* and other ecologically important sites is eliminated.

57. In the Section 7.1.7 and Figure 2 of EXPLANATORY STATEMENT, TCVOZP, "*two Non-Building Areas (NBA) of 20m and 30m wide are proposed in Area 60 and 71A respectively as breezeway to promote better air ventilation and to enhance visual permeability*" and not shown in the draft TCVOZP, i.e.
    (a) an extension of Yu Tung Road through "R(C)2"(Area 60) to "CPA" on the eastern bank of Tung Chung River,
    (b) an "NBA" zone connecting "CA" with Road L25 through "R(C)1"(Planning Area No.71A) to the north of Shek Mun Kap,

    However, we worry that these NBAs will become road access that facilitate flytipping and threaten the adjoining "CPA" and "CA". Moreover, road access will generate air pollution from vehicles that contradicts the design concept of these NBAs.

58. We are highly concerned about the Road L28 connecting existing Shek Mun Kap Road to Mok Ka, which runs across an EIS designated by AFCD.

59. Also, the existing illegal road access across Tung Chung River in Area 84 must be removed because it is not compatible with the planned River Park. Moreover, such illegal structure threatening the water quality and ecology of Tung Chung River should not be accepted and rationalized in the statutory land-use plan.

60. We are also concerned that road access will initiate and ecological vandalism activities in ecologically important areas, e.g. the "CA" zone adjoining Ngau Au, and the "CA" zone between Shek Mun Kap Road and Area 71A.

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

Yours faithfully,

Cheng Luk Ki

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

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

Encl.
Appendix 1. Green Groups' recommended DPA Plan (version Oct 2015)
Appendix 2. Joint green groups' recommended DPA Plan for Tung Chung River, estuary, coastal areas and associated habitats (version Jun 2012)
Appendix 3. Map illustrating degraded site complaints and photos by green groups.
Appendix 4. Aerial photos of Tung Chung Valley taken in November 2007 and April 2015.

c.c.

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Professor Anthony CHEUNG
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tpbpd

TPB/R/S/I-TCV/1-32

寄件者: Wick Leung [redacted]
寄件日期: 08日03月2016年星期二 18:40
收件者: 'tpbpd'
主旨: Comments on Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1
附件: TPB20160308(TCV)-FINAL.pdf

Dear Sir/Madam,

Please refer to the attachment for comment.

Best Regards,

Wick Leung
Campaign Officer
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8th March 2016

The Secretary
Town Planning Board

E-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

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

The Conservancy Association (CA) opines that the proposed zoning of the joint green groups' recommended Development Permission Area(DPA) Plan for Tung Chung River, estuary, coastal areas and associated habitats should applied to the Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 because of the following reasons:

1. Extend the boundary of OU(River Park)

The concept of OU (River Park) is similar to the OU (River Nature Park) green groups proposed. Therefore, CA supports the designation of OU (River Park). However, since Tung Chung River and its riparian zone is of very high ecological value, the boundary of OU (River Park) should not cover a small area of Tung Chung River and its riparian zone only and should be extended appropriately for proper protection and serving the public interest (Figure 1).

River Park can be a biodiversity and tourist hotspot to promote Lantau tourism, provide ecological education and recreation for visitors. Meanwhile, the land near the Tung Chung River estuary should be designated as "Other Specified Uses (Conservation, ecotourism & ecological education)" to promote the above objectives.

2. Ecologically sensitive area should be covered with conservation zoning

Numerous ecologically sensitive sites and natural features should be covered by different zonings to ensure proper protection.

2a. Tung Chung bay, Tung Chung River and their riparian zones

Tung Chung River is listed as Ecologically Important Stream (EIS) which represents a

natural stream with important ecological functions such as providing habitat for diverse or rare animal or plant communities, designated by AFCD. Taking Tung Chung River as an example, it is the second richest in freshwater fish diversity with a total of at least 23 freshwater species in Hong Kong[1]. Besides, many rare and endangered species such as Beijiang Thick-lipped Barb (*Acrossocheilus beijiangensis,* Fellowes et al. 2002: Global Concern), Romer's Tree Frog (*Philautus romeri,* IUCN: Endangered & Fellowes et al. 2002: Potential Global Concern), Hong Kong Newt (*Paramesotriton hongkongensis,* IUCN: Near Threatened & Fellowes et al. 2002: Potential Global Concern) and short-legged Toad (*Xenophrys brachykolos,* IUCN: Endangered & Fellowes et al. 2002: Potential Global Concern) are recorded in Tung Chung Stream and its riparian zone[2]. The very high ecological value of Tung Chung River was also proved by an approved EIA report "Improvement to Tung Chung Road between Lung Tseng Tau and Cheung Sha", which the ecological value of Tung Chung River and its' riparian zone was listed as "Very High"[3].

According to an annotated checklist[4], there is a marked difference in species richness of two adjacent lowland streams (Tung Chung River and Tai Ho Stream) such that channelized Tung Chung Stream, despite greater flow volume and channel size, yields only about half of fish species compared with the smaller but unregulated Tai Ho Stream on Lantau. Chong and Dudgeon (ibid.) suspected that the reason for such difference was the channelization over much of Tung Chung River's lower reach. Since government is willing to restore the channelized part of Tung Chung River to its original natural condition[5], the biodiversity of Tung Chung River and riparian zone is believed to have a great enhancement.

Tung Chung Bay has a good connection with Tung Chung River. Species with conservation interest such as Chinese Horseshoe Crab (*Tachypleus tridentatus*, China Species Red List: Endangered) and Mangrove Horseshoe Crab (*Carcinoscorpius rotundicauda*, China Species Red List: vulnerable) were found to be nurtured and breed in Tung Chung Bay[6][7]. Besides, San Tau Beach, a designated SSSI, consists of area of

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[1] Noffke, C. & Yip, P. 2014. *Lantau – Hong Kong's Jewel: A Biodiversity Study of Lantau.*.

[2] Ades G., Lau M., Nip T., Yip P., Ng S. C., Gale S. and Woo M. C., 2013. *Ecological and Conservation Importance of Tung Chung, Lantau*

[3] Approved EIA report of "Improvement to Tung Chung Road between Lung Tseng Tau and Cheung Sha". website: http://www.epd.gov.hk/eia/register/report/eiareport/eia_0752002/EIA%20Report/contents_with_hyperlink.htm

[4] Chong, D. H and Dudgeon, D. 1992. Hong Kong Stream Fishes: an annotated checklist with remarks on conservation status. *Memoirs of the Hong Kong NaturalHistory Society* 19: 79-112.

[5] 《東涌明渠擬還原天然河道》，明報，14-9-2015

[6] Arup. (2009). Hong Kong- Zhuhai- Macao Bridge, Hong Kong Boundary Crossing Facilities- Investigation. Agreement No. CE14/ 2008 (CE). EIA Report (EIA-173/2009).

[7] Shin, P.K.S., Li, Y.H. and Cheung, S.G. (2009). Horseshoe Crabs in Hong Kong: Current population status and human exploitation. Biology and Conservation of Horseshoe Crabs: 347- 360.

mangroves including rare *Bruguiera gymnorrhiza* and seagrass bed including *Zostera japonica,* which was found in only four sites of HK and *Halophila ovalis* which was found in only five sites in HK[68]. These two seagrass species were listed as of Local Concern status[9].

The above areas have very high ecological value. The mainstream of Tung Chung River and riparian zone should be designated with SSSI (Figure 1).

2b. Fung Shui woodland and mature woodland

Several Fung shui woodlands are found next to villages. They are native mature and large trees such as *Aquilaria sinensis, Pavetta hongkongensis, Adenanthera microsperma* and *Antidesma bunius.* Native mature trees could also been found in the Tung Chung Valley and its riparian zone. These areas should not be developed and should be designated as "CA" (Figure 1). Therefore, CA objects to the designation of OU (polder) on the Fung Shui woodland. It should be noted that if the development intensity is reduced, fewer or no polders would be needed on the Tung Chung Valley.

2c. Coastline of Tung Chung Bay

Mudflat and mangroves are found along the coastline of Tung Chung Bay. Since mangroves and mudflat are known to be ecologically important habitat for many species, these areas should be designated as "Coastal Protection Area".

2d. Other vegetation cover

Orchards, natural vegetation, woodland, hillside shrubland and grassland could be found easily inside this OZP. In order to respect existing farming activities, maintain the tranquil environment, define the limits of development area and serve as a buffer to ecologically sensitive areas, they should be designated as GB.

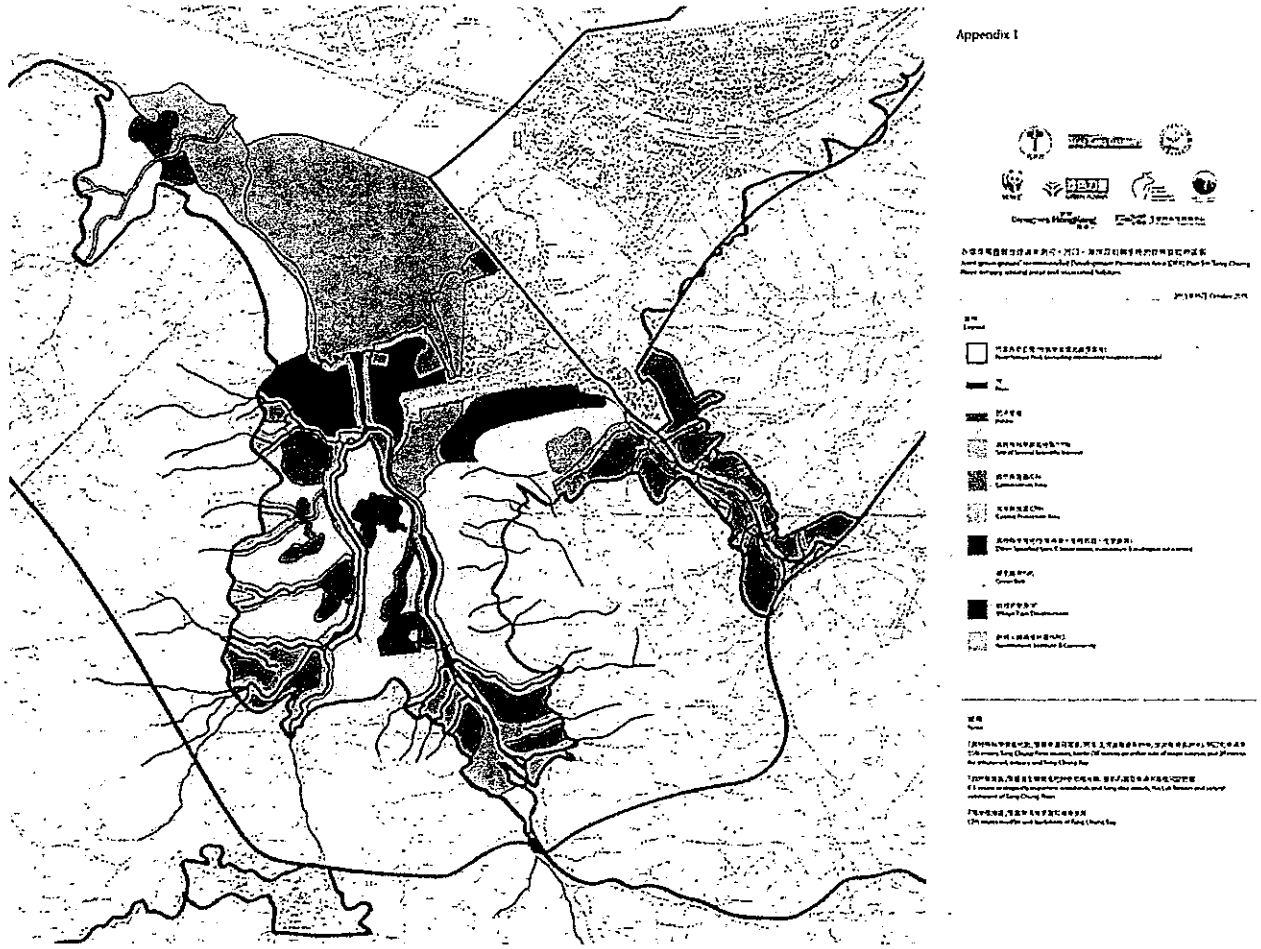
Yours faithfully,

梁德明

Leung Tak Ming
Campaign Officer

[8] AFCD. (2011b). Flora of Hong Kong. v.4, p.8 + 16. Agriculture, Fisheries and Conservation Department. Hong Kong.
[9] AFCD. (2003). Rare and Precious Plant of Hong Kong. Agriculture, Fisheries and Conservation Department

Figure 1 Joint Green Groups' recommended Development Permission Area (DPA) Plan for Tung Chung River, estuary, coastal areas and associated habitats



TPB/R/S/I-TCV/1-33

寄件者: Andrew Chan (Local Biodiversity) [redacted]
寄件日期: 08日03月2016年星期二 18:26
收件者: tpbpd@pland.gov.hk
主旨: S_I-TCV_1 & S_I-TCTC_20_WWF_Mar2016_WWF
附件: S_I-TCV_1 & S_I-TCTC_20_WWF_Mar2016_WWF.pdf; (Appendix1)Joint Green Groups Tung Chung DPA proposal.jpg

Dear Sir/Madam,

Please find attached our submission and Appendix 1 on the captioned.

Thank you for your attention.

Yours faithfully,

Andrew Chan
Conservation Officer, Local Biodiversity
World Wide Fund For Nature Hong Kong
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WWF Hong Kong works to ensure a better environment for present and future generations in Hong Kong (See attached: S_I-TCV_1 & S_I-TCTC_20_WWF_Mar2016_WWF)

Registered Name 註冊名稱: World Wide Fund For Nature Hong Kong 世界自然(香港)基金會 (Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

世界自然基金會
香港分會

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WWF for a living planet®

Our Ref.: SHK/LDD 5/16
8 March 2016

Chairman and members
Town Planning Board
15/F North Point Government Offices,
333 Java Road, North Point, Hong Kong
(E-mail: tpbpd@pland.gov.hk)

By E-mail ONLY

Dear Sir/Madam,

Re: Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 & Proposed Amendments to the Approved Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/20

WWF welcome the gazettal of the draft Tung Chung Valley Outline Zoning Plan (OZP) which enables statutory planning enforcement action against eco-vandalism at the ecologically important Tung Chung Valley area. Nevertheless, we would like to raise our concern and submit herewith our comments and recommendations on the captioned draft Tung Chung Valley OZP and the proposed amendments to the Tung Chung Town Centre Area OZP as follow:

Tin Sam and Wong Lung Hang should be covered with DPA Plans

While the captioned OZPs cover most of the area of Tung Chung West, we view that the government should take this opportunity to cover Development Permission Area (DPA) Plans to Tin Sam area and Wong Lung Hang where both have ecological and conservation interest (Fig. 3). In Tin Sam area, apart from the San Tau seagrass bed "Site of Special Scientific Interest" ("SSSI"), Beijiang Thick-lipped Barb, a freshwater species of conservation concern by AFCD[1], can be found in the San Tau Stream[2]. Wong Lung Hang Stream is one of the Ecologically Important Stream (EIS) listed by AFCD where two species of conservation concern have been recorded[3], namely Beijiang Thick-lipped Barb and Hong Kong Newt[4]. Both areas are not covered by any DPA Plan and thus are vulnerable to environmental destructions and incompatible developments which cannot be stopped

[1] http://www.afcd.gov.hk/tc_chi/conservation/hkbiodiversity/database/popup_record.asp?id=2984
[2] Kadoorie Farm and Botanic Garden. 2013. *Ecological and Conservation Importance of Tung Chung, Lantau.* Kadoorie Farm and Botanic Garden, Hong Kong Special Administrative Region. 29 pp.
[3] *Ibid*
[4] http://www.afcd.gov.hk/english/conservation/hkbiodiversity/database/popup_record.asp?id=3100&lang=en

Patron: The Honourable CY Leung, GBM,GBS, JP
Chief Executive of the HKSAR
Chairman: Mr Edward M Ho
Acting CEO: Ms Nicole Wong

Honorary Auditors: BDO Limited
Honorary Company Secretary:
McCabe Secretarial Services Limited
Honorary Solicitors: Mayer Brown JSM
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Registered Name: 世界自然(香港)基金會 World Wide Fund For Nature Hong Kong
(Incorporated in Hong Kong with limited liability by guarantee)

and enforced by the planning authority, especially those happened on private lands. Therefore, green groups had jointly recommended the government to extend the boundary of the DPA Plan to cover Tin Sam and Wong Lung Hang in previous consultation of the Tung Chung Valley DPA Plan so that local habitats and species of conservation interests could be protected by effective land use control.

However, we are disappointed that the government did not include both Wong Lung Hang and Tim Sam into the Tung Chung Valley DPA Plan before the gazettal of the Tung Chung Valley OZP. We noted that Wong Lung Hang has now been zoned as "Conservation Area" ("CA") and the San Tau seagrass bed had already been registered as "SSSI" under AFCD in 1994. Nevertheless, if both areas are not covered by DPA Plan, they are still unprotected as the Planning Department cannot take enforcement actions against any incompatible development and environmental destruction activity on private lands in the future. In particular, we worry that the Tung Chung New Town Extension will increase development pressure and encourage the dumping of construction & demolition (C&D) waste and incompatible development at the nearby ecologically sensitive private lands, i.e. Wong Lung Hang and San Tau area. We worry that C&D waste will be washed down to Wong Lung Hang and San Tau SSSI during heavy rainstorm event. This will diminish the ecological and landscape value of these areas and result in the loss of important habitats and species of both places.

In fact, the lack of effective land use control has already resulted in irreversible ecological and landscape impacts to the South Lantau area. For example, frequent C&D waste dumping has seriously destroyed the ecologically important wetlands in Pui O (Fig. 1). Although these wetlands are "Coastal Protection Area" on the Approved South Lantau Coast OZP, no enforcement action could be taken by the planning authority to stop the dumping activities because Pui O has never been covered by a DPA Plan. In order not to recommit the same error, **we strongly request the members of the Town Planning Board to excise the Wong Lung Hang area from the Tung Chung Town Centre OZP and designate it into a separate DPA Plan while the San Tau / Tin Sam area should also be covered by a DPA Plan (Fig. 2). The planning authority will then have the enforcement power against destruction activities to protect the sensitive habitats and species found in Wong Lung Hang and San Tau / Tin Sam area.**

***Fung Shui* woods should be zoned as "CA"**

According to the Environmental Impact Assessment Report of the Tung Chung New Town Extension (EIA-233/2015), the overall ecological value of *Fung Shui* woods in the Tung Chung Valley are

"Moderate to High" while their potential ecological value is evaluated as "high if protected from illegal harvesting and encroachment by farming and village expansion". These *Fung Shui* woods could provide breeding habitats for birds, reptiles and butterflies (Table 9.11 of EIA-233/2015). We appreciate that the *Fung Shui* woods of Ngau Au and north of Shek Lau Po are protected by "CA" zone in the captioned OZP. However, we found that the remaining *Fung Shui* woods fall within zonings that will be potentially affected by developments, e.g. "Village Type Development" and "Green Belt" zones (Fig. 3). We gravely concern that these remaining *Fung Shui* woods will be affected by tree removal due to future developments or village expansion if the current zoning plan proceeds. Therefore, **to prevent illegal harvesting and encroachment by farming and village expansion, we strongly recommend that all the *Fung Shui* woods of the Tung Chung Valley should be protected by "CA" zone. This is also in line with the conservation approach of the *Fung Shui* woods of Ngau Au and north of Shek Mun Kap.**

We would be grateful if our comments and recommendations can be duly considered by the Board.

Thank you for your attention.

Yours faithfully,

Andrew Chan
Conservation Officer, Local Biodiversity

Figure 1. C&D waste dumping at Pui O where has no DPA Plan and the planning authority cannot take enforcement action. Similar ecological degradation can happen in Wong Lung Hang & Tin Sam if not covered by DPA Plan.

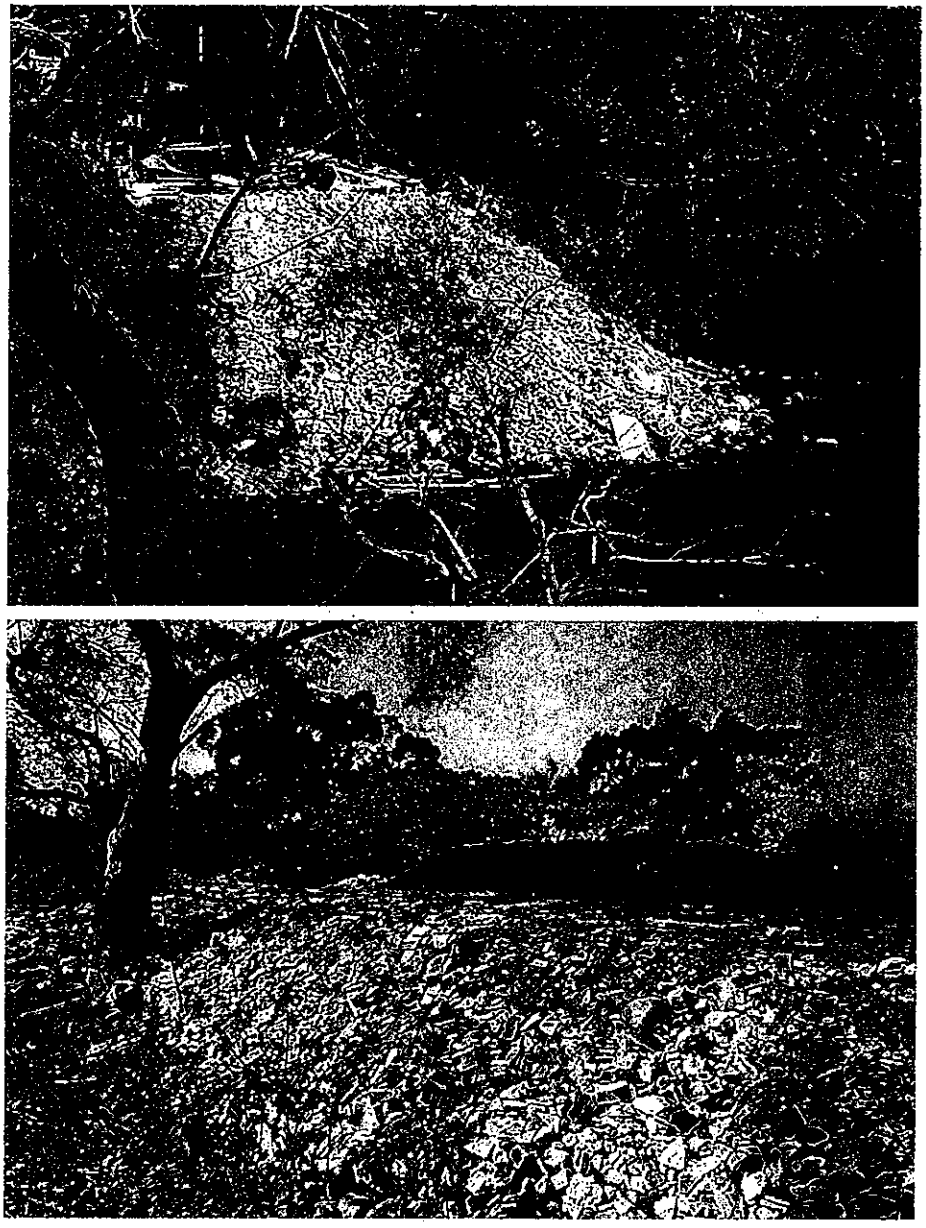


Figure. 2 Recommended DPA Plan by Joint Green Groups in October 2015 (The version of higher resolution attached as Appendix 1)

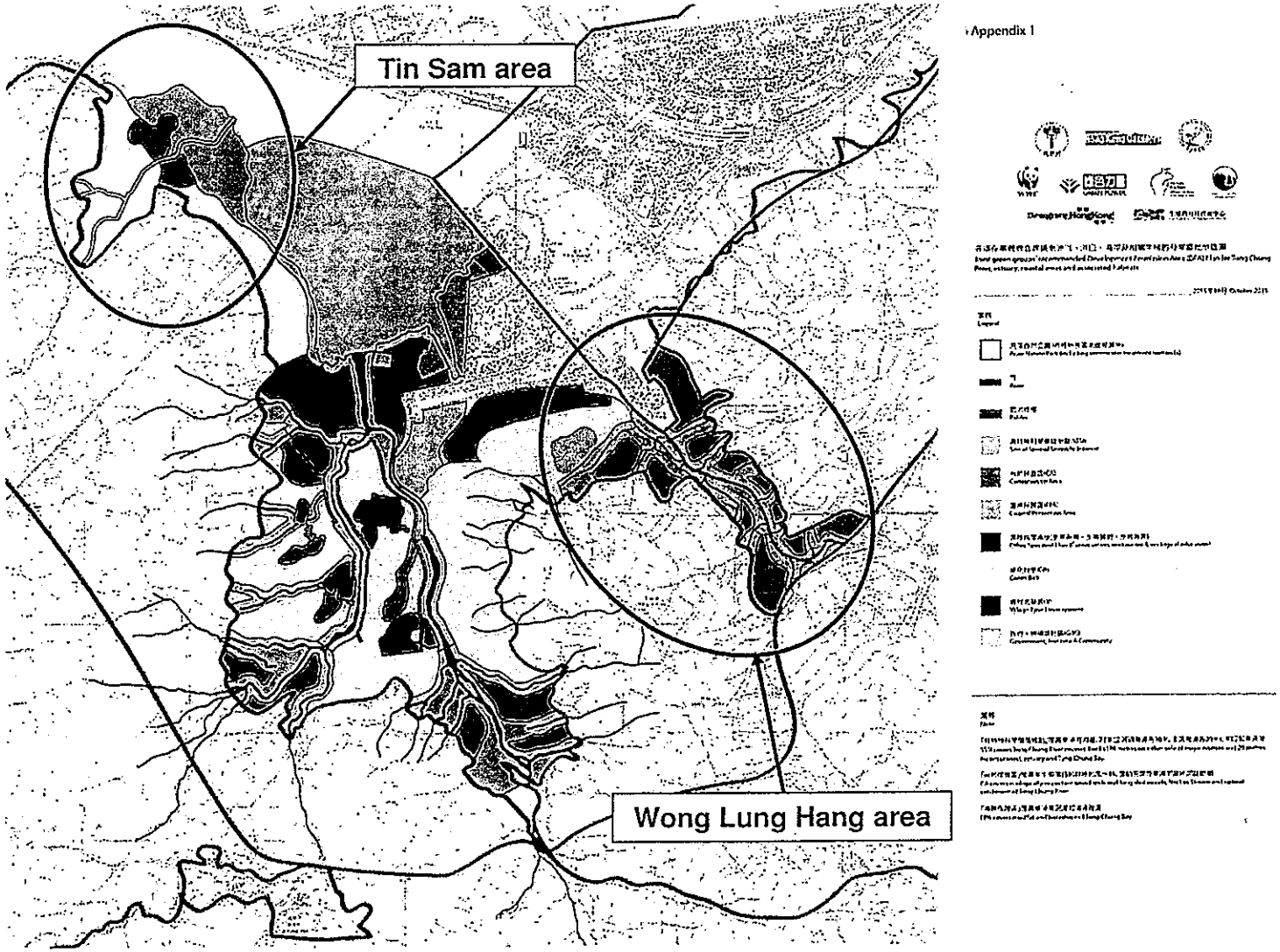
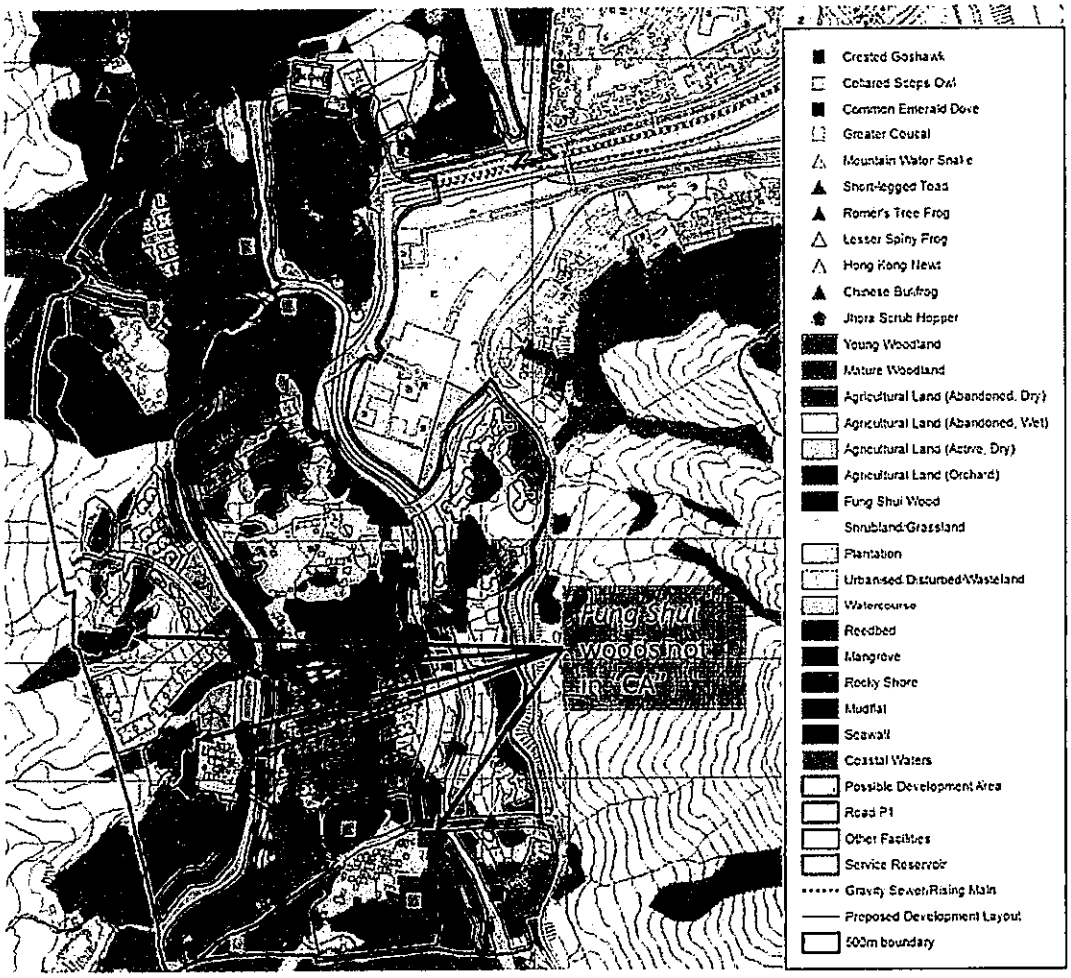
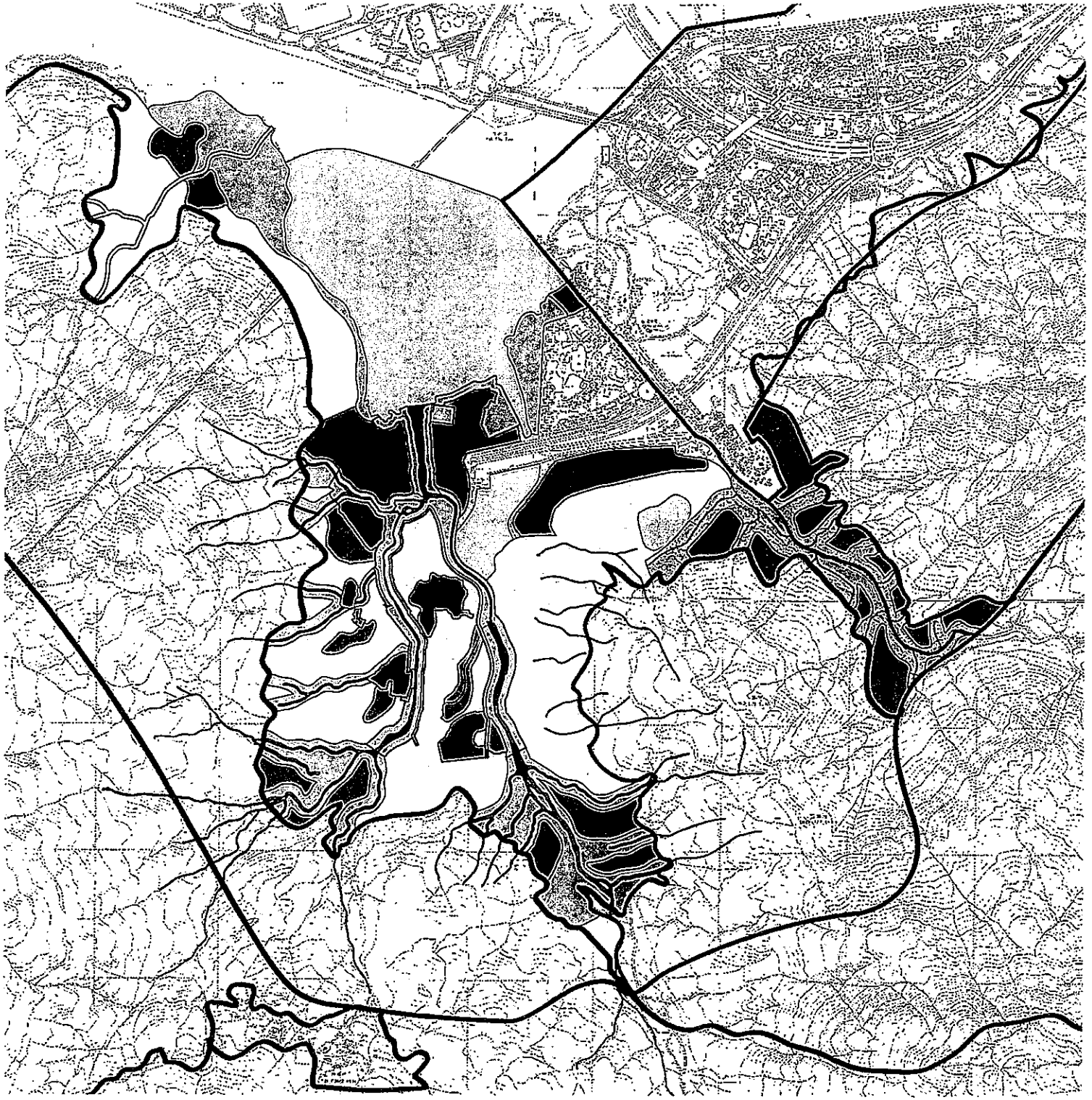


Figure 3. *Fung Shui* woods that are not protected by "CA" zone (Habitat map extracted from the Tung Chung New Town Extension EIA report No.EIA-233/2015)



Appendix 1



會項保育團聯合建議的商潤、河口、海岸及相關生境的發展許批地區圖
Joint green groups' recommended Development Permission Area (DPA) Plan for Tung Chung River, estuary, coastal areas and associated habitats

2015年10月 October 2015

圖例
Legend

- 河流自然公園(包括地表徑流處理濕地)
  River Nature Park (including stormwater treatment wetlands)
- 河
  River
- 防洪渠道
  Polder
- 具特別科學價值地點(SSSI)
  Site of Special Scientific Interest
- 自然保育區(CA)
  Conservation Area
- 海岸保護區(CPA)
  Coastal Protection Area
- 其他指定用途(生態保育、生態旅遊、生態教育)
  Other Specified Uses (Conservation, ecotourism & ecological education)
- 綠化地帶(GB)
  Green Belt
- 鄉村式發展(V)
  Village Type Development
- 政府、機構或社區(G/IC)
  Government, Institute & Community

註釋:
Notes

「具特別科學價值地點」覆蓋東涌河河道、河岸(在河道兩邊各30米，支流兩邊各20米)、河口和東涌灣
SSSI covers Tung Chung River courses, banks (30 metres on either side of major courses and 20 metres for tributaries), estuary and Tung Chung Bay.

「自然保育區」覆蓋高生態價值的林地和風水林、胸動石段及東涌河流地河盆範圍
CA covers ecologically important woodlands and fung shui woods, Nei Lak Stream and upland catchment of Tung Chung River.

「海岸保護區」覆蓋東涌灣泥灘和海濱地帶
CPA covers mudflat and backshore of Tung Chung Bay.

tpbpd

TPB/R/S/I-TCV/1-34

寄件者: KFBG EAP [redacted]
寄件日期: 01日03月2016年星期二 9:42
收件者: tpbpd
主旨: KFBG's comments on Draft TCV OZP and Amendments to TCTC OZP
附件: 160301 Draft TCV OZP and Amendments to TCTC OZP.pdf

Dear Sir/ Madam,

Attached please see our comments regarding the captioned.

Best Regards,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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

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

(Email: tpbpd@pland.gov.hk)

1st March, 2016. **By email only**

Dear Sir/ Madam,

Draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1
&
Amendments to Approved Tung Chung Town Centre Area Outline Zoning Plan No. S/I-TCTC/20

1. We would like to express our grave concerns regarding the captioned.

2. We have previously commented, in December 2015, on a statutory EIA entitled 'Tung Chung New Town Extension' which covered the land use zoning plan of the Tung Chung Valley. We consider that our comments regarding this EIA are also highly applicable to the Draft Tung Chung Valley OZP No. S/I-TCV/1 (Please see **Appendix 1**).

3. We consider that many of the natural habitats and wooded areas such as some of the *fung shui* woodlands in the Tung Chung Valley are not well protected under the proposed land use zoning plan. We strongly urge that these areas should be better protected by more appropriate zonings. Please refer to the attached document in the appendix for further elaborations and our detailed recommendations.

4. In addition, we strongly object to the incorporation of the Wong Lung Hang Valley (the area to the southeast of the Chek Lap Kok New Village including the Wong Lung Hang Stream, which is an Ecologically Important Stream (EIS); **Figure 1**) into the proposed Tung Chung Town Centre Area OZP.

香港新界大埔林錦公路
Lam Kam Road, Tai Po, New Territories, Hong Kong
Email: eap@kfbg.org

5. We have, on many occasions, expressed our grave concerns to the Planning Department about the present statutory loophole which involves the absence of coverage by a DPA plan in many rural areas. There was also a recent newspaper article elaborating upon the issue[1]. For instance, in South Lantau, in an area without previous coverage by a DPA plan but with OZP, the Planning Department has no enforcement power to curtail or cause to cease activities which are destructive to the environment. In the Coastal Protection Area (CPA) zone at Pui O, indiscriminate dumping activities frequently occur (**Figure 2**) BUT the Planning Department can do nothing because there was no DPA plan covering the area.

6. The so-called CPA zone exists on paper only – it is not a protective zone at all, in reality. This is, of course, not a desirable situation and we consider that the integrity of the Government is also being undermined by the lack of any kind of authority under such situations. Surprisingly, the Planning Department is, now, creating and perpetuating the same kind of legal loophole in the Wong Lung Hang Area, i.e., designating an OZP for a highly sensitive area without any prior DPA plan.

7. The Wong Lung Hang Valley is widely recognised to be ecologically important. There is at least an EIS, and as shown in **Figure 3**, the whole valley is naturally wooded with the vegetation even denser than many woodlands in the Tung Chung Valley. Otherwise, it would not be proposed to be covered mainly with GB and CA zones under the current amendment plan. However, because of the lack of coverage by a DPA plan, these zones will never actually protect the areas (i.e., any land filling/ excavation activities appearing on the private land in these zones will not be controllable by the Planning Department even though these zones are generally being designated for conservation purposes). We are deeply worried that the many cases of environmental destruction now happening along the South Lantau coast, such as those in Pui O, would inevitably occur in this area. What the Planning Department is now doing, is not, by any means, protecting this highly sensitive area but is in practice pushing the area to the brink of lawlessness and the gulf of environmental destruction. It seems that The Planning Department is incapable of learning the bitter lessons of the past.

8. We rigorously object to the proposal to cover the Wong Lung Hang Valley with the amended Tung Chung Town Centre OZP. This area should be completely excised from the current proposed plan/ amendment. We urge that this area should be accorded due statutory process and be covered with a DPA plan, first, and later followed through with an OZP with

[1] http://news.mingpao.com/pns/dailynews/web_tc/article/20160229/s00012/1456682982359

appropriate conservation zonings.

9. These are the only responsible steps to protect this area. Its fate should not be hung in the balance. There should be no administrative or planning shortcuts for the biologically rich and ecologically endowed natural landscapes of the Wong Lung Hang Valley.

10. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

cc. Conservancy Association
Designing Hong Kong
Green Power
Hong Kong Bird Watching Society
WWF – Hong Kong

Figure 1. The Wong Lung Hang Valley

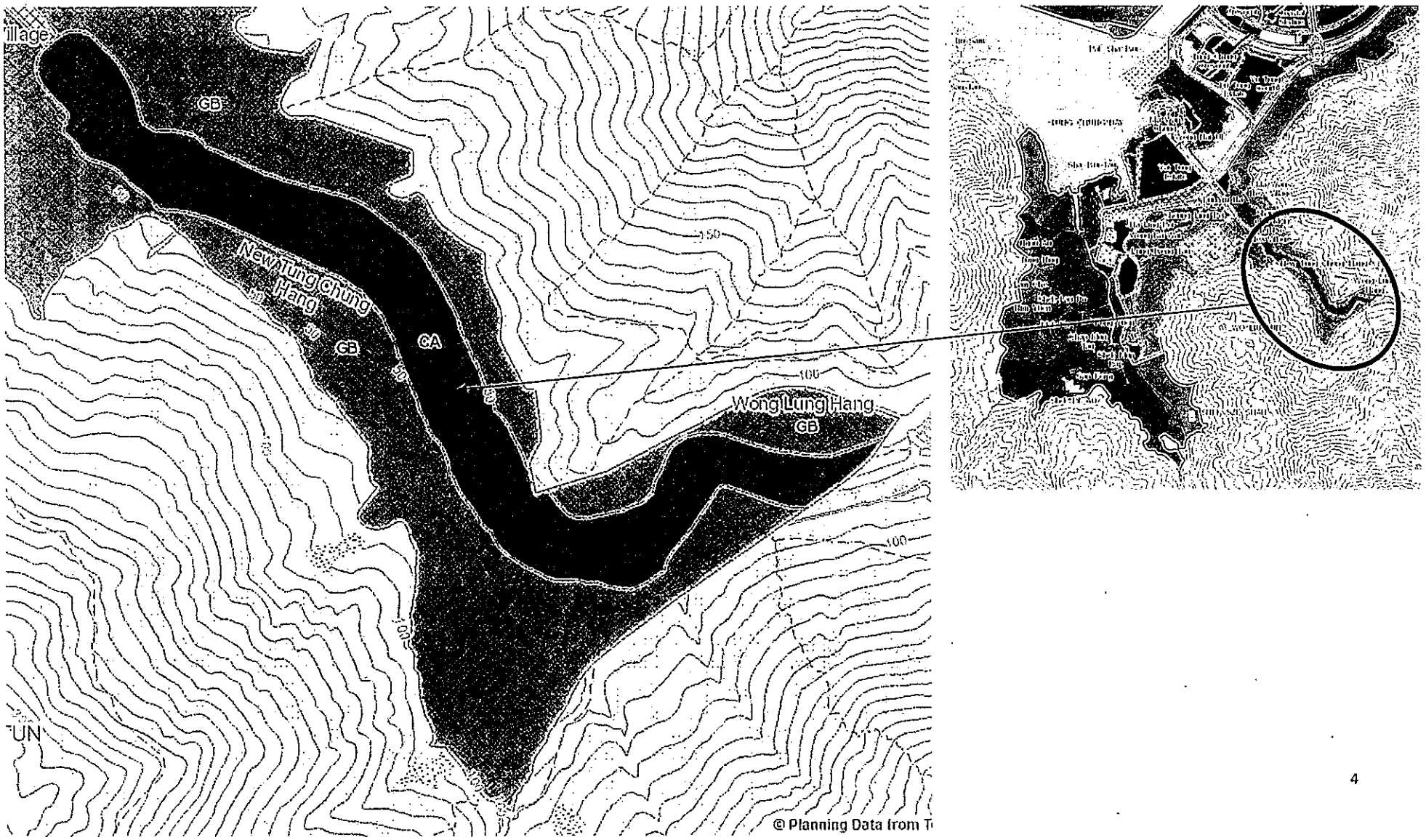
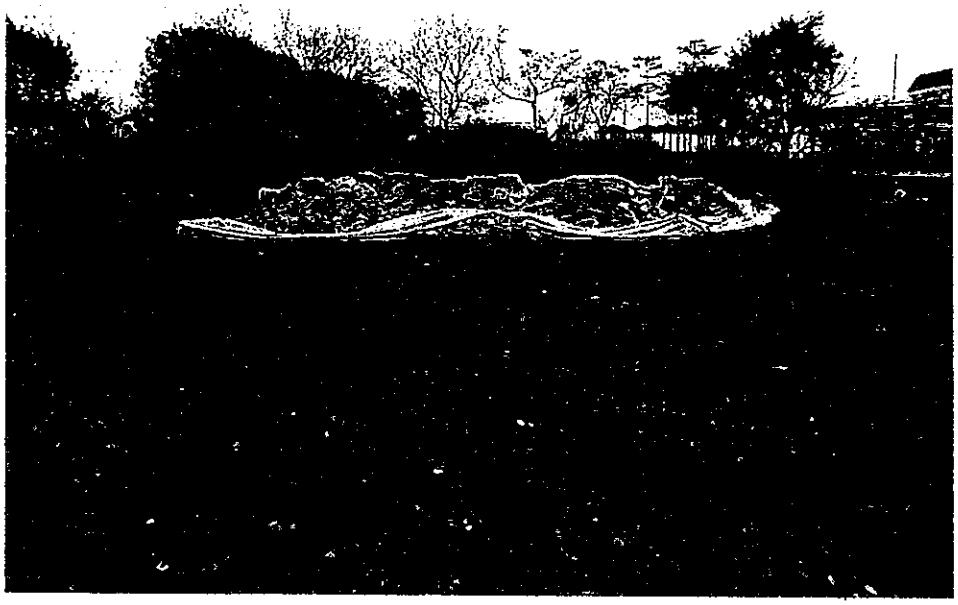
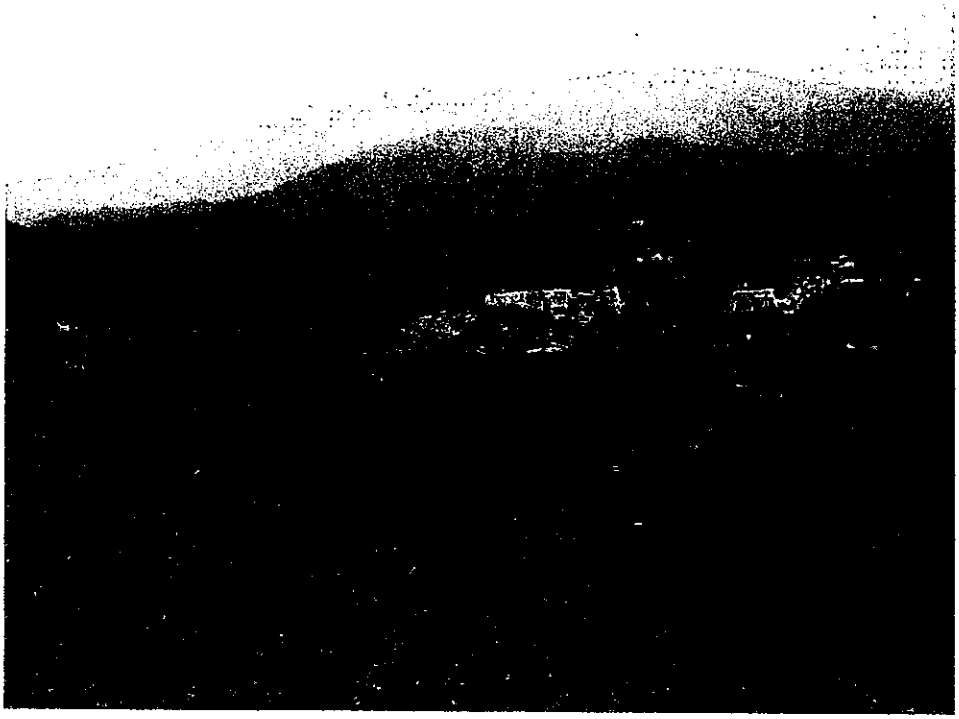


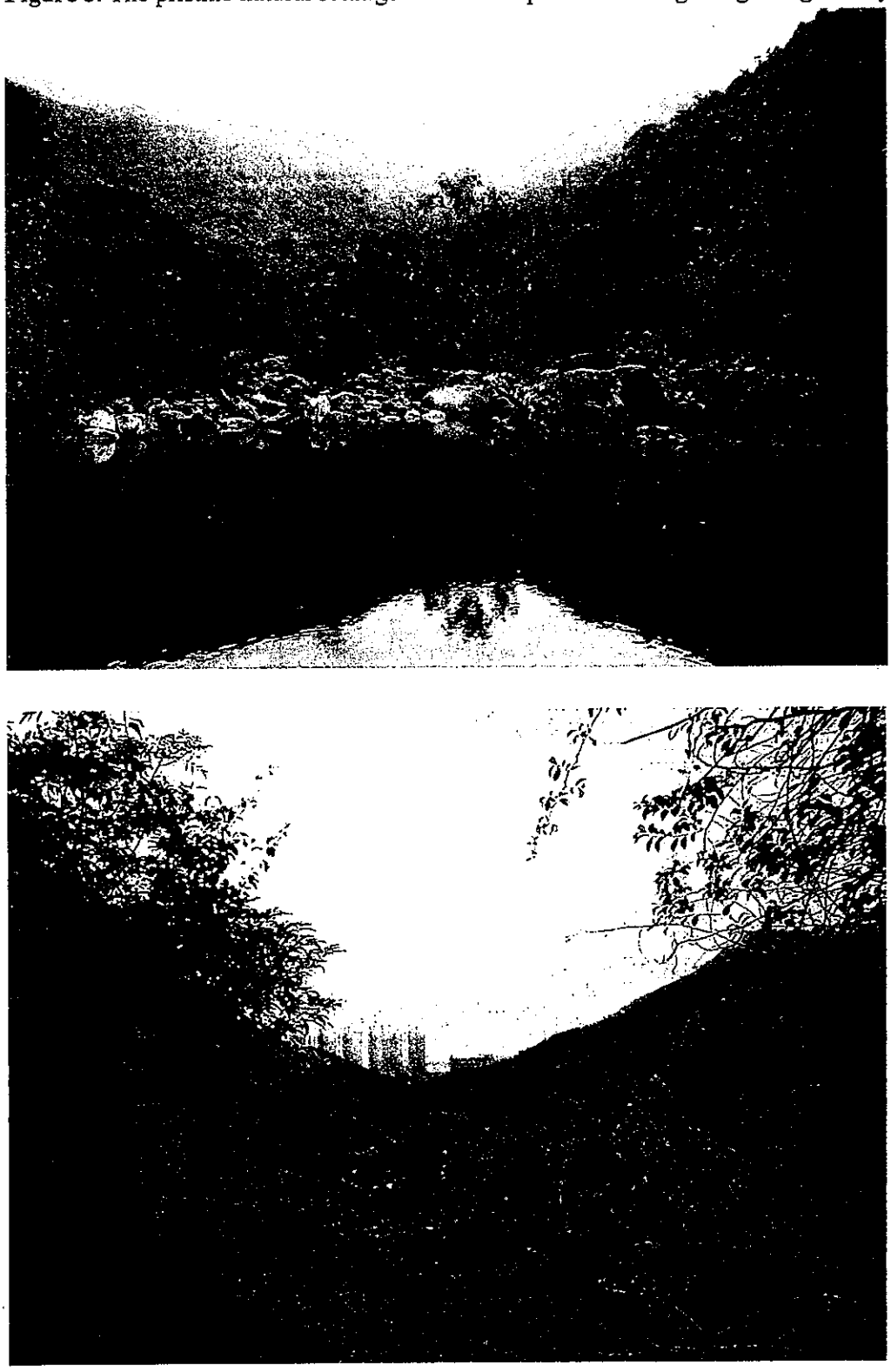
Figure 2. Flagrant dumping within the CPA zone at Pui O, Lantau. Although it is stated as a CPA zone on the OZP, the Planning Department has no enforcement power to curtail or cause to cease these environmentally damaging activities.





香港新界大埔林錦公路
Lam Kam Road, Tai Po, New Territories, Hong Kong
Email: eap@kfbg.org

Figure 3. The pristine natural settings and landscape of the Wong Lung Hang Valley



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 project[1]. 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 (EIA-075/2002)[2] and an AFCD's Practice Note[3] 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.

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[2] http://www.epd.gov.hk/eia/register/report/eiareport/eia_0752002/EIA%20Report/contents_with_hyperlink.htm

[3] https://www.afcd.gov.hk/english/conservation/con_tech/files/NCPN_No.04_Wildlife_Underpass_Structures_v2006.pdf

In addition, the stream bed under the future bridges should remain natural so as to allow for free and unobstructed passage of wildlife.

Conflicts between Current Proposed Zonings and Well Vegetated Habitats

5. *We find from the RODP – TCW that some well vegetated areas are included into the development/ non-conservation zonings and some Fung Shui woodlands are not adequately protected.*

5.1 The area TCV-8 is now covered with a residential zone according to the EIA. However, as shown in the Digest, this area was previously proposed to be a GB zone under the DRODP (see **Figure 13**). We consider this is to be significant change (the area is about 4 ha) and we hope the ACE would request for elaborations from the authorities as to why there is such a major change. According to Figure 9.6a of the EIA, this area is largely an orchard and Romer's Tree Frog was recorded in the vicinity. As shown in an aerial photograph taken in August 2015, the area (TCV-8) is currently largely vegetated (**Figure 13**). We consider that it is still ecologically linked with the Tung Chung Stream, the coastal habitats, and the hillside woodlands. As mentioned in our Technical Report for the Tung Chung Valley area, Romer's Tree Frog has been recorded in the orchard habitat in the valley[4] 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 KFBG[1], 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-Document/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 natural[6]. Some scholars have estimated that China's coastal wetlands have been lost at a rate of 20,000 hectares per year[7], with an estimated total loss of 2,190,000 hectares of coastal wetlands since the 1950s[8].

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 lost[9], 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 2005[10]. 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 1997[11].

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 restored[4]. 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 impacts[12]. In 2011, an article published in the "Xin Hua Net" (China's official

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6 http://www.gov.cn/gzdt/2013-06/03/content_2417721.htm

7 Gu, D., Zhao, X. and Xia, D. 2003. A systemic analysis of the environmental pressure factors to the degradation of coastal wetlands in China. *Acta Oceanologica Sinica* 25, 78-85.

8 Zhang, X., Li, P., Li, P. and Xu, X. 2005. Present conditions and prospects of study on coastal wetlands in China. *Advances in Marine Science* 23, 87-95.

9 Li, J., Wang, A. and Li, T. 2011. Variations of coastal wetland landscapes in the Pearl River Delta in the last 20 years. *Advances in Marine Science* 29, 170-178.

10 Gao, Y., Su, F., Sun, X. and Xue, Z. 2010. On changes in landscape pattern of coastal wetland around the Pearl River Estuary in past two decades. *Tropical Geography* 30, 215-220.

11 Li, B. and Huang, G. 2008. Ecology effect and counter measure of urbanisation in Pearl River Estuary. *Marine Environmental Science* 27, 543-546.

12 http://www.mlr.gov.cn/xwdt/xwpl/201105/t20110531_872583.htm

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 impacts[13].

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 project[14]. 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 decades[15].

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 sites[16] and about 2,300 hectares of Government Land under short-term tenancies[17], 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 Land[18]. 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-075/2002[19] and AFCD's Practice Note[20]) should be made reference to, and incorporated

[19] http://www.epd.gov.hk/eia/register/report/eiareport/eia_0752002/EIA%20Report/contents_with_hyperlink.htm

into the road designs (including those bridges crossing the watercourses) of the present project.

11.6 The potential movement corridor to the north of the area TCV-5a would pass through the attenuation pond. We urge that the design of the fencing surrounding this pond should not block nor pose an obstruction to the free passage of wildlife.

11.7 We urge the authorities to re-zone the area TCV-8 back to GB, following what has been previously shown in the Digest.

11.8 All *Fung Shui* woodlands should be zoned as CA rather than being given a GB or V status.

11.9 The applicant should clarify and further elaborate in the ACE as to how the areas of mangroves and mudflats under the proposed RO as shown in **Figure 13** would be preserved, and thus, no loss of these natural habitats would occur at any time in the future.

11.10 The suspected illegal bridges should either be removed or replaced with ecologically-friendly designs.

11.11 The applicant should liaise with the relevant maintenance authority in the comprehensive design of the drainage and wetland system for the collection and treatment of surface runoff.

11.12 The applicant should ensure that the connection rate of communal sewers to village houses should be of a satisfactory level.

12. *Tung Chung East*

12.1 There should not be any reclamation.

12.2 The potential impacts on the Ayu Sweetfish, the Horseshoe Crab and the Chinese White Dolphin should be adequately addressed and effectively mitigated.

13. *Convention on Biological Diversity*

13.1 In addition, we would like to remind the applicant that The Convention on Biological Diversity (CBD) was extended to Hong Kong by the Central People's Government in May

[20] https://www.afcd.gov.hk/english/conservation/con_tech/files/NCPN_No.04_Wildlife_Underpass_Structures_v2006.pdf

2011. Article 8 (*in-situ* conservation) of the CBD[21] 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).

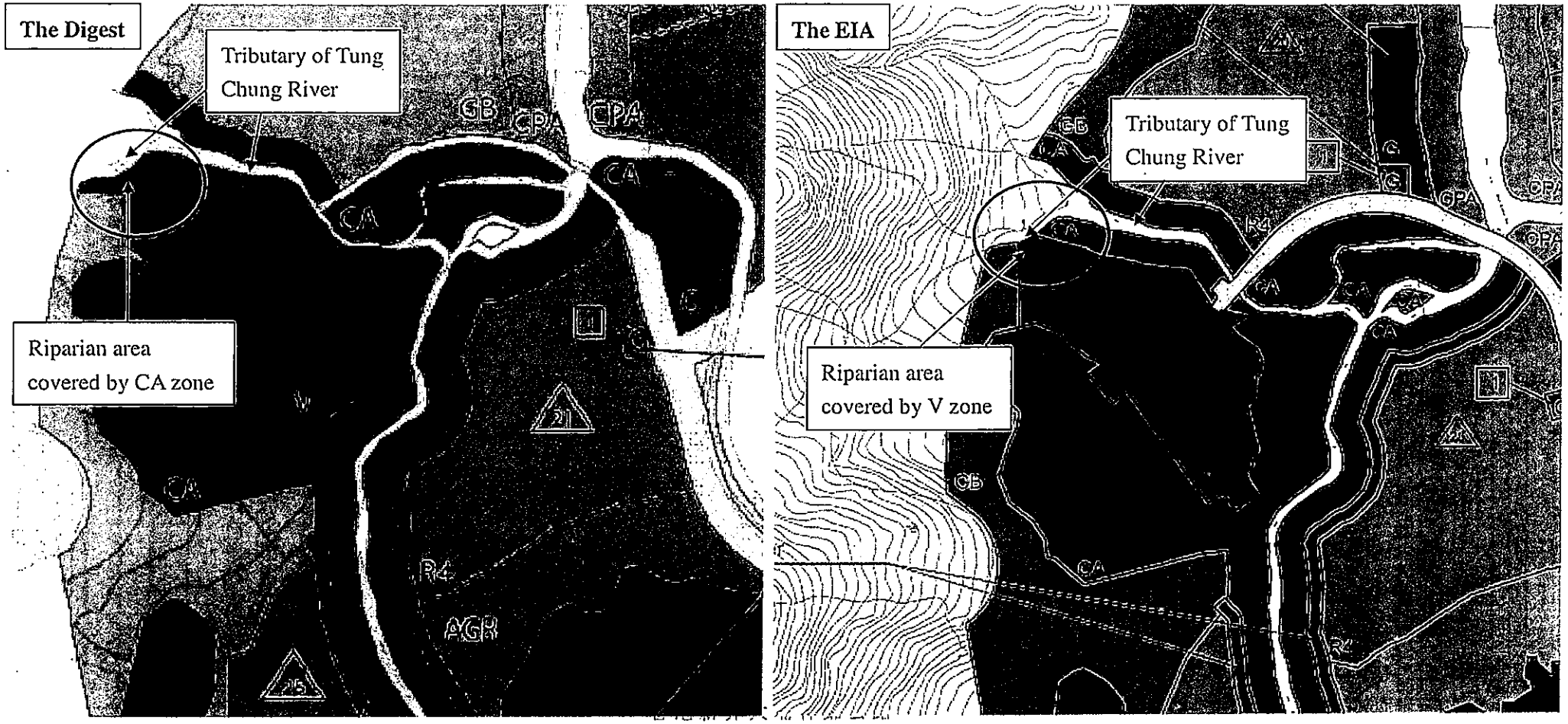

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Figure 2. Habitat map extracted from the EIA shows that the area to the northwest of Ngau Au Village is covered with mature woodland.

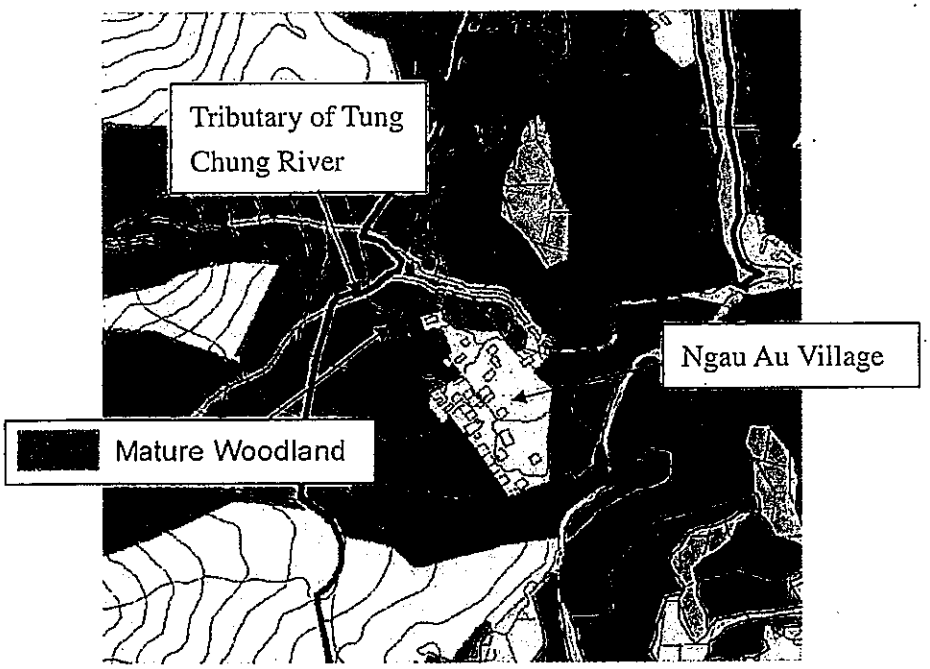

Figure 3. Aerial photograph taken in August 2015 showing Ngau Au Village and its well vegetated surroundings.

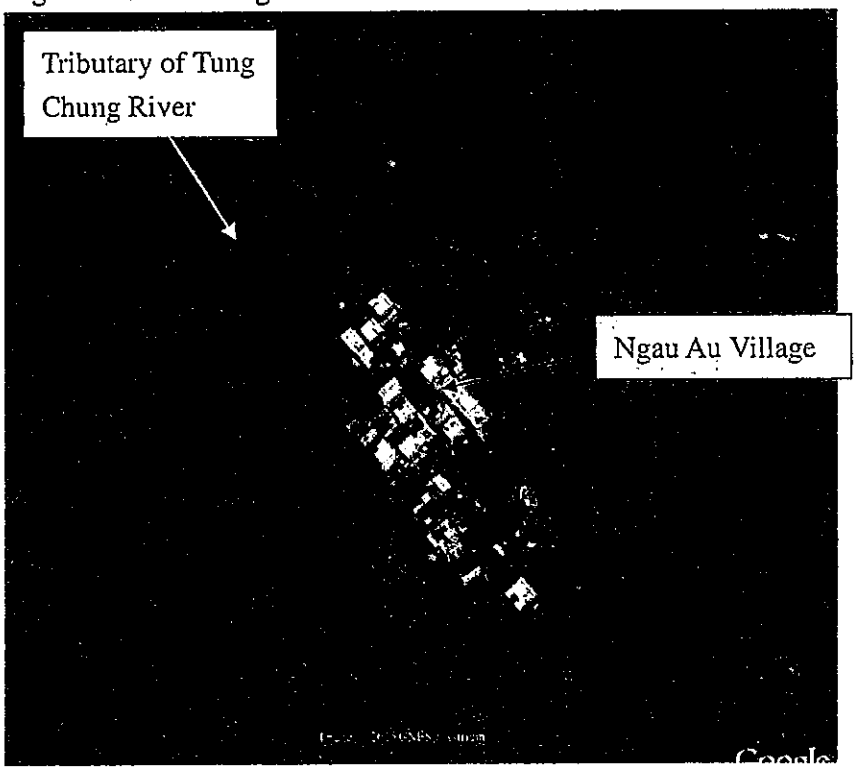

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Figure 4. On-site photograph showing the well-vegetated riparian area at Ngau Au Village (taken in December 2015).

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).

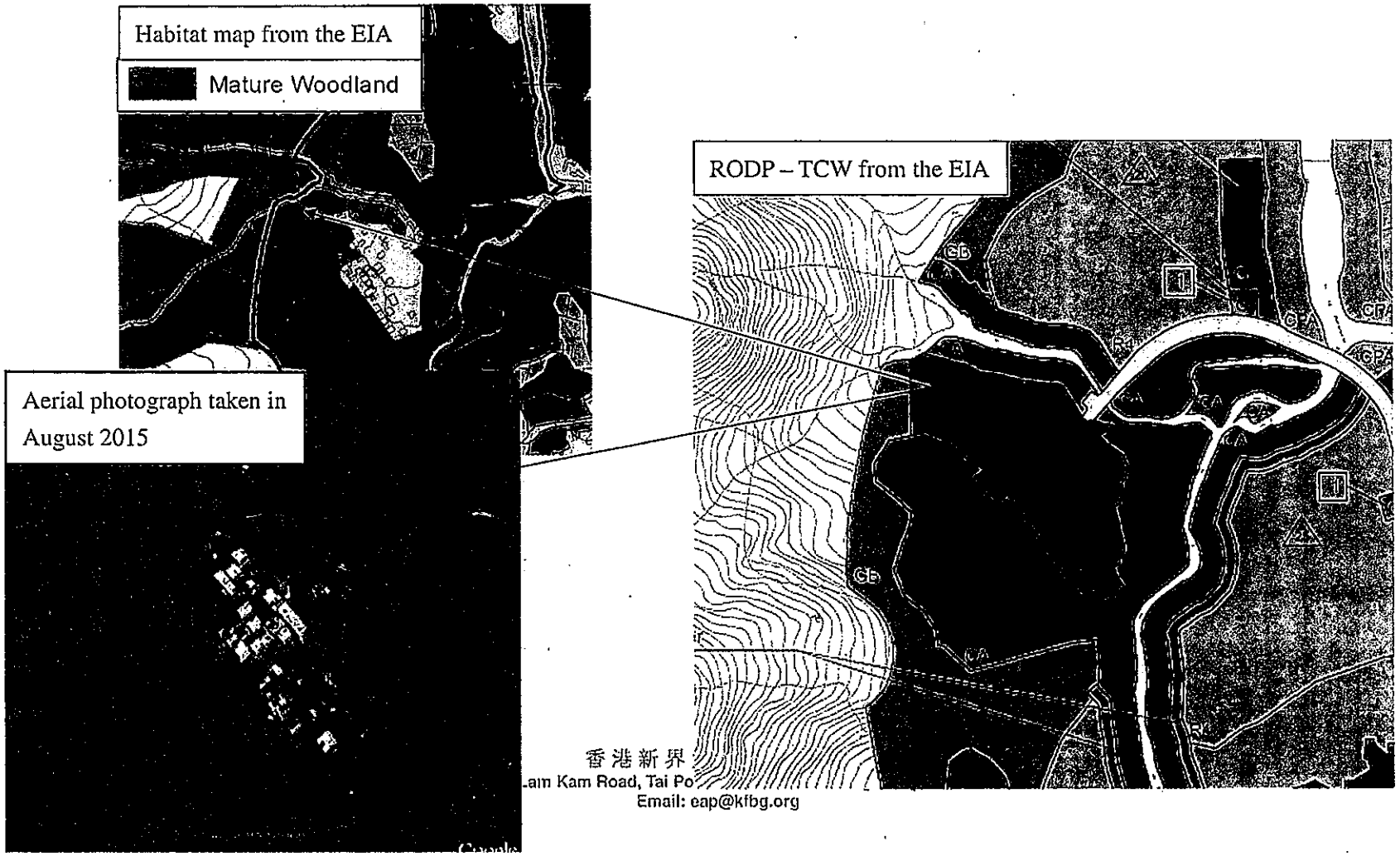

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Figure 6. Sensitive habitats (not including those at Ngau Au Village, mentioned above) that are now included in the V zones (indicated approximately by the white line) under the EIA's proposal (approximately marked by the arrows)

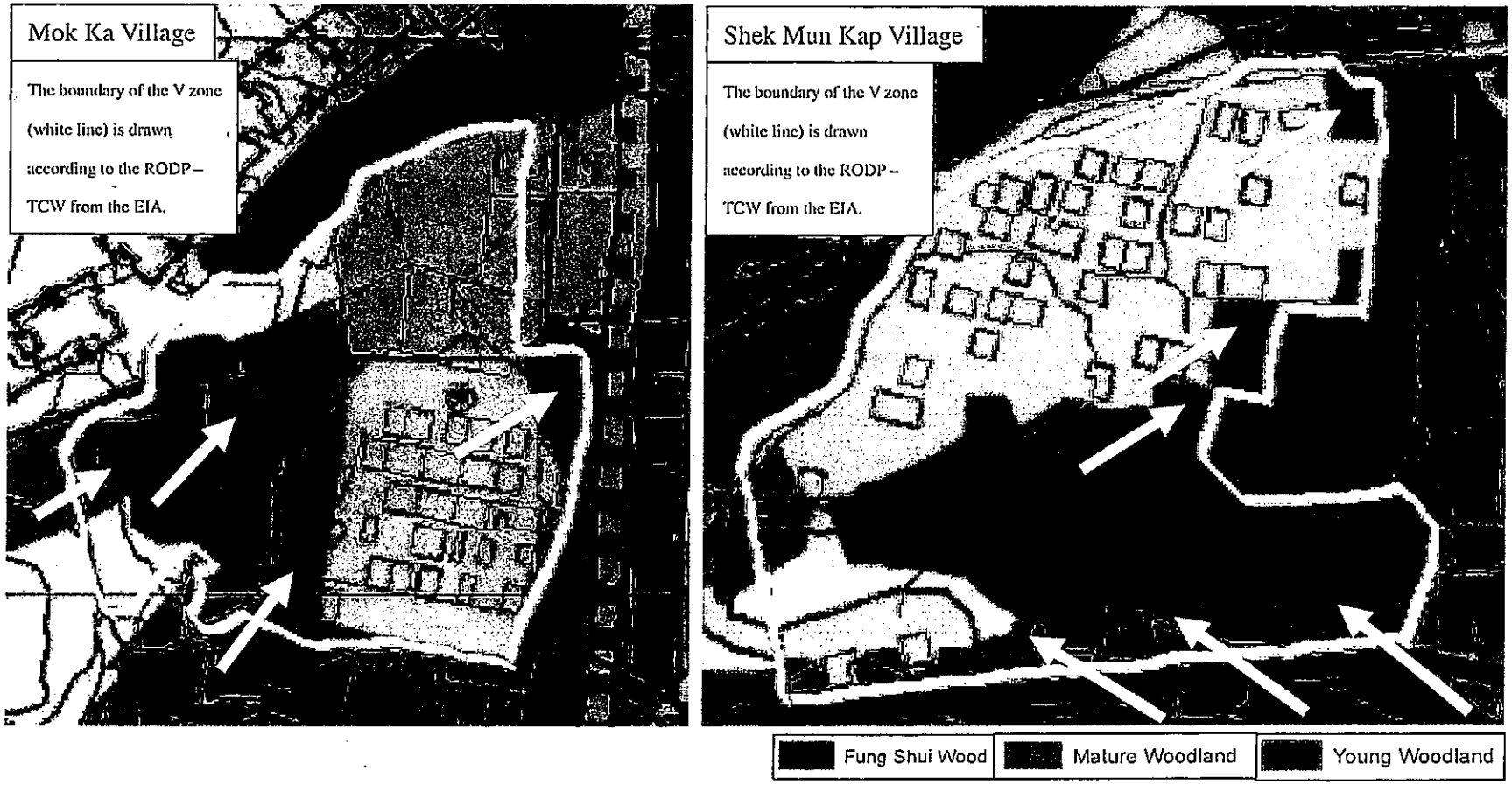

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Figure 7. Sensitive habitats were excluded from the proposed V zones in the DRODP in the Digest of the Stage 3 public engagement consultation exercise

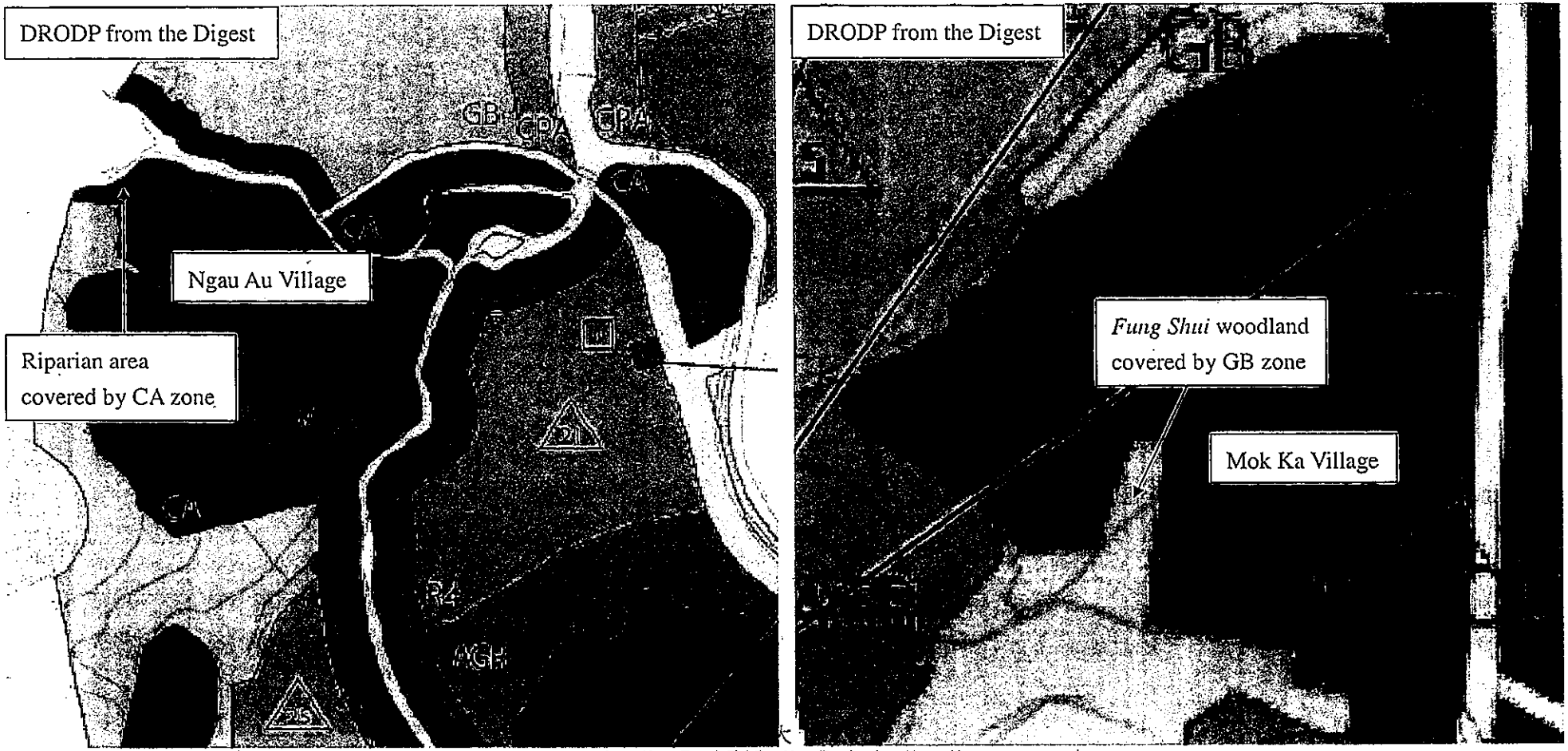

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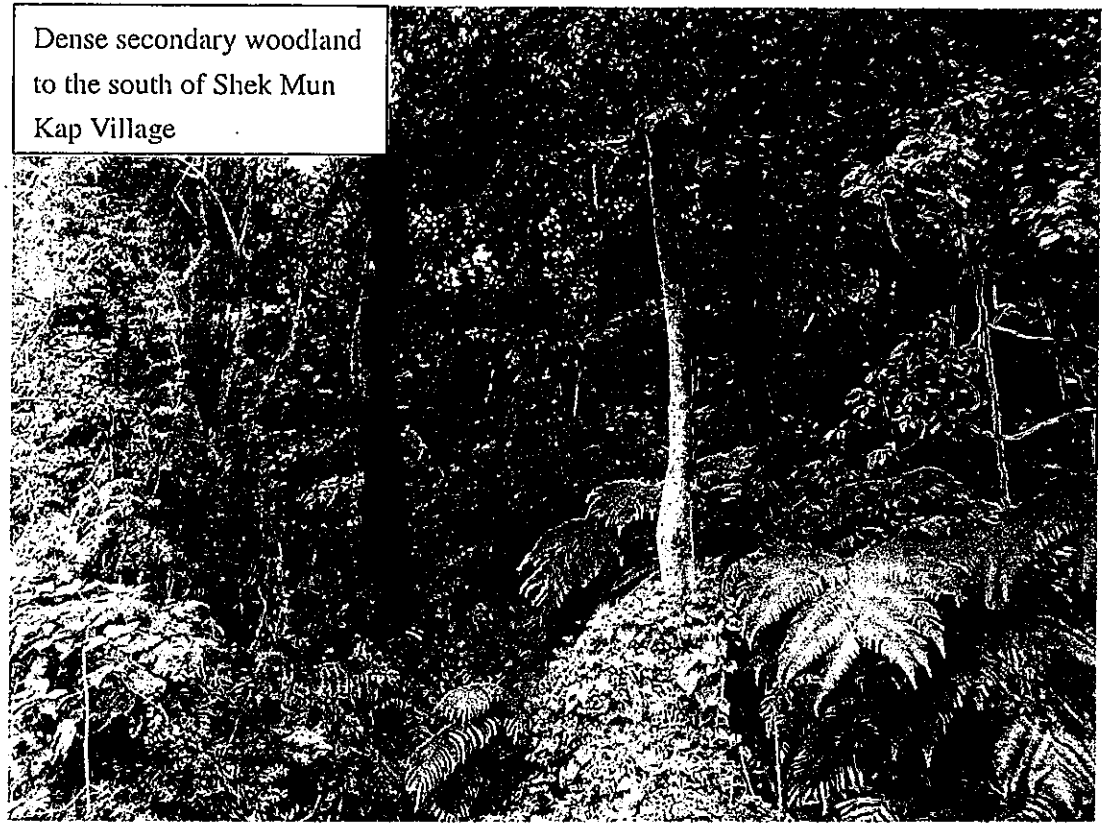
Figure 8. Sensitive habitats within or very close to the proposed V zones.

Dense secondary woodland to the south of Shek Mun Kap Village



Natural watercourse in the orchard to the south of Shek Mun Kap Village

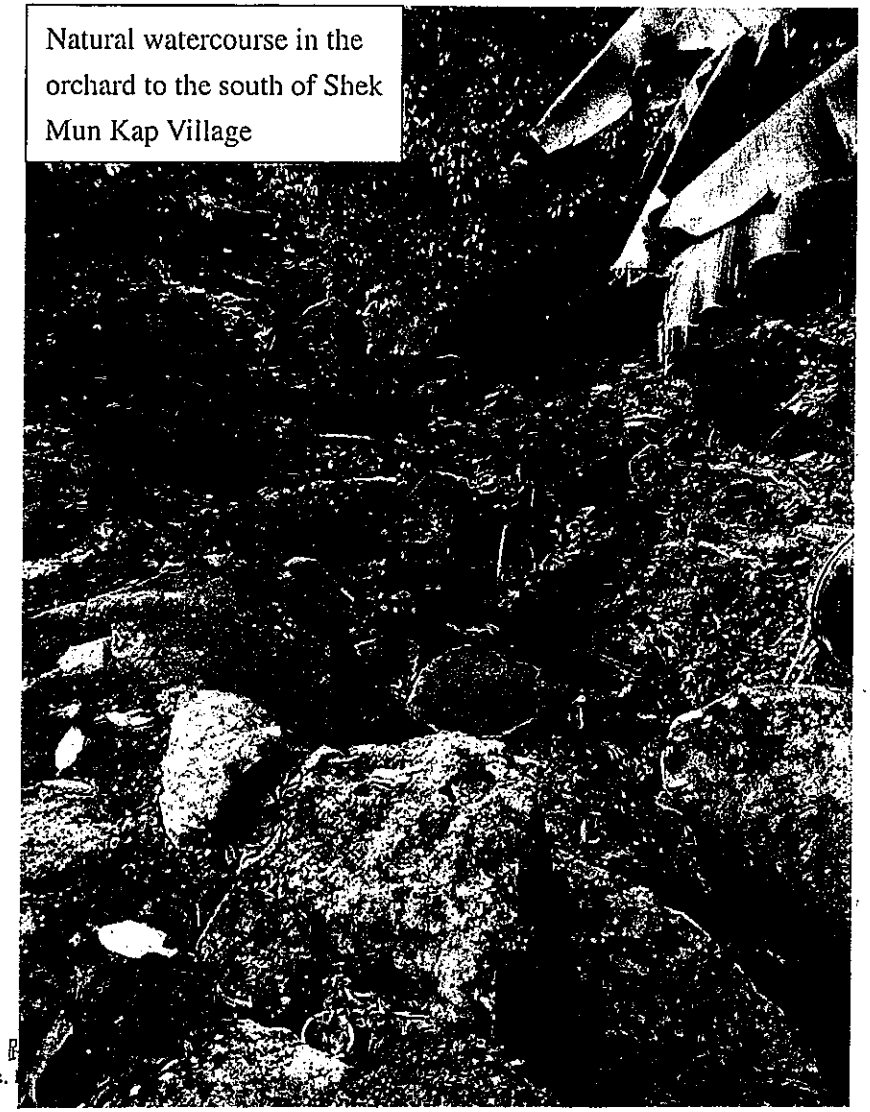


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Figure 8. Con't

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

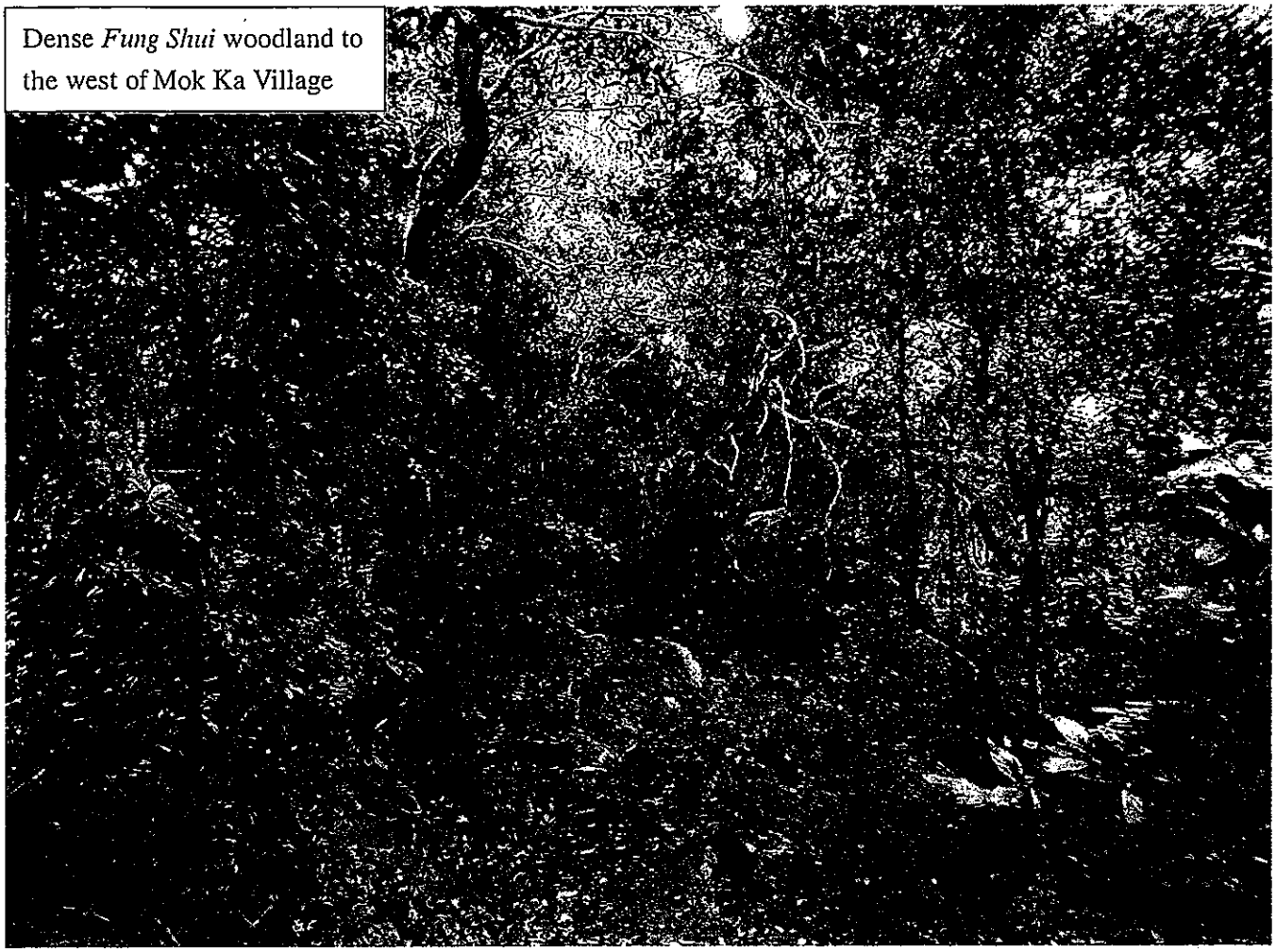

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Figure 8. Con't

Natural watercourse to the west of Mok Ka Village

Natural watercourse to the west of Mok Ka Village

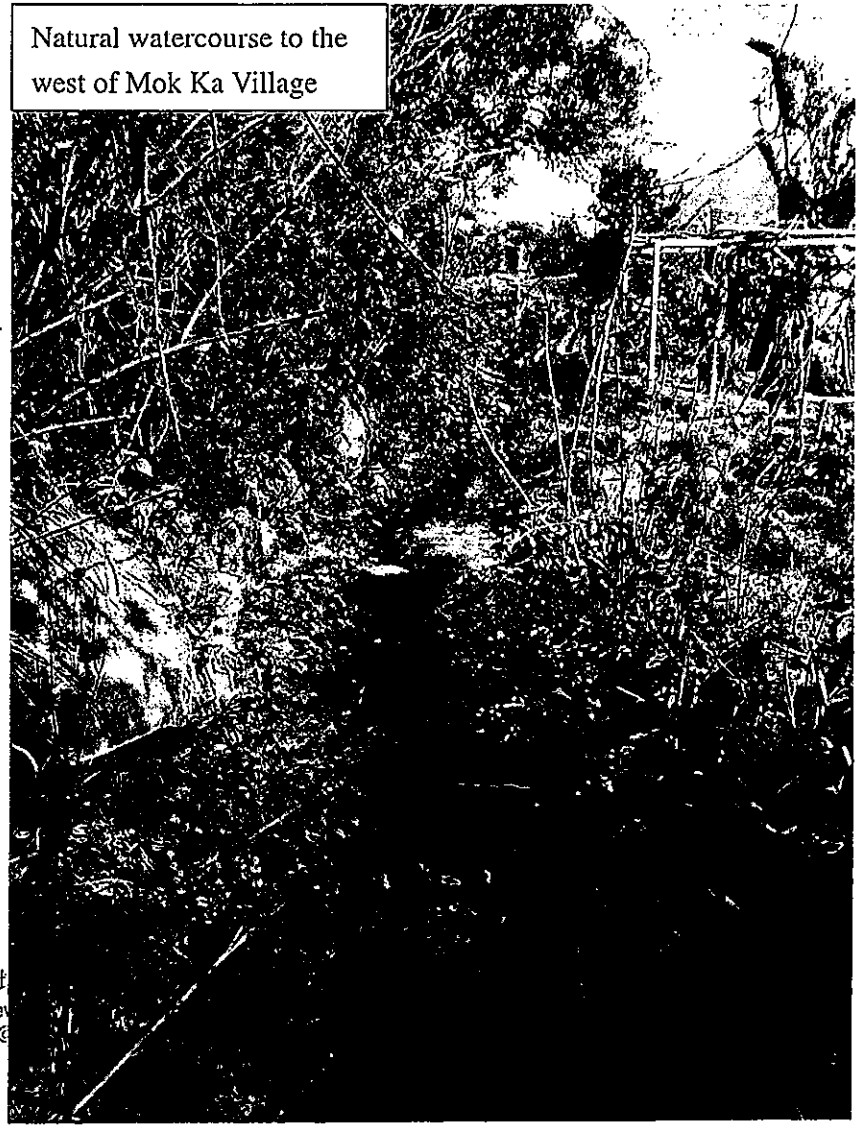

Figure 9. The potential movement corridor shown in the EIA actually passes through the proposed V zone near the existing Mok Ka Village.

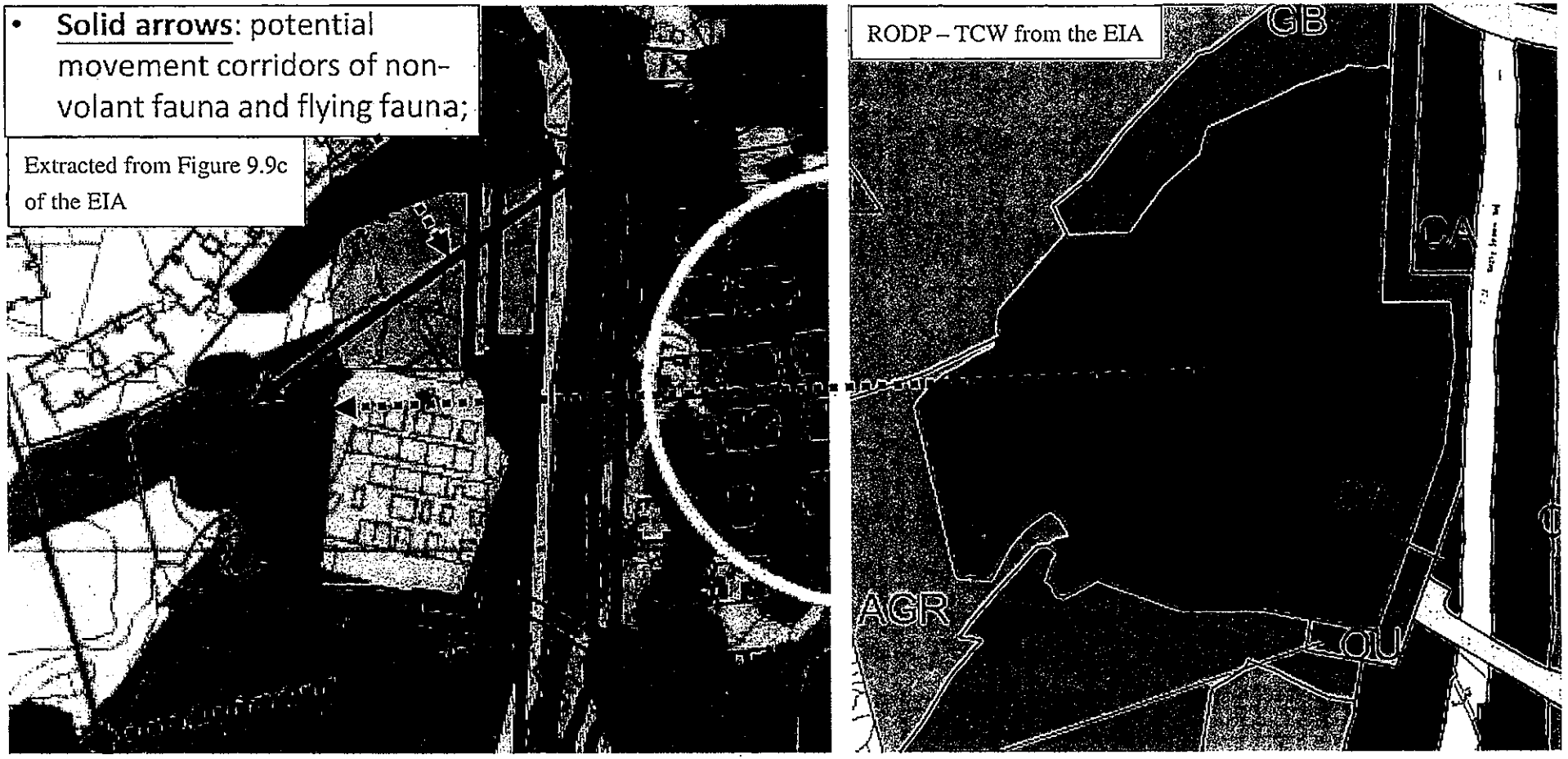

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Figure 10. Valid movement corridor (solid arrow) with conservation zonings recommended by KFBG (approximately indicated by the green rectangle with dotted boundary) adjacent to Mok Ka Village.

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

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.

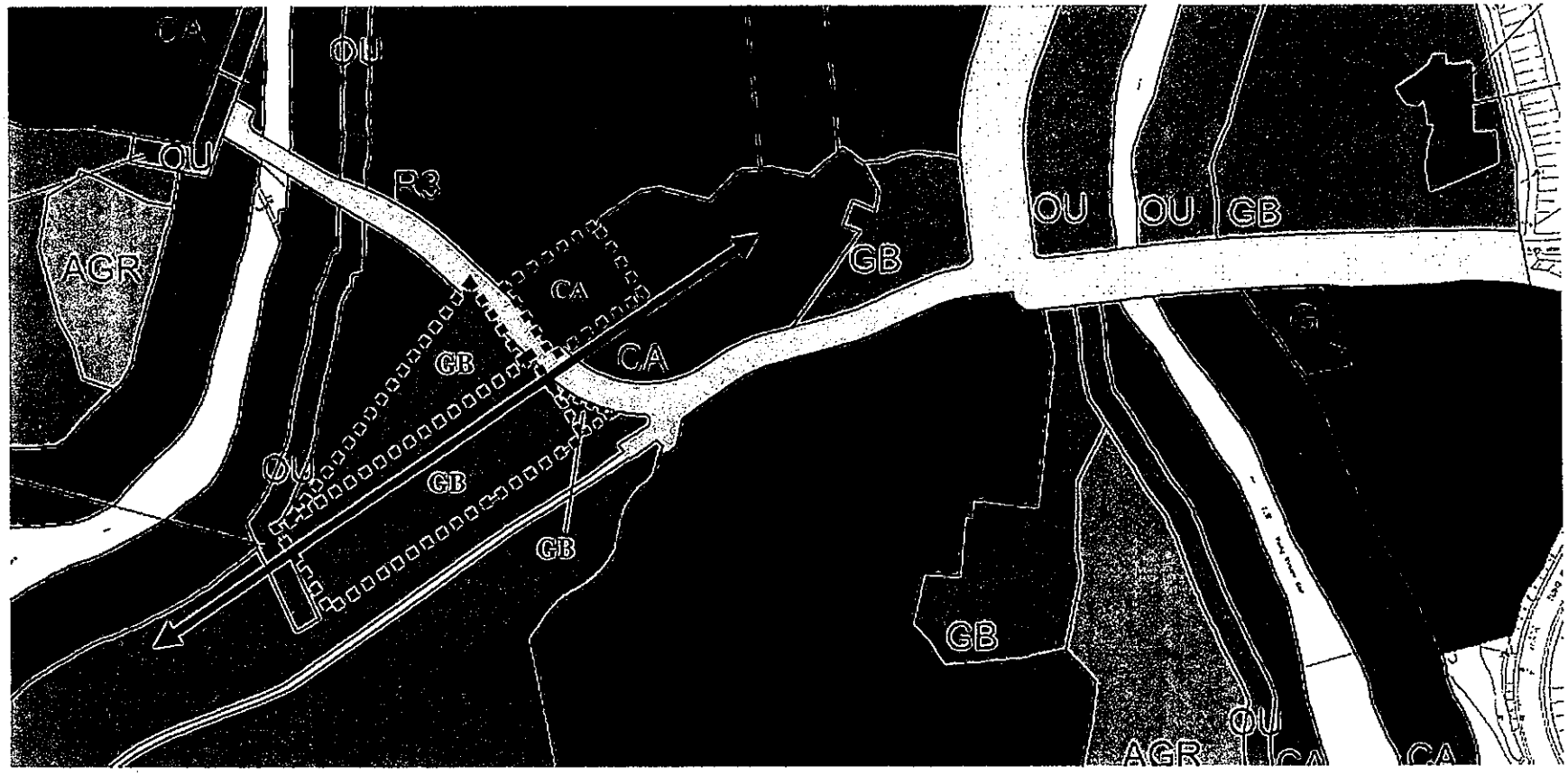

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Figure 12. Many of the predicted movement corridors (arrows) intersect with the proposed new roads network (white lines).

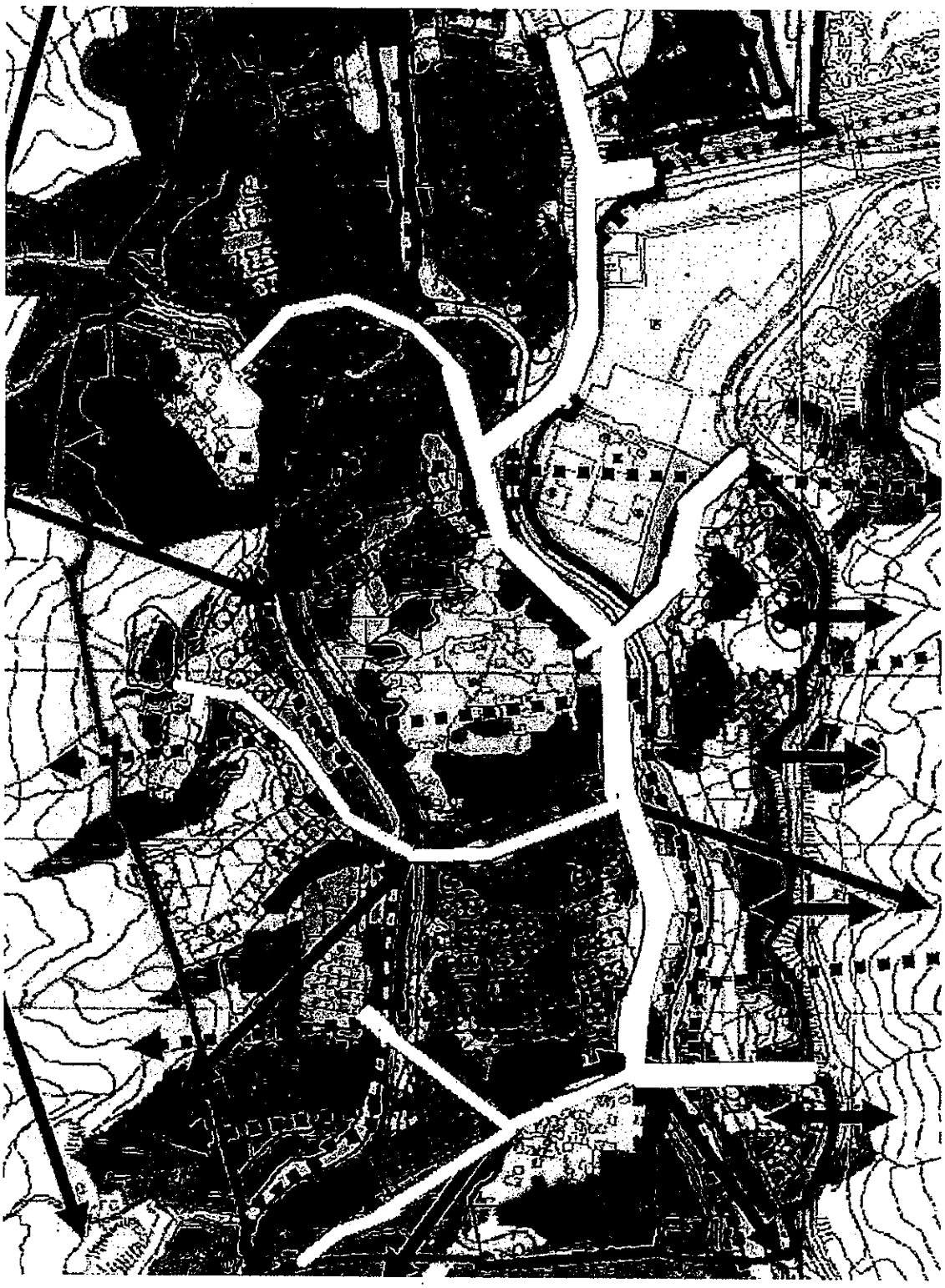

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Figure 13. A large piece of proposed GB zone to the north-east of Ngau Au Village shown in the Digest, which is currently well vegetated, that is now zoned as R4 in the EIA.

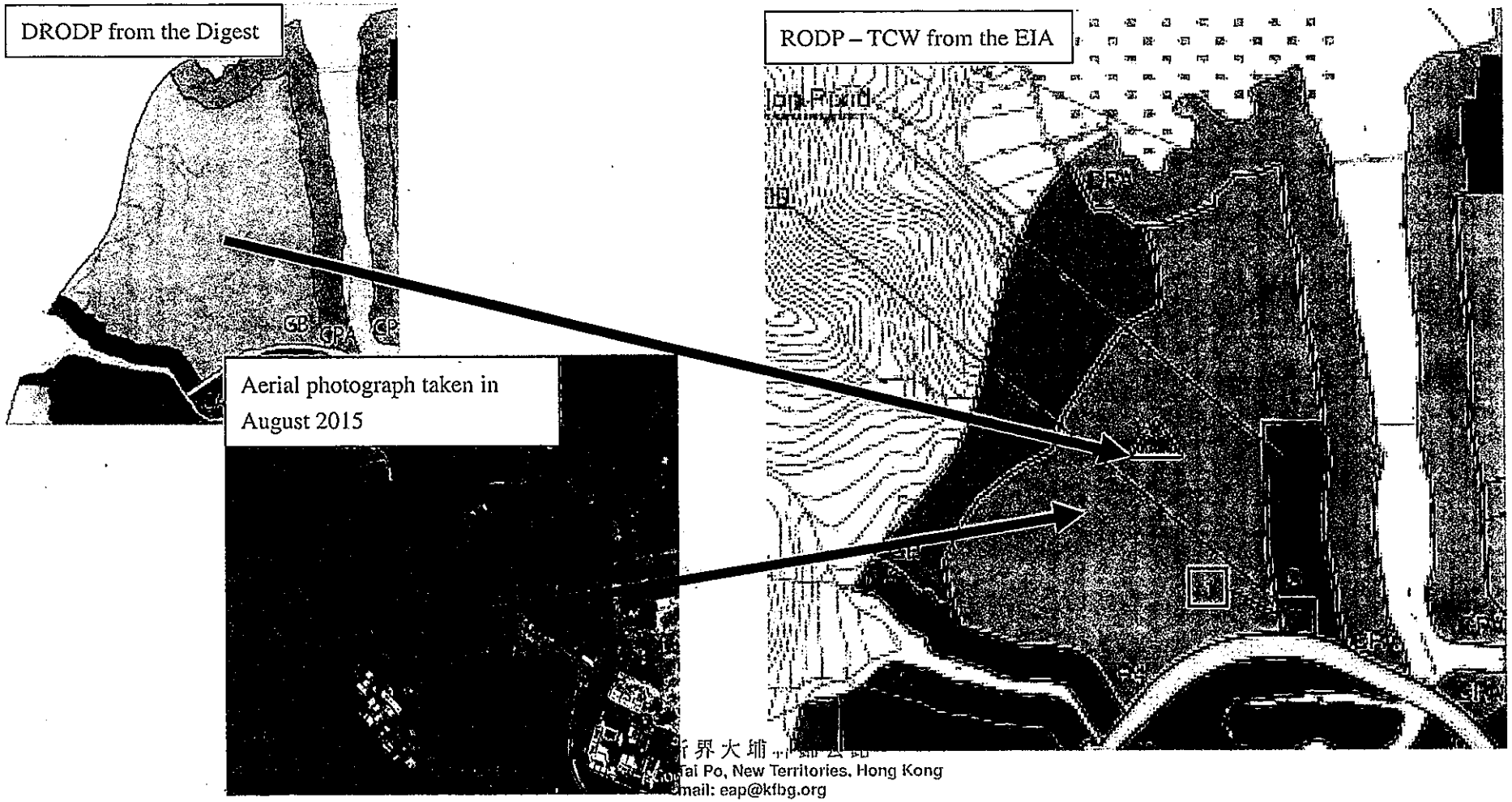

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Figure 14. *Fung Shui* woodlands identified in the KFBG's Technical Report covered with proposed GB and V zones (approximately indicated by the blue arrows).

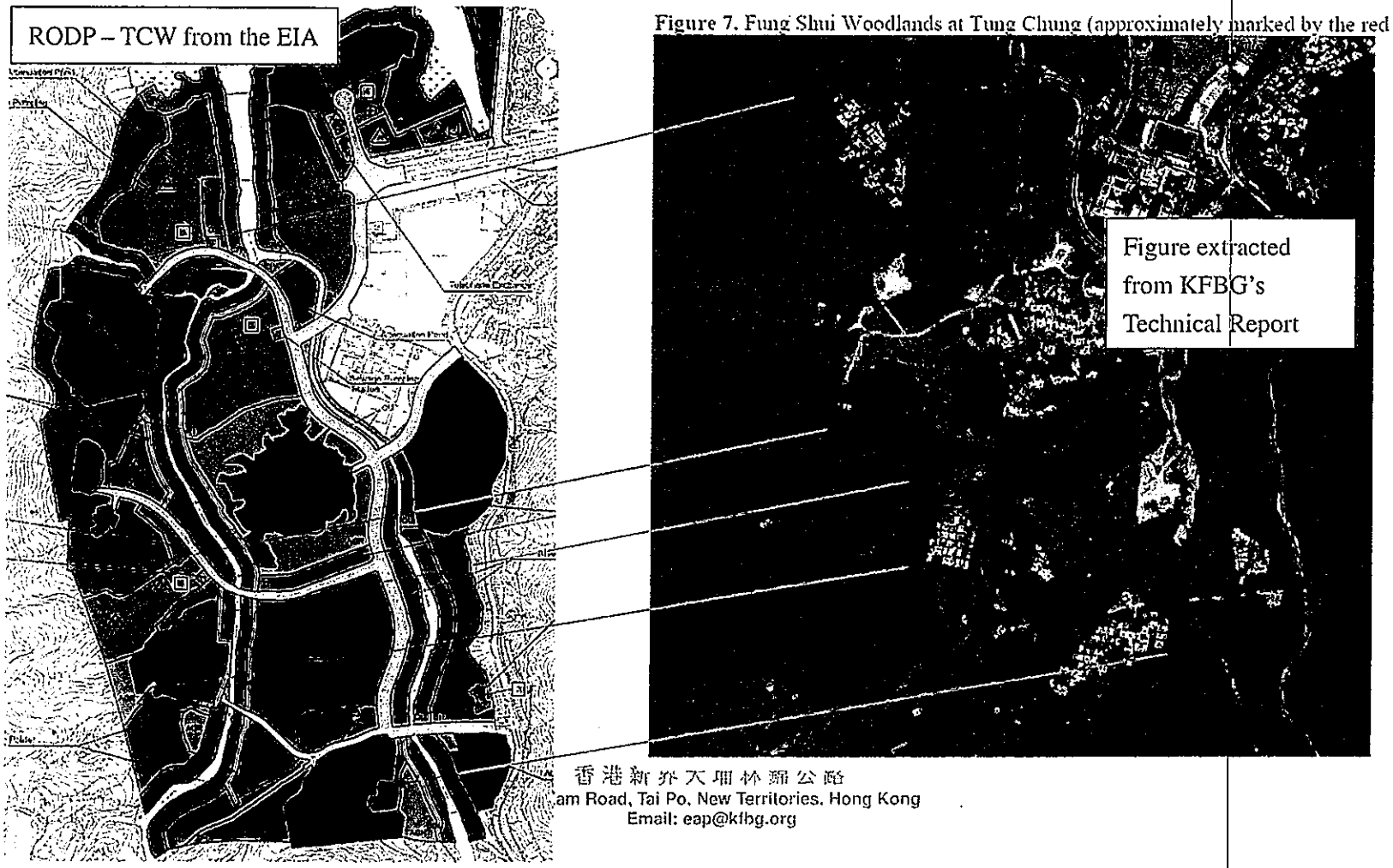

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Figure 15. Mudflat and mangrove habitats covered by the proposed Regional Open Space (RO) zone under the RODP – TCW.

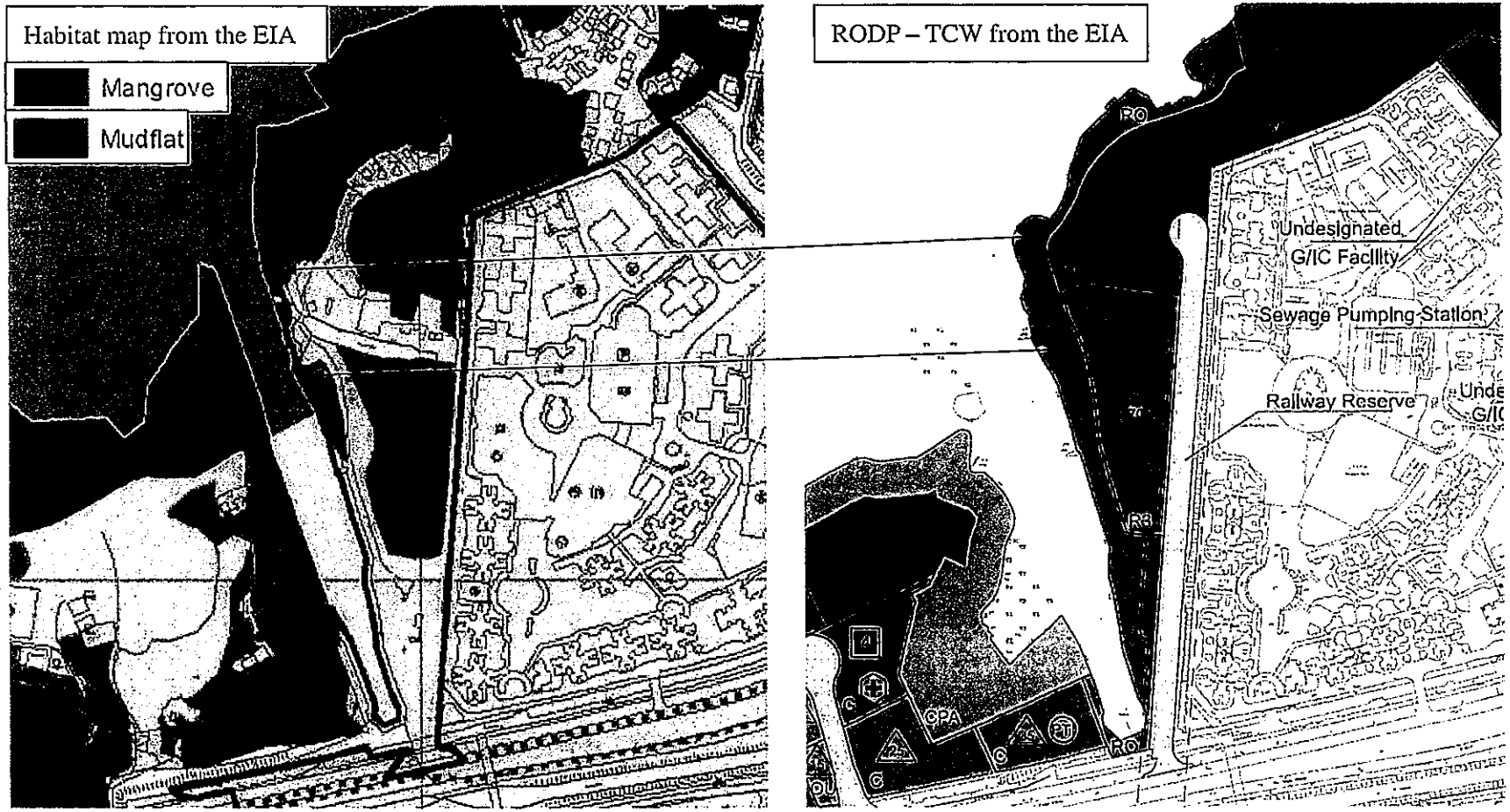

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Figure 16. Suspected illegal bridges constructed across Tung Chung streams.

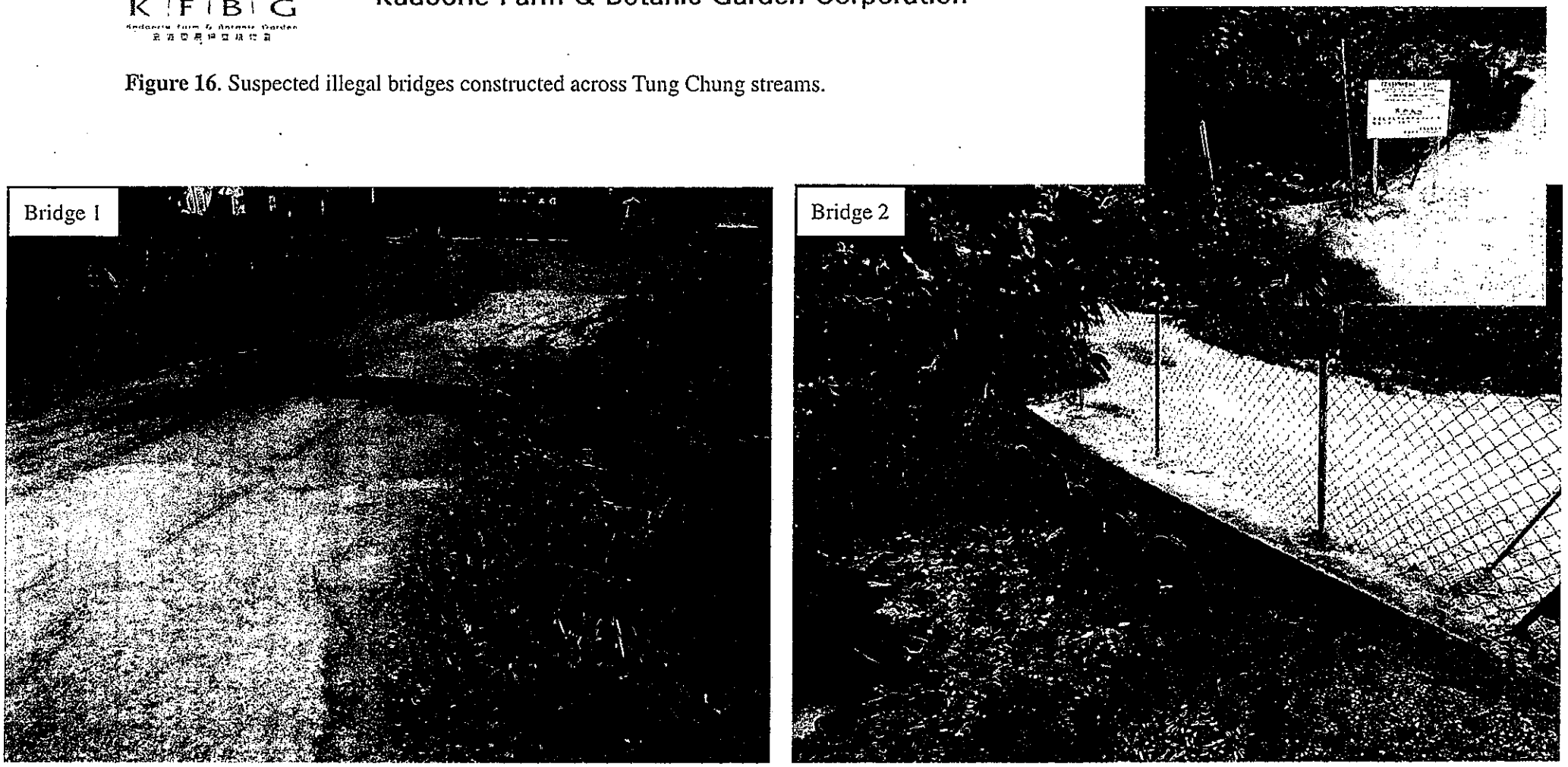

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Figure 17. Polluted runoff discharging into the Tung Chung Stream from a drain observed in December 2015

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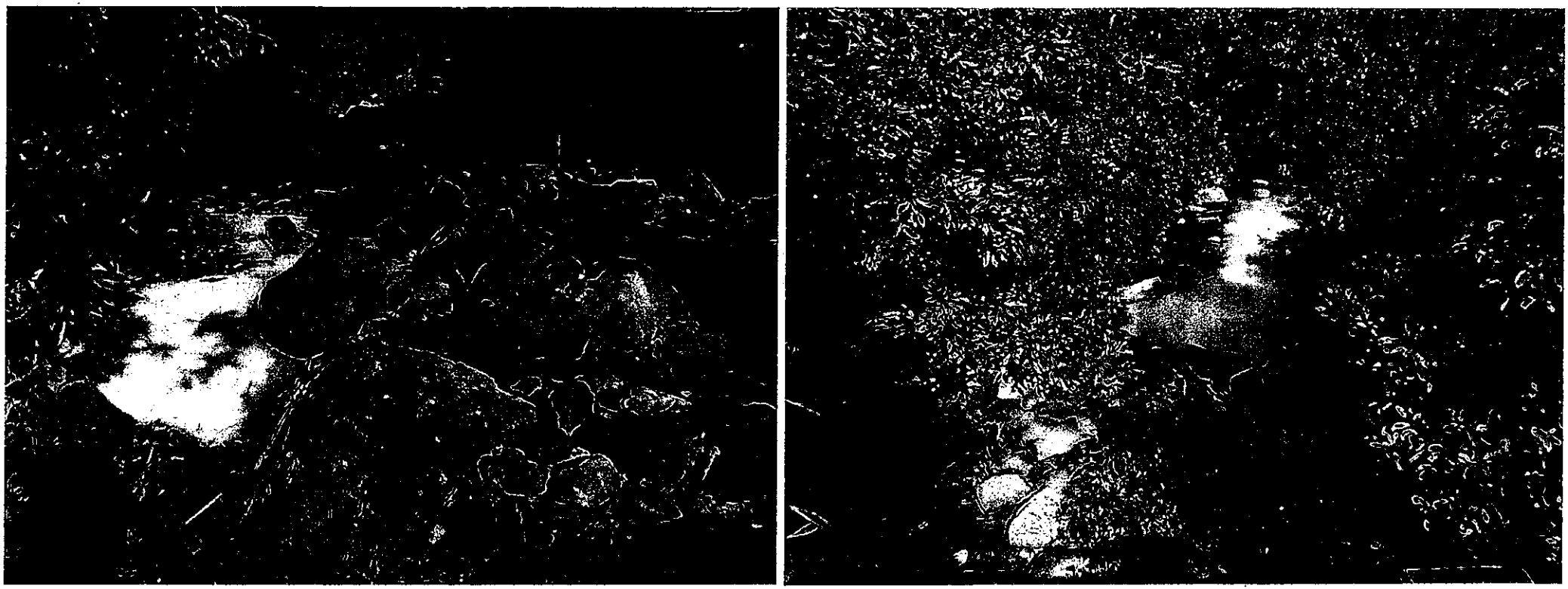
Figure 17. Con't



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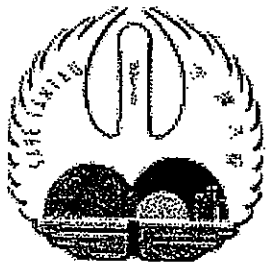
TPB/R/S/I-TCV/1-35

寄件者: Wright Fu [redacted]
寄件日期: 08日03月2016年星期二 14:57
收件者: tpbpd
副本: sdev@devb.gov.hk; sthoffice@thb.gov.hk; sen@enb.gov.hk; kkling@pland.gov.hk; kclo@cedd.gov.hk; kklau@hyd.gov.hk; comr@td.gov.hk
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
電郵：tpbpd@pland.gov.hk

就東涌谷分區計劃大綱草圖編號 S/I-TCV/1、東涌市中心分區計劃大綱草圖編號 S/I-TCTC/21，及東涌擴展區分區計劃大綱草圖編號 S/I-TCE/1 提出申述

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

磡頭、黃龍坑等地區，亦應盡快制定「發展審批地區圖」覆蓋。聯盟認為上述舉動可促進東涌的可持續發展及環境保護。

2）正視東涌的環境和周遭水域生態，重新審視發展及填海規模，並就北大嶼山的環境生態進行基線評估和策略環評

東涌擴展區內有大量的甲類房屋發展，但擴展區範圍鄰近港珠澳大橋及機場跑道。雖然沿海的地段大多已被劃作政府、機構與社區用地，但大量的車流及飛機升降量，加上東涌的地形問題，擴展區內居民將飽受嚴重的空氣污染問題。根據環境評估報告的資料，東涌擴展工程將令東涌區的一小時總懸浮粒子濃度由現時每立方米最高 404 微克升至 464 微克，離 500 微克的警戒線相差不遠；而二氧化氮濃度由現時每立方米 113 至 163 微克，進一步升至 141 至 168 微克，離 200 微克的警戒線越來越近。而擴展區內廣建高樓，亦會阻礙現時東涌市中心地段的空氣流動，令區內的廢氣更難吹散。故此，高密度的房屋發展加上惡劣的空氣質素，將嚴重影響東涌居民之健康。

此外，東涌擴展區將在現時東涌 54-56 區對出填海達 120 公頃，預料施工期間進出填海範圍的工程躉船多達 42-56 架次。由於東涌擴展區之填海工程跟機場第三條跑道的工期相近，加上距離接近，雖然環境評估報告表示機場第三條跑道工程將不會影響東涌擴展區周邊水域的海岸生態，但若兩項工程同時進行，每日將有多達二百艘高速船、工程船穿梭大嶼山東北部水域，產生巨大交通流量。需注意的是，東涌擴展區毗鄰因港珠澳大橋環境補償而設置的大小磨刀洲海岸公園，但隨著北大嶼山水域多項大型基建工程陸續上馬，2014 年在北大嶼山水域錄得的中華白海豚數字只剩下一條。東涌擴展區的填海工程將嚴重威脅大小磨刀洲海岸公園的生態，令其「名存實亡」。

聯盟要求重新審視東涌擴展區的填海面積，並降低東涌擴展區之發展密度，應著重建築物的擺位，以確保現時東涌市中心地區的空氣質素。而現時政府以「斬件式」的方法，各自就單獨的項目評估其對環境之影響，並無法反映眾多工程同時上馬時對環境的累計影響。此外，政府亦未有詳細就同一地點在發展項目開展前後的環境影響估算。故此，在眾多大型建設項目同時於大嶼山北岸的水域進行的情況下，一個就大嶼山北岸水域的基線評估和策略環評乃必須，以全面探討各填海項目對周遭環境的累積影響。

此外，擴展區擬劃作遊艇會的其他用途土地亦應予以取消，讓公眾人士可暢通無阻地享用海濱設施。

3）提供更多社區設施，多元就業機會，切合居民不同需要，達致以人為本社區

東涌社區設施匱乏的問題長期為人疾病，雖然東涌谷及擴展區的規劃大綱圖已預留相當之政府、機構及社區用地發展學校、專上學院、運動場、健康中心等設施，亦會興建市鎮公園，但仍未能完全符合居民之需要。而在建議的東涌東地鐵站旁興建的大型商場及寫字樓，雖有關當局估算能夠提供四萬就業機會，但工種亦只以零售業、飲食業、專業服務等為主，種類單一。根據 2011 年人口普查的資料，荃灣葵青區在相對能提供較多元的工種的情況下，仍只有四成多的居民能夠原區就業，故此東涌的商業發展對促進居民原區就業，幫助實在有限。

此外，倡議中的大型商場鄰近多個大型跨境基建項目。雖然在東涌擴展區內預留了空間設置步行街和位處街道旁的商店，而針對大嶼山發展策略所作的「大嶼山綜合經濟發展策略及大嶼山主要發展上商業用地的初步市場定位研究」也就機場北商業區、港珠澳大橋口岸上蓋商業發展，及東涌擴展區的商業發展項目作出分工，但由於商場定位及商店組合終歸將由市場決定，加上「橋頭

經濟」概念的熱炒，大量遊客需求將容易令商場設計及商店定位以服務旅客為主，居民如需購買日用品，只能面對款式少、價錢昂貴的苦況，現時東薈城的情況勢將複製至擴展區內。「橋頭經濟」最終只能讓一小撮大商家從巨大旅客人流中賺取更多，居民卻苦無獲益，甚至犧牲了生活質素。

聯盟要求在擴展區及鄰近逸東村的地方增劃更多政府、機構及社區用地，以提供居民爭取多年的市政街市、墟市、綜合服務大樓等設施，結合東涌西現存的農業活動，發展社區經濟，給予小商戶生存的空間，給予居民實踐經濟自主、促進睦鄰交流的空間。有關當局亦應按照人口增長預測，審視建議興建之學校數量，以期釋放更多土地發展其他社區設施，令東涌能夠成為一個更「以人為本」的社區。

4）審視交通設施負荷，減少規劃失誤之負面影響

當東涌谷及東涌擴展區完全發展過後，東涌人口將增加至二十六萬，加上港珠澳大橋及第三條跑道帶來新增的人流車流，東涌不論是區內及對外的交通負荷將會是一大考驗。如將來出現道路擠塞，將會對東涌區居民造成甚大困擾。

聯盟要求應再進一步審視東涌各區內道路、北大嶼山公路及屯門至赤蠟角連接路在東涌擴展計劃完竣後的車流量，並檢視東涌線的負荷。由於「東大嶼都會」等遠期規劃並不會在東涌擴展計劃完竣後短時間內落成，如發現現行的交通配套未能配合新增的人口需要，應減少東涌谷及東涌擴展區的發展密度及可容納人口。

聯盟盼望城規會各委員能詳細審視現時東涌新市鎮擴展計劃背後的各種隱憂和弊端，如計劃獲倉猝通過，屆時不只是東涌居民，全港市民亦需就相關的規劃失誤付出代價。

守護大嶼聯盟 謹啟
2016年3月8日

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寄件者: Mark Mak [redacted]
寄件日期: 08日03月2016年星期二 23:59
收件者: tpbpd
副本: RoyTam Tam
主旨: 東涌谷分區計劃大綱草圖S/I-TCV/1號 環保觸覺意見書
附件: 東涌谷_意見書_final_20160308.docx

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

please see attached

環保觸覺
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致　城市規劃委員會

有關：東涌谷分區計劃大綱草圖 S/I-TCV/1 號
環保觸覺意見書

環保觸覺（本會）為本地環保團體，長期關注香港環境保育、城市規劃等議題。本會現就上述分區計劃大綱圖提出意見如下：

本會認為東涌河及東涌谷有很重要的生態價值，亦是一直以來各環保團體希望可以保育的地方。

但本會認為，於河谷中規劃大片住宅區，將影響河流生態，以及污染會影響出河口東涌灣一帶的珍貴環境。草圖規劃的住宅面積是過大。規劃作多個住宅，也會令日後大量工程及平整進行，日後河流或會被建築廢料污染。

而且，東涌河石門甲不少綠化地變成鄉村式發展土地。東涌河是淺水濕地，除河流中有不少動物，濕地上也有珍貴昆蟲、蝴蝶等。當局須考慮減少鄉村式發展土地至最少的面積，例如只包括目前有建築物的地方。本會亦要求城規會進行詳細生態調查，將有價值的地方規劃保育區等作更佳規劃方向。

本會亦同意其他團體所指，草圖中沒有把沒把擁有大片海草床、列為具特殊科學價值地點的磡頭海灘納入保護的意見，城規會亦考慮修訂草圖。

如有任何回覆，請致電 8100-4877 或電郵至 info@greensense.org.hk 與本會聯絡。

環保觸覺

二零一六年三月八日

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Return-Path: mark@greensense.org.hk
X-OriginalArrivalTime: 08 Mar 2016 15:58:51.0861 (UTC) FILETIME=[68D6D050:01D17953]
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tpbpd

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

:者: Land Justice League土盟 [redacted]
寄件日期: 08日03月2016年星期二 0:00
收件者: 城規會
主旨: Tung Chung Valley Outline Zoning Plan No. S/I-TCV/C

Dear Sir / Madam,

We have reservation on the "V" zone in Shek Lau Po which provided a large area of the village development zone.

1. The village development zone can cater for 120.39% of new small house demand without strong reason.
2. Northern part of the village development zone is zoned as agriculture in the 3rd stage of public consultation. The reason for such a change is needed.

Yours faithfully,
Land Justice League

007

From: Yin Siu [redacted]
Sent: Tuesday, March 08, 2016 12:09 PM
To: tpbpd@pland.gov.hk; tspd@pland.gov.hk; enquiry@cedd.gov.hk; DSD HKSARG
Cc: [redacted]
Subject: 就東涌新市鎮擴展的意見

就東涌新市鎮擴展的意見

城市規劃委員會主席及委員、規劃署署長、 土木工程拓展署署長及 渠務署署長，

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

Eddie TSE

反對東涌東填海_Eddie TSE.docx

東涌市中心發展-Eddie TSE.docx

東涌谷_Eddie TSE.docx

Eddie TSE
[redacted]

東涌谷分區計劃大綱草圖編號 S/I - TCV/ 1

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

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

(C) 建議對有關草圖作出的修訂
發展有機農業區
本土有機農作物有價有市；而且中國內地毒菜等問題，一直令港人憂心入口農產品的安全性。有見及此，支持發展一套安全及有保障的本土有機農業是一門符合長遠利益的產業；近年來政府積極推廣【源頭減廢】，而東涌區正正有大量廚餘可為本土有機農業提供有機肥料。比如：逸東邨、富東邨 、裕東苑 、映灣園 、海堤灣畔及機場等地區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；
鄰近東涌住宅區的有機商品能以便捷及快速運送到區內的不同屋苑販賣，當中包括私人住宅區如映灣園，東堤灣畔，以及日後的東涌東填海區，符合區內原經濟發展。

Your Ref. : TPB/R/S/I-TCV/1-R7
Our Ref. : BOD/OC/TPB/10052016/AC

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

By Fax and Hand

RECEIVED
13 MAY 2016
Town Planning Board

10 May 2016

Dear Sir/Madam

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

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

We have made our representation on the Plan by our letter dated 8 March 2016 (TPB/R/S/I-TVC/1-R7 refers).

We wish to comment on the Representations No. TPB/R/S/I-TCV/1-R1 and TPB/R/S/I-TCV/1-R2.

1. The proposition to develop a columbarium in the Nim Yuen Village was made known to local villagers of Lam Che and Shek Lau Po as early as 2010. We attach copies of supporting letters from Mr. Law Wai Hung, the Indigenous Inhabitant Representative of Shek Lau Po, and Mr. Kwan Yip Chuen, the former village Representative of Nim Yuen and Lam Che for your reference;

2. The Plan should include columbarium as one of the permitted uses in the Nim Yuen Village area for the following reasons:-

香港葵涌梨木道 79 - 89 號亞洲貿易中心 19 樓 1903A 室
1903A, 19/F, Asia Trade Centre, 79 - 89 Lei Muk Road, Kwai Chung, Hong Kong

a. our existing use of the Columbarium in Nim Yuen prior to the gazette of the Plan and the Draft Tung Chung Valley Development Permission Area Plan No. DPA/I-TCV/1;

b. the area surrounding the Columbarium has been used by villagers of Shek Lau Po, Lam Che and Nim Yuen village as the traditional burial area; and

c. no supply of suitable land for building village houses as all the private land within the Nim Yuen Village had been sold to outsiders and the Government land within the village is very limited;

By reason of the above, we are of the view that it is more suitable to designate the zoning of Nim Yuen village as "Institution or Community"

Meanwhile, we reserve our right to take further legal actions if the Government deprive our right and interests in Nim Yuen village.

Yours faithfully,

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

.....
Authorized Signature(s)

Your faithfully,

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

.....
Authorized Signature(s)

香港葵涌梨木道 79 - 89 號亞洲貿易中心 19 樓 1903A 室
1903A, 19/F, Asia Trade Centre, 79 - 89 Lei Muk Road, Kwai Chung, Hong Kong
T:+852 2764 6886 F:+852 2765 6198

(附件二)

東涌石榴埔村公所

大嶼山東涌石榴埔村壹號

敬啟者：

就解決骨灰位不足、私營骨灰龕發牌制度等問題，社會各階層得來不同聲音，再者，對大嶼山東涌欖圍村私人發展商申請建骨灰龕事項亦然，本人認為申請通過合法規劃是文，向政府申請合法骨灰龕個案，應該支持。

反之，非法骨灰龕應該反對，政府亦要執法對付非法經營者，免市民受騙，蒙受金錢時間損失，造成社會不安。

此致：

西貢及離島規劃署專員

離島地政處專員，

樂島民政事務處專員

東涌石榴埔村原居民代表

羅雅洪

二〇一〇年七月九日

致：

離島規劃處專員

離島地政處專員

離島民政事務處專員

敬啟者:

對於私人發展商在東涌稔園村申請興建骨灰龕，以合法渠道向有關政府部門申請興建合法骨灰龕，本村認為要支持。

對心存僥倖，非法手段經營非法骨灰龕机構，本村認為要反對。

東涌稔園村及藍輋村原居民代表

二零一零年七月十日

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

致：
香港城市規劃委員會

秘書先生：

有關回應 TPB/R/S/I-TCV/1-1 和 TPB/R/S/I-TVC/1-2 之申述

於本年三月七日，本人經已陳述石榴埔村村民普遍支持發展商在東涌稔園村內私人土地上發展骨灰龕(申述編號：TPB/R/S/I-TVC/1-4)。並因村內已無合適土地發展丁屋，建議將稔園村範圍劃成“機構或社區”用途。

現就以上申述提出的反對信，作出以下回應：

1. 稔園村附近滿佈來自石榴埔/藍輋/稔園村民先人之金塔及墳墓，故於稔園村內興建骨灰龕將與周圍環境相協調。，

2. 村民早年經已知悉發展商在東涌稔園村內私人土地上發展骨灰龕的計劃，並已透過石榴埔村原居民代表羅維洪致信西貢及離島規劃署專員，離島地政處專員足離島民政事務署專員表示贊同支持。

稔園村至今經已空置數十年，無人居住，村內亦無適合土地供興建丁屋。若留作鄉村式發展用地，實屬浪費寶貴資源。如能把該處劃成“機構或社區”用途，則更具彈性並能迎合附近實際需求，更可達致充分利用土地資源的目標。

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13 MAY 2016
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石榴埔村居民代表羅禮詞
暨村民 上
2016年5月8日

聯絡電話：[redacted]

致：城市規劃委員會秘書處

回應：TPB/R/S/I-TCV/1-1
及 TPB/R/S/I-TCV/1-2

敬啟者：

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13 MAY 2016
Town Planning Board

(I) 有關東涌谷分區計劃大綱圖編號 S/I-TCV/1

本人於 2016 年 2 月 29 日就上述東涌谷分區計劃大綱圖編號 S/I-TCV/1 致函貴會作出下列申述: 請參閱(申述編號: TPB/R/S/I-TCV/1-3)

a. 稔園及藍輋村村民一向知悉及支持發展商在稔園村土地上發展及經營合法私營骨灰龕場。

b. 稔園村內的私人土地已全部售予外來發展商，村民於村內再沒擁有任何土地，村民亦不會以高價錢向發展商購回土地建丁屋。村內地理環境局限，村內亦無適合政府土地可供建丁屋。因此，規劃稔園村土地用途為「鄉村式發展」，絕對不合時宜。村民建議規劃成「機構或社區」用途最為合理。

(II) 回應申述編號：TPB/R/S/I-TCV/1-1 及 TPB/R/S/I-TCV/1-2

現回應以上兩份來自藍輋村及石榴埔村的申述：

a. 藍輋村及石榴埔村村民並非於 2015 年 4 月中才知悉有發展商在稔園村發展合法私營骨灰龕。早於 2010 年中，稔園及藍輋村村民經已知曉此計劃，其後更透過石榴埔村原居民代表羅維洪致信西貢及離島規劃署專員,離島地政處專員足離島民政事務署專員表示贊同支持。

b. 稔園村局限於地理環境，村內剩餘的政府土地要不是太狹窄便是位處陡峭斜坡上，村內無(私人或政府) 土地適合建丁屋。如要提供合適興建丁屋的土地，政府必須斬伐大量樹木、削平山坡及填塞天然溪澗，此舉不但破壞區內生態環境，違反政府保育政策，更涉及龐大工程費用，實在不切實際。若堅持將稔園村一帶規劃為「鄉村式發展」，實有違善用土地原則。

c. 稔園村自八十年代開始空置至今，周邊滿佈附近村民先人的金塔及祖墳(包括來自石榴埔村、藍輋村及稔園村)。加上稔園村地處幽靜山谷，於村內發展合法私營骨灰龕，實在十分配合附近本村墓地環境，故村民均表示認同。

此致

城市規劃委員會秘書

東涌稔園村及藍輋村代表

關偉安

暨村民 上

(聯絡電話：[redacted]

香港新界大嶼山東涌
東涌鄉事委員會
TUNG CHUNG RURAL COMMITTEE
TUNG CHUNG, LANTAU ISLAND, N.T. HONG KONG.
地址：香港大嶼山東涌上嶺皮村壹號
電話：2988 8228　　傳真：2988 8924

TPB/R/S/I-TCV/1-C4

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

敬啟者：

關於回應東涌谷分區大綱圖
申述編號：TPB/R/S/I-TCV/1-1 及 TPB/R/S/I-TVC/1-2

繼本會於 2016 年 3 月 4 日致函 貴會(請參考 TPB/R/S/I-TCV/1-6 之申述)，現作補充如下：

(甲)東涌鄉內村民早已知悉有發展商計劃於稔園村發展合法私營骨灰龕一事，幾近十載，相信村民不會覺得陌生。

(乙)稔園村地處幽谷，被樹林環抱，遠離民居。實地視察所得，稔園村貼鄰是村民墓地及金塔集中區域，所以於該處興建合法私營骨灰龕將與周邊環境協調。

(丙)稔園村村內私人土地已盡售予發展商，剩餘政府土地狹小且位於山坡，實際無地可供鄉村式發展，若能把該片土地規劃作「機構或社區」用途，反而更有利區內需求。

此致
香港城市規劃委員會秘書處

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TUNG CHUNG RURAL COMMITTEE
大嶼山東涌鄉事委員會

樊志平

東涌鄉事委員會主席：樊志平

日期：2016 年 5 月 9 日

009

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

Your Ref.: TPB/R/OZP/I-TCV/1
Our Ref.: UCH/08032016/TC

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

By Fax and Hand

8 March 2016

Dear Sir,

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

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

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

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

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

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

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

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

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

.....
Authorized Signature(s)

Authourised Signatory

RECEIVED
- 8 MAR 2016
Town Planning Board

Encl.

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

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

Your Ref.: TPB/R/S/I-TCV/1-R8
Our Ref.: UCH/10052016/TC

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

BY Fax and Hand
10 May 2016

Dear Sir

Comments on the Representations on Draft Tung Chung Valley Outline Zoning Plan No. S/I-TVC/1

We are the landowner of Lot Nos. 1868, 1872 and 1874 in D.D.1 Tung Chung, Lantau Island, and wish to reiterate our stance as stipulated in our letter to you dated 8 March 2016 (copy attached for your ease of reference).

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13 MAY 2016
Town Planning Board

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

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

.....
Authorized Signature(s)

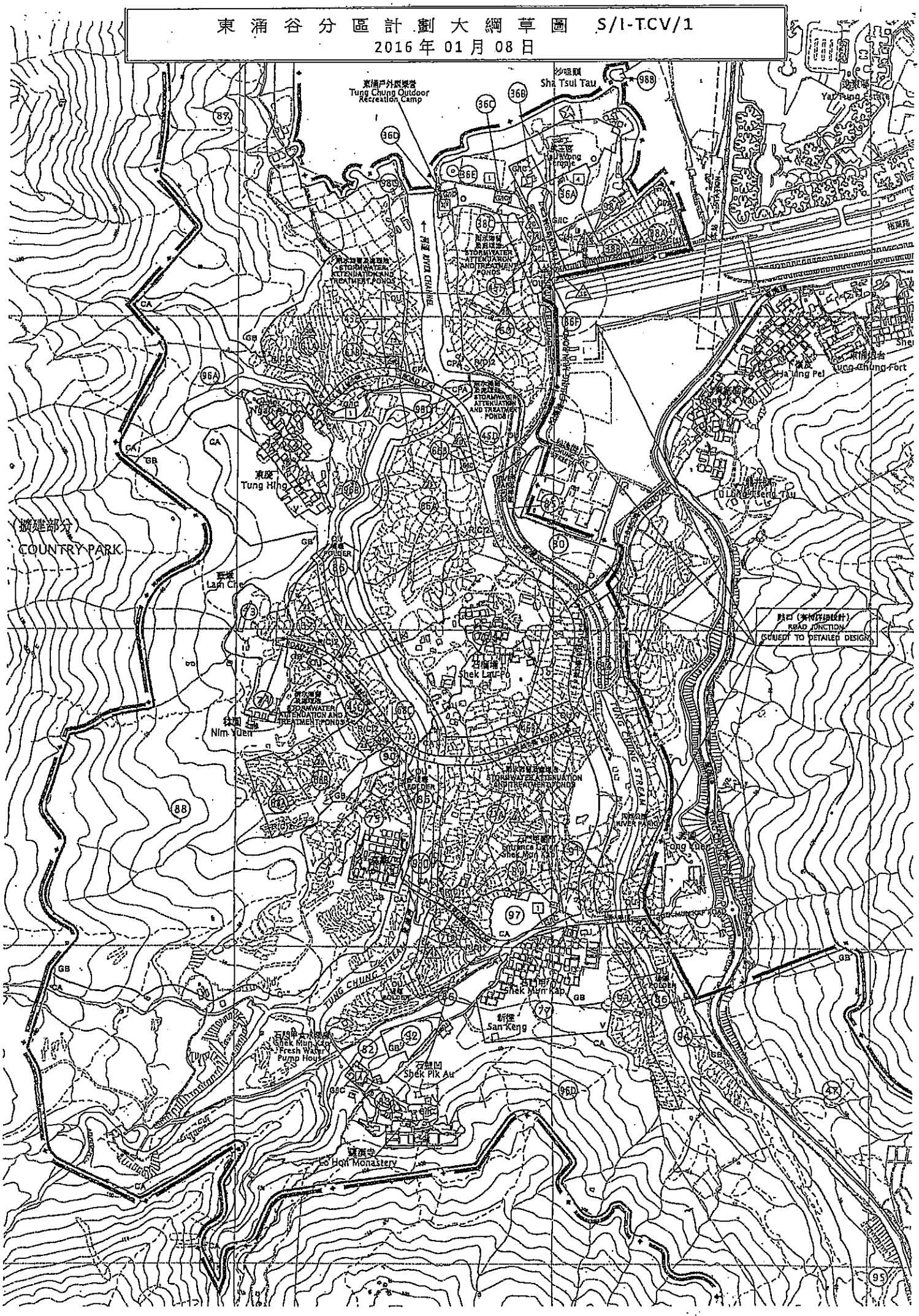
Authourised Signatory

008

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

東涌谷分區計劃大綱草圖 S/I-TCV/1

2016年01月08日



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

參考編號
Reference Number: 160512-223709-17120

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

提交日期及時間
Date and time of submission: 12/05/2016 22:37:09

提出此份意見的人士 (下稱「提意見人」)
Person Making This Comment (known as "Commenter") hereafter: 先生 Mr. 石門甲村村代表羅美發

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

意見詳情
Details of the Comments:

申述編號 **Representation No:**	意見詳情 **Details of Comments:**
TPB/R/S/I-TCV/1-3 TPB/R/S/I-TCV/1-4 TPB/R/S/I-TCV/1-5 TPB/R/S/I-TCV/1-6 TPB/R/S/I-TCV/1-7 TPB/R/S/I-TCV/1-8 TPB/R/S/I-TCV/1-9	我們強烈反對TPB/R/S/I-TCV/1-3至TPB/R/S/I-TCV/1-9這七個申述的內容，稔園村及附近一帶範圍只有一小部份的地方是用作安放金塔，而金塔的數量只有三十多個左右，這些金塔全都屬於本鄉的原居民，多是附近村落的先人，而位於稔園村旁大部份土地都是休耕土地，並不是用來安放金塔，八十年代中期，政府已規定東涌原居民死後需安葬在東涌「十八區」內，因此並不會令鄉村旁的金塔數量有所增加，更不能將附近的山丘稱為金塔山。時代變遷，現今社會房屋供不應求，如有合適土地作住宅，應加以善用，此外區內免費娛樂、康樂及休憩設施缺乏，大綱圖內有很多綠化土地，我們建議可興建更多球類活動場地或遊樂場，既可推動健康生活，而且能令居民接近大自然。 南嶼及稔園村屬於合併認可鄉村，在村界範圍內的土地應用作鄉村式發展，鄉村正繼續擴展，減少鄉村式發展用地並不合理，反應完善村內道路及配套，讓我們能繼續繁衍後代，提供合適的環境給下一代。 設置一所「靈灰安置所」需要考慮周詳細節，胡亂安放會對社區及生態造成深遠而負面的影響，包括造成區內沉重交通負荷、環境衛生受影響、治安壓力加大等問題，我們相信政府深深明白這個道理，因此才會立例規管，以防奸商為謀取暴利而置他人於不顧，村民盼 貴會能維持此裁定，將稔園村劃為鄉村式發展用途、將67區定為住宅用途及提供更多文娛康樂設施供社區使用，讓村民有一個安穩及健康的生活環境。

28770245

Form No. 36A 表格第S.6 A號

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	TPB/R/S/I-TCV/1-C12
	Date Received 收到日期	

1. The comment should be made to the Town Planning Board (the Board) before the expiry of the specified period for making comment on the representation. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
意見必須於指定對申述提出意見的期限屆滿前向城市規劃委員會（下稱「委員會」）提出。填妥的表格及支持有關意見的文件（如有），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。

2. Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong - Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at http://www.info.gov.hk/tpb/.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道333號北角政府合署15樓，電話：2231 4810或2231 4835）及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The comment may be treated as not having been made if the required information is not provided.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出意見的人士須以打印方式或以正楷填寫表格，填寫的資料宜中英文並備。倘若未能提供所需資料，則委員會可把有關意見視爲不曾提出論。

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

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

何紹基

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

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

3. Details of the Comment
意見詳情

Draft plan to which the comment relates 與意見相關的草圖	TPB/R/S/I-TCTC/21-22 TPB/R/S/I-TCV/1-33
Representation(s) to which the comment relates (please specify the representation number) 與意見相關的申述（請註明申述編號）	TPB/R/S/I-TCTC/21-22 TPB/R/S/I-TCV/1-33

003

* Delete as appropriate 刪除法不適用者
Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

Form No. S6A 表格第S.6A號

3. Details of the Comment (Continued) (use separate sheet if necessary)
意見詳情（續）（如有需要，請另頁說明）

Detailed comments on the representation(s) mentioned above 對上述所提及的申述的意見詳情

本人何紹基為磡頭村居民代表及大澳鄉事委員會副主席，有關 TPB/RIS/T-TCTC/21-22 及 TPB/RIS/L-TCVI-33 的建議，村民全部反對，因為本村九成多面積係私人土地。政府土地村民會支持政府規劃，最重要係民生設施及交通作長遠規劃，尤其是由東涌至大澳之緊急救援通道是非常逼設，每逢假日，市民都進行行山或騎單車由東涌至大澳但有意外或傷亡，救援人員須用上一小時才到達現場進行救援。

Part 3 Continued) 第3部分（續）

tpl

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

寄件者: Chiu Sein Tuck [redacted]
寄件日期: 10日05月2016年星期二 11:03
收件者: tpbpd@pland.gov.hk
主旨: Comments on Representations relating to Draft Plans: S/I-TCTC/21 & S/I-TCV/1 (Tung Chung)

Subject: Comments on Representations relating to Draft Plans: S/I-TCTC/21 & S/I-TCV/1 (Tung Chung)

Dear Sir/ Madam,

Please see my comments, as follows:

Comments on Representations relating to S/I-TCV/1

TPB/R/S/I-TCV/1-3 to 6
- In view of the future zonings (with many residential zones) and the ecological sensitivity of Tung Chung Valley, I consider that there may not be suitable sites and enough space to develop a columbarium in Tung Chung.

TPB/R/S/I-TCV/1-10 to 11
- In order to prevent flooding, I do not agree with the proposals to rezone "OU (Stormwater Attenuation and Treatment Ponds)" to R(C)2 or other zonings.

Comments on Representations relating to S/I-TCTC/21

TPB/R/S/I-TCTC/21-1
- I do not agree to re-zoning of GB to other non-conservation zonings.

TPB/R/S/I-TCTC/21-2
- I do not agree with the proposal to expand V zones.

Thank you for your attention.

Regards,

CHIU Sein Tuck

tpl

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

寄件者: Tony Nip [redacted]
寄件日期: 10日05月2016年星期二 10:54
收件者: tpbpd
主旨: Comments on Representations relating to Draft Plans: S/I-TCTC/21 & S/I-TCV/1 (Tung Chung)

Dear Sir/ Madam,

Below please see my comments:

Comments on Representations relating to S/I-TCV/1

TPB/R/S/I-TCV/1-3 to 6
- In view of the future zonings (with many residential zones) and the ecological sensitivity of Tung Chung Valley, we consider that there may not be suitable sites and enough space to develop columbarium in Tung Chung.

TPB/R/S/I-TCV/1-10 to 11
- In order to prevent flooding, we do not agree with the proposals to rezone "OU (Stormwater Attenuation and Treatment Ponds)" to R(C)2 or other zonings.

Comments on Representations relating to S/I-TCTC/21

TPB/R/S/I-TCTC/21-1
- We do not agree to rezone GB to other non-conservation zonings.

TPB/R/S/I-TCTC/21-2
- We do not agree with the proposal to expand V zones.

Tony NIP

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

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

參考編號
Reference Number: 160512-005201-30025

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

提交日期及時間
Date and time of submission: 12/05/2016 00:52:01

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

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

意見詳情
Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
TPB/R/S/I-TCV/1-1及 TPB/R/S/I-TCV/1-2	把鄉村式發展的土地擴大並無助解決香港現時的房屋問題，並會進一步破壞東涌河和東涌谷內農地的生態
TPB/R/S/I-TCV/1-3至 TPB/R/S/I-TCV/1-9（除TPB/R/S/I-TCV/1-8）	如把現時在區內非法營運中的骨灰龕場劃入「政府、機構或社區」土地用途，等於把現時的骨灰龕場合法化，有轉移視線之嫌。而骨灰龕場在春秋二祭也會引來大量人流及車流，不但會加重社區設施的負荷，亦會對東涌谷的自然生態環境帶來負面影響

002

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

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

參考編號
Reference Number: 160512-005306-44004

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

提交日期及時間
Date and time of submission: 12/05/2016 00:53:06

提出此份意見的人士 (下稱「提意見人」)
Person Making This Comment (known as "Commenter") hereafter: 先生 Mr. 5103

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

意見詳情
Details of the Comments:

申述編號 **Representation No:**	意見詳情 **Details of Comments:**
TPB/R/S/I-TCV/1-11	認同該申述人士對設立河畔公園的支持，惟所有在東涌谷內的房屋發展應予以取消，以更好的保育東涌谷內的自然生態。而且，現時建議在東涌谷內的房屋發展項目，以私人住宅為主，密度亦不高，無助解決基層人士的住屋需要
TPB/R/S/I-TCV/1-12及 TPB/R/S/I-TCV/1-14	政府不應為了照顧原居民的利益，而犧牲對環境保護而作出的規劃規管

001

寄件者: [redacted]
寄件日期: 11日05月2016年星期三 14:04
收件者: Town Planning Board
副本: Ian Brownlee
主旨: Tung Chung Valley OZP : Comments on Representation No. 11
附件: 201605111343.pdf

TPB/R/S/I-TCV/1-C 17

Dear Sir

Pleasesee the attached letter for your action.

Regards
Anna Wong

006

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

11 May 2015
Our Ref. MP/TCV/1

By Fax and Email

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

Dear Sir,

Draft Tung Chung Valley Outline Zoning Plan
Number S/I-TCV/1

Comment on Representation

We are authorised by Forestside Limited to submit this in relation to Representation No. 11.

We support the view expressed in the Representation about the designation of extensive area of land for flood control. The government should inform the public whether alternative flood control methods had been explored and provide more detailed explanation why such land extensive system is adopted.

Land is a scarce resource in the territory. Development potential of land parcels in new development area should be optimized, especially those within 500m from the future railway terminus station. This is in line with the Transit-oriented Development planning concept.

It is considered that sites zoned OU(Stormwater Attenuation and Treatment Ponds) within 500m from the future railway station should be zoned for development use. Relocating such attenuation and treatment ponds underneath the land zoned "Open Space" to the east of the Tung Chung Stream is a possible way of better utilize the scarce land resource.

We also support the view that the Government should acquire the land zoned for "OU(River Park)" and "Conservation Area", taking up the ownership for management responsibility. Land zoned "Coastal Protection Area" should also be taken up by the Government. This would also help speeding up the realization of the planning intention of the Tung Chung Valley area.

Yours faithfully,

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

Cc Client

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

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

11 May 2015
Our Ref. MP/TCV/1

By Fax and Email

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

Dear Sir,

Draft Tung Chung Valley Outline Zoning Plan
Number S/I-TCV/1

Comment on Representation

We are authorised by Forestside Limited to submit this in relation to Representation No. 11.

We support the view expressed in the Representation about the designation of extensive area of land for flood control. The government should inform the public whether alternative flood control methods had been explored and provide more detailed explanation why such land extensive system is adopted.

Land is a scarce resource in the territory. Development potential of land parcels in new development area should be optimized, especially those within 500m from the future railway terminus station. This is in line with the Transit-oriented Development planning concept.

It is considered that sites zoned OU(Stormwater Attenuation and Treatment Ponds) within 500m from the future railway station should be zoned for development use. Relocating such attenuation and treatment ponds underneath the land zoned "Open Space" to the east of the Tung Chung Stream is a possible way of better utilize the scarce land resource.

We also support the view that the Government should acquire the land zoned for "OU(River Park)" and "Conservation Area", taking up the ownership for management responsibility. Land zoned "Coastal Protection Area" should also be taken up by the Government. This would also help speeding up the realization of the planning intention of the Tung Chung Valley area.

Yours faithfully,

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

Cc Client

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

tpbpd

TPB/R/S/I-TCV/1-C 18

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

Dear sirs,

Attached please find our comment on the captioned.

Best Regards,
Miffy, Ng Chun Wing
Project Officer
Designing Hong Kong Limited
Tel: [redacted]
Fax: 2187 2305
Unit 7, 5/F, Eastern Harbour Centre, 28 Hoi Chak Street, Quarry Bay, Hong Kong
Website: http://www.designinghongkong.com/
Facebook Page: https://www.facebook.com/DesigningHongKong

創建
DesigningHongKong
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

寄件者: Mark Mak [redacted]
寄件日期: 13日05月2016年星期五 23:26
收件者: tpbpd
副本: Green Sense環保觸覺
主旨: S/I-TCE/1、S/I-TCTC/21、S/I-TCV/1號草圖_環保觸覺意見書
附件: 東涌三草圖_環保觸覺意見書_20160513.pdf

TPB/R/S/I-TCV/1-C 19

To: Town Planning Board

Please find attached Green Sense's comment.

Regards
Green Sense

環保觸覺 Green Sense
電話：8100 4877
傳真：3011 9577
地址：荃灣郵政信箱 454 號
電郵：info@greensense.org.hk
網頁：www.greensense.org.hk

致　城市規劃委員會

有關：S/I-TCE/1、S/I-TCTC/21、S/I-TCV/1 號草圖

環保觸覺意見書

環保觸覺（本會）就上述各草圖的申述提出意見如下：

總括

本會認為從申述中可見，各草圖的支持意見少，反對及提出改善意見較多，城規會應考慮民意，就草圖研究及將各申述人士，特別是環保團體及環團的聯署，所提出的有力意見及理據，納入草圖之中。

大嶼山是香港珍貴自然環境的所在，東涌的發展及改變勢必為大嶼山的自然環境帶來不同的影響，當局必須小心考慮，於規劃實踐「可持續發展」，為下一代保留適宜居住的環境。

本會認為城規會有責任要求規劃署與相關部門，向城規會提供其就申述及或意見所作回應的理據所依賴的文件，及將該得文件全面公開，否則所有的討論只會是「空中樓閣」，申述人士無法檢視改劃的理據，亦將不能作出有效回應及陳詞，是有違城規會條例諮詢程序的精神。

本會曾就草圖向城規會作出申述，希望重申本會關注香港整體及東涌環境承載力的立場。當政府至今未有完整及合理的人口規劃，本會及廣大市民實在難以支持犧牲環境及生活空間作所謂的住屋用途。

S/I-TCE/1

本會反對 TPB/R/S/I-TCE/1-2 的申述，認為草圖中的遊艇停泊處將會帶來更多船

環保觸覺 Green Sense
電話：8100 4877
傳真：3011 9577
地址：荃灣郵政信箱 454 號
電郵：info@greensense.org.hk
網頁：www.greensense.org.hk

隻進出海域，有機會對海洋生態做成影響，應取消遊艇停泊處；認同 TPB/R/S/I-TCE/1-52 等團體提出的反對意見，特別是將整個大嶼山都納入陸上及海洋生態基線調查研究的要求，為規劃提供更多科學數據。

S/I-TCTC/21

本會反對 TPB/R/S/I-TCTC/21-2 擴大黃泥屋的「鄉村式發展」地帶的意見，認為在香港政府未有為丁屋政策提出改善之前，為保障香港環境，不應增加「鄉村式發展」面積；對 TPB/R/S/I-TCTC/21-3 提及增加房屋用地有極大保留，因為本會重申香港未有長遠的人口計劃，未有科學及認可的評估就增加房屋用地是不智；同意 TPB/R/S/I-TCTC/21-20 等環保團體提出的意見，特別因應近月香港各處以「倒垃圾／泥頭」方式破壞環境的行動愈多，當局應採用申述中提及的方法，更有力地保護自然。

S/I-TCV/1

本會重申東涌河是香港愈來愈少擁有自然出海口的淡水河流，當局應先進行保育，才考慮是否及如何進行必要的發展。本會同意 TPB/R/S/I-TCV/1-35 等的意見，極之擔心住宅和鄉村式發展對東涌河、谷及灣生態的影響。有鑑過去經驗，當局提出的保育措施非常不足，及往往未能如實實踐，本會強烈要求當局於今次改劃的回應中提出比以往更實在及經大眾接受的條款及承諾。請城規會認真考慮各環團提出的意見和要求。

如有任何回覆，請致電 8100-4877 或電郵至 info@greensense.org.hk 與本會聯絡。

環保觸覺

二零一六年五月十三日

Town Planning Board

Response to representations made on the draft Tung Chung Valley OZP No. S/I-TCV/1

Submitted by

Kevin Laurie,
Independent Horseshoe Crab Researcher,
Hong Kong

11 May 2016

RECEIVED
12 MAY 2016
Town Planning Board

COVERING LETTER

Chairman and Members, Town Planning Board,

Response to Gist of Representations in respect of draft TCV OZP S/I-TCV/1

This submission is made in response to the Gist of Representations published in respect of the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1.

Tung Chung is important because the lower reaches of the Tung Chung River Valley (the subject of OZP No. S/I-TCV/1) is a critical spawning ground and nursery site for the Mangrove horseshoe crab, Tung Chung bay is a critical spawning ground and nursery site for the Chinese horseshoe crab and protecting these locations is vital to ensure the long term survival of these two species in Hong Kong.

This submission is made in response to the following comments made in the representations:

- concern about the overall capacity of Tung Chung area with the planned increase in population (TPB/R/S/I-TCV/1-29)
- the ecology and the value of Tung Chung Stream should be considered as a whole river system (TPB/R/S/I-TCV/1- 15 to 21) and regard the river system as a whole in assessing the ecological value (TPB/R/S/I-TCV/1-29).
- make use of the ecology of Tung Chung Valley for eco-education (TPB/R/S/I-TCV/1- 15 to 21)
- provision of community facilities and employment opportunity (TPB/R/S/I-TCV/1-35).
- support the proposal of "Tung Chung Stream Nature River Park" (TPB/R/S/I-TCV/1-35)
- designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education)".

This submission is based on proposals that were submitted in response to the Lantau Development Plan consultation exercise, in which it was proposed to construct a continuous boardwalk through the Tung Chung River Valley and across the mudflat at Tung Chung, to provide an educational, community, Green Group and tourism resource.

As you will note, Tung Chung Bay has already over-exceeded its visitor receiving capacity and more visitors or any additional population in Tung Chung will only worsen this situation.

This submission therefore urges you to protect the lower reaches of the Tung Chung River Valley with a status compatible with protecting its biodiversity, at the same time allowing for the construction of the proposed boardwalk.

SUBMITTED BY

Kevin Laurie.
Independent Horseshoe Crab Researcher,
Hong Kong
Email: [redacted]
Mobile: [redacted]

In making this submission, I give my consent to the TPB and the Government of the HKSAR to partially or wholly publish my comments (including my personal details).

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EXECUTIVE SUMMARY

HORSESHOE CRAB CONSERVATION CONCERNS

Tung Chung is important to horseshoe crabs because:

- **the lower reaches of Tung Chung River Valley (the subject of OZP No. S/I-TCV/1) is a critical spawning ground and nursery site for Mangrove horseshoe crabs;**
- Tung Chung bay is a critical spawning ground and nursery site for Chinese horseshoe crabs;
- protecting this area is vital to ensuring the long term survival of these two species in Hong Kong.

However, rather than object to development proposals in Tung Chung, this submission recommends an approach in which:

- these spawning grounds/nursery areas are incorporated in the development plans;
- development complements conservation;
- conservation complements development;

REPRESENTATIONS BEING RESPONDING TO

Comments are made in response to the following representations made in respect of the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1:

- concern about the overall capacity of Tung Chung area with the planned increase in population (TPB/R/S/I-TCV/1-29)

- the ecology and the value of Tung Chung Stream should be considered as a whole river system (TPB/R/S/I-TCV/1- 15 to 21) and regard the river system as a whole in assessing the ecological value (TPB/R/S/I-TCV/1-29).

- make use of the ecology of Tung Chung Valley for eco-education (TPB/R/S/I-TCV/1- 15 to 21)

- provision of community facilities and employment opportunity (TPB/R/S/I-TCV/1-35).

- support the proposal of "Tung Chung Stream Nature River Park" (TPB/R/S/I-TCV/1-35)

- designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education)" (TPB/R/S/I-TCV/1-32).

THIS SUBMISSION

This submission addresses these issues as follows:

Concern about the overall capacity of Tung Chung area

As you will note, Tung Chung Bay has already over-exceeded its visitor receiving capacity and any additional population in Tung Chung will only worsen this situation.

To alleviate this problem, it is proposed a continuous boardwalk be constructed through the Tung Chung River Valley and across the mudflat at Tung Chung, so that visitors can enjoy the area, without destroying it.

The ecology and the value of Tung Chung Stream should be considered as a whole river system

Constructing a continuous boardwalk through the Tung Chung River Valley and across the mudflat at Tung Chung will treat the 'Tung Chung Stream' as a whole river system.

This will meet the Lantau Development Plan goals of adopting a "point-line-plane" approach linking up places of conservation value to attract visitors and add value to the River Cum Biodiversity Park, which has already been proposed for the area.

Make use of the ecology of Tung Chung Valley for eco-education

Constructing a continuous boardwalk linking the River Cum Biodiversity Park with the inter-tidal mudflat at Tung Chung will provide an unrivalled eco- education resource in Hong Kong.

Provision of community facilities and employment opportunity

Constructing a continuous boardwalk linking the River Cum Biodiversity Park with the inter-tidal mudflat at Tung Chung will provide a community resource for local families to enjoy and will help create local job opportunities.

Support the proposal of "Tung Chung Stream Nature River Park"

This proposal supports the Lantau Development Plan for a River Cum Biodiversity Park at Tung Chung and complements it by extending the park to incorporate the inter-tidal mudflat into the plan.

Designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education)

Conservation, Ecotourism and Ecological Education can be achieved only if the lower reaches of the Tung Chung River Valley are afforded appropriate protections to protect the biodiversity there, at the same time allowing visitors to access the area without destroying it, which can be achieved with the construction of a boardwalk.

Horseshoe crabs in Hong Kong

'The Science'

HORSESHOE CRAB OVERVIEW

HORSESHOE CRAB SPECIES

There are four species of horseshoe crab living today:

- *Limulus polyphemus;*
- *Tachypleus tridentatus;*
- *Tachypleus gigas;*
- *Carcinoscorpius rotundicauda.*

Limulus occurs along the east coast of the USA and Mexico. The other three species occur in South-East Asia. *Tachypleus tridentatus*, the Chinese horseshoe crab and *Carcinoscorpius rotundicauda*, the Mangrove horseshoe crab are found in Hong Kong.

HORSESHOE CRAB RELATIVES

Horseshoe crabs are an ancient animal group which belong to the Phylum Arthropoda, Subphylum Chelicerata, Class Merostomata. Despite their name, they are not true crabs but are more closely related to scorpions, spiders and ancient sea scorpions.

LIVING FOSSILS

Horseshoe crabs are considered to be 'living fossils' because their fossil relatives are recognized as far back as the Late Ordovician Period, about 475 million years ago, and modern-day horseshoe crabs have a body structure that dates back to the Jurassic Period, from 200 million to 146 million years ago (Rudkin and Young 2009).

MAJOR VALUE TO HUMANS

Horseshoe crabs famously have 'blue blood'. In the 1950's it was observed that horseshoe crab blood clotted when exposed to bacterial endotoxins, even in incredibly small amounts. From this basic observation, a reagent called Limulus Amoebocyte Lysate (LAL) was developed that can detect minute levels of bacterial contamination.

LAL is now used worldwide to test injectable drugs, biomedical devices and instrumentation used in the pharmaceutical industry and the Food and Drug Administration (FDA) in the USA requires that all medical devices be pre-screened using the LAL test prior to use on humans.

HORSESHOE CRABS IN HONG KONG

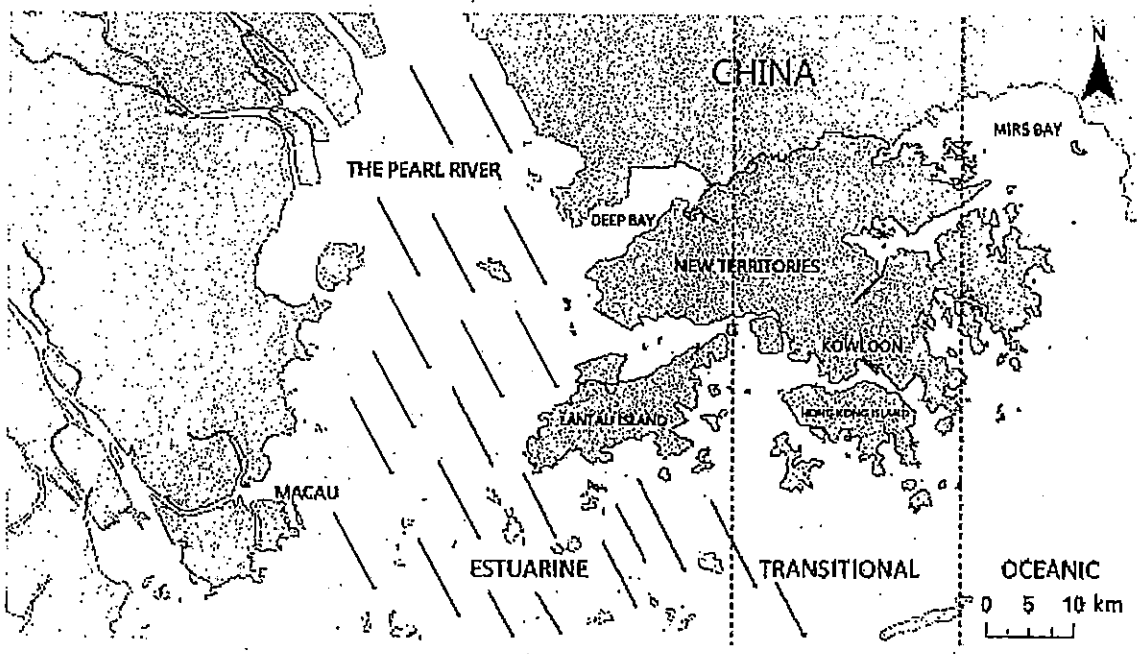
There are two species of horseshoe crab in Hong Kong:

Chinese horseshoe crab (*Tachypleus tridentatus*).

Mangrove horseshoe crab (*Carcinoscorpius rotundicauda*).

FACTORS AFFECTING HORSESHOE CRAB DISTRIBUTION IN HONG KONG

Hong Kong's waters can be divided into three hydrographic zones based on the influence of the Pearl River, which discharges into the western waters of Hong Kong. These divisions are the estuarine west, a central transition zone and the oceanic east (HKRMS).



CHINESE HORSESHOE CRABS

Chinese horseshoe crabs favour estuarine waters, explaining why they are predominantly found on the west side of Hong Kong. Chinese horseshoe crab spawning grounds and nursery beaches in Hong Kong are now restricted to the shore of Deep Bay and select bays and inlets on Lantau. Their young forage on sandy substrate.

MANGROVE HORSESHOE CRABS

Mangrove horseshoe crabs are associated with mangroves, so they are more widely distributed than the Chinese horseshoe crab. Their young forage in mangroves and on the muddy shores surrounding mangroves and they frequently share the same mudflats as the Chinese horseshoe crab. Mangrove horseshoe crabs are found in both eastern and western waters and for a number of reasons, they are less threatened in Hong Kong than the Chinese horseshoe crab.

COMMENT

The importance of Lantau to the survival of Chinese horseshoe crabs in Hong Kong can clearly be seen from this map. Both species inhabit Tung Chung.

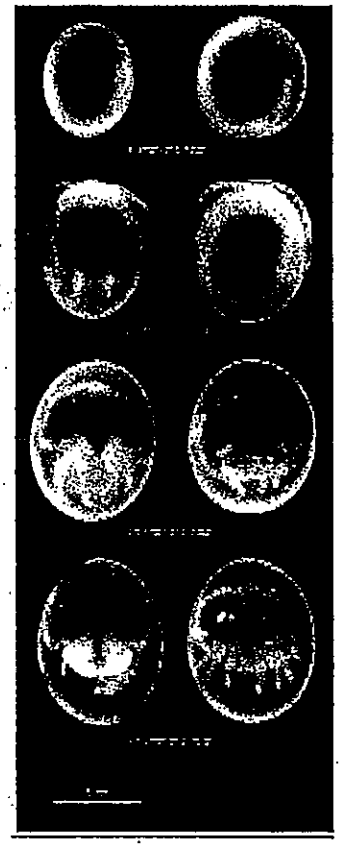
EARLY HORSESHOE CRAB DEVELOPMENT STAGES

All horseshoe crab species have specific and specialized habitat requirements during different stages of their life cycles, related to:

- spawning and larval development;
- juvenile development;
- adulthood.

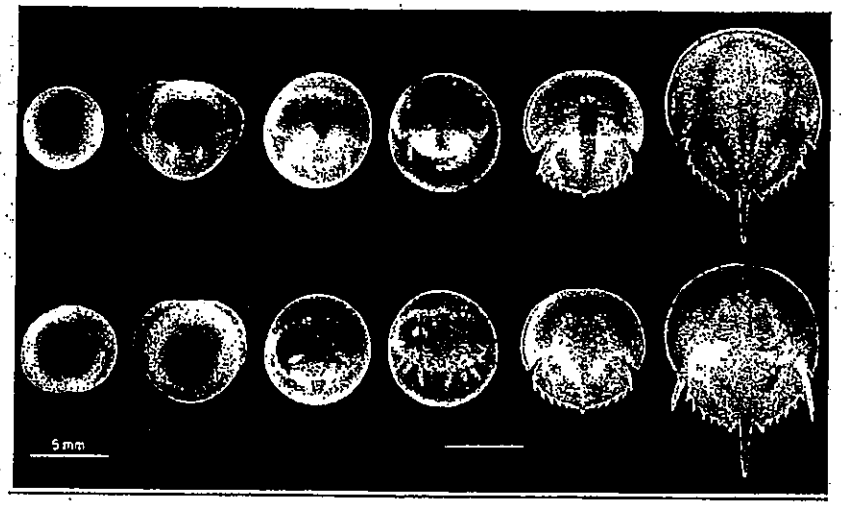
It is the close proximity of these three differing habitats to meet the demands of the different stages of development that is critical to their survival needs, and if either the spawning grounds or juvenile development areas are lost, then the entire habitat suite is lost.

DEVELOPMENT IN THE EGG



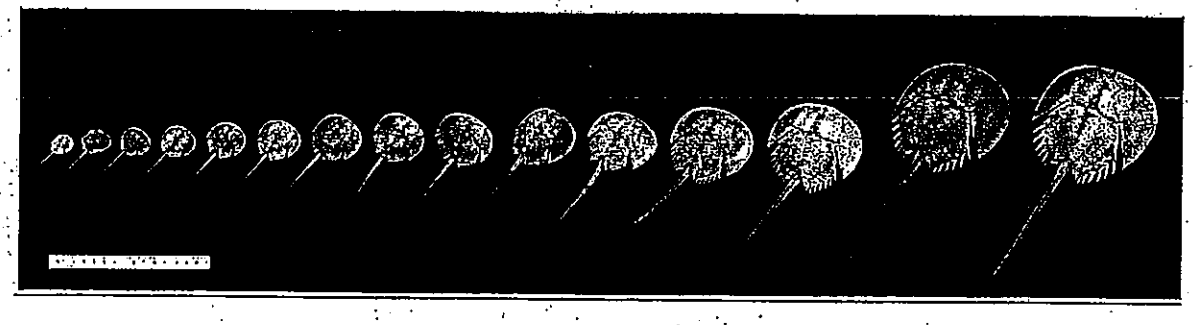
Juvenile horseshoe crabs start life by developing in their eggs (William Lau).

DEVELOPMENT IN THE SPAWNING AREA



Juvenile horseshoe crabs develop in their eggs first, then after hatching they continue to develop in the spawning area (William Lau).

JUVENILE DEVELOPMENT ON INTER-TIDAL MUDFLATS



After developing in the spawning area for about 6 weeks, the juveniles move to inter-tidal mudflats for the juvenile stages of their development.

This is a growth range of juvenile Chinese horseshoe crab molts collected from the beaches of Ha Pak Nai in Deep Bay.

Each moult represents one stage of growth or instar and the Chinese horseshoe crab might undergo 18 instar (molting) stages before reaching maturity.

The scale is a 1 foot (30 centimetre) ruler.

CONSERVATION STATUS: CHINESE HORSESHOE CRAB IN HONG KONG

Chinese horseshoe crabs are critically endangered and on the verge of extinction in Hong Kong and without our help, they will go extinct. This assessment is based on the following information:

LIFE CYCLE

All horseshoe crab species have specific and specialized habitat requirements during different stages of their life cycles, related to:

- spawning and larval development;
- juvenile development;
- adulthood.

It is the close proximity of these three differing habitats to meet the demands of the different stages of development that is critical to their survival needs, and if either the spawning grounds or juvenile development areas are lost, then the entire habitat suite is lost.

HISTORIC SITUATION

Chinese horseshoe crabs were once widely distributed and abundant in western waters and research suggests Hong Kong was once a haven for them.

WHAT HAS LEAD TO THEIR DECLINE?

A combination of factors has lead to the decline of Chinese horseshoe crabs in Hong Kong, all based on their habitat choices:

Spawning habitat

- where possible, Chinese horseshoe crabs spawn along high tide lines. If these are not available, they will spawn in marginal habitats, such as sand banks in stream beds;
- young horseshoe crabs develop in their eggs and for about 6 weeks after hatching they continue to develop in the spawning area, before moving to inter-tidal mudflats for the juvenile stages of their development;
- coastal reclamation and development have destroyed many of their spawning and juvenile foraging grounds and the lower reaches of many streams have been revetted to improve drainage.

Juveniles and juvenile habitat

- after leaving the spawning area, the juveniles spend the next 15 to 16 years foraging on nearby inter-tidal mudflats, passing through 18 instar or growth stages to become adults;

- juvenile Chinese horseshoe crabs live on sandy sediments near stream mouths, which is also favoured by clams and razor shells;

- after reclamation, the single biggest threat to juvenile horseshoe crabs in Hong Kong is from clam digging. Inter-tidal mudflats are ecologically sensitive, so even walking on them can cause considerable damage;

- of major concern are the results from recent population surveys, which show that new recruits of 1st to 3rd instars are seldom encountered on Hong Kong shores now. This is extinction in action!

Adults and adult habitat

- In the 1970's, the local fishing fleet was upgraded to using trawlers, making the adult horseshoe crab habitat on the sea bed vulnerable to fishing and between 1980 and 2001, much of the adult Chinese horseshoe crab population was caught as by-catch and sold;

- Whilst the trawling ban in 2012 was positive news for adult Chinese horseshoe crabs, the current use of mono-filament nets across stream mouths at high tides often coincides with their peak spawning and if spawning females are caught, they often die from struggling in fishing nets, or if they survive, they are frequently sold, so the remaining adult population is gradually being 'fished out'.

CURRENT CONSERVATION SITUATION

Horseshoe crabs are not protected and no habitats have been dedicated to horseshoe crab conservation in Hong Kong. Based on the evidence of reproductive activity and juvenile population counts, the Chinese horseshoe crab is commercially extinct in Hong Kong and facing considerable threats to its future survival.

Historic records suggest Chinese horseshoe crabs were widespread and common in Hong Kong, but recent survey data shows they are now only found at:

- Pak Nai, **Tung Chung Bay**, Shui Hau, Yi O and the north shore of Lantau (San Tau, Sha Lo Wan and Sham Wat).

There are now the only remaining Chinese horseshoe crab spawning and nursery locations left in Hong Kong. These are, in order of conservation priority:

1. Pak Nai;
2. **Tung Chung**;
3. Shui Hau;
4. Yi O;
5. North shore of Lantau.

As can be seen, four out of these five locations are on Lantau and three out of the five, **Tung Chung**, Shui Hau and Yi O are now subject to development proposals under the Lantau Development Plan.

This further shows the importance of adopting appropriate protection measures at **Tung Chung**.

SPECIES RECOVERY PLAN

In 2005, the Ocean Park Conservation Foundation (OPCF) sponsored City University of Hong Kong to develop a breed and release programme for Chinese horseshoe crabs as an ex-situ conservation measure in enhancing local populations.

The programme aims to catch mating pairs, let them spawn in the laboratory, then rear the hatched juveniles so they reach a size where they are no longer vulnerable to predation, before releasing them back into the wild. Follow-up field studies using tracking devices have proven the survival and growth of those released juveniles.

The main release beaches have been Ha Pak Nai and Shui Hau, but this programme relies on there being undisturbed mudflats for the juveniles to be released on.

This was the case until recently, but villagers have started promoting clam digging to increase visitor numbers to their villages. Mass clam digging is a recent phenomenon; it used to be restricted to a few villagers on the mudflats of Hong Kong. This is no longer the case.

This Chinese horseshoe crab species recovery plan can be extended to Tung Chung, but only if appropriate measures are put in place to protect the juvenile horseshoe crabs that are released there.

CONSERVATION STATUS: MANGROVE HORSESHOE CRAB IN HONG KONG

Mangrove horseshoe crabs are not as threatened as Chinese horseshoe crabs, but are nevertheless a species of conservation concern in Hong Kong. This assessment is based on the following information:

LIFE CYCLE

Mangrove horseshoe crabs have a similar lifestyle to Chinese horseshoe crabs, except their habitat requirements are tied to mangroves.

HISTORIC SITUATION

The Mangrove horseshoe crab is a more elusive species. It was only 'discovered' in Hong Kong in 1997 and because it spawns in mangroves, which are inhospitable by nature, it has not been widely studied.

Mangrove horseshoe crabs are found in both the eastern and western waters of Hong Kong associated with mangroves and they can frequently be found spawning in the same areas as Chinese horseshoe crabs, although as juveniles, their young forage on muddy substrates.

It is not uncommon to see spawning pairs in certain streams, or find evidence of their presence, usually in the form of dead animals, discarded by fishermen because of their nuisance value – they tangle their fishing nets.

CURRENT CONSERVATION SITUATION

Mangrove horseshoe crabs face lesser threats than the Chinese horseshoe crab in Hong Kong, but still pose cause for conservation concern.

Unlike the Chinese horseshoe crab, which is still kept if an egg-laden female is caught, Mangrove horseshoe crabs have negligible commercial value. Their juveniles forage on mudflats, which are not only lacking in clams, but are also inhospitable places to walk across, so clam diggers do not pose the same threat to them as they do to Chinese horseshoe crabs.

Like Chinese horseshoe crabs, the main threat to adult Mangrove horseshoe crabs is from fishermen who use mono-filament nets across stream mouths at high tides, which often coincides with the peak spawning of Mangrove horseshoe crabs and who kill them because they tangle their nets.

On Lantau, Mangrove horseshoe crabs can be found sharing spawning and nursery grounds with the Chinese horseshoe crab at **Tung Chung**, Yi O and the beaches on the north shore of Lantau and they are found solely at Tai Ho Wan. **Tung Chung**, Yi O and Tai Ho Wan are now subject to development proposals under the Lantau Development Plan.

IMPORTANCE OF TUNG CHUNG TO HORSESHOE CRABS IN HONG KONG

A recent scientific paper has proposed three priority areas in Deep Bay, Starling Inlet and Tung Chung to be established as Horseshoe Crab Marine Protected Area's (MPAs)

Biodivers Conserv
DOI 10.1007/s10531-016-1084-z

ORIGINAL PAPER

Present population and habitat status of potentially threatened Asian horseshoe crabs *Tachypleus tridentatus* and *Carcinoscorpius rotundicauda* in Hong Kong: a proposal for marine protected areas

Billy K. Y. Kwan[1] · Hwey-Lian Hsieh[2] · Siu Gin Cheung[1,3] · Paul K. S. Shin[1,3]

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The map below shows the location of the three proposed MPA's, including Tung Chung.

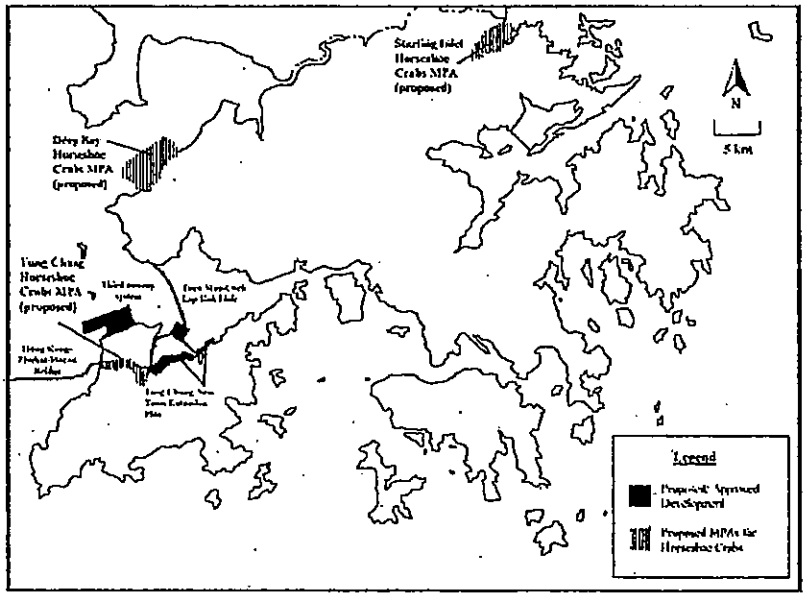


Fig. 3 The locations of the three proposed marine protected areas and the nearby proposed or approved major developments

'The Opportunities that exist at Tung Chung'

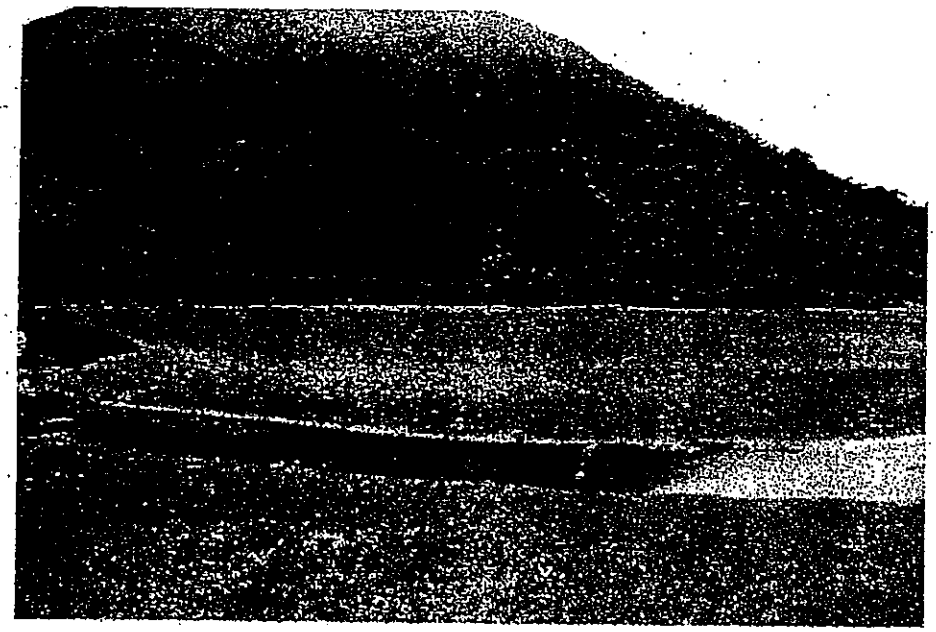
TUNG CHUNG BAY

Natural streams

Natural streams feed the mudflat at Tung Chung Bay, bordered by substantial and relatively undisturbed mangrove stands (3 July 2012)

Streams cross the intertidal mudflat at Tung Chung Bay Horseshoe crabs navigate up the stream beds at high tide to spawn (23 September 2010).

TUNG CHUNG BAY
Intertidal mudflat

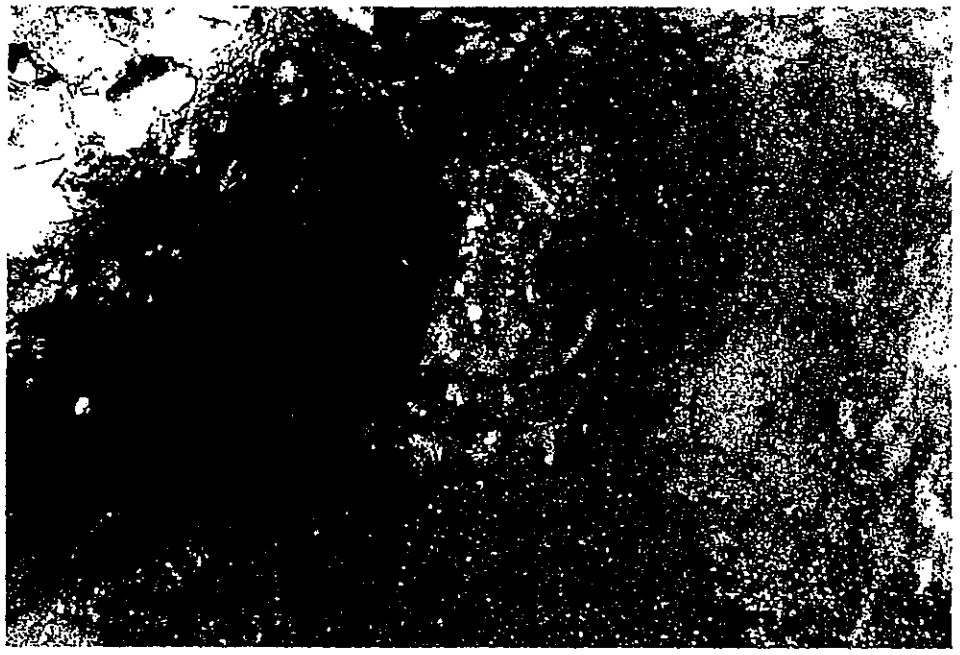


Juvenile Chinese horseshoe crab foraging area on the sandy intertidal mudflat in the centre of Tung Chung Bay (3 July 2012).

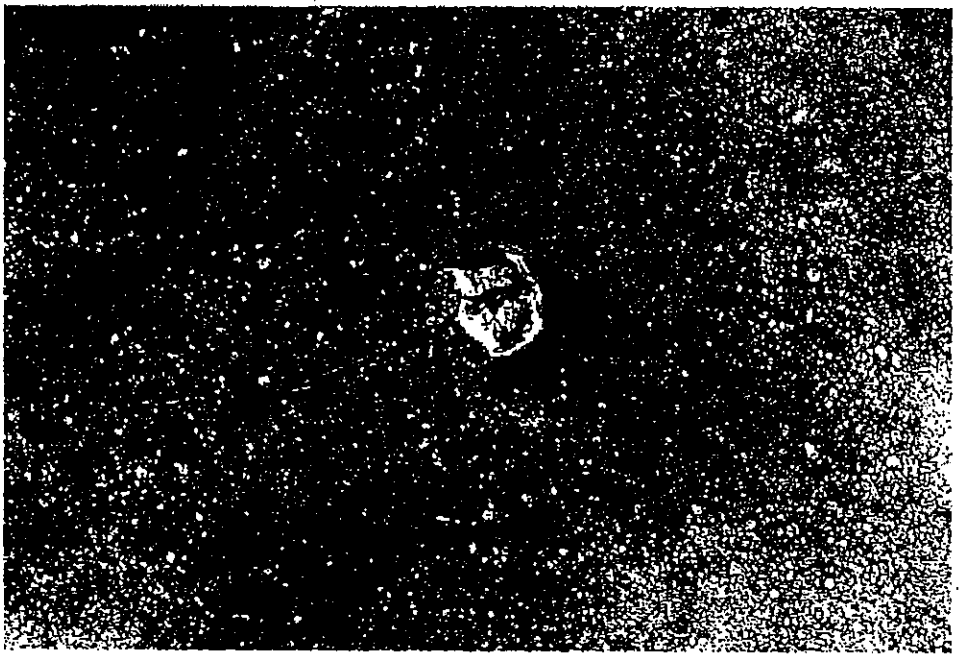
Juvenile Mangrove horseshoe crab foraging area on the muddy intertidal mudflat in front of the mangrove stand at the western end of Tung Chung Bay (3 July 2012).

STREAMS DISCHARGE INTO TUNG CHUNG BAY

Mangrove Horseshoe crabs



Mating pair of adult Mangrove horseshoe crab in a stream bed in Tung Chung Bay (3 July 2012).



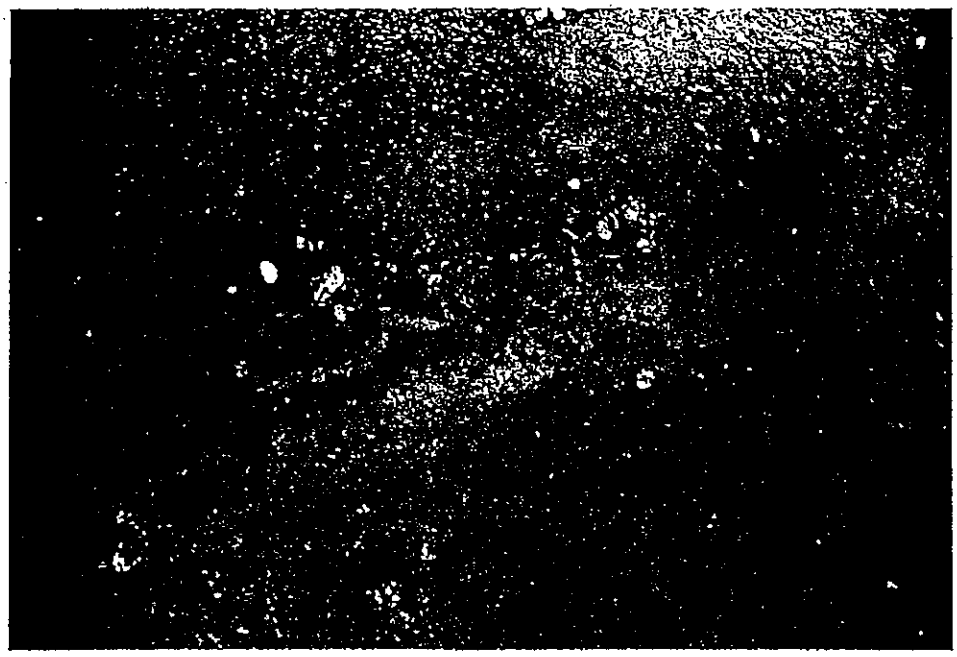
Juvenile Mangrove horseshoe crab in a stream bed in Tung Chung Bay (3 July 2012).

TUNG CHUNG BAY
Adult Chinese Horseshoe crabs

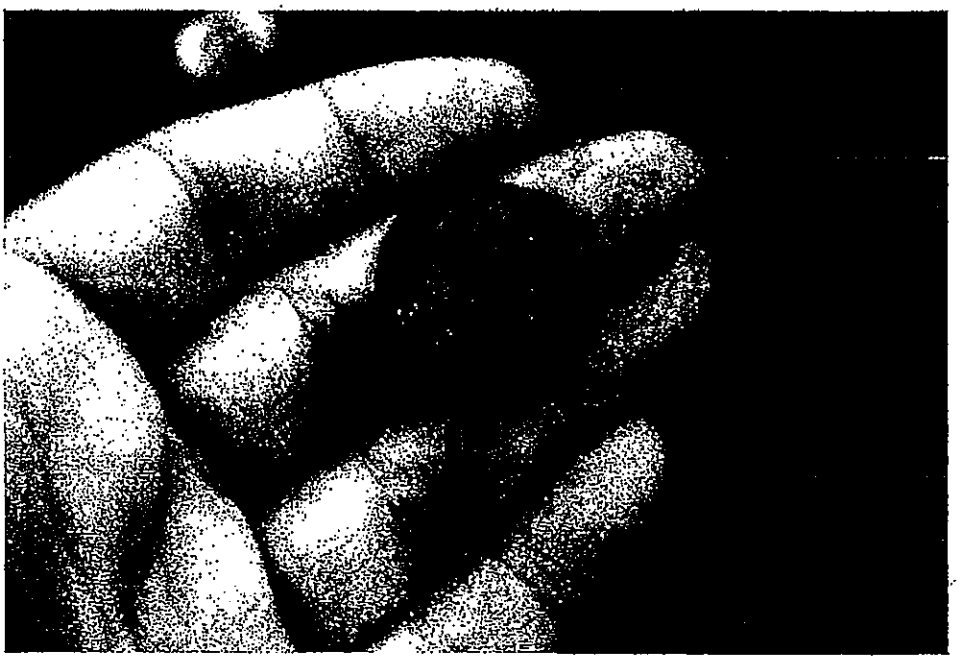
Adult Chinese horseshoe crabs are sometimes seen on the mudflat at Tung Chung (Jacky Lau. 9 April 2016).

Close-up of the female Chinese horseshoe crab in the picture above (Jacky Lau. 9 April 2016).

TUNG CHUNG BAY
Juvenile Chinese Horseshoe crabs

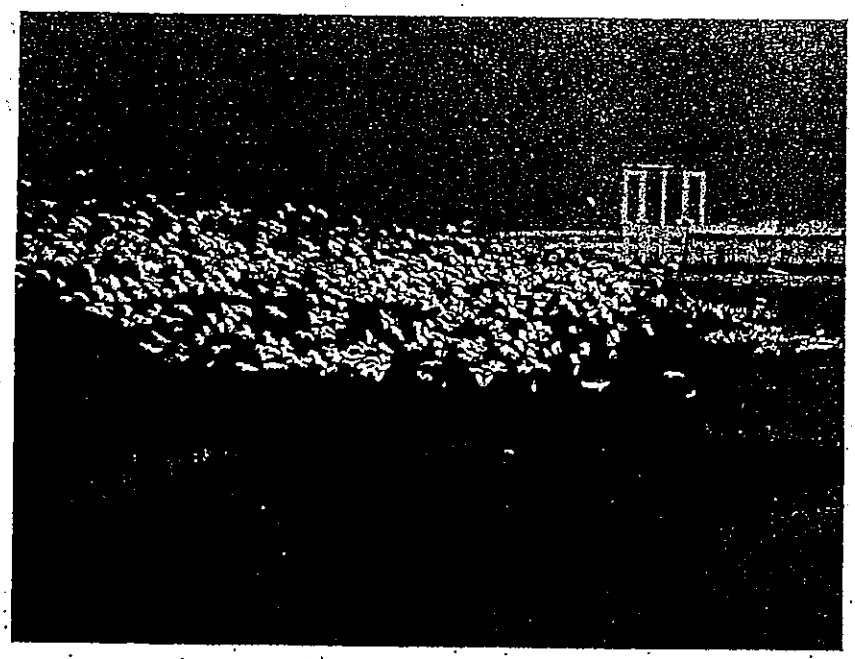


Juvenile Chinese horseshoe crab foraging on the mudflat at Tung Chung (23 September 2010).



The juvenile Chinese horseshoe crab in the photograph above (23 September 2010).

Egrets at Tung Chung Bay

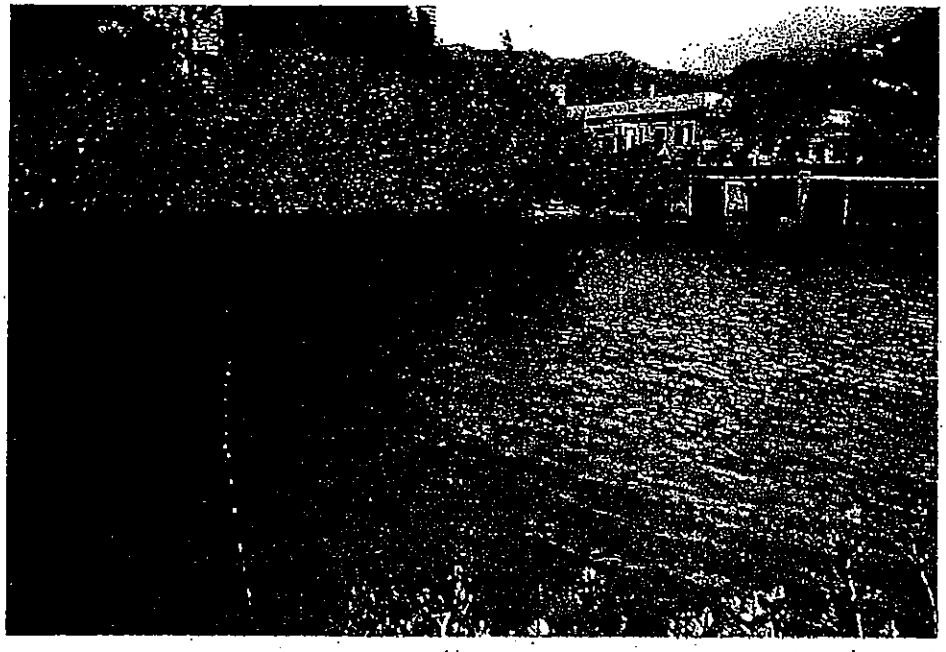


Flock of Egrets at the mouth of the Tung Chung River (Dickson Wong. 24 September 2003)

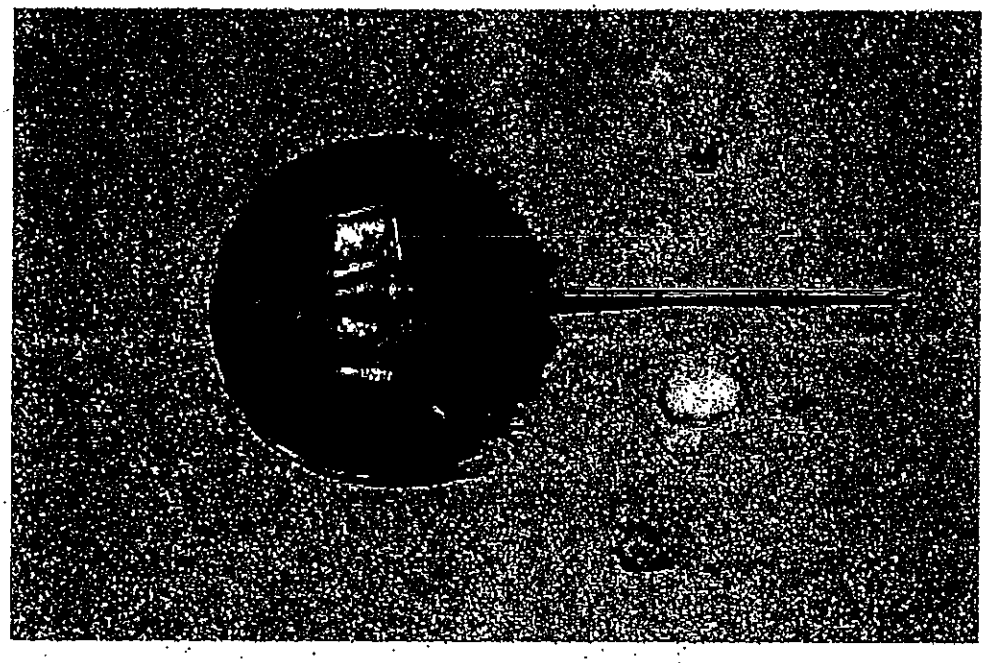
Same flock of Egrets roosting in the Mangroves at the the mouth of the Tung Chung River (Dickson Wong. 24 September 2003).

'Threats to biodiversity in the lower Tung Chung River'

Fishing across Tung Chung River mouth using a mono-filament net



A mono-filament fishing net stretched across the mouth of Tung Chung river (6 May 2011).



Adult Mangrove horseshoe crab caught in the net above (6 May 2011).

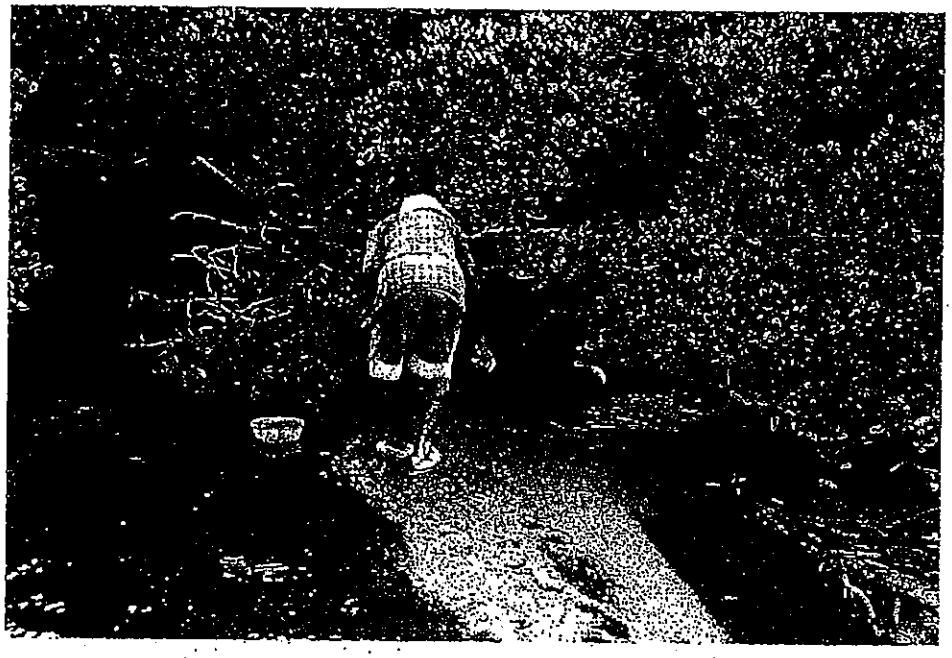
Bycatch - spawning pairs of Mangrove horseshoe crabs

Mating pair of adult Mangrove horseshoe crabs caught in a mono-filament net across a stream mouth and killed (23 September 2010).

Mating pair of adult Mangrove horseshoe crabs caught in a mono-filament net across a stream mouth and killed (23 May 2013).

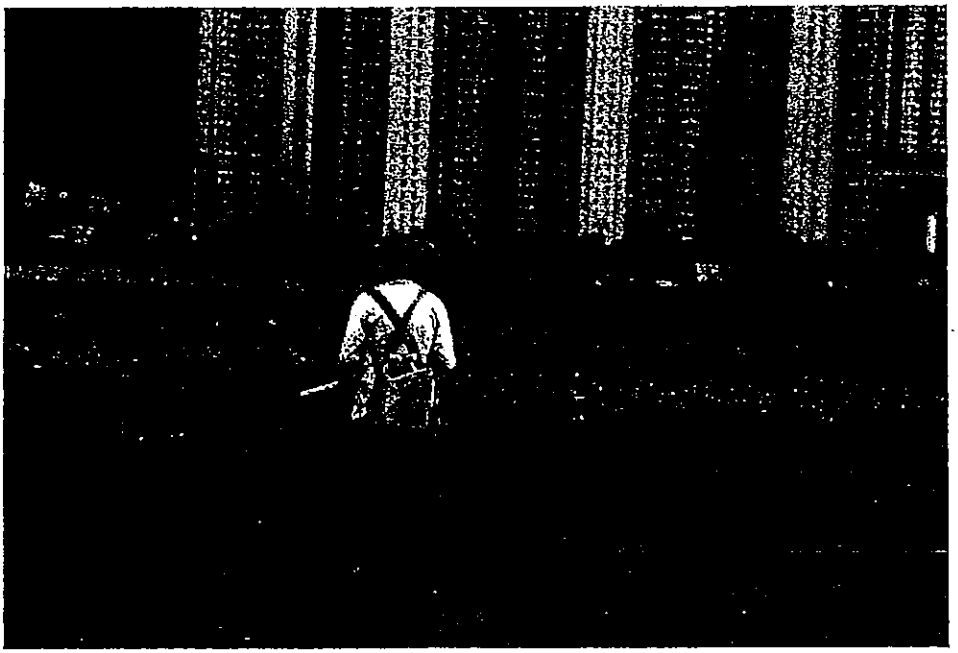
Fishing for shrimps in a mangrove stream

Fishing for shrimps in a mangrove stream (23 May 2013).



Fishing for shrimps in a mangrove stream (23 May 2013).

Electric fishing along the banks of the river



Electric fishing along stream banks (23 September 2010).

Electric fishing along stream banks (23 September 2010).

TUNG CHUNG BAY

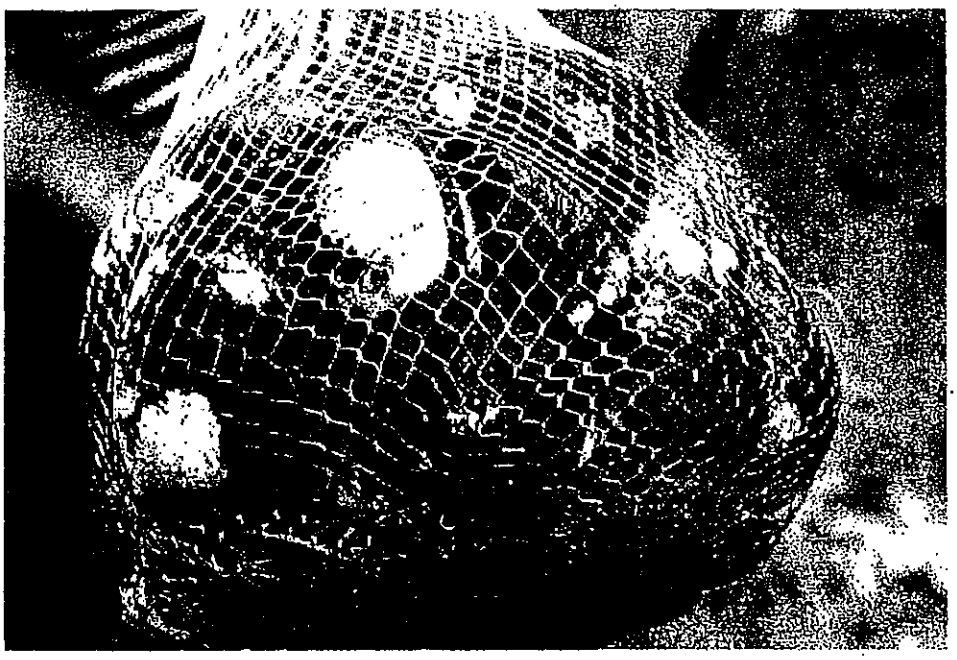
Mangrove Clam and Snail Collectors Clam diggers pose a real threat to biodiversity

Collecting mangrove clams and gastropods as the tide is receding in the lower reaches of Tung Chung River (6 May 2011).

Collecting mangrove clams and gastropods as the tide has receded (23 September 2010).

TUNG CHUNG BAY

Mangrove Clam and Snail Collectors Clam diggers pose a real threat to biodiversity



Mangrove clams (*Geloina erosa*) collected by the women on the last page (23 September 2010).

Gastropods collected by the women on the last page (23 September 2010).

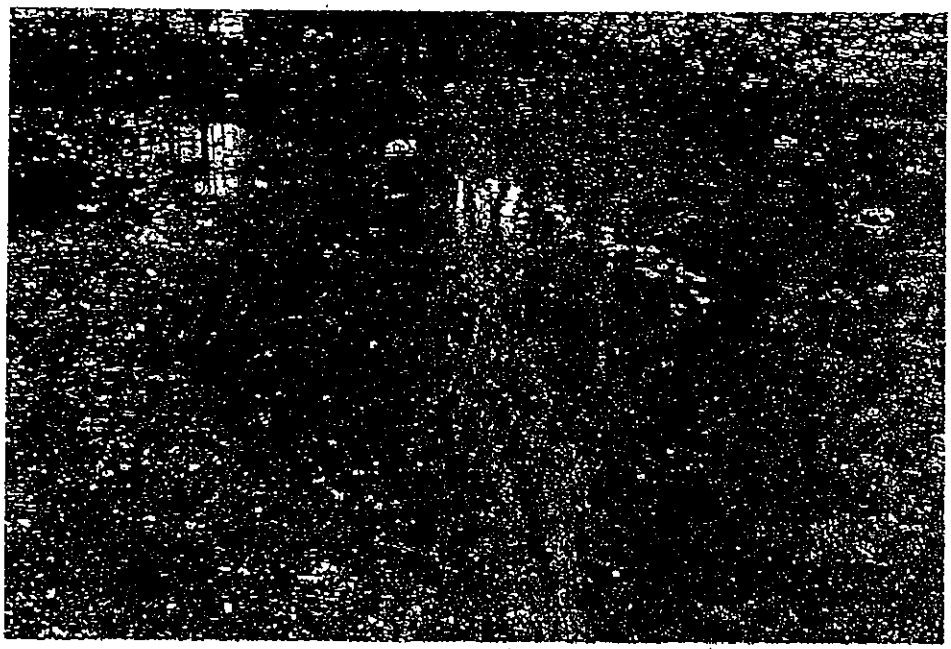
'Tung Chung Bay has already exceeded its visitor receiving capacity'

TUNG CHUNG BAY MUDFLAT
Already exceeded visitor receiving capacity

Cyclist crossing a juvenile horseshoe crab foraging area (19 September 2010).

Cyclist crossing a juvenile horseshoe crab foraging area (6 May 2011).

TUNG CHUNG BAY MUDFLAT
Already exceeded visitor receiving capacity

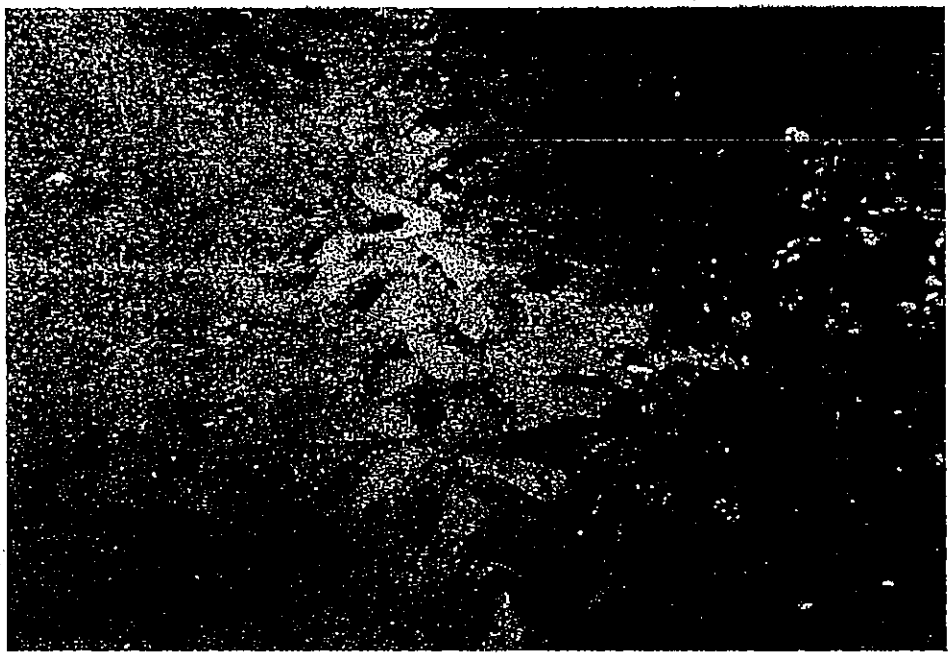


Cycle tracks and footprints on a juvenile horseshoe crab foraging area (3 July 2012).

Cycle tracks and footprints on a juvenile horseshoe crab foraging area (23 May 2013).

TUNG CHUNG BAY MUDFLAT
Already exceeded visitor receiving capacity

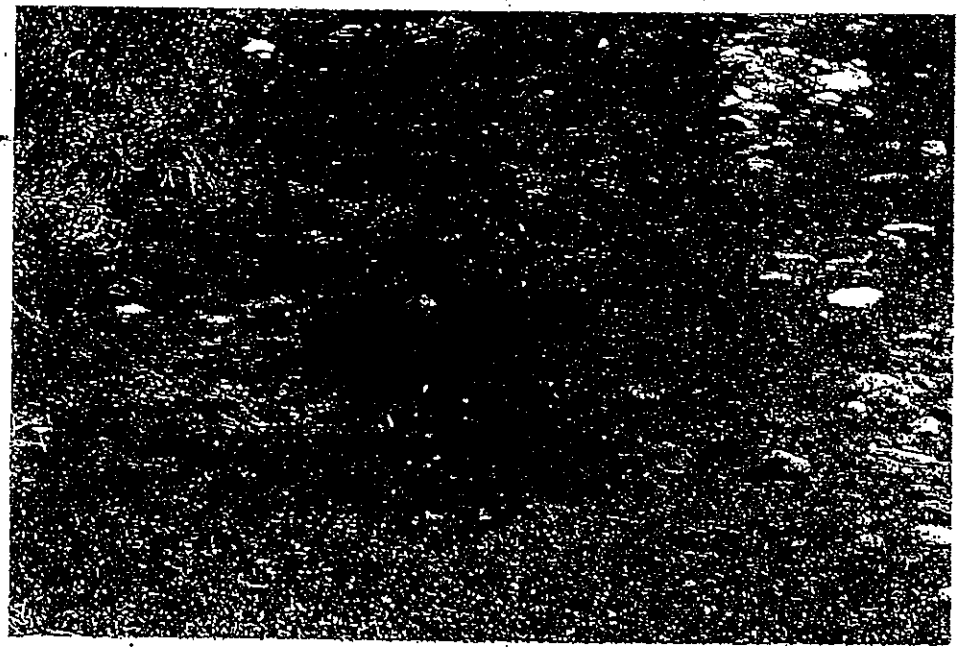
Cycle tracks and footprints on a juvenile horseshoe crab foraging area (23 May 2013).



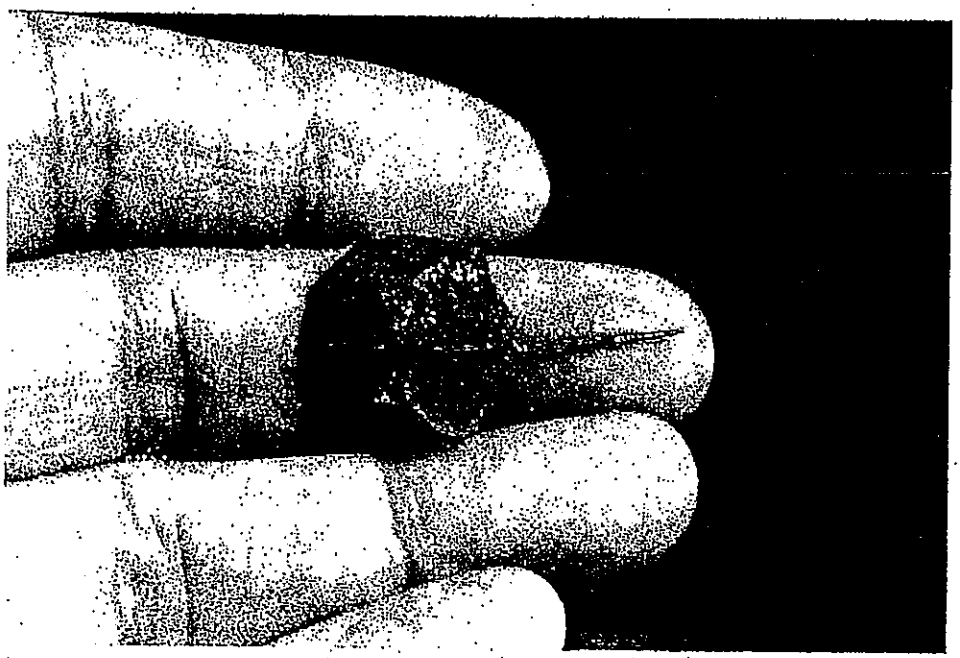
Footprints on a juvenile horseshoe crab foraging area, possibly from a guided nature tour (6 May 2011).

TUNG CHUNG BAY MUDFLAT

Visitors pose a real threat to juvenile horseshoe crabs



This pool formed in an inter-tidal area on a footpath to the mudflat. Notice the footprints through the pool (3 July 2012).



This juvenile Mangrove horseshoe crab was found foraging in this pool. Juvenile horseshoe crabs of this size are now rarely being found in population surveys (3 July 2012).

TUNG CHUNG BAY MUDFLAT

Clam diggers pose a real threat to juvenile horseshoe crabs

Clam digging on a juvenile horseshoe crab foraging area (3 July 2012).

Clam digging on a juvenile horseshoe crab foraging area (23 May 2013).

TUNG CHUNG BAY MUDFLAT

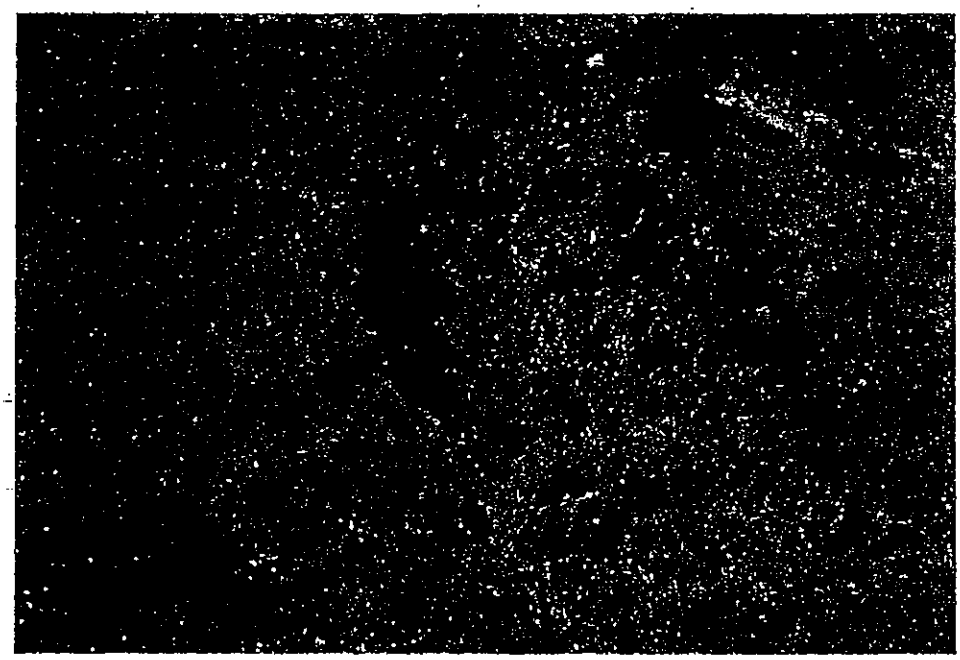
Clam diggers pose a real threat to juvenile horseshoe crabs

A family clam digging on a juvenile horseshoe crab foraging area (23 September 2010).

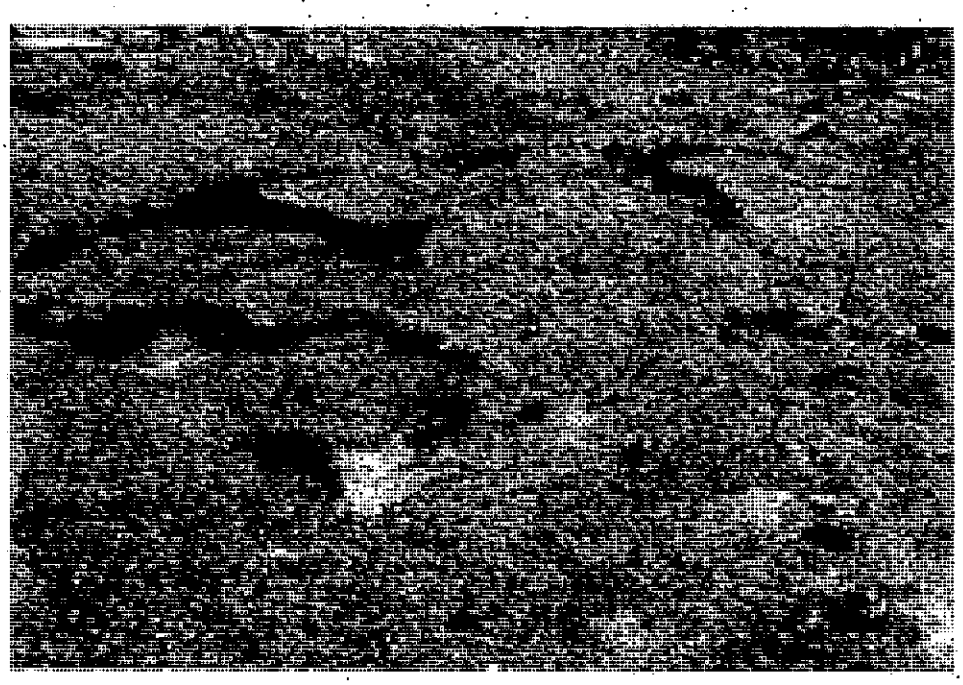
Clam digging excavation on a juvenile horseshoe crab foraging area (23 September 2010).

TUNG CHUNG BAY MUDFLAT

Clam diggers pose a real threat to juvenile horseshoe crabs



Clam digging excavation on a juvenile horseshoe crab foraging area (6 May 2011).



Clam digging excavations on a juvenile horseshoe crab foraging area (6 May 2011).

TUNG CHUNG BAY

Industrial scale clam diggers on the sub-tidal mudflat

Clam digger heading to the sub-tidal horseshoe crab foraging area (23 May 2013).

Clam digger heading to the sub-tidal horseshoe crab foraging area (23 May 2013).

TUNG CHUNG BAY

Industrial scale clam diggers on the sub-tidal mudflat

Clam diggers heading to the sub-tidal horseshoe crab foraging area (23 May 2013).

Clam diggers on the sub-tidal horseshoe crab foraging area (23 May 2013).

A boardwalk

‘What the future could look like at Tung Chung’

Boardwalk through Tung Chung River Valley

The following proposals are based on activities at Chek Jawa Boardwalk and other visitor facilities in Singapore, which are similar in setting to Tung Chung.

A resource for all ages (Chek Jawa).

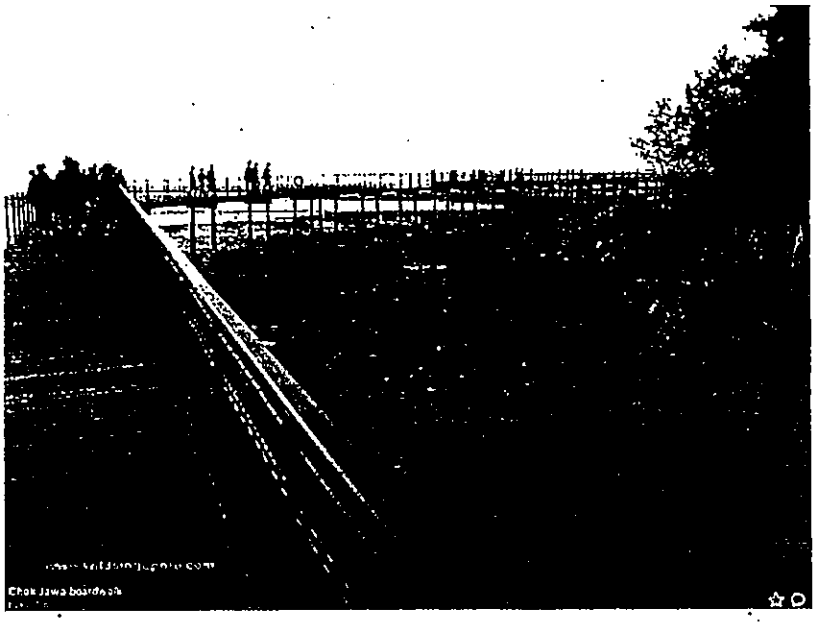
Hikers (Chek Jawa).

Boardwalks let you get up close to nature, without destroying it

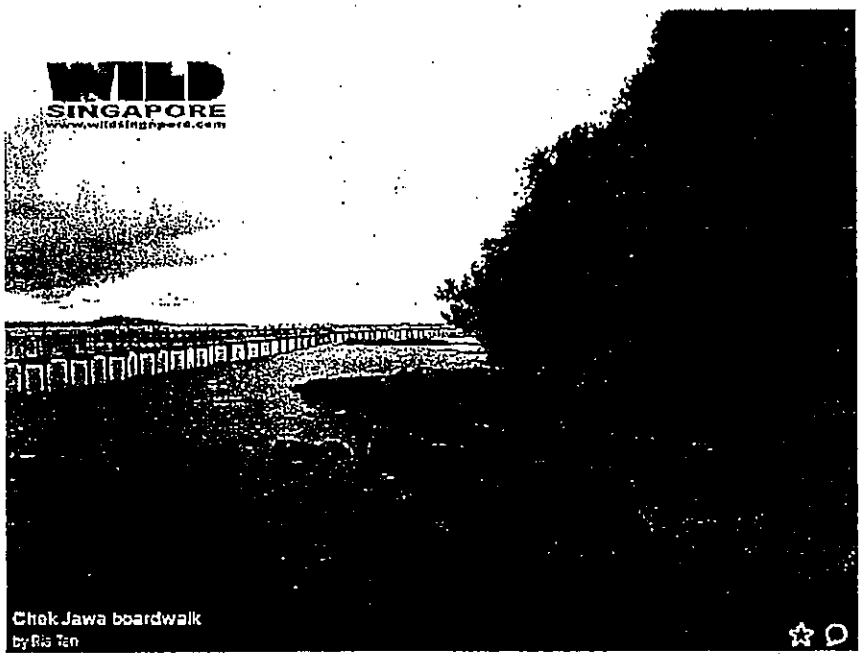
Curious minds (Chek Jawa).

Budding scientists (Chek Jawa).

Boardwalk across the mudflat – continuation of the River Cum Biodiversity Park



Low tide – inter-tidal mudflat viewing (Chek Jawa).



High tide – coastal walkway (Chek Jawa).

An educational resource

School visit (Wild Shores)

Students comparing notes (Wild Shores)

Job opportunities provided by Guided tours by Green Groups

The Naked Hermit Crabs are volunteer guides who lead public walks to conduct free monthly guided tours of Singapore's shores such as Chek Jawa, Pulau Semakau, Kusu Island.

Guided walks are themed towards the water and mud, focusing on children from 7 to 12 years and include tours themed on:

- What's in my Water;
- What's in my Mud;
- Muddy and his home;
- Muddy and his friends.

Green Groups in Hong Kong do not have a convenient, easy to access, ecologically sensitive and safe place to take guided tours to. A boardwalk at Tung Chung would be that resource.

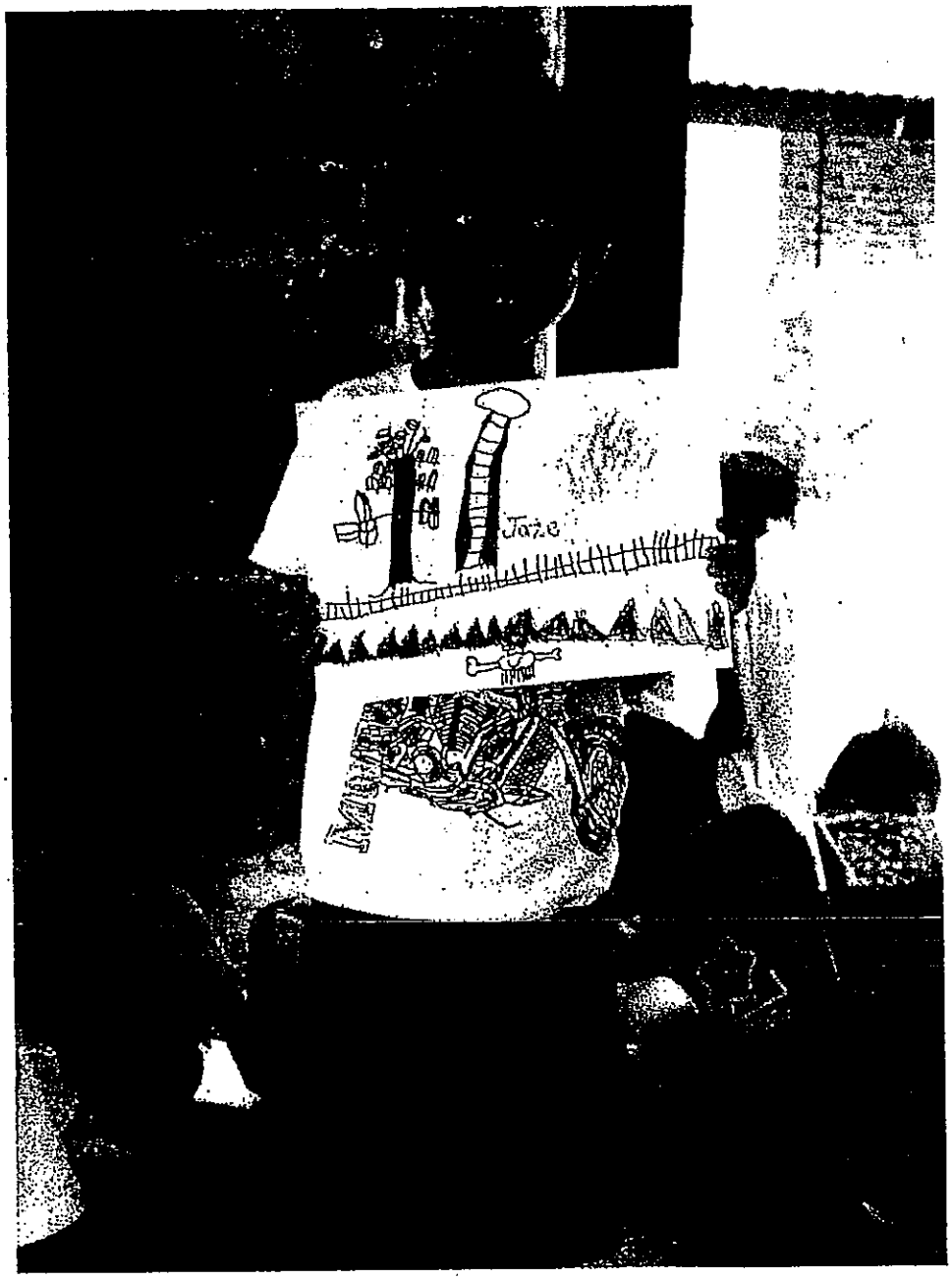
Typical make-up of a Naked Hermit Crabs Guided Tour.

Each tour ends with a drawing session

Everyone participates

The face of concentration

Reflect on what you've seen



'Here's one of the proud and talented artists with their work. I'm constantly amazed at how much the kids notice and remember of the walk' (Ria Tan).

Job opportunities through training nature guides

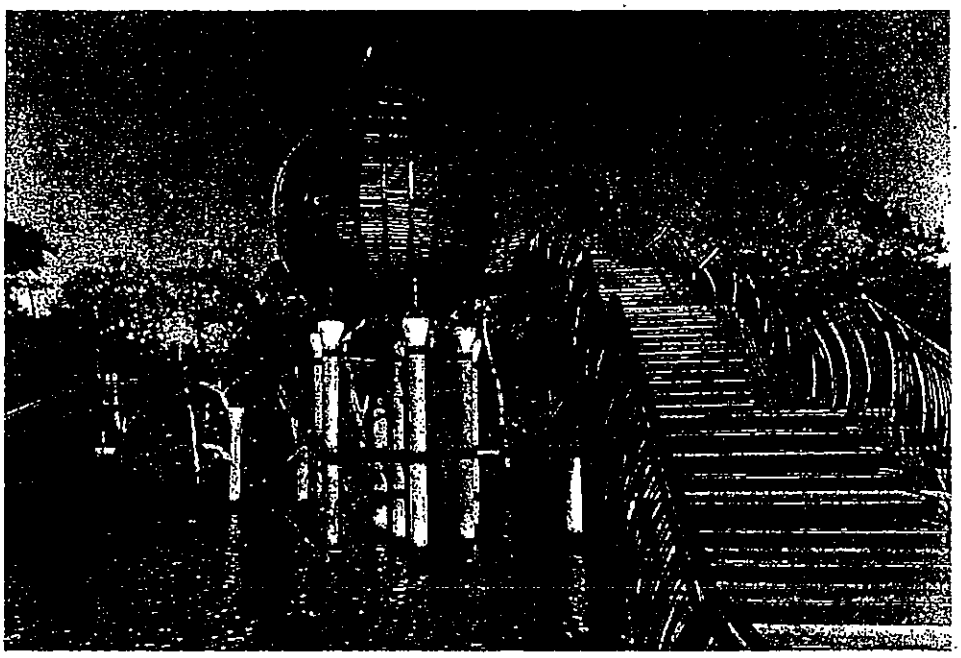
" ... four students from CHIJ Katong Convent. This is their first experience at being a nature guide. They are tagging along with the Naked Hermit Crab guides to learn how to conduct nature guiding. They picked up many interesting information and hopefully, they will start guiding slowly in the next session" (Wild Shores. 6 April 2013)

Encouraging and supporting bird watching

Between September to March, Sungei Buloh Wetland Reserve mudflats functions as a "refuelling point" for waders to feed and roost. These habitat-specific birds feed on the polychaetes (worms) found in the mudflats on the Reserve.

Also, throughout the year, look out for resident birds such as herons, kingfishers, bitterns, sunbirds, tailorbirds and fruit pigeons (Sungei Buloh Wetland Reserve).

The same is true for the inter-tidal mudflats of Hong Kong.



Viewing Pod (Bird Hide) at Sungei Buloh Wetland Reserve.
(Singapore through my eyes)

Summary and Submission

SUMMARY

Constructing a boardwalk will enable conservation and development to go hand-in-hand at Tung Chung and both will complement each other. The following comments are pertinent to this proposal:

TUNG CHUNG

Status

- In terms of mudflats, Tung Chung is the **'Crown Jewel of Lantau'**;
- Tung Chung Bay is an active horseshoe crab spawning ground/nursery area for both the Chinese horseshoe crab and Mangrove horseshoe crab;
- The lower reaches of the Tung Chung River Valley are an important spawning ground and nursery area for Mangrove horseshoe crabs;
- Juvenile horseshoe crab populations are under serious threat from human activities on the mudflat and if no action is taken, the Chinese horseshoe crab will become locally extinct here;
- Tung Chung has recently been identified as one of the critical areas for enhanced protection to conserve both species of horseshoe crabs in Hong Kong (Kwan and others);
- Tung Chung River Valley (Mok Ka and Shek Mun Kap) is listed as an Ecologically Important Stream (EIS No. 27) by AFCD;
- Of all the mudflats in Hong Kong, Tung Chung is the most accessible and user-friendly in terms of existing transport infrastructure, closeness to local amenities and safe and easy access.

Existing activities

None of the existing activities in the river valley or on the mudflat at Tung Chung are consistent with the conservation of horseshoe crabs or other biodiversity. These activities include:

- Walking, cycling and visitor damage to the mudflat;
- Clam Digging;
- Mangrove clam and snail collecting;
- Fishing in stream mouths with mono-filament nets;
- Electric Fishing;
- Fishing in streams.

PROPOSAL TO BUILD A BOARDWALK

This submission proposes the following at Tung Chung:

- Construct a boardwalk through the Tung Chung River Valley and across the mudflat.
- Through "point-line-plane" approach, link the River cum Biodiversity Park with the boardwalk across the mudflat to fully utilize all of the ecological offerings available at Tung Chung.
- Focus on constructing a facility for education first, then as an amenity for local community, then as a facility for Green Groups, then tourism. They are all mutually inclusive and complementary.
- The Tung Chung River Valley be accorded appropriate conservation status, to protect the biodiversity there, at the same time allowing for the construction of a boardwalk;
- Tung Chung Bay be designated a Marine Protected Area, or be accorded similar conservation status to restrict access to stop further visitor damage.
- Promote Tung Chung as Lantau's "Living Fossil Nature Reserve and Boardwalk".

ADDRESSING REPRESENTATIONS IN DRAFT TCV OZP NO. S/I-TCV/1

This submission addresses the issues raised in response to the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1 as follows:

Concern about the overall capacity of Tung Chung area

- Tung Chung Bay has already over-exceeded its visitor receiving capacity and any additional population or visitors in Tung Chung will only worsen this situation.
- Building a boardwalk through the Tung Chung River Valley and across the mudflat at Tung Chung will alleviate this problem, so visitors can enjoy the area, without destroying it.

The ecology and the value of Tung Chung Stream should be considered as a whole river system

- Constructing a boardwalk through the Tung Chung River Valley and across the mudflat at Tung Chung will treat the 'Tung Chung Stream' as a whole river system.
- This will also meet the Lantau Development Plan goals of adopting a "point-line-plane" approach linking up places of conservation value to attract visitors and add value to the River Cum Biodiversity Park, which has already been proposed for the area.

Make use of the ecology of Tung Chung Valley for eco-education

- Constructing a continuous boardwalk linking the River Cum Biodiversity Park with the inter-tidal mudflat at Tung Chung will provide an unrivalled eco-education resource in Hong Kong.

Provision of community facilities and employment opportunity

- Constructing a boardwalk linking the River Cum Biodiversity Park with the inter-tidal mudflat at Tung Chung will provide a community resource, for local families to enjoy and will help create local job opportunities.

Support the proposal of "Tung Chung Stream Nature River Park"

- This proposal supports the Lantau Development Plan for a 'River Cum Biodiversity Park' at Tung Chung, and complements it by extending the park to incorporate the inter-tidal mudflat into the plan.

Designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education)

- The Lantau Development Plan for a 'River Cum Biodiversity Park' can't be achieved if the biodiversity in the Tung Chung River Valley is being caught or collected.

- Conservation, Ecotourism and Ecological Education can be achieved only if the lower reaches of the Tung Chung River Valley are afforded appropriate protections to protect the biodiversity there, at the same time allowing visitors to access the area without destroying it, which can be achieved with the construction of a boardwalk.

SUBMISSION

This submission has:

- Provided evidence of the importance of the Tung Chung River Valley to Mangrove horseshoe crabs in Hong Kong;
- Demonstrated Tung Chung Bay has already exceeded its visitor receiving capacity;
- Identified threats to the biodiversity at Tung Chung that increases in population and visitor numbers will bring.

To address these concerns, and allow development to take place in the area, it is proposed to build a boardwalk linking the River Cum Biodiversity Park with the mudflat, which will also address the following issues raised in response to the draft Tung Chung Valley Outline Zoning Plan No. S/I-TCV/1:

- Concern about the overall capacity of Tung Chung area;
- The ecology and the value of Tung Chung Stream should be considered as a whole river system;
- Make use of the ecology of Tung Chung Valley for eco-education;
- Provision of community facilities and employment opportunity;
- Support the proposal of "Tung Chung Stream Nature River Park";
- Designate the land near Tung Chung Stream estuary as "OU (Conservation, Ecotourism & Ecological Education).

All of this can be achieved if the lower reaches of the Tung Chung River Valley are afforded conservation protection status compatible with the construction of the proposed boardwalk.

This submission therefore urges you to afford the lower reaches of the Tung Chung River Valley a protection status compatible with conservation and construction of the proposed boardwalk.

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Independent Horseshoe Crab Researcher,
Hong Kong.

11 May 2016

ACKNOWLEDGEMENTS

This submission acknowledges the contributions and assistance given by the following persons:

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Germaine Leng (Ms), Manager/Conservation, Pulau Ubin Branch, Conservation Division, National Parks Board, Singapore.

N. Sivasothi, Department of Biological Sciences, National University of Singapore.

Ria Tan - Creator: Wild Singapore web resources, which includes: Wild Shores of Singapore, Wild Singapore homepage, Wild Singapore News, Wild Happenings in Singapore and Wild Fact Sheets. Coordinator: Naked Hermit Crabs and many more.

Hong Kong

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Jacky Lau. Life in Nature Company Limited, Hong Kong.

William Lau. Formerly Department of Biology and Chemistry, City University of Hong Kong. Now with AFCD.

Dickson Wong. Hong Kong Wildlife Net.

Dr. Cynthia Yau (Ph.D), Independent Marine Biology Consultant/Honorary Assistant Professor HKU.

USA

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寄件者: Yin Siu [redacted]
寄件日期: 13日05月2016年星期五 19:58
收件者: tpbpd
主旨: Re: 東涌谷分區計劃大綱草圖編號S/I-TCV/1

TPB/R/S/I-TCV/1-C 21

S_I-TCV_1

本人支持以下意見。

TPB/R/S/I-TCV/1-15,
TPB/R/S/I-TCV/1-16,
TPB/R/S/I-TCV/1-17,
TPB/R/S/I-TCV/1-18,
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TPB/R/S/I-TCTC/21-27

Fung Siu yin

tpbpd <tpbpd@pland.gov.hk> 於 2016 年 4 月 22 日 上午 9:48 寫道：

城市規劃委員會
香港北角渣華道三百三十三號
北角政府合署十五樓

TOWN PLANNING BOARD
15/F., North Point Government Offices
333 Java Road, North Point,
Hong Kong.

傳 真 Fax: 2877 0245 / 2522 8426
電 話 Tel: 2231 4810
電郵函件

來函檔號 Your Reference:
覆函請註明本會檔號 In reply please quote this ref.: TPB/R/S/I-TCV/1-R15

严小燕

先生／女士：

東涌谷分區計劃大綱草圖編號 S/I-TCV/1

(申述編號：R15)

城市規劃委員會(下稱「城規會」)於 2016 年 3 月 7 日收到你提出的申述。

按照《城市規劃條例》(下稱「條例」)，城規會會在提交申述的兩個月指定法定期結束後公布全部申述(包括你的申述)，為期三個星期，以供公眾提出意見。全部申述亦會供公眾查閱，直至行政長官會同行政會議根據條例第 9 條就有關的草圖作出決定為止。查閱地點為規劃署的規劃資料查詢處(查詢熱線：2231 5000；地址：北角渣華道 333 號北角政府合署 17 樓及沙田上禾輋路 1 號沙田政府合署 14 樓)。在該段三個星期的期間結束後，有關意見(如有的話)會在上述地點供公眾查閱，直至行政長官會同行政會議就該草圖作出決定為止。供公眾查閱申述和意見的訊息會在城規會的網頁上(http://www.info.gov.hk/tpb/)公布。而有關上述草圖的申述摘要及意見索引亦會上載城規會網頁(http://www.info.gov.hk/tpb/tc/plan_making/submission_insp.html)。

在提出意見的三個星期限期屆滿後，城規會或其申述聆訊小組委員會(下稱「小組委員會」會舉行會議以考慮你的申述及有關意見(如有的話)。你及／或你的授權代表可出席城規會／小組委員會的會議，並可按你的意願，獲給予機會在會上作出申述。會議詳情將於稍後奉告。

請於日後的來信中，註明這項申述的編號。

城市規劃委員會秘書

(簡志陶 簡志陶 代行)

二零一六年四月二十二日

城規會東涌未來發展聲明書

Reference List:
http://www.info.gov.hk/tpb/tc/plan_making/Attachment/20160422/S_I-TCTC_21_gist_of_representations_eng_chi.pdf
http://www.info.gov.hk/tpb/tc/plan_making/Attachment/20160422/S_I-TCE_1_gist_of_representations_eng_chi.pdf
http://www.info.gov.hk/tpb/tc/plan_making/Attachment/20160422/S_I-TCV_1_gist_of_representations_eng_chi.pdf

姓名 Name *

馮小燕

電郵 Email *

[redacted]

本人同意這一份聲明 I agree this declaration *

◉ 同意 Agress

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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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

出席者

主席
周玉堂先生, BBS

副主席
余漢坤先生, JP

議員
翁志明先生, BBS
陳連偉先生
張　富先生
黃漢權先生
樊志平先生
劉焯榮先生
黃文漢先生
余麗芬女士
李桂珍女士
容詠嫦女士
鄧家彪先生, JP
鄺官穩先生
周浩鼎先生
曾秀好女士
郭　平先生
傅曉琳女士

應邀出席者

馬紹祥先生, JP	發展局 副局長
黎卓豪先生	發展局 首席助理秘書長(工務)
劉寶儀女士	規劃署 總城市規劃師/策略規劃
胡明儀女士	規劃署 高級城市規劃師/離島
區宇欣女士	規劃署 城市規劃師/離島
阮榮昌先生	運輸署 高級運輸主任/渡輪策劃
李家曦先生	運輸署 工程師/離島
謝秀麗女士	地政總署 離島地政處 高級產業測量師
韓翠珊女士	地政總署 離島地政處 高級產業測量師
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雷國強博士	環境保護署 高級環境保護主任(空氣政策)
何凱恩女士	香港鐵路有限公司 助理公共關係經理
周國樑先生	土木工程拓展署 高級工程師(離島發展部)
郭俊熙先生	奧雅納工程顧問有限公司 助理董事
李潔兒女士	康樂及文化事務署 高級經理(新界南)文化推廣
吳麗芳女士	康樂及文化事務署 經理(新界南)市場推廣及地區活動
郭麗娟女士	康樂及文化事務署 圖書館高級館長(離島區)

列席者

李炳威先生, JP	離島民政事務處 離島民政事務專員
莊欣怡女士	離島民政事務處 離島民政事務助理專員(1)
周　哲先生	離島民政事務處 離島民政事務助理專員(2)
許婉媚女士	離島民政事務處 高級聯絡主任(1)
陳慶群女士	離島民政事務處 高級聯絡主任(2)
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林定楓先生	社會福利署 中西南及離島區福利專員
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黃偉宏先生	食物環境衞生署 離島區環境衞生總監
張玉瓊女士	康樂及文化事務署 總康樂事務經理(新界西)
吳潘港英女士	康樂及文化事務署 離島區康樂事務經理

秘書

陳心心女士	離島民政事務處 高級行政主任(區議會)

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，以改善環境衞生。

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) 關於梅窩三鄉的連接道路，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-TCV/1-	申述的理據／建議	規劃署的回應
R1 及 R2	支持《東涌谷分區計劃大綱草圖》(下稱「草圖」)把稔園村劃為「鄉村式發展」地帶，反對把該地帶改作「靈灰安置所」用途，因為稔園村一向為認可鄉村，而「靈灰安置所」用途會對社區和生態造成不良影響。	備悉。
R3	(a) 關注該區缺乏安老設施。 (b) 支持發展商在稔園村發展及經營私營靈灰安置所，因為該村及其周邊地區一直作墓地及存放金塔之用。該區亦有為數不少的墳墓和墓地，以及歷史悠久的宗教機構，包括羅漢寺和般若禪寺，這兩間寺院均有作「靈灰安置所」用途。 (c) 稔園村的私營靈灰安置所遠離現有民居，故靈灰安置所用途與稔園的土地用途互相協調，不會對附近居民造成負面影響(例如在噪音、異味及心理等方面)。 (d) 在稔園發展私營靈灰安置所可紓緩現時公眾靈灰龕位不	見城市規劃委員會(下稱「城規會」)文件第6.17至6.21段。

	足的情況，以及支持區內經濟。 (e) 稔園村的私人土地全部都已售予私人發展商，村民在稔園村已沒擁有任何土地，因此，村民根本不能在稔園興建小型屋宇。 **<u>建議</u>** (i) 把第 67 區由「住宅(丙類)2」地帶改劃作「機構或社區」用途，以興建安老院(包括日間安老設施)，照顧區內長者。 (ii) 把稔園村的私人土地改劃作「機構或社區」用途。	
R4	(a) 鑑於社區人口老化，以及公營安老設施短缺，故此關注區內缺乏安老設施的問題。 (b) 支持發展商在稔園村發展及經營私營靈灰安置所，因為該村及其周邊地區一直作墓地及存放金塔之用。 (c) 認為稔園村的私營靈灰安置所與稔園的土地用途互相協調，不會對環境造成負面影響。 (d) 認為在稔園發展私營靈灰安置所可紓緩現時公眾靈灰龕位不足的情況、滿足東涌新市鎮的未來需求，以及支持	見城規會文件第6.17至6.21段。

	區內經濟。 **<u>建議</u>** (i) 把第 67 區由「住宅(丙類)2」地帶改劃作「機構或社區」用途，以興建安老院及附屬設施，為長者提供護老服務。 (ii) 把稔園村的私人土地改劃作「機構或社區」用途。	
R5	(a) 支持在東涌稔園發展靈灰安置所 (b) 稔園村的私營靈灰安置所遠離現有民居，故靈灰安置所用途與稔園的土地用途互相協調，不會造成負面的環境影響(例如在噪音、異味及心理等方面)。 (c) 應支持發展私營靈灰安置所，因其所提供的龕位可滿足市民的需求。 **<u>建議</u>** 把稔園村的私人土地改劃作「機構或社區」用途。	見城規會文件第6.17至6.19段。
R6	(a) 支持在東涌稔園發展私營靈灰安置所，因為該村及其周邊地區一直作墓地及存放金塔之用。 (b) 稔園村的私營靈灰安置所遠離現有民居，故靈灰安置所	見城規會文件第6.17至6.19段。

	用途與稔園的土地用途互相協調，不會對環境造成負面影響。 (c) 應支持發展私營靈灰安置所，因其所提供的龕位可滿足市民的需求。 **<u>建議</u>** 把稔園村的私人土地改劃作「機構或社區」用途。	
R7	(a) 反對「鄉村式發展」地帶涵蓋稔園村及稔園村現有的私營靈灰安置所發展項目。 (b) 私營靈灰安置所在涵蓋該區的發展審批地區草圖刊憲前已開始營運，應視為現有用途。 (c) 稔園村及其周邊地區一直作墓地及存放金塔之用。該村及其周邊地區的鄉郊特色應適合作「靈灰安置所」用途。該區亦有相當數量的墳墓和墓地，以及歷史悠久的宗教機構，包括羅漢寺和般若禪寺，這兩間寺院均有作「靈灰安置所」用途。 (d) 稔園村的私營靈灰安置所遠離現有民居，故「靈灰安置所」用途與稔園的土地用途互相協調，不會對該區的生態、自然環境及鄉郊特色造成負面影響。	見城規會文件第6.17至6.21段。

	(e) 認為「鄉村式發展」地帶的規劃意向沒有反映現況，因為稔園村並無尚未處理的小型屋宇申請，村內亦無私人土地或政府土地可供興建小型屋宇。 **<u>建議</u>** 把稔園村的靈灰安置所由「鄉村式發展」地帶改劃作「機構或社區」用途，以作「靈灰安置所」用途及其他服務社區的用途(例如安老院及宗教機構)。	
R8	關注全港人口老化，公營安老設施短缺，缺乏為長者提供的支援服務。 **<u>建議</u>** 把第67區由「住宅(丙類)2」地帶改劃作「機構或社區」用途，以發展社區護理和長者支援服務，包括長者社區護理服務、老人中心、日間護理中心、護養院及安老院等。	見城規會文件第6.20及6.21段。
R9	(a) 反對把思親園及靈灰安置所劃為「鄉村式發展」地帶，因此舉或會影響申述人在其土地上的利益。 (b) 表明申述人無意在其土地發展「鄉村式發展」地帶准許的任何用途。 (c) 思親園數十年來一直用作靈灰安置所。	見城規會文件第6.17至6.19及6.47段。

	(d) 關注草圖的規劃可能對該區的生態構成威脅。	
R10	(a) 反對未來鐵路站 500 米範圍內一些用地的擬議土地用途，包括把沙咀頭一塊用地(用地 A)劃為「政府、機構或社區」地帶、「休憩用地」地帶及「海岸保護區」地帶，以及把位於松逸街及松滿路交界處附近的一塊用地(用地 B)劃為「海岸保護區」地帶和「其他指定用途」註明「雨水滯留及處理池」地帶。 (b) 關注草圖的界線並非沿沙咀頭海岸線而劃，以及東涌河河口西岸的紅樹林地區沒有納入草圖範圍內，會令有關地區得不到妥善的規劃管制保護。從土地行政、生態保護及規劃的角度而言，東涌河河口西岸的私人土地及紅樹林地區應納入草圖範圍內。 (c) 關注房屋用地建議的發展密度普遍過低，未有善用稀有的土地資源，尤其是將會設有公用事業設施和運輸基建的地區。 (d) 關注擬議鐵路站 500 米範圍內的擬議土地用途違反草圖夾附的《說明書》所述的「運輸主導發展」概念。該些在 500 米範圍內的用地所容納的人口太少。把較遠離鐵路站的地方的建築物高度及發展密度定得較高，並不能為眾多人口提供便利，例如讓市民較易到達公共交通及社區設施。	見城規會文件第6.34至6.37、6.39至6.42及6.63段。

	(e) 把擬議鐵路站西面的未發展用地作中密度的住宅及／或商業發展，可成為朝氣蓬勃的活動樞紐，增添該區的特色。 (f) 申述人關注，從社會經濟角度而言，「東涌新市鎮擴展研究」(下稱「東涌研究」)就東涌西建議的可建單位總數，會產生公共房屋過度集中的情況，因為東涌西現時已經有逸東邨及在第 39 區的既定的公共房屋發展項目，而公共房屋發展項目所採用的發展密度又相對較高。 (g) 關注第 39、42 及 46 區三個擬議／既定的公共房屋發展項目的建築物較高，但東涌谷的擬議私人住宅用地的建築物則遠較低矮，令建築物形貌呈不對稱狀，偏離了東涌研究就東涌西建議的城市設計概念。 (h) 關注擬建的排水系統設有露天雨水滯留及處理池，須佔用的土地面積極廣，缺乏充分理據支持。認為擬議河畔公園及河溪緩衝區足以保護該河。若須增加蓄洪量，應將雨水滯留池闢建於休憩用地下，以便善用住宅發展區的土地。 **<u>建議</u>** (i) 修訂草圖的界線，把沙咀頭的紅樹林區(第 96A 區附	

	近)納入草圖範圍，並將之劃為「海岸保護區」地帶。 (ii) 用地 A：調整第 36A 及 36B 區的「政府、機構或社區」地帶、第 36E 區的「休憩用地」地帶和第 98A 區的「海岸保護區」地帶的範圍，以及在「政府、機構或社區」地帶內劃設兩幅非建築用地，並將「分層住宅」用途列入「政府、機構或社區」地帶的《註釋》的第二欄用途。 (iii) 用地 B：把第 45D 區的「其他指定用途」註明「雨水滯留及處理池」地帶和第 98D 區的「海岸保護區」用地，分別改劃為「住宅(丙類)2」地帶(地積比率為 1 倍及最高建築物高度為主水平基準上 20 米)及「其他指定用途」註明「河畔公園」地帶。 (iv) 把第 80 區的「休憩用地」改劃為「休憩用地(1)」地帶，並在草圖中「休憩用地(1)」地帶的《註釋》內，把「雨水滯留及處理池」用途列為第一欄用途。	
R11	(a) 大致支持草圖。 (b) 支持在第 61A 區劃設「住宅(丙類)2」地帶，因為該處位於擬議鐵路站 500 米範圍的邊緣，而且將可由擬建的 L24 公路直達。	見城規會文件第6.29至6.32、6.34、6.35、6.43至6.46、6.54及6.58段。

	(c) 應提高未來鐵路站 500 米範圍內的住宅發展項目的密度，以符合「運輸主導發展」的概念和政府要增加房屋供應的政策。 (d) 關注廣泛地方被劃為「其他指定用途」註明「雨水滯留及處理池」地帶，當局須進一步解釋為何在東涌谷內預留逾兩公頃土地作此用途。 (e) 認同設立河畔公園，因為此舉可保護東涌谷的自然環境和生態。 (f) 須檢討東涌谷的擬議道路系統及石門甲的公共運輸交匯處的容量／規模，以改善東涌谷對內和對外的接駁交通。 (g) 沒有足夠商業及社區設施供日後的居民使用，不符合新市鎮自行持續發展的概念。 **<u>建議</u>** (i) 把第 60 區由「住宅(丙類)2」地帶改劃為「住宅(丙類)1」地帶，並相應增加最高地積比率和建築物高度限制。 (ii) 把非必要用作「其他指定用途」註明「雨水滯留及處理	

	池」用途的地方改劃為其他合適的土地用途地帶，以便更善用稀有的土地資源。 (iii) 把擬議的河畔公園與東涌河西段一帶的「自然保育區」用地連接起來，作為河畔公園的延伸部分，以長期保育東涌河，並發展成為一個生態公園。 (iv) 政府應收回劃為「其他指定用途」註明「河畔公園」地帶及「自然保育區」地帶的私人土地，並承擔管理責任。 (v) 彈性處理「住宅(丙類)」地帶，容許在地帶內發展「商店及服務行業」用途。 (vi) 刪除第60及71A區的非建築用地。	
R12	(a) 反對把一些私人土地劃入「自然保育區」地帶。 (b) 反對把牛凹村原有可建屋範圍(即「鄉村範圍」)劃入「自然保育區」地帶，因為這樣會扼殺發展空間，剝奪原居民的權利。 **<u>建議</u>** 擴大牛凹村的村界範圍。	見城規會文件第6.22及6.23段。

R13	**<u>建議</u>** 「擴大侯王宮的範圍」(把侯王宮附近第 36D、36E 及 98A 區的部分「政府、機構或社區」地帶、「休憩用地」地帶及「海岸保護區」地帶改劃為「商業」地帶)。	見城規會文件第6.28段。
R14	供大澳磡頭村村民使用的現有墓地劃為「綠化地帶」會影響該墓地。	見城規會文件第6.24段。
R15 至 R17	(a) 不宜發展低密度私人住宅。 (b) 東涌谷的發展項目無助改善經濟，亦無助區內以低技術勞工為主的居民就業。 (c) 發展有機農業。 (d) 借助東涌谷鄰近機場的地利優勢，建立本地有機農產品品牌，經機場外銷出口。 (e) 政府應收回私人土地，讓市民發展農業。 (f) 發展本地農業可減少依賴進口食品供應，並可為低技術工人提供更多原區就業機會，盡量減低跨區交通的需要。 (g) 在東涌及機場預留土地收集廚餘，以減低肥料成本。	見城規會文件第6.25至6.27及第6.38段。

R18、R19及R23	(a) 關注東涌河兩岸的低密度私人住宅，並認為這些發展項目不能為香港帶來顯著和可持續的經濟收益。 (b) 應從整個河流系統來考慮東涌河的生態和價值，只把河口一帶劃為「海岸保護區」地帶對東涌河的保育作用不大。 (c) 關注東涌河谷和「海岸保護區」地帶會變得商業化，導致環境污染。 (d) 東涌谷是香港僅餘幾個天然河谷之一，當地有不同種類的樹、大大小小的農地、濕地、紅樹林，生物種類繁多。發展東涌河谷的上流和中流地帶，會直接影響生物的多樣性和村民的生活質素。 (e) 質疑有否為草圖進行環評和會否對落實／建築方法加以管制。 (f) 關注低密度私人住宅發展會令該區的私家車數量增加，導致環境污染，破壞自然環境。 (g) 不可接受把自然景色的地方改作泊車用途。 (h) 關注石榴埔的「鄉村式發展」地帶日後的發展項目會破壞自然環境和螢火蟲的生境。	見城規會文件第6.25至6.27、6.38、6.47、6.48、6.57、6.59及6.64段。

	(i) 東涌谷的天然景致吸引廣大市民和東涌居民經常前往該處遊覽，不應為興建私人住宅而破壞當地社區和生態價值高的地方。政府應保持河谷的天然景觀，並鼓勵市民到東涌河和東涌谷遊覽，享受那裏的天然環境，以舒展身心。 (j) 發展有機農業區，令東涌成為一個「零廢」新市鎮。 (k) 在東涌及機場預留地方收集廚餘，從源頭減廢。 (l) 經處理的廚餘可作為肥料供東涌谷的有機農場使用，這樣可減少棄置於堆填區的廚餘量。 (m) 借助東涌谷鄰近機場的地利優勢，建立本地有機農產品品牌，經機場外銷出口。 (n) 市民對本地有機農產品有一定需求。具體而言，東涌谷的本地有機農產品可銷售予東涌市中心和東涌擴展區現有和未來的私人住宅居民，以支持地區經濟發展。 (o) 發展本地農業可減少依賴進口食品供應，並可為低技術工人提供更多原區就業機會，盡量減低跨區交通的需要。	

	(p) 當局應善用東涌谷的生態作教育用途，如建立生態教育營地，並利用東涌谷的農地和果林生產本地農作物，以發展地區經濟。 (q) 建立設有單車徑網絡的低碳和「無車」社區，參考其他國家的做法，在港鐵站和巴士站提供公共單車租賃服務，並參考馬灣和愉景灣禁示使用私家車的做法，鼓勵市民使用公共交通工具。	
R20及R21	(a) 應從整個河流系統來考慮東涌河的生態和價值，只把河口一帶劃為「海岸保護區」地帶對東涌河的保育作用不大。 (b) 關注東涌河谷和「海岸保護區」地帶會變得商業化，導致環境污染。 (c) 發展本地農業可減少依賴進口食物供應，並可為低技術工人提供更多原區就業機會。 (d) 當局應善用東涌谷的生態作教育用途，並利用當地的農地和果林生產本地農作物，以發展地區經濟。	見城規會文件第6.25、6.47、6.57及6.59段。
R22及R38	(a) 關注東涌河兩岸的低密度私人住宅發展項目。 (b) 關注低密度私人住宅發展會令該區的私家車數量增加，	見城規會文件第6.25至6.28、6.38、6.47及6.64段。

	導致環境污染，破壞自然環境。 (c) 發展有機農業。 (d) 廚餘循環再用。 (e) 市民對本地有機農產品有一定需求。具體而言，東涌谷的本地有機農產品可銷售予東涌市中心和東涌擴展區現有和未來的私人住宅居民，以支持地區經濟發展。	
R24	(a) 關注東涌河和東涌谷的天然生態受損。 (b) 關注石榴埔的「鄉村式發展」地帶日後的發展項目會破壞自然環境和螢火蟲的生境。 (c) 東涌谷的天然景致吸引廣大市民和東涌居民經常前往該處遊覽，不應為興建私人住宅而破壞當地社區和生態價值高的地方。政府應保持河谷的天然景觀，並鼓勵市民到東涌河和東涌谷遊覽，享受那裏的天然環境，以舒展身心。 (d) 發展本地農業可減少依賴進口食物供應，並可為低技術工人提供更多原區就業機會。 (e) 當局應善用東涌谷的生態作教育用途，並利用東涌谷的	見城規會文件第6.27、6.38、第6.47、6.48及6.59段。

	農地和果林生產本地農作物，以發展地區經濟。 (f) 建立設有單車徑網絡的低碳社區，參考其他國家的做法，在港鐵站和巴士站提供公共單車租賃服務，鼓勵市民使用公共交通工具。	
R25	(a) 反對進一步發展東涌及加入新的住宅發展區。 (b) 東涌有很多具生態價值之處，尤其是田心及東涌沙灘，當地是香港最珍貴和重要的海草床棲地之一。 (c) 關注東涌河一帶的發展項目會對東涌的海洋生態造成影響，包括海馬的生境。 (d) 關注政府任由甚至鼓勵非法傾倒廢料、挖土及其他行為。	見城規會文件第6.47及6.61段。
R26	反對影響生態。	見城規會文件第6.47段。
R27	拯救中華白海豚，擱置東涌的發展計劃。	見城規會文件第6.47段及另作的回應如下： <u>中華白海豚所受影響</u> 東涌新市鎮擴展區的經核准環評報告已妥為評估及處理有關問

		題。關於中華白海豚受到生態影響，漁護署署長表示，東涌東擬議的填海範圍(在草圖涵蓋的土地範圍以外)屬生態價值較低的沿岸生境，中華白海豚甚少在該範圍活動。
R28	(a) 支持制定法定圖則，並同意草圖的一般規劃意向，將鄉村式發展集中於「鄉村式發展」地帶內；「綠化地帶」、「自然保育區」地帶和「海岸保護區」地帶按一般推定不宜進行發展；以及「自然保育區」地帶和「海岸保護區」地帶不得作臨時用途／發展。 (b) 歡迎將第 96D 區、位於牛凹以西和石門甲以北的現存風水林劃為「自然保育區」地帶，惟對餘下風水林並無劃為適當的土地用途地帶以防林內進行發展和出現惡意破壞生態行為表示失望。 (c) 關注東涌河、東涌谷及東涌灣的生態系統所受的影響；與四周不協調的發展和惡意破壞的行為可能會變本加厲；田心及黃龍坑仍未受到保護；住宅及商業發展會威	見城規會文件第6.47、6.51、6.53至6.56、6.58、6.59、6.65、6.66及6.69段及另作的回應如下： <u>施工期的不良影響</u> 施工期內，工地監察小組將會監督工程，以期盡量減輕對附近地區的滋擾，包括空氣和噪音污染，並會密切監察施工情況，以防承建商有舞弊行為。此外，承建商須提交廢料管理計劃，闡述所採取的良好工地作業模式，以

	脅東涌谷、東涌河和東涌灣的水質、生態系統和景觀，以及具全球保育價值的物種；道路網對環境和生態的負面影響。 (d) 關注第 60 區及第 71A 區內兩幅非建築用地會被闢作道路，對毗鄰的「海岸保護區」地帶及「自然保育區」地帶構成威脅。 (e) 採取「先保育，後發展」的策略以保護河道源頭，並盡早落實環保和保育土地用途。 (f) 關注工程車輛和機械會破壞環境，東涌谷和東涌灣應實施交通管制。 (g) 關注該區的發展壓力，當局應採取多方面的措施以緩解發展帶來的影響，包括(i)避免在東涌河谷發展住宅及工業用地；(ii)規劃土地用途時應盡量保存植被和避免以混凝土覆蓋大面積土地，讓雨水可滲入土地；以及(iii)對東涌河兩旁的違法傾倒廢料、違例車路和違例發展加强執法。 (h) 關注通往生態易受影響地方的非必要道路(如橫跨東涌河的 L28 道路)及第 84 區橫跨東涌河的現有違法道路。	及盡量減少運輸廢料車程次數的減廢措施等。對於關注會出現傾倒東涌日後發展項目的拆建廢料情況，東涌研究已評估施工期間可能產生的建築和拆卸廢物。當局會採取策略性緩解措施(包括盡可能在工地把廢料分類、重用拆建物料等)，以盡量減少須在工地以外處置的過剩物料。當局亦會實施工程合約訂明的運載記錄制度，確保承建商會妥善記錄和核實棄置的拆建物料，以免承建商在東涌非法傾倒和堆填拆建物料。為更妥善監察施工期間工地的拆建物料會否被非法傾倒和堆填，當局會成立一隊監察小組，定期巡視工地，並向環保署匯報可疑個案。 有關部門會在東涌西工程項目的詳細設計階段，探討可否早日落實環保措施和劃設保育地帶。

	(i) 政府應收回東涌河谷的所有私人地段，以設立由政府管理的河流自然公園，為整個河谷和河口闢設有關防洪、環保和保育的基礎設施。 **<u>建議</u>** (i) 為田心及黃龍坑制訂新的發展審批地區圖或把該兩個地區納入為郊野公園的擴建部分。 (ii) 把東涌河及黃龍坑的河道、河岸和支流兩旁 30 米範圍內的地方、東涌河口和東涌灣劃為「具特殊科學價值地點」。 (iii) 把所有風水林劃為「自然保育區」地帶。 (iv) 把第 38A 區的公共交通交匯處重置於東涌市中心地區分區計劃大綱草圖第 107 區的「政府、機構或社區」地帶或第 39 區的「住宅(甲類)1」地帶，並將班灰蜻的生境納入河畔公園或其他合適的保育地帶。 (v) 對多個土地用途地帶的《註釋》及草圖說明頁作以下修訂： — 禁止(i)進行河道改道、填土／填塘或挖土工程；(ii)對現有用途作出會對該區有負面影響的實質改變；(iii)不符合《水污染管制條例》所訂的用途；(iv)在	

	「自然保育區」地帶和「海岸保護區」地帶及農地作「小食亭」用途；(v)在水道 30 米範圍內翻建的小型屋宇闢設化糞池；(vi)在「自然保育區」地帶和「海岸保護區」地帶進行臨時用途／發展；以及(vii)「露天貯物及港口後勤」土地用途； — 優先考慮可改善該區生態的改動及／或修改現有用途的申請；以及 — 任何會影響水道的實際狀況和生態的水道保養／維修工程和排水工程，必須取得相關政府部門的許可。	

R29	(a) 關注東涌規劃人口增加對東涌整體承受力的影響，特別是空氣質素、就業機會、陸上及海洋生態基線調查和生物多樣性。 (b) 關注東涌谷內與周邊不協調的發展和破壞環境的行為，以及在石門甲傾倒廢料的活動。 (c) 關注東涌谷及附近劃設住宅用途地帶的影響，以及對東涌谷的景觀、水文系統、生態、通風及景觀廊影響所及的情況。 (d) 關注擴大石榴埔的「鄉村式發展」地帶以涵蓋周邊原擬劃為「農業」地帶的土地，此舉未為環評報告所支持。 (e) 支持環保團體聯合提交的申述書。 (f) 應制訂全面大嶼山發展計劃，就整個大嶼山進行陸上及海洋生態基線研究。 (g) 遵守《生物多樣性公約》的原則。應從整個河流系統來評估生態價值。 (h) 關注對現存及潛在違例用途和惡意破壞生態行為的管制。	見城規會文件第6.25至6.27、6.29、6.30、6.32、6.47、6.49、6.58、6.61、6.62、6.64、6.67、6.68及6.69段，以及另作的回應如下： <u>施工期的不良影響</u> 施工期內，工地監察小組將會監督工程，以期盡量減輕對附近地區的滋擾，包括空氣和噪音污染，並會密切監察施工情況，以防承建商有舞弊行為。此外，承建商須提交廢料管理計劃，闡述所採取的良好工地作業模式，以及盡量減少運輸廢料車程次數的減廢措施等。對於關注會出現傾倒東涌日後發展項目的拆建廢料情況，東涌研究已評估施工期間可能產生的建築和拆卸廢物。當局會採取策略性緩解措施(包括盡可能在工地把廢料分類、重用拆建物料等)，以盡量減少須在工地以外處置的過剩物料。當局亦會實施工程合約訂明的運載記

	(i) 在其他工程進行前，盡早落實草圖擬議的環保和保育土地用途。 (j) 當局已制訂一項新政策，確保本港農業可持續發展。城規會應保留優質農地以支持這項新政策，促進本土經濟持續發展。 (k) 發展廚餘循環再用系統，回收東涌及機場的廚餘，從源頭減廢。經處理的廚餘可作肥料供東涌谷的有機農地使用。 **<u>建議</u>** (i) 應採用世界衞生組織新訂的空氣質素指引來評估累積影響。 (ii) 為田心及黃龍坑制訂新的發展審批地區圖。 (iii) 收回東涌河一帶擬作保育及水利防洪用途的土地。 (iv) 收回私人土地以設立河流自然公園。 (v) 在東涌谷及東涌灣實施交通管制。	錄制度，確保承建商會妥善記錄和核實棄置的拆建物料，以免承建商在東涌非法傾倒和堆填拆建物料。為更妥善監察施工期間工地的拆建物料會否被非法傾倒和堆填，當局會成立一隊監察小組，定期巡視工地，並向環保署匯報可疑個案。 有關部門會在東涌西工程項目的詳細設計階段，探討可否早日落實環保措施和劃設保育地帶。
R30	(a) 歡迎把草圖刊憲。	見城規會文件第6.47、6.50、6.51、6.54至6.56、6.58至

	(b) 關注分區計劃大綱草圖不足以長遠保育東涌河及東涌灣系統。 (c) 高度關注擬議的「住宅」及「鄉村式發展」地帶對東涌灣的漁業、水質及生態的影響。 (d) 關注「商業」地帶，特別是第 38A 區規劃興建公共交通交匯處的「商業」地帶，因為該公共交通交滙處會侵入黃龍坑河口西岸的紅樹林，該處是斑灰蜻這種蜻蜓的繁殖地。 (e) 關注區內的破壞活動、東涌河及東涌灣的水文狀況、排水、空氣污染(特別是臭氧)，以及土力安全風險。 (f) 支持環保團體聯合提交的申述書。 (g) 應在分區計劃大綱草圖積極加入協調的土地用途，以進一步提升東涌谷和東涌灣的生態和文化價值，包括(i)設立連接東涌谷不同遠足徑的生態旅遊樞紐；(ii)設立東涌河溯溪基地；(iii)闢設融入原有天然環境的休憩用地和綠化區；(iv)提供教育設施(如博物館)；(v)在東涌谷生態易受破壞的地區外設立遊客中心，有助市民欣賞東涌河及東涌灣系統重要的生態價值；(vi)方便遊客以環保的方式前往區內各個景點；(vii)利用東涌河現有的景觀和文化遺產來加強東涌河谷對遊客的吸引力	6.61、6.64、6.65、6.69段及下列補充回應： <u>土力安全風險</u> 對於關注東涌谷岩土穩定性的問題，土木工程拓展署港島和離島拓展處處長表示，東涌研究曾就研究範圍進行土力評估，目的是找出所有可能影響擬議發展及基礎設施的潛在重大地基工程問題及天然山坡災害。初步天然山坡災害評估已評估相關的土地範圍，發現並沒有無法克服的土力問題。建議在有關發展的詳細設計階段進行詳細的天然山坡災害評估，以決定是否須採取適當的緩解措施。 <u>施工期的不良影響</u> 施工期內，工地監察小組將會監督工程，以期盡量減輕對附近地區的滋擾，包括空氣和噪音污染，並會密切監察施工情況，以

	和推廣靜態康樂活動；以及(viii)作科研和教育用途。 (h) 應落實草圖所建議的環境保護和保育的土地用途及立即限制區內的交通，特別是工程車輛和機械。 (i) 應强制收集建築及家居廢物並妥善處置。 **<u>建議</u>** (i) 把磡頭、東涌灣、田心及黃龍坑地區納入新的發展審批地區圖或郊野公園擴建部分的範圍內。 (ii) 設立河流自然公園。 (iii) 把東涌河劃為「具特殊科學價值地點」。 (iv) 把斑灰蜻生境納入河畔公園或其他合適的保育地帶內，並把擬在第 38A 區興建的公共交通交匯處遷往東涌市中心地區第 107 區的「政府、機構或社區」用地或第 39 區的「住宅(甲類)1」用地內。	防承建商有舞弊行為。此外，承建商須提交廢料管理計劃，闡述所採取的良好工地作業模式，以及盡量減少運輸廢料車程次數的減廢措施等。對於關注會出現傾倒東涌日後發展項目的拆建廢料情況，東涌研究已評估施工期間可能產生的建築和拆卸廢物。當局會採取策略性緩解措施(包括盡可能在工地把廢料分類、重用拆建物料等)，以盡量減少須在工地以外處置的過剩物料。當局亦會實施工程合約訂明的運載記錄制度，確保承建商會妥善記錄和核實棄置的拆建物料，以免承建商在東涌非法傾倒和堆填拆建物料。為更妥善監察施工期間工地的拆建物料會否被非法傾倒和堆填，當局會成立一隊監察小組，定期巡視工地，並向環保署匯報可疑個案。 有關部門會在東涌西工程項目的詳細設計階段，探討可否早日落實環保措施和劃設保育地帶。

R31	(a) 關注「鄉村式發展」地入侵林地及東涌河的支流，這對一些依賴林地為生且具保育價值品種的雀鳥會造成不良影響。 (b) 支持環保團體聯合提交的申述書。 (c) 採取「生態系統方法」以保護東涌谷內易受影響的生境。 **建議** (i) 把河岸兩邊 30 米的範圍劃為「自然保育區」地帶，以保護所有天然河溪(包括其所有支流)。 (ii) 從「鄉村式發展」地帶中剔出林地、河溪及濕地。	見城規會文件第6.47、6.54、6.55、6.56及6.59段。
R32	(a) 支持劃設「其他指定用途」註明「河畔公園」地帶，但應擴大其範圍。 (b) 草圖應採納由多個環保團體聯合擬備的建議發展審批地區圖。 (c) 關注生態易受影響的地方、東涌灣、東涌河及其沿岸地帶，風水林和成齡林地、沿東涌灣海岸的泥灘和紅樹林及其他植被。	見城規會文件第6.47、6.54至6.56、6.58、6.59及6.63段。

	(d) 反對把風水林劃入「其他指定用途」註明「堤堰」地帶。 **建議** (i) 根據環保團體建議的發展審批地區圖擴大「其他指定用途」註明「河畔公園」地帶的範圍。 (ii) 把東涌河河口附近的土地劃為「其他指定用途」註明「保育、生態旅遊及生態教育」地帶。 (iii) 把生態易受影響的地方劃為保育地帶。 (iv) 把東涌河的主流及其沿岸地帶劃為「具特殊科學價值地點」。 (v) 把風水林及成齡林地劃為「自然保育區」。 (vi) 把東涌灣沿岸的泥灘及紅樹林劃為「海岸保護區」。 (vii) 把果園、天然植被、林地、山邊灌木林和草地劃為「綠化地帶」。	
R33	(a) 歡迎把分區計劃大綱草圖刊憲，藉此對東涌谷地區內具重要生態價值的地方的破壞生態活動採取法定規劃管執	見城規會文件第 6.47、6.55、6.56 及 6.62 段。

	行動。 (b) 關注政府沒有針對黃龍坑的不協調發展和傾倒廢物問題實施有效的土地用途管制，無權就該等問題採取執管行動。 (c) 支持把牛凹及石榴埔北面的風水林劃入「自然保育區」地帶以作保護，但關注其餘在「鄉村式發展」地帶和「綠化地帶」內的風水林。 **<u>建議</u>** (i) 把磡頭／田心及黃龍坑納入新的發展審批地區圖。 (ii) 把所有風水林所在之處劃為「自然保育區」。	
R34	(a) 關注草圖未能有效保護不少天然生境和林地，例如一些風水林。 (b) 環評報告所指潛在的野生動物走廊位於莫家村的擬議「鄉村式發展」地帶內，莫家村日後的小型屋宇發展會破壞和干擾生境，影響動物走廊。 (c) 貫穿整個東涌谷的擬建道路會中斷潛在的野生動物走廊。	見城規會文件第6.29、6.30、6.32、6.47、6.50、6.52、6.53、6.55、6.56、6.65、6.67段。

	(d) 應拆除非法搭建的橋樑或以環保設計的道路取代，以防野生動物在道路上被殺或阻礙野生動物在橋樑下和河床上經過。 (e) 關注第 45B 區擬設雨水滯留及處理池的圍欄設計可能會阻塞或妨礙野生動物自由活動。 (f) 尊重、承諾及實施《生物多樣性公約》的原則。 (g) 仔細檢討東涌谷能否承受擬增加的人口。 **<u>建議</u>** (i) 不應把易受影響和具重要生態價值的生境及河溪的沿岸地帶劃入「鄉村式發展」地帶或其他發展區地帶。 (ii) 根據申述人的建議地點擴大保育地帶的範圍，確保可形成有效的野生動物走廊。 (iii) 把第 61A 區的住宅地帶改劃為「綠化地帶」。 (iv) 把所有風水林的所在之處劃為「自然保育區」地帶而非「綠化地帶」或「鄉村式發展」地帶。	

R35	(a) 關注住宅和鄉村式發展對東涌灣生態的影響、東涌河谷的違規土地用途、東涌的環境和周遭水域的生態、社區設施和就業機會的提供，以及交通設施的承受力。 (b) 應預留土地作農業和收集廚餘等用途。 (c) 關注把原本打算作農業用途的一些土地劃為「鄉村式發展」地帶，而有關擴展「鄉村式發展」地帶一事，環境影響評估並未有充分理由支持。 (d) 支持環保團體提出的「東涌河河流自然公園」的建議及相關的污水處理要求，以加強保育東涌河谷的生態。 (e) 應在擴展區及鄰近逸東邨的地方預留多些政府、機構及社區用地，以提供東涌居民爭取多年的街市、墟市和市政大廈，並把這些政府、機構及社區設施結合東涌谷現有的農業活動，以發展地方經濟。 (f) 按照人口預測檢討計劃興建的學校數量，以期釋放更多土地發展其他政府、機構及社區設施。 (g) 進一步檢討東涌各區內道路網絡和北大嶼山公路及屯門至赤鱲角連接路在東涌擴展計劃完成後的車流量以及東涌綫的承受力。	見城規會文件第6.25至6.27、6.29、6.30、6.32、6.33、6.38、6.47、6.49、6.58、6.61及6.62段。

	建議 (i) 制定涵蓋磡頭及黃龍坑等地區的發展審批地區圖。 (ii) 減低東涌新市鎮擴展區的發展密度和人口。 (iii) 取消東涌谷和東涌灣內的「商業」、「住宅(甲類)」及「住宅(丙類)」地帶。	
R36	(a) 保育生態價值高的東涌河和東涌谷。 (b) 擬議的住宅區面積太大，可能須進行大量土地平整及興建工程。關注建築廢料和工程或會影響河流。 (c) 關注把石門甲及沿東涌河一帶一些全新土地劃為「鄉村式發展」地帶。 (d) 應進行詳細的生態評估，並把具生態價值的地方劃為保育相關地帶。 **建議** (i) 盡量縮減「鄉村式發展」地帶的面積，例如只覆蓋現有建築物。 (ii) 把列為「具特殊科學價值地點」的磡頭海灘納入分區計	見城規會文件第6.47、6.50、6.62及6.69段。

	劃大綱草圖以提供保護。	
R37	(a) 對於為應付逾 120%的小型屋宇新需求而在石榴埔劃設大範圍的「鄉村式發展」地帶有保留，這個需求量並沒有有力理據支持。 (b) 第三階段的公眾諮詢曾建議把該「鄉村式發展」地帶的北部劃為「農業」地帶。當局須解釋作出更改的原因。	見城規會文件第6.49段。此外，石榴埔的「鄉村式發展」地帶除了要應付所屬村民的小型屋宇需求外，還須應付東涌鄉內供發展小型屋宇的土地不足的其他鄉村的需求。

對申述的意見的摘要及規劃署的回應

意見編號 **S/I-TCV/1-**	**意見的理據／建議**	**規劃署的回應**
C1 至 C4	對**R1**和**R2**的申述表示關注，支持在稔園發展靈灰安置所，並認為稔園沒有合適的土地發展村屋。 **建議：** 把稔園村指定作「機構或社區」用途。	見城市規劃委員會(下稱「城規會」)文件第6.17至6.19段。
C5	支持**R8**(由同一公司提交)的申述。	見城規會文件第6.20及6.21段。
C6 至 C11	(a) 反對 **R3** 至 **R9** 及在稔園發展靈灰安置所的申述，有關發展會引致社會、生態、交通、衞生和治安問題。 (b) 支持把稔園村劃為「鄉村式發展」地帶及把第67區劃為「住宅(丙類)2」地帶。 **建議：** 在稔園提供更多康樂設施。	見城規會文件第6.17至6.21及6.32段。

C12	反對**R33**的申述，並表示磡頭村逾90%的土地都是私人擁有的。村民會支持政府就政府土地的社區設施和交通進行長遠規劃，尤其是在東涌與大澳之間闢建緊急車輛通道。	見城規會文件第6.47、6.55、6.56及6.62段。
C13和C14	(a) 對 **R3** 至 **R6** 的申述表示關注，並認為東涌未必有合適的用地發展靈灰安置所。 (b) 對 **R10** 和 **R11** 的申述表示關注，不贊成把「其他指定用途」註明「雨水滯留及處理池」地帶改劃為「住宅(丙類)2」地帶或其他用途地帶的建議。	見城規會文件第6.17至6.19、6.41、6.42及6.46段。
C15	(a) 對 **R1** 和 **R2** 的申述表示關注，認為擴大「鄉村式發展」地帶既不能解決香港當前的房屋問題，並會進一步破壞東涌谷農地和東涌河的生態。 (b) 對 **R3** 至 **R7** 和 **R9** 的申述表示關注，不支持把靈灰安置所發展項目劃為「政府、機構或社區」地帶，因為這會把現有的靈灰安置所合法化，以及對東涌谷的社區和生態造成負面影響。	見城規會文件第6.17至6.19及6.47段。

C16	(a) 同意 **R11** 支持設立河畔公園的申述，但認為在東涌谷發展低密度的私人住宅不能解決房屋需要。 (b) 對**R12**和**R14**的申述表示關注，認為政府不應只照顧原居村民的利益而犧牲環保。 **建議：** 刪除所有住宅發展項目，加強保育東涌谷的自然環境。	見城規會文件第6.22至6.24、6.34、6.37及6.47段。
C17	支持**R11**有關把廣泛地方指定作防洪用途的申述，亦支持**R11**認為政府應收回劃為「其他指定用途」註明「河畔公園」地帶、「自然保育區」地帶和「海岸保護區」地帶的私人土地，並承擔管理責任的意見。 **建議：** 改劃未來鐵路站500米範圍內的「其他指定用途」註明「雨水滯留及處理池」地帶，以作發展用途，而該雨水滯留及處理池應遷至第80區的「休憩用地」地帶的地底。	見城規會文件第6.41至6.42、6.46及6.58段。

C18	支持**R28**、**R30**和**R33**的申述，並對東涌河谷的不協調發展和惡意破壞生態行為表示關注。 **建議：** 要求當局為田心制訂發展審批地區圖或把該區納入郊野公園範圍。	見城規會文件第6.61及6.62段。
C19	支持**R35**有關擬議住宅／鄉村發展會影響東涌河谷、東涌谷和東涌灣的生態的申述，並認為政府考慮發展需要前，應採取保護措施。	見城規會文件第6.25至6.27、6.29、6.30、6.32、6.33、6.38、6.47、6.49、6.58、6.61及6.62段。
C20	(a) 東涌河谷的下游和東涌灣是圓尾鱟和中國鱟的重要繁殖和育幼地，因此東涌對馬蹄蟹很重要。保護該區對確保這兩個物種在香港持續生長十分重要。 (b) 對 **R15** 至 **R21** 和 **R29** 的申述表示關注，認為應從整個河流系統來考慮東涌河的生態和價值，並善用東涌谷的生態作教育用途。 (c) 就 **R32** 有關把東涌河河口附近的土地劃為「其他指定用途」註明「保育、生態旅遊及生態教育」地帶的申述提出意見。 (d) 就 **R35** 有關提供社區設施和就業機會的申述提出	見城規會文件第7.2段對行人板道建議的具體回應，以及第6.47、6.54、6.57及6.58至6.60段對其他理據的回應。

	意見，並支持「東涌河自然河畔公園」的建議。 (e) 東涌谷河谷對香港的圓尾鱟，十分重要。 (f) 東涌灣接待遊客的能力已超出負荷。 (g) 識別人口和遊客增加對東涌生物多樣性的威脅。 (h) 擬議的行人板道會視東涌河為整個河流系統；達致大嶼山發展計劃的目標，即採用「點、線、面」的方法來連接具保育價值的地方以吸引遊客，並為河畔公園增值；在香港提供生態教育資源；紓緩東涌接待遊客能力超出負荷的問題；在東涌河谷下游採取適當措施以保護該處的生物多樣性，同時准許遊客前往該區但不得加以破壞，以達致保育、生態旅遊和生態教育的目的；為本地家庭提供社區資源，以供享用，並有助創造區內就業機會；以及支持和配合大嶼山發展計劃，在東涌設立「河岸暨生物多樣化公園」，並擴大該公園的範圍以便把潮間泥灘納入草圖。 **<u>建議：</u>** (i) 闢建無間斷的行人板道，連接河岸暨生物多樣化公園與東涌的潮間泥灘。	

	(ii) 採用「點、線、面」的方法，連接河岸暨生物多樣化公園與橫跨泥灘的行人板道，以善用東涌所有生態環境。 (iii) 首先主要成為一項教育設施，然後作為一項供區內居民使用的美化市容設施，再成為環保團體的一項設施，和最後才發展成為一項旅遊設施。 (iv) 付予東涌河谷適當的保育地位，以保護該處的生物多樣性，同時准許闢建行人板道。 (v) 指定東涌灣為海洋保護區，或付予該處相當的保育地位，限制遊客進入以制止進一步破壞該區。 (vi) 推廣東涌為大嶼山的「活化石自然護理區及行人板道」。	
C21	(a) 支持 **R15** 至 **R29** 的申述。 (b) 應建立地區經濟。 (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。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。

C22 和 C76	(a) 支持 **R15** 至 **R29** 的申述。 (b) 應保護東涌的自然環境。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。
C23、C25、C36、C48、C51、C62、C71、C72、C79 和 C82	(a) 支持 **R15** 至 **R29** 的申述。 (b) 有需要在東涌興建由食物環境衞生署(下稱「食環署」)營運的街市。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。
C24	(a) 支持 **R15** 至 **R29** 的申述。 (b) 有需要在東涌興建由食環署營運的街市。 (c) 政府應進行有關在東涌闢建水路交通設施的研究。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。
C26、C28、C30 至 C31、C33 至 C35、C39、C40、C42、C46、C49、C50、C52 至 C55、C57、C58 至 C60、C63 至	支持**R15**至**R29**的申述。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。

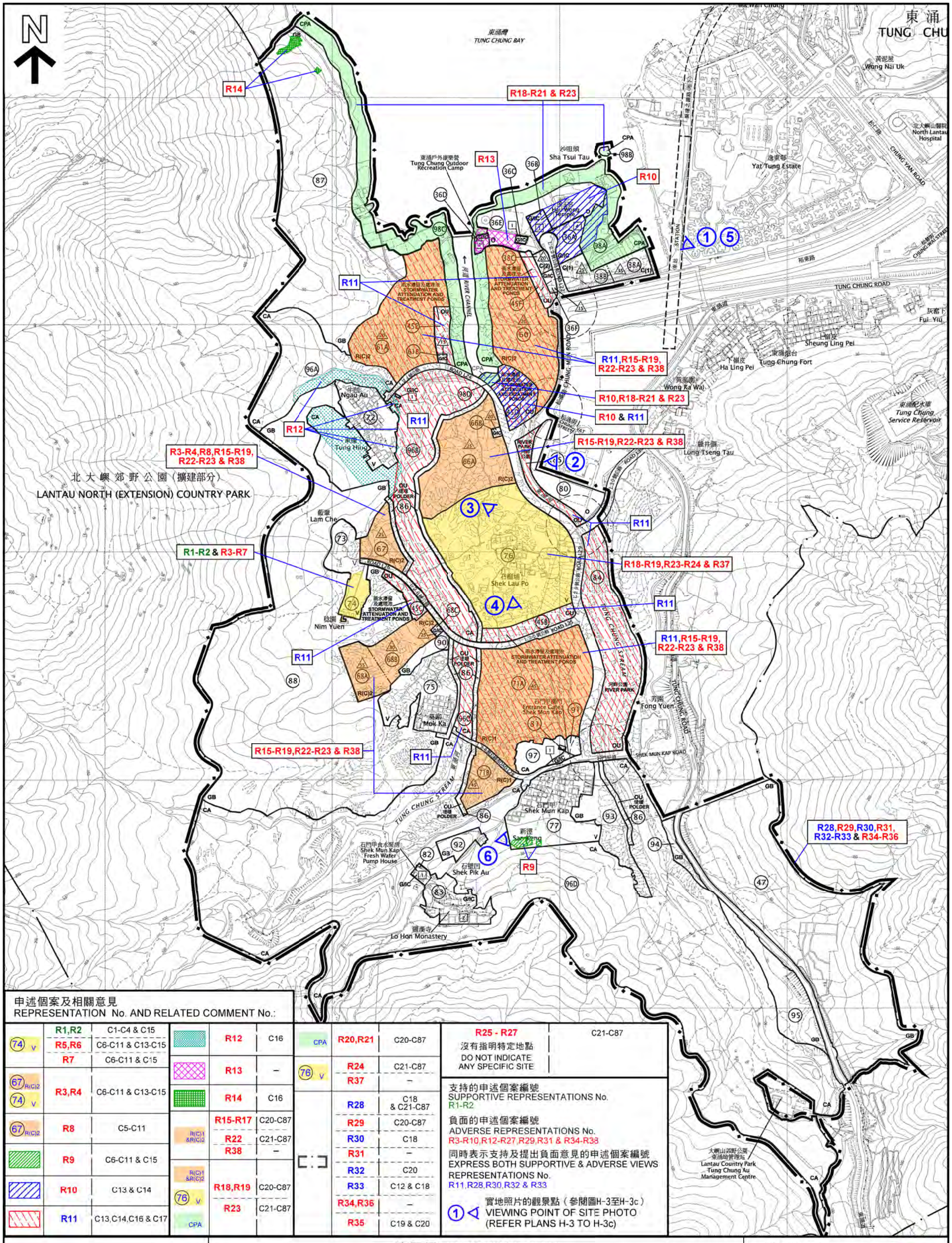
C67、C70、C73、C75、C77、C78、C81、C83至C85		
C27	(a) 支持**R15**至**R29**的申述。 (b) 應改善及增加連接機場的小巴服務。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。
C29	(a) 支持**R15**至**R29**的申述。 (b) 有需要在東涌興建由食環署營運的街市。 (c) 計算東涌的交通容量時，應採用較低的飽和點。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。
C32	(a) 支持**R15**至**R29**的申述。 (b) 有需要在東涌興建由食環署營運的街市。 (c) 應盡快落實東涌西鐵路站的工程。 (d) 應保留東涌灣。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。

C37	(a) 支持 **R15** 至 **R29** 的申述。 (b) 應保護郊區。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。
C41	(a) 支持 **R15** 至 **R29** 的申述。 (b) 反對發展東涌。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。
C43	(a) 支持 **R15** 至 **R29** 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6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。
C44	(a) 支持 **R15** 至 **R29** 的申述。 (b) 反對填海。 (c) 首要工作應是改善東涌的社區設施。 (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6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70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。
C45	(a) 支持 **R15** 至 **R29** 的申述。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至

	(b) 官、商與村民互相謀取利益。	6.59、6.61、6.62及6.64至6.70段。
C47	(a) 支持**R15**至**R29**的申述。 (b) 東涌需要一個完善的綠化規劃。 (c) 應提供充足的本地就業支援。 (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衞生。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段及下列補充回應： 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。
C56	(a) 支持 **R15** 至 **R29** 的申述。 (b) 應保留地區特色。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。
C61	(a) 支持 **R15** 至 **R29** 的申述。 (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。 (c) 為拯救海豚，不應進行填海工程。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62及6.64至6.70段。

C68	(a) 支持**R15**至**R29**的申述。 (b) 有需要在東涌興建由食環署營運的街市。 (c) 應降低發展密度。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。
C69	(a) 支持**R15**至**R29**的申述。 (b) 有需要在東涌興建由食環署營運的街市。 (c) 不應進行沒有理據支持的發展。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。
C74	(a) 支持 **R15** 至 **R29** 的申述。 (b) 有需要在東涌興建由食環署營運的街市和熟食中心。 (c) 房屋委員會應准許居民在公共屋邨的露天地方闢設市集。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。

C80	(a) 支持 **R15** 至 **R29** 的申述。 (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。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。
C86	(a) 支持 **R15** 至 **R29** 的申述。 (b) 有需要在東涌興建由食環署營運的街市。 (c) 不應破壞林地區域。 (d) 應改善區內的交通連接。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段。
C87	(a) 支持**R15**至**R29**的申述。 (b) 有需要在東涌興建由食環署營運的街市。 (c) 市民對闢設深夜營業的食肆有需求。	見城規會文件第6.25至6.30、6.32、6.38、6.39、6.47至6.49、6.51、6.53至6.59、6.61、6.62、6.64至6.70及7.3段及下列補充回應：「食肆」用途可在個別土地用途地帶提供，例如在草圖上的「商業」地帶和「鄉村式發展」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。



申述個案及相關意見
REPRESENTATION No. AND RELATED COMMENT No.:

74 V	R1,R2	C1-C4 & C15
	R5,R6	C6-C11 & C13-C15
	R7	C6-C11 & C15
67 R(C)2 / 74 V	R3,R4	C6-C11 & C13-C15
67 R(C)2	R8	C5-C11
	R9	C6-C11 & C15
	R10	C13 & C14
	R11	C13,C14,C16 & C17

	R12	C16
	R13	–
	R14	C16
R(C)1 &R(C)2	R15-R17	C20-C87
	R22	C21-C87
	R38	–
R(C)1 &R(C)2	R18,R19	C20-C87
76 V	R23	C21-C87
CPA		

CPA	R20,R21	C20-C87
76 V	R24	C21-C87
	R37	–
	R28	C18 & C21-C87
	R29	C20-C87
	R30	C18
	R31	–
	R32	C20
	R33	C12 & C18
	R34,R36	–
	R35	C19 & C20

R25 - R27 沒有指明特定地點 DO NOT INDICATE ANY SPECIFIC SITE	C21-C87

支持的申述個案編號
SUPPORTIVE REPRESENTATIONS No.
R1-R2

負面的申述個案編號
ADVERSE REPRESENTATIONS No.
R3-R10,R12-R27,R29,R31 & R34-R38

同時表示支持及提出負面意見的申述個案編號
EXPRESS BOTH SUPPORTIVE & ADVERSE VIEWS REPRESENTATIONS No.
R11,R28,R30,R32 & R33

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

本摘要圖於2016年9月13日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1

EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No. S/I-TCV/1 EXHIBITED ON 8.1.2016

位置圖 LOCATION PLAN

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

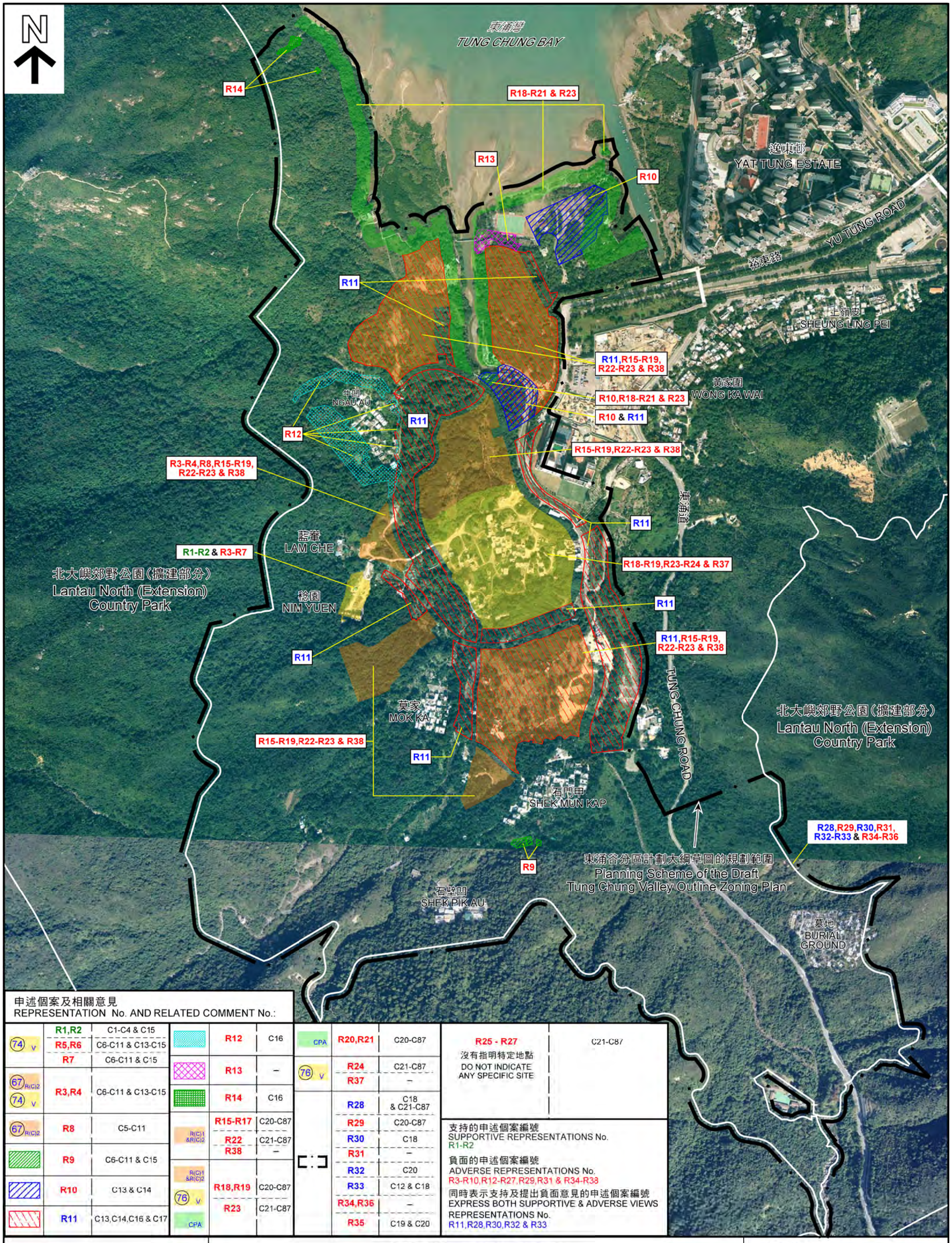
SCALE 1：7 500 比例尺

米 METRES 100 0 100 200 300 400 500 600 700 米 METRES

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 1



申述個案及相關意見
REPRESENTATION No. AND RELATED COMMENT No.:

(74) V	R1,R2	C1-C4 & C15
	R5,R6	C6-C11 & C13-C15
	R7	C6-C11 & C15
(67)R(C)2 (74) V	R3,R4	C6-C11 & C13-C15
(67)R(C)2	R8	C5-C11
	R9	C6-C11 & C15
	R10	C13 & C14
	R11	C13,C14,C16 & C17

	R12	C16
	R13	–
	R14	C16
R(C)1 &R(C)2	R15-R17	C20-C87
	R22	C21-C87
	R38	–
R(C)1 &R(C)2	R18,R19	C20-C87
(76) V	R23	C21-C87
CPA		

CPA	R20,R21	C20-C87
(76) V	R24	C21-C87
	R37	–
	R28	C18 & C21-C87
	R29	C20-C87
	R30	C18
	R31	–
	R32	C20
	R33	C12 & C18
	R34,R36	–
	R35	C19 & C20

R25 - R27 沒有指明特定地點 DO NOT INDICATE ANY SPECIFIC SITE	C21-C87

支持的申述個案編號
SUPPORTIVE REPRESENTATIONS No.
R1-R2

負面的申述個案編號
ADVERSE REPRESENTATIONS No.
R3-R10,R12-R27,R29,R31 & R34-R38

同時表示支持及提出負面意見的申述個案編號
EXPRESS BOTH SUPPORTIVE & ADVERSE VIEWS REPRESENTATIONS No.
R11,R28,R30,R32 & R33

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2015年1月拍得的航攝照片
編號CW112378和CW113095

EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON AERIAL PHOTO
No. CW112378 & CW113095
TAKEN IN JAN 2015
BY LANDS DEPARTMENT

航攝照片 AERIAL PHOTO

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 2

東涌谷分區計劃大綱草圖的規劃範圍（只作識別用）
PLANNING SCHEME OF THE DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN (FOR IDENTIFICATION PURPOSE ONLY)

區域景觀
REGIONAL VIEW

本摘要圖於2016年9月13日擬備，
所根據的資料為攝於2016年7月21日
的實地照片
PLAN PREPARED ON 13.9.2016
BASED ON SITE PHOTOS TAKEN ON 21.7.2016

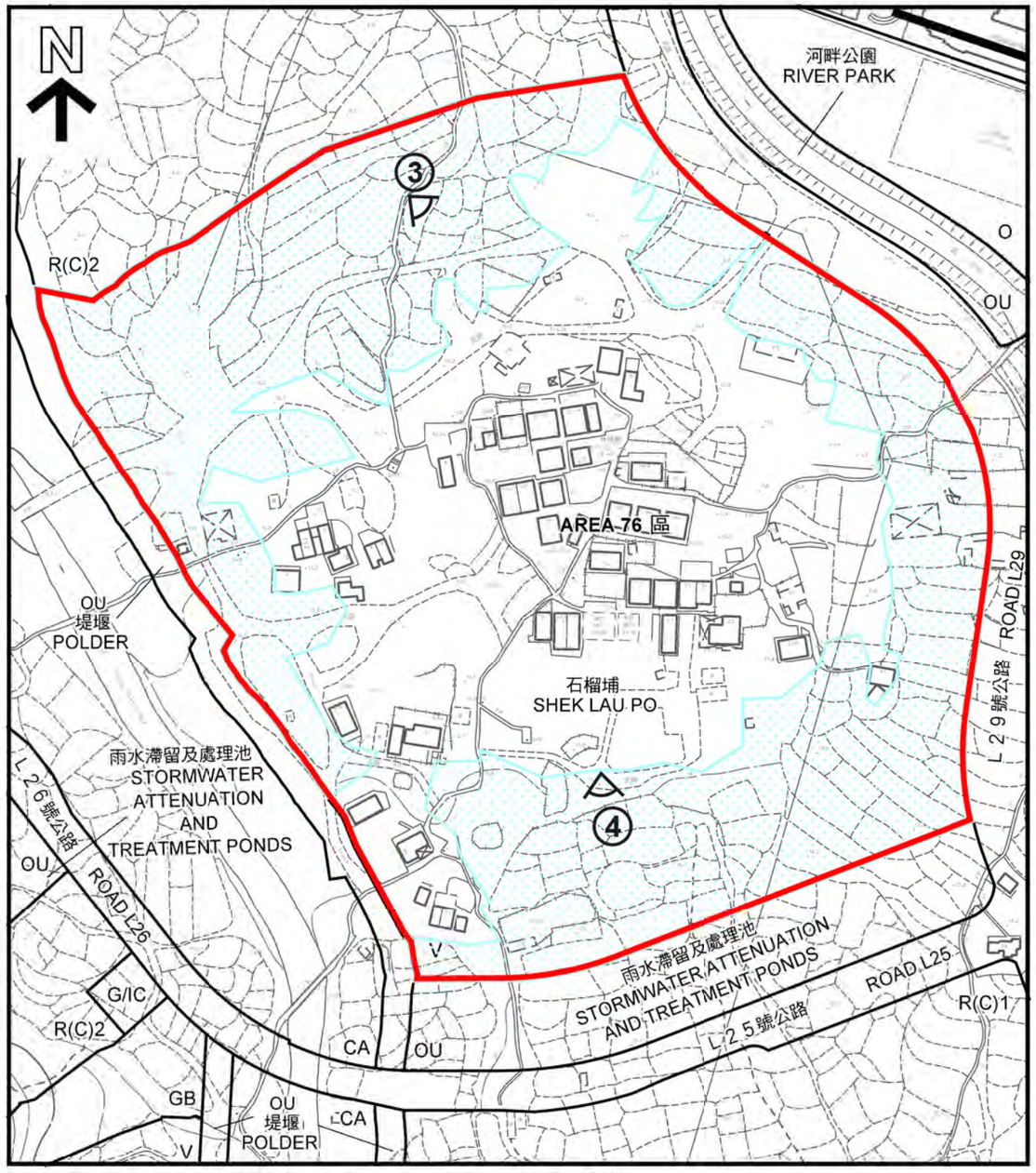
實地照片 SITE PHOTOS

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING
DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3



在「東涌新市鎮擴展研究」中修訂發展大綱圖擬議的「農業」用地
"AGRICULTURE" ZONE PROPOSED UNDER THE REVISED RECOMMENDED OUTLINE DEVELOPMENT PLAN OF TUNG CHUNG NEW TOWN EXTENSION STUDY

平面圖 SITE PLAN

航攝照片 AERIAL PHOTO

觀景點 VIEWING POINT 3

無人管理的果園 UNMANAGED ORCHARDS

觀景點 VIEWING POINT 4

荒廢農地 ABANDONED FARMLAND

申述地點
REPRESENTATION SITE

③ 實地照片的觀景點
VIEWING POINT OF SITE PHOTO

本摘要圖於2016年9月12日擬備，所根據的資料為測量圖編號9-SE-13A及13C、地政總署於2016年3月1日拍得的航攝照片編號CS64197
EXTRACT PLAN PREPARED ON 12.9.2016
BASED ON SURVEY SHEETS No. 9-SE-13A & 13C,
AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016 BY LANDS DEPARTMENT

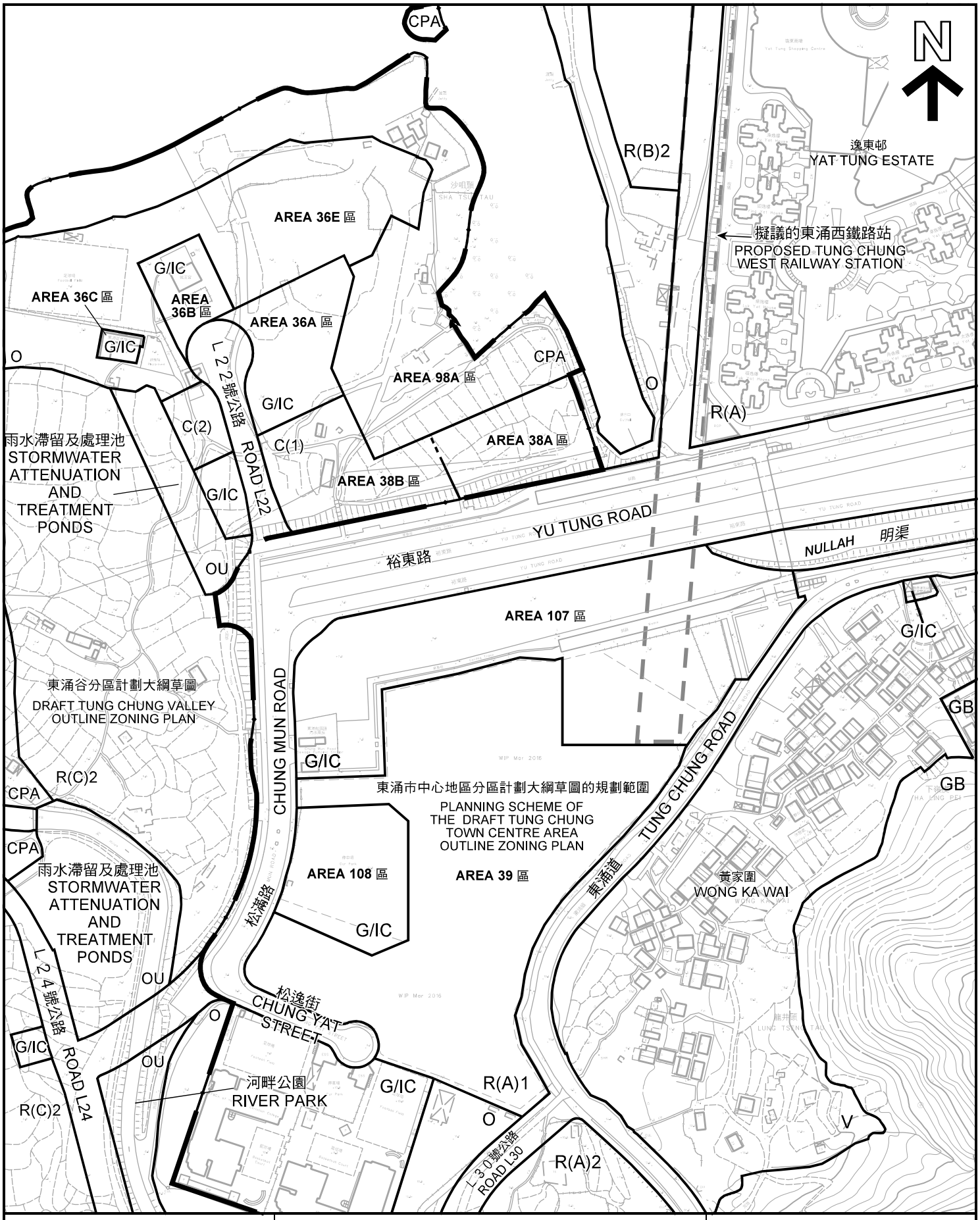
申述個案編號 REPRESENTATIONS No. (R18,R19,R23,R24 & R37)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3a



申述地點（沒有特定地點）
REPRESENTATION SITE
(NO SPECIFIC SITE)

本摘要圖於2016年9月14日擬備，
所根據的資料為測量圖編號9-SE-8C及13A
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS
No. 9-SE-8C & 13A

申述個案編號 REPRESENTATIONS No. (R28, R30 & R32)

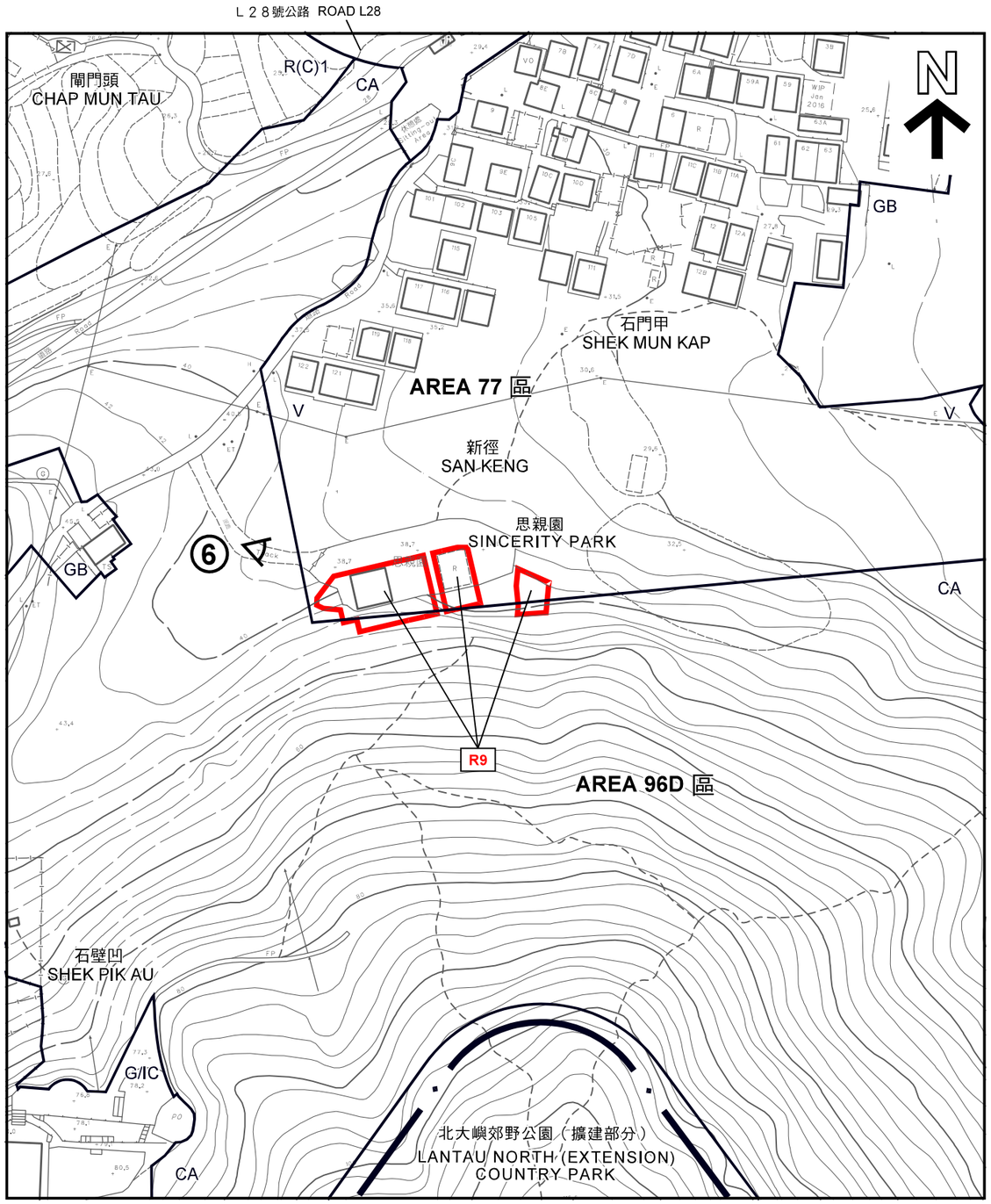
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38 AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

SCALE 1 : 3 000 比例尺
米 METRES 50 0 50 100 米 METRES

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H-3b



平面圖 SITE PLAN

航攝照片 AERIAL PHOTO

觀景點
VIEWING POINT 6

關乎申述個案編號 RELATE TO REPRESENTATION No. R9

申述地點
REPRESENTATION SITES

⑥ 實地照片的觀景點
VIEWING POINT OF SITE PHOTO

本摘要圖於2016年9月13日擬備，
所根據的資料為測量圖編號9-SE-8C及13A、
地政總署於2016年3月1日拍得的航攝照片編號CS64197
及攝於2016年的實地照片
EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON SURVEY SHEETS No. 9-SE-8C & 13A,
AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016 BY LANDS DEPARTMENT
AND SITE PHOTO TAKEN IN 2016

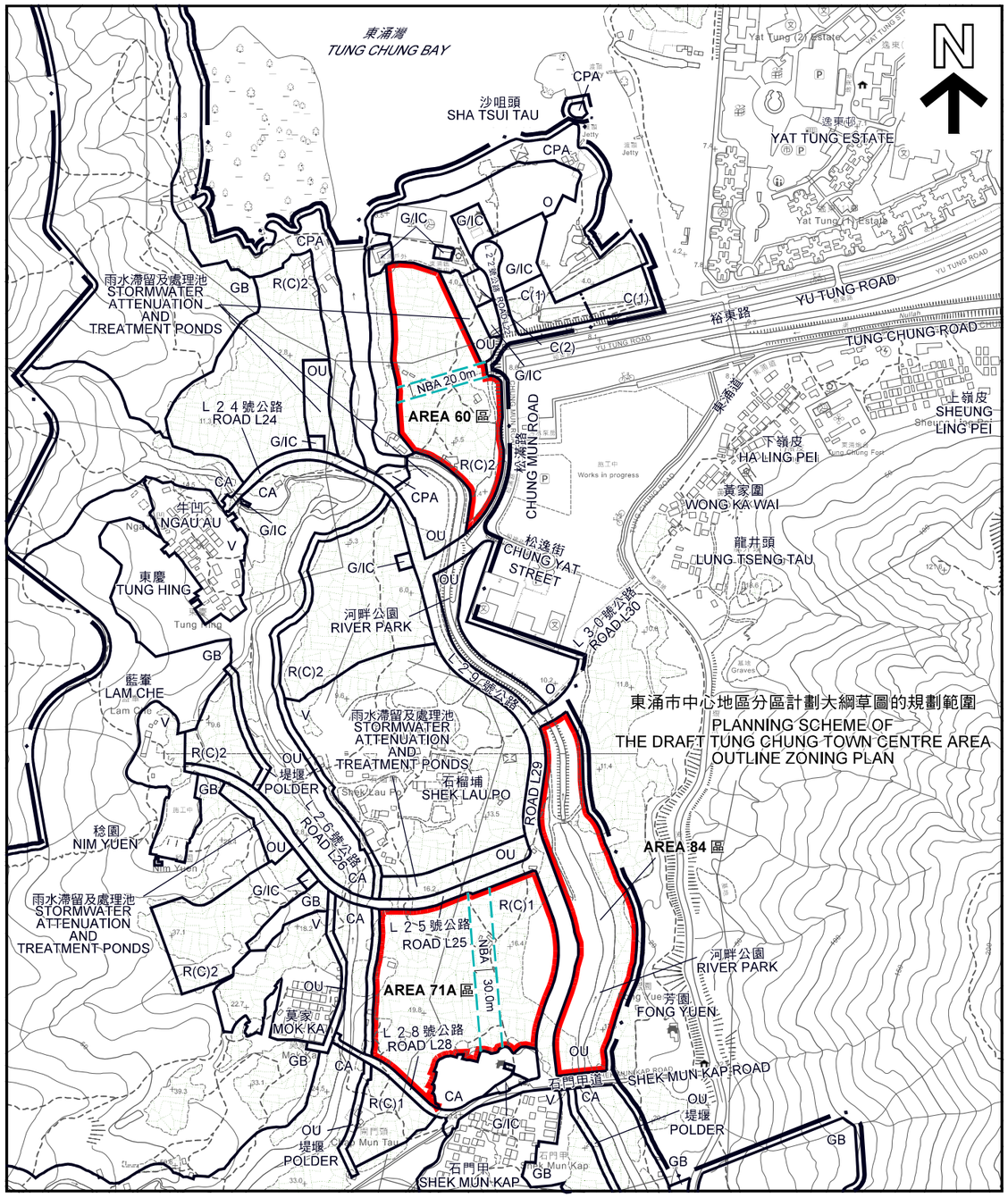
申述個案編號 REPRESENTATION No. (R9)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

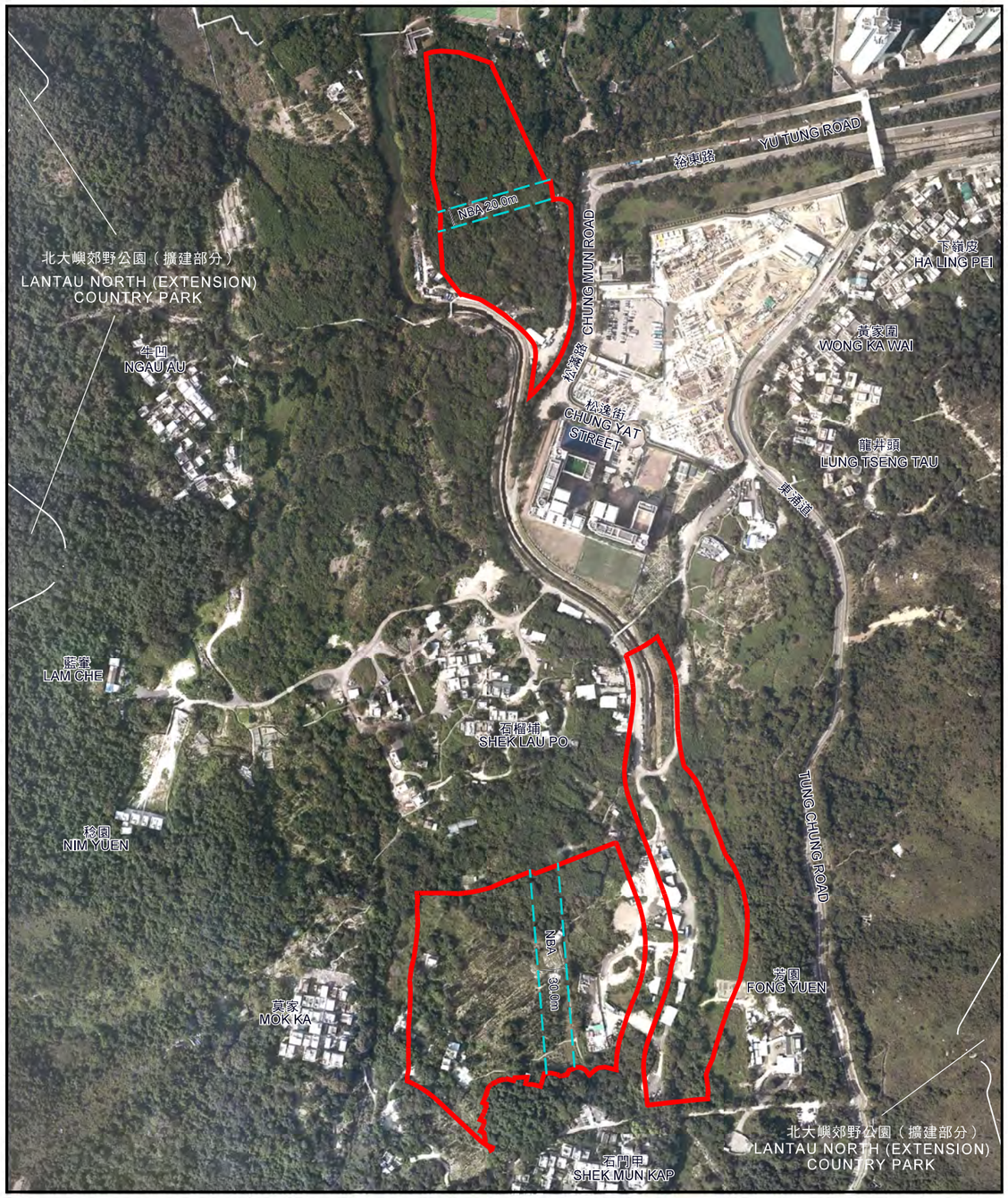
規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3c



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

申述地點
REPRESENTATION SITES

本摘要圖於2016年9月14日擬備，
所根據的資料為組別HP5C的測量圖編號9-SE-A、B、C及D
及地政總署於2016年3月1日拍得的航攝照片編號CS64198

EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SERIES HP5C SURVEY SHEETS No.9-SE-A, B, C & D
AND AERIAL PHOTO No. CS64198 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

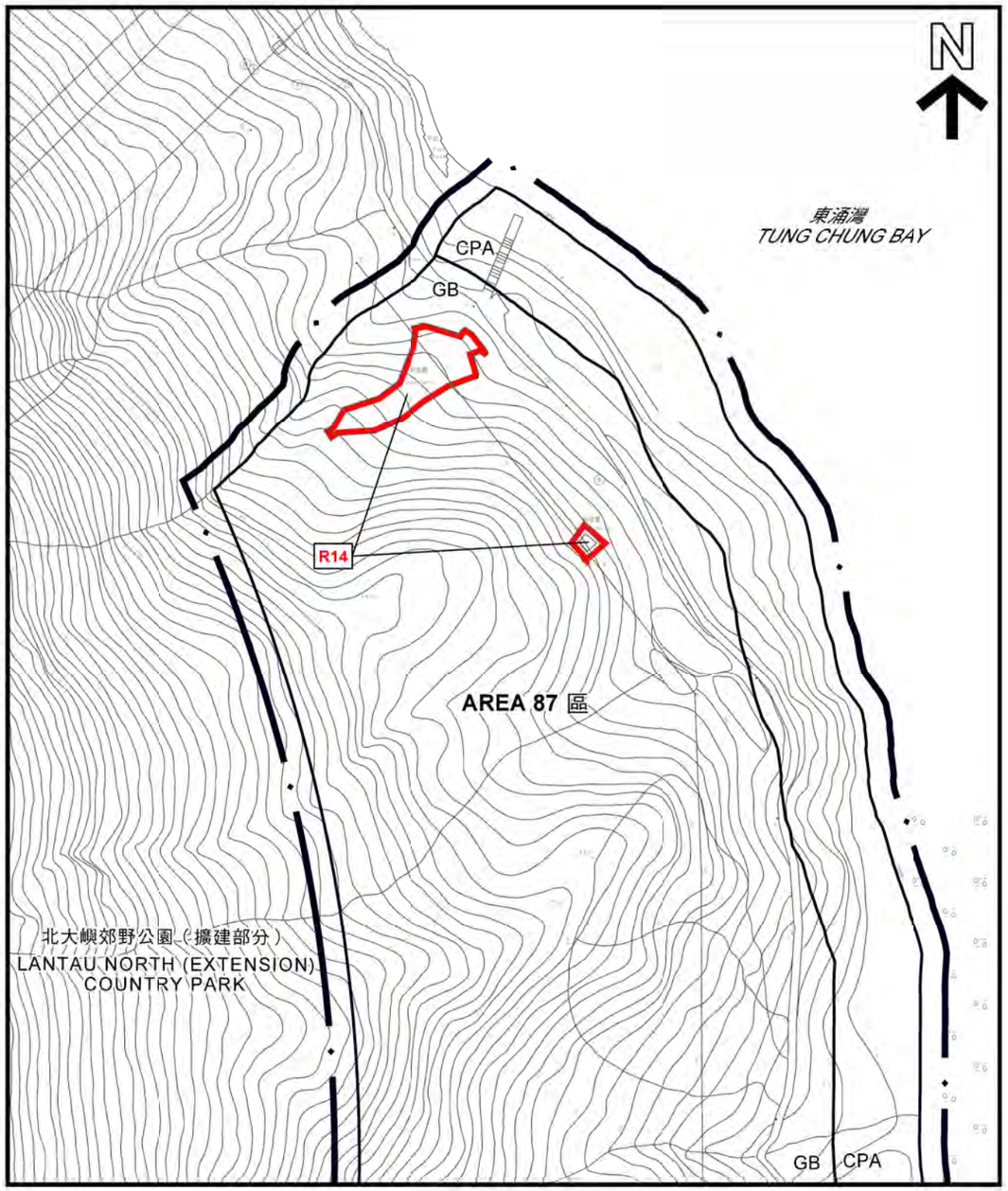
申述個案編號 REPRESENTATION No. (R28)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3d



平面圖 SITE PLAN

航攝照片 AERIAL PHOTO

申述地點
REPRESENTATION SITES

本摘要圖於2016年9月13日擬備
所根據的資料為測量圖編號9-SE-7B、7D及8C
及地政總署於2016年3月1日拍得的航攝照片編號CS64125
EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON SURVEY SHEETS No.9-SE-7B, 7D & 8C
AND AERIAL PHOTO No. CS64125 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

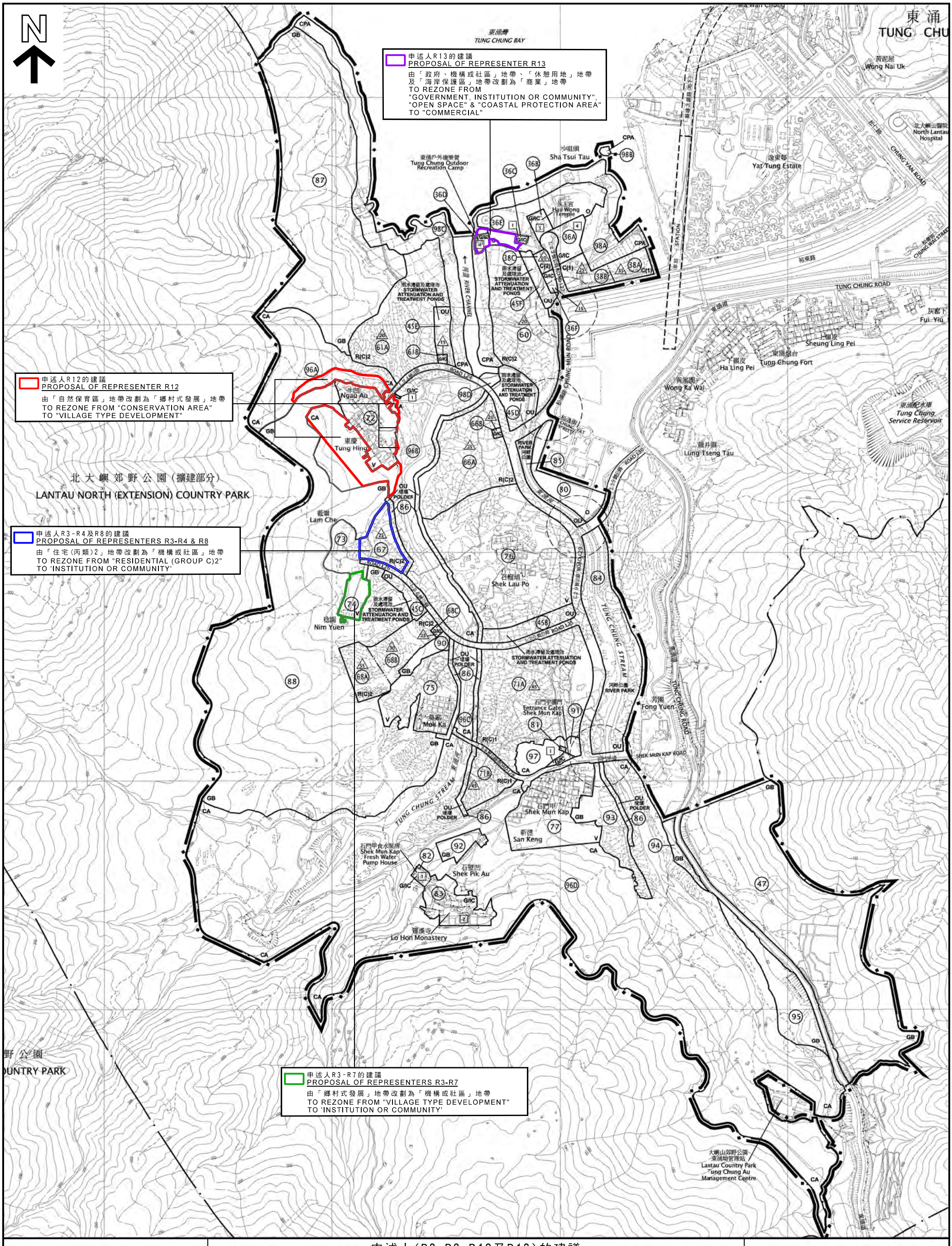
申述個案編號 REPRESENTATION No. (R14)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 3e



本摘要圖於2016年9月14日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1

EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No. S/I-TCV/1 EXHIBITED ON 8.1.2016

申述人(R3-R8, R12及R13)的建議
PROPOSALS OF REPRESENTERS (R3-R8, R12 & R13)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮

CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

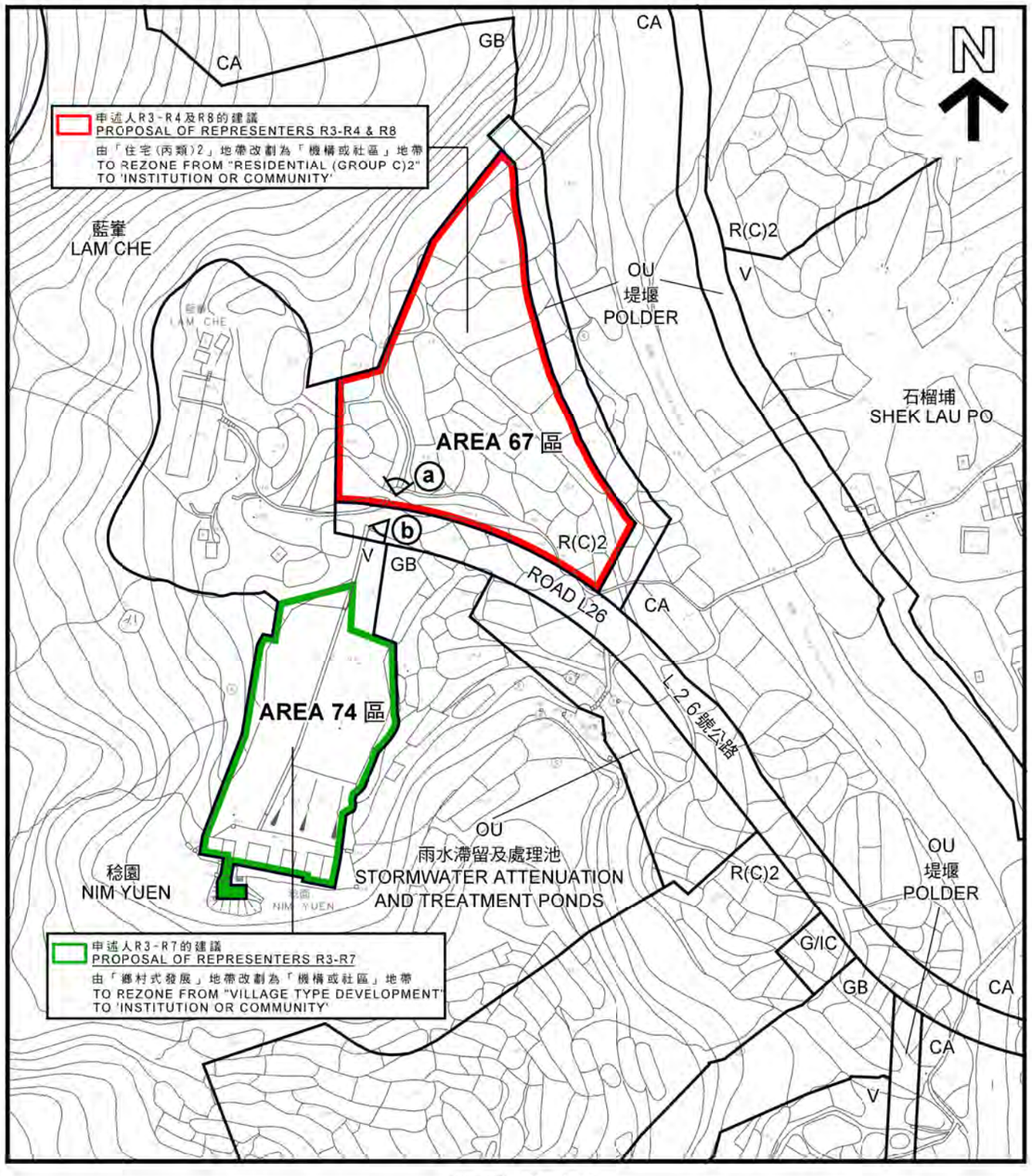
SCALE 1 : 7 500 比例尺

米 METRES 100 0 100 200 300 400 500 600 700 米 METRES

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 4



平面圖 SITE PLAN

航攝照片 AERIAL PHOTO

觀景點 VIEWING POINT a

觀景點 VIEWING POINT b

ⓐ◁ 實地照片的觀景點
VIEWING POINT OF SITE PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為測量圖編號9-SE-12B、12D、13A及13C、
地政總署於2016年3月1日拍得的航攝照片編號CS64197
及攝於2016年的實地照片
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS No.9-SE-12B, 12D, 13A & 13C,
AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016 BY LANDS DEPARTMENT
AND SITE PHOTOS TAKEN IN 2016

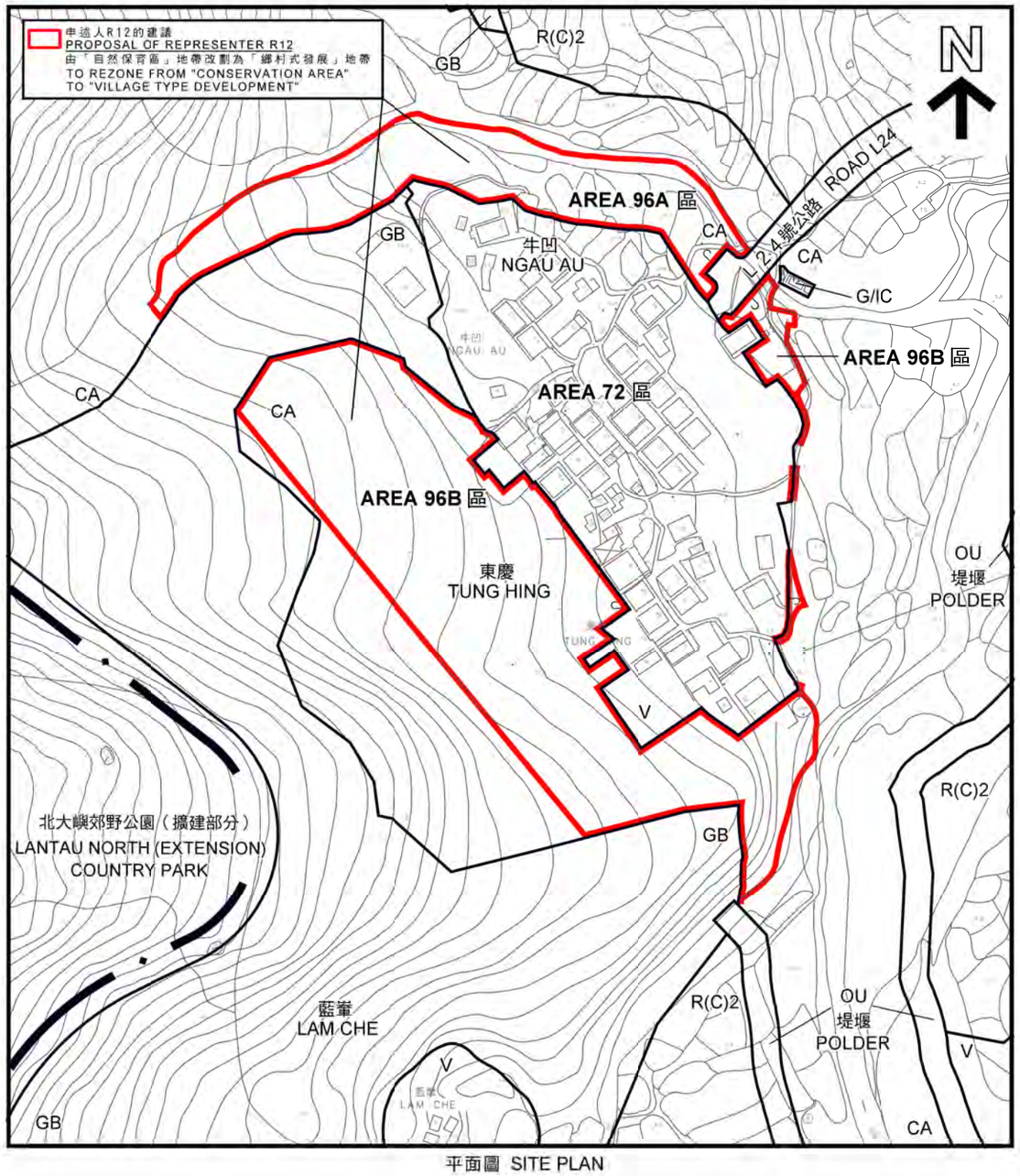
申述人(R3-R8)的建議
PROPOSALS OF REPRESENTERS (R3-R8)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

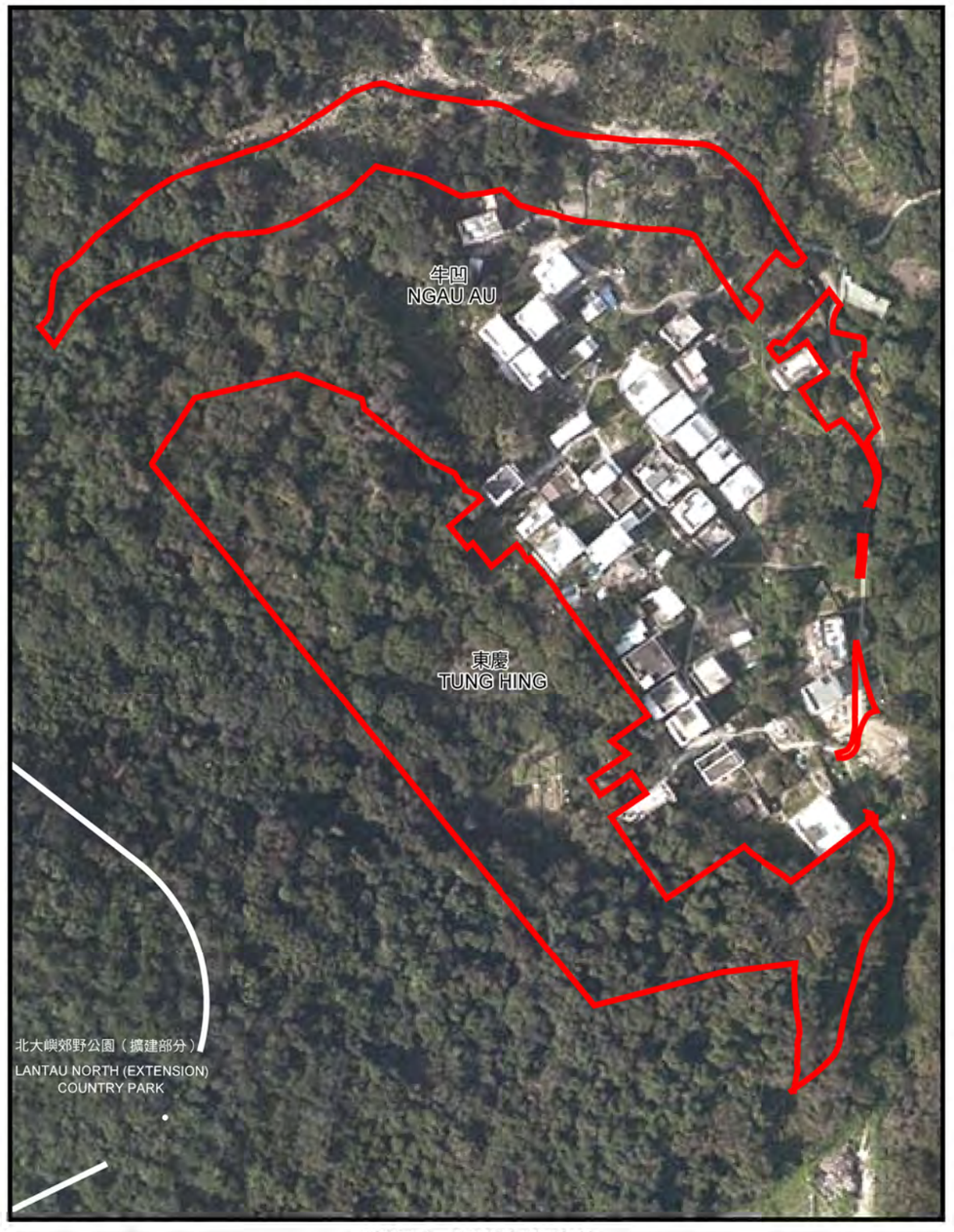
規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖PLAN
H - 4a



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為測量圖編號9-SE-12B、12D、13A及13C
及地政總署於2016年3月1日拍得的航攝照片編號CS64197
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS No.9-SE-12B, 12D, 13A & 13C
AND AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

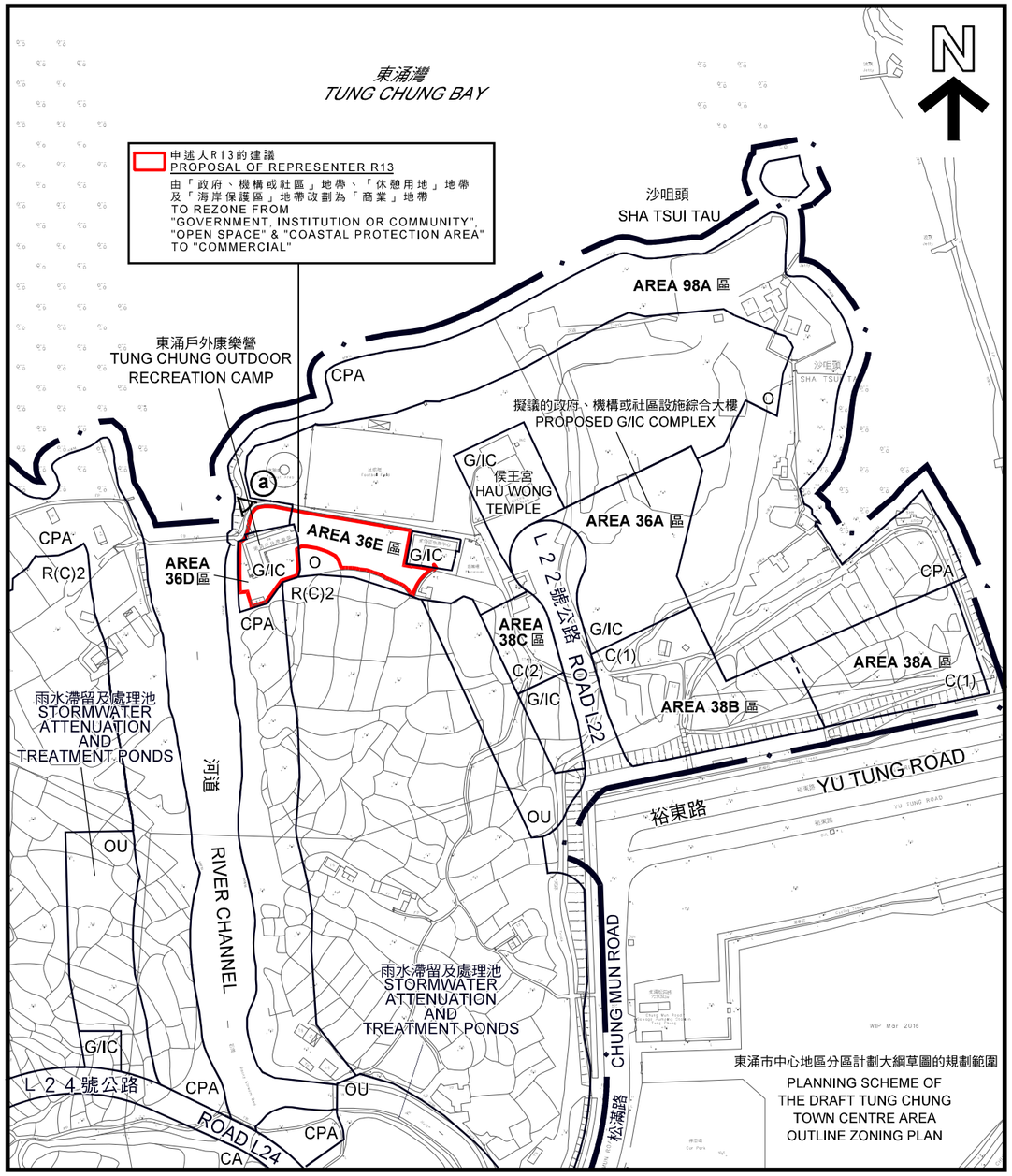
申述人(R12)的建議
PROPOSALS OF REPRESENTER (R12)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 4b



平面圖 SITE PLAN

航攝照片 AERIAL PHOTO

觀景點 VIEWING POINT a

ⓐ◁ 實地照片的觀景點
VIEWING POINT OF SITE PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為測量圖編號9-SE-8C及13A、
地政總署於2016年3月1日拍得的航攝照片編號CS64126
及攝於2016年的實地照片
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS No.9-SE-8C & 13A,
AERIAL PHOTO No. CS64126 TAKEN ON 1.3.2016 BY LANDS DEPARTMENT
AND SITE PHOTO TAKEN IN 2016

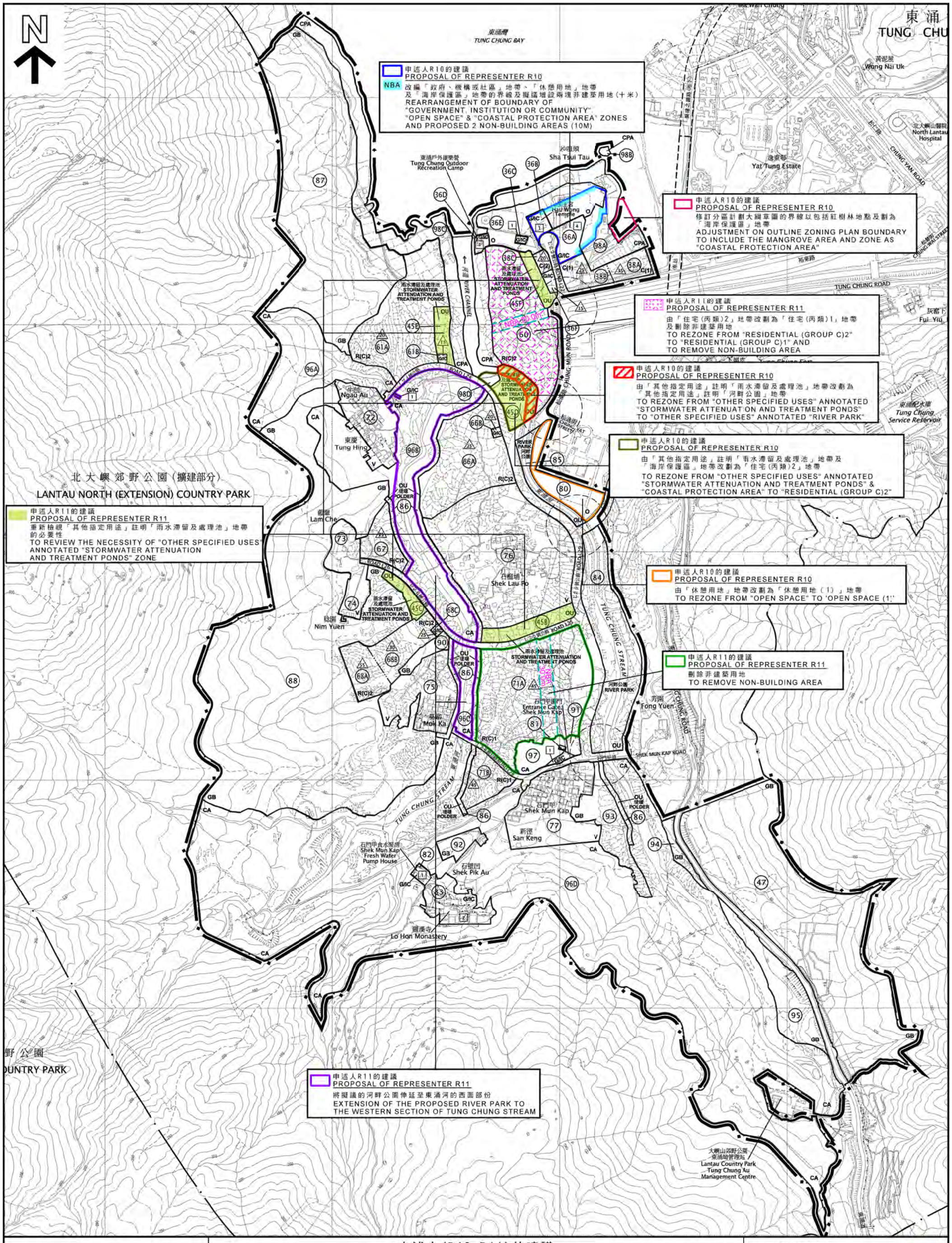
申述人(R13)的建議
PROPOSALS OF REPRESENTER (R13)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖PLAN
H - 4c



本摘要圖於2016年9月14日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1

EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No. S/I-TCV/1 EXHIBITED ON 8.1.2016

申述人(R10-R11)的建議
PROPOSALS OF REPRESENTERS (R10-R11)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮

CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

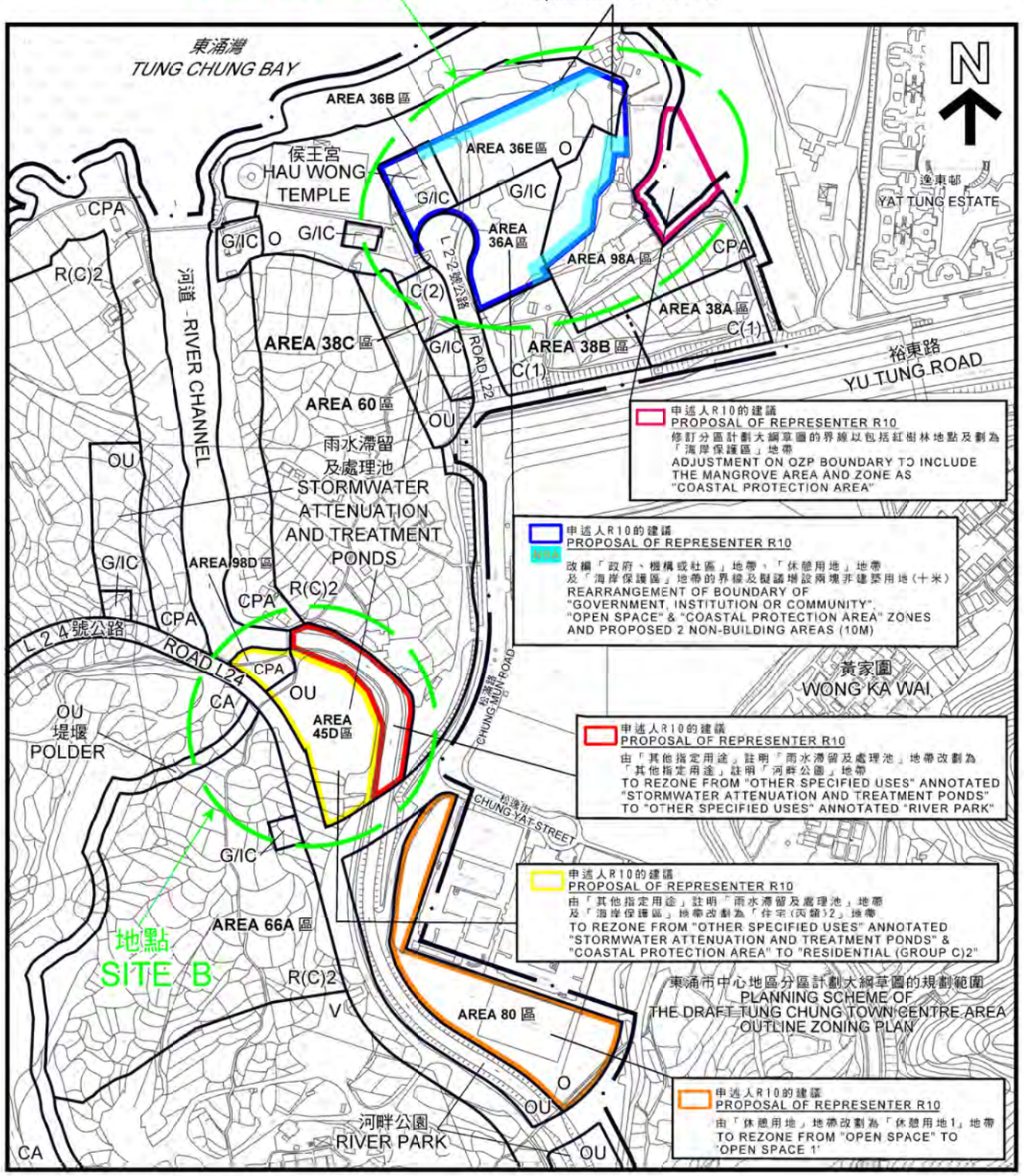
SCALE 1 : 7 500 比例尺

米 METRES 100 0 100 200 300 400 500 600 700 米 METRES

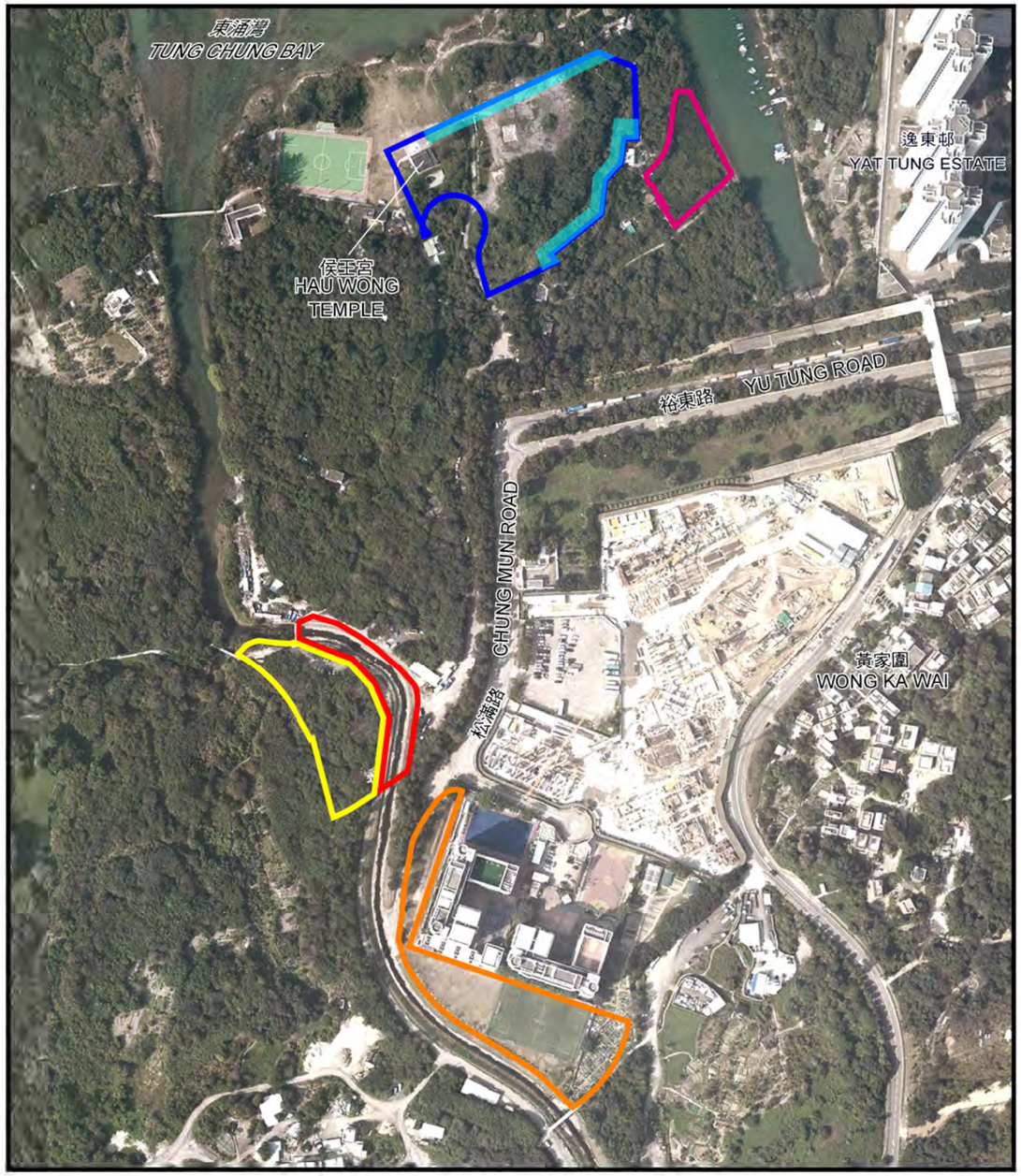
規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 5



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為測量圖編號9-SE-8C、8D、13A及13B
及地政總署於2016年3月1日拍得的航攝照片編號CS64198
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS No.9-SE-8C, 8D, 13A & 13B
AND AERIAL PHOTO No. CS64198 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

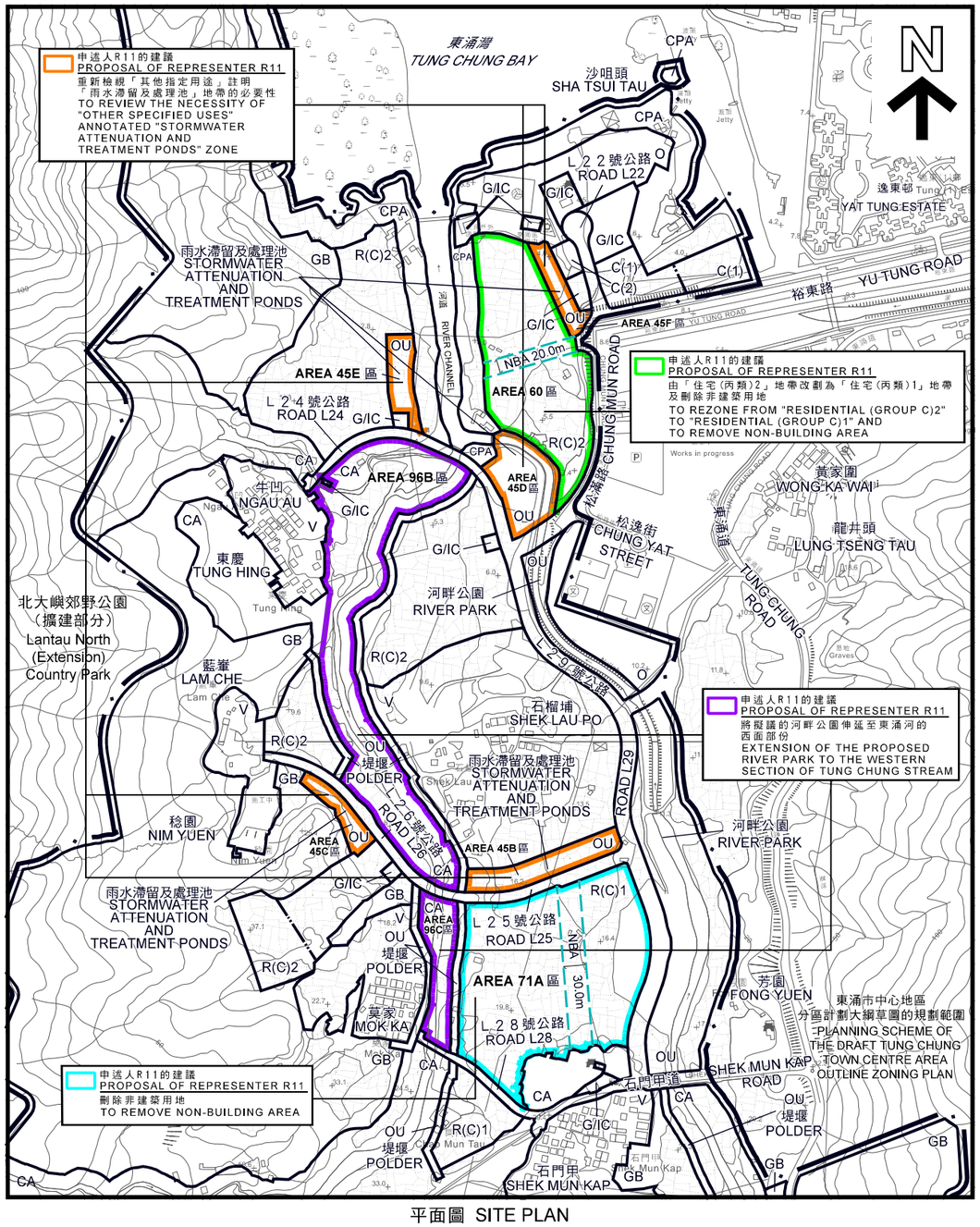
申述人(R10)的建議
PROPOSALS OF REPRESENTER (R10)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

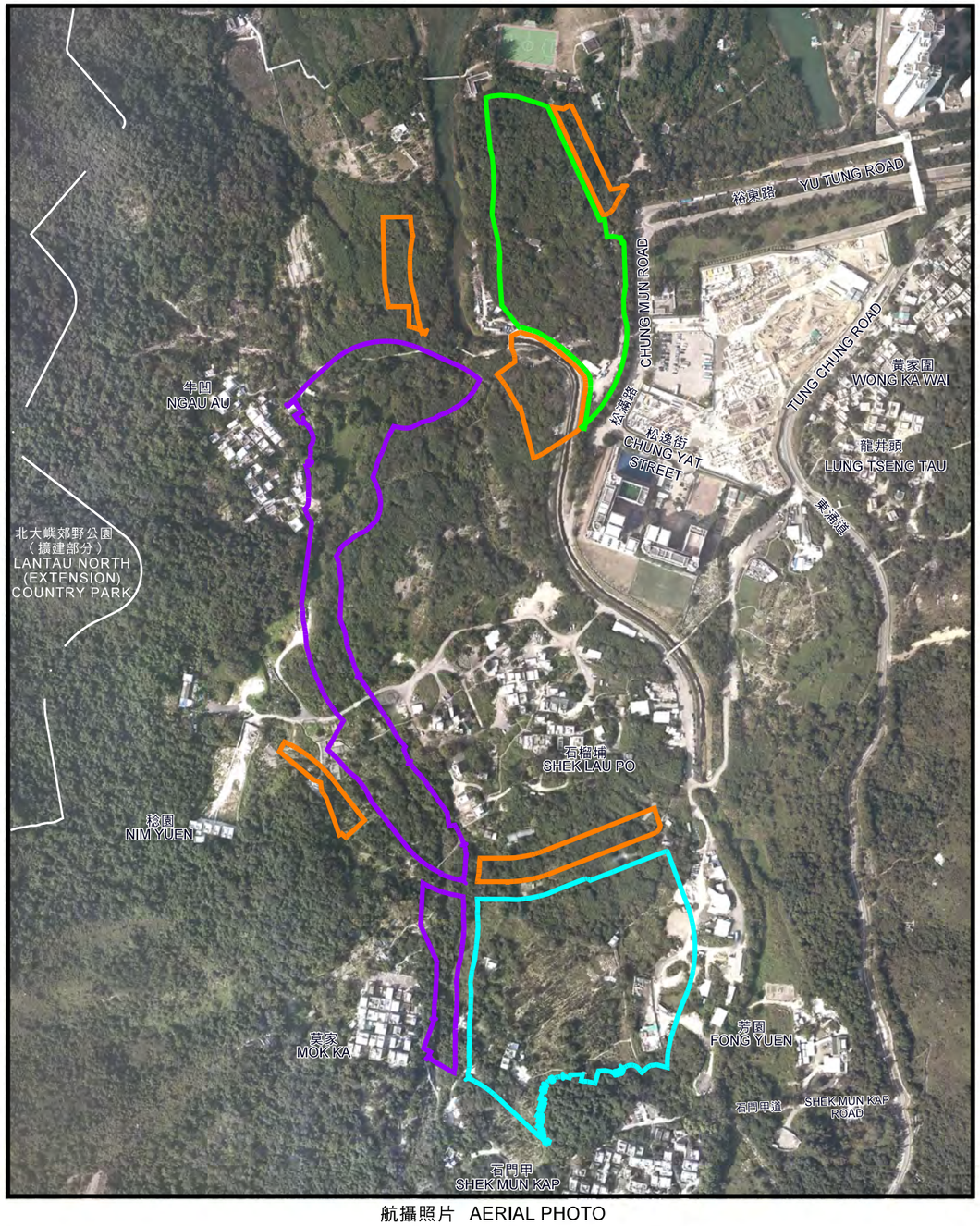
規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 5a



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為組別HP5C的測量圖編號9-SE-A、B、C及D
及地政總署於2016年3月1日拍得的航攝照片編號CS64198
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SERIES HP5C SURVEY SHEETS No.9-SE-A, B, C & D
AND AERIAL PHOTO No. CS64198 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

申述人(R11)的建議
PROPOSALS OF REPRESENTER (R11)

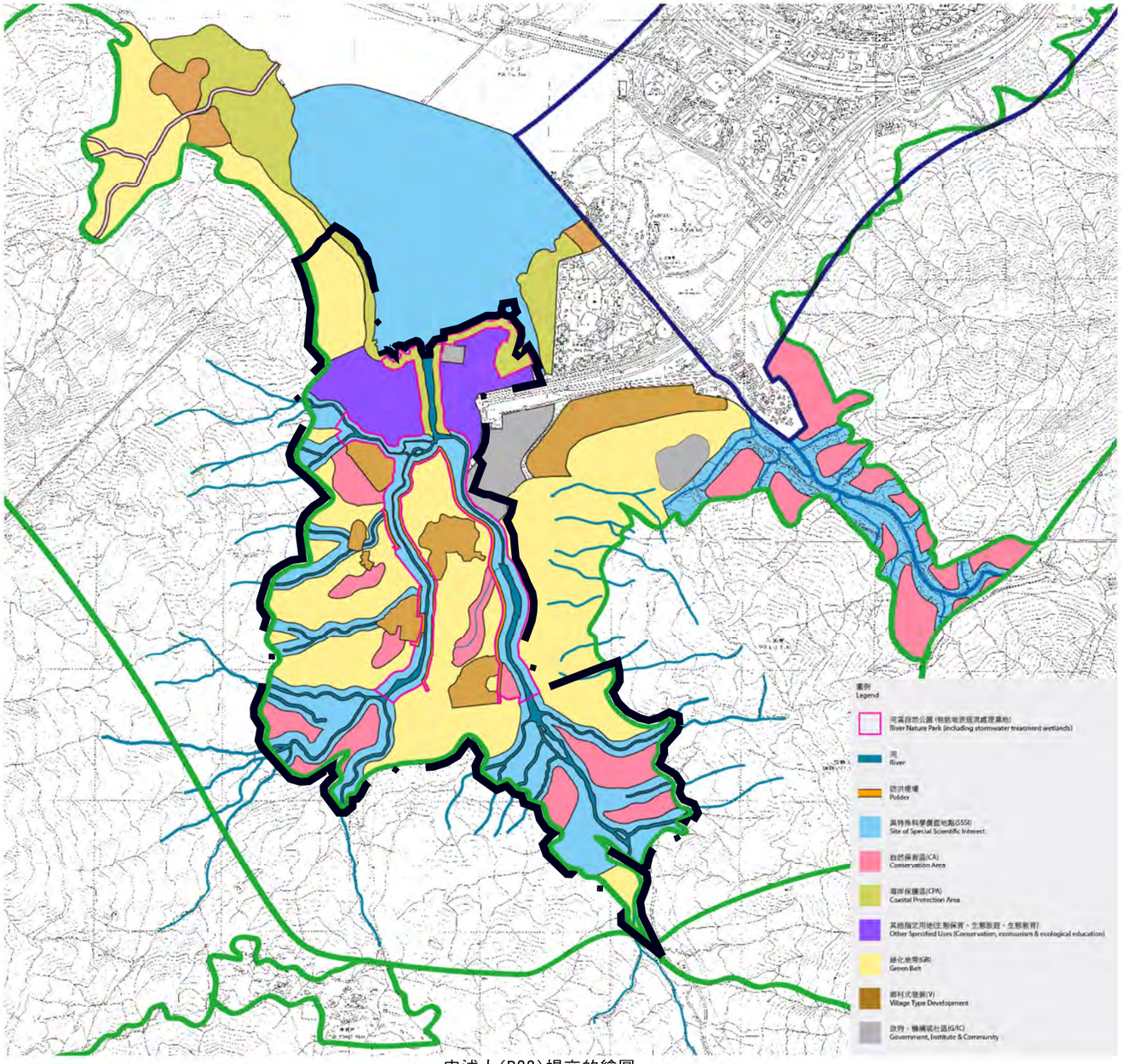
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 5b

東涌谷分區計劃大綱草圖編號S/I-TCV/1
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1



申述人(R28)提交的繪圖
DRAWING SUBMITTED BY REPRESENTER (R28)

東涌谷分區計劃大綱草圖的規劃範圍（只作識別用）
PLANNING SCHEME OF THE DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN
(FOR IDENTIFICATION PURPOSE ONLY)

本摘要圖於2016年9月14日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No.
S/I-TCV/1 EXHIBITED ON 8.1.2016

申述人(R28)的建議
PROPOSALS OF REPRESENTER (R28)
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1
SCALE 1 : 20 000 比例尺

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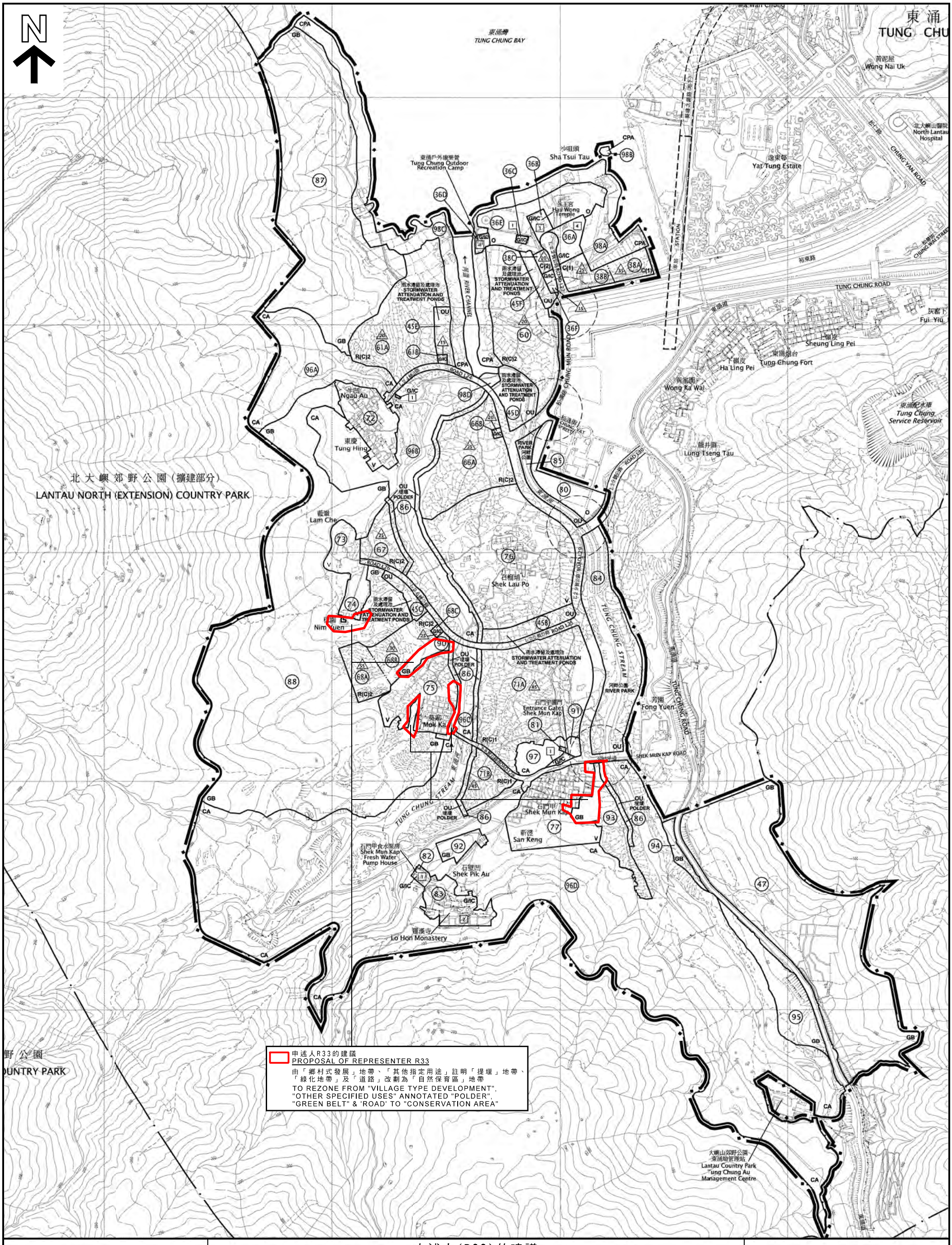
規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 6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東涌灣
TUNG CHUNG BAY
東涌
TUNG CHU
北大嶼郊野公園（擴建部分）
LANTAU NORTH (EXTENSION) COUNTRY PARK
東涌戶外康樂營
Tung Chung Outdoor Recreation Camp
沙咀頭
Sha Tsui Tau
黃泥壆
Wong Nai Uk
逸東邨
Yat Tung Estate
北大嶼山醫院
North Lantau Hospital
CHUNG YAN ROAD
CHUNG WAI STREET
裕東路
TUNG CHUNG ROAD
東涌道
CHUNG MUN ROAD
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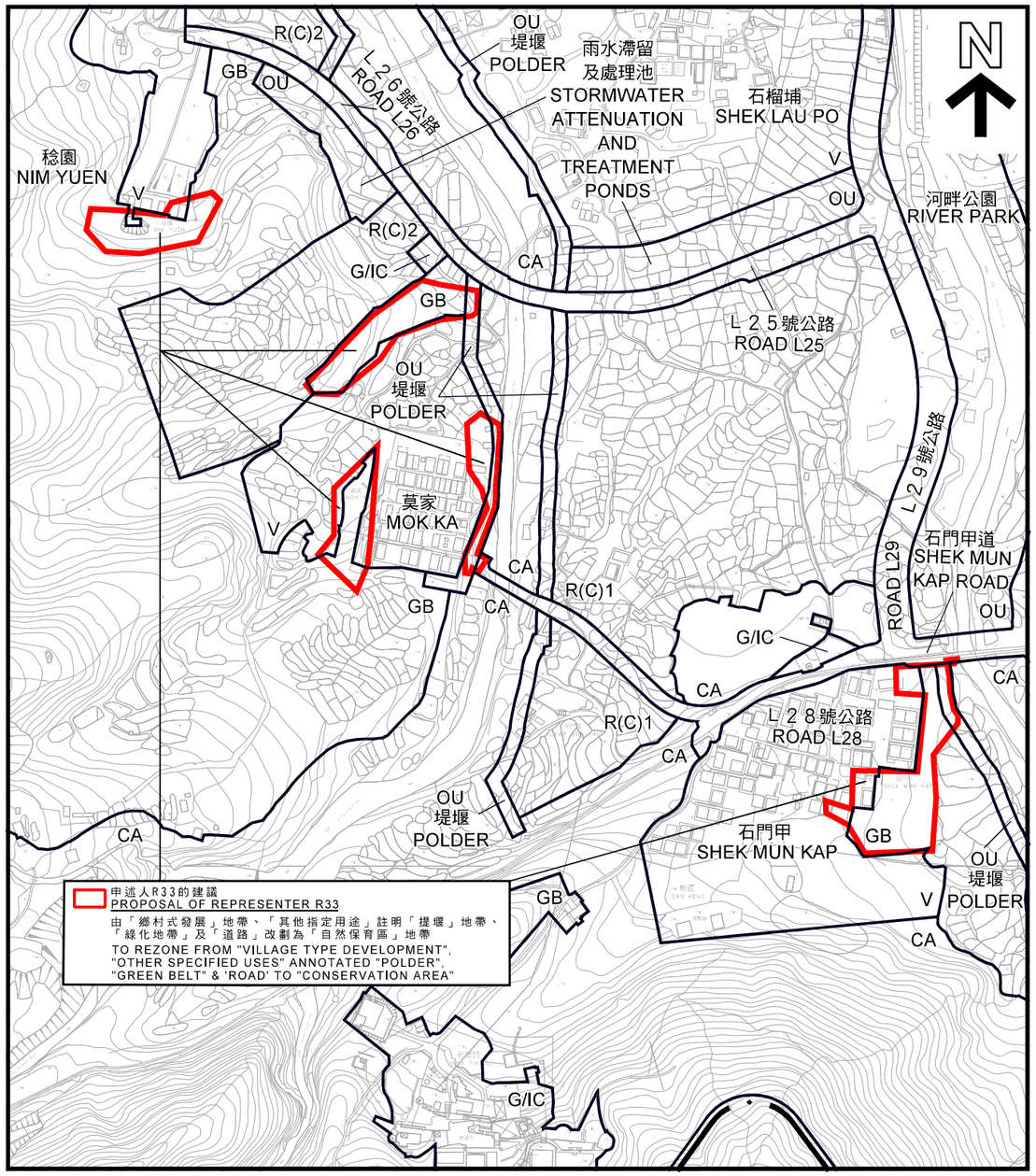
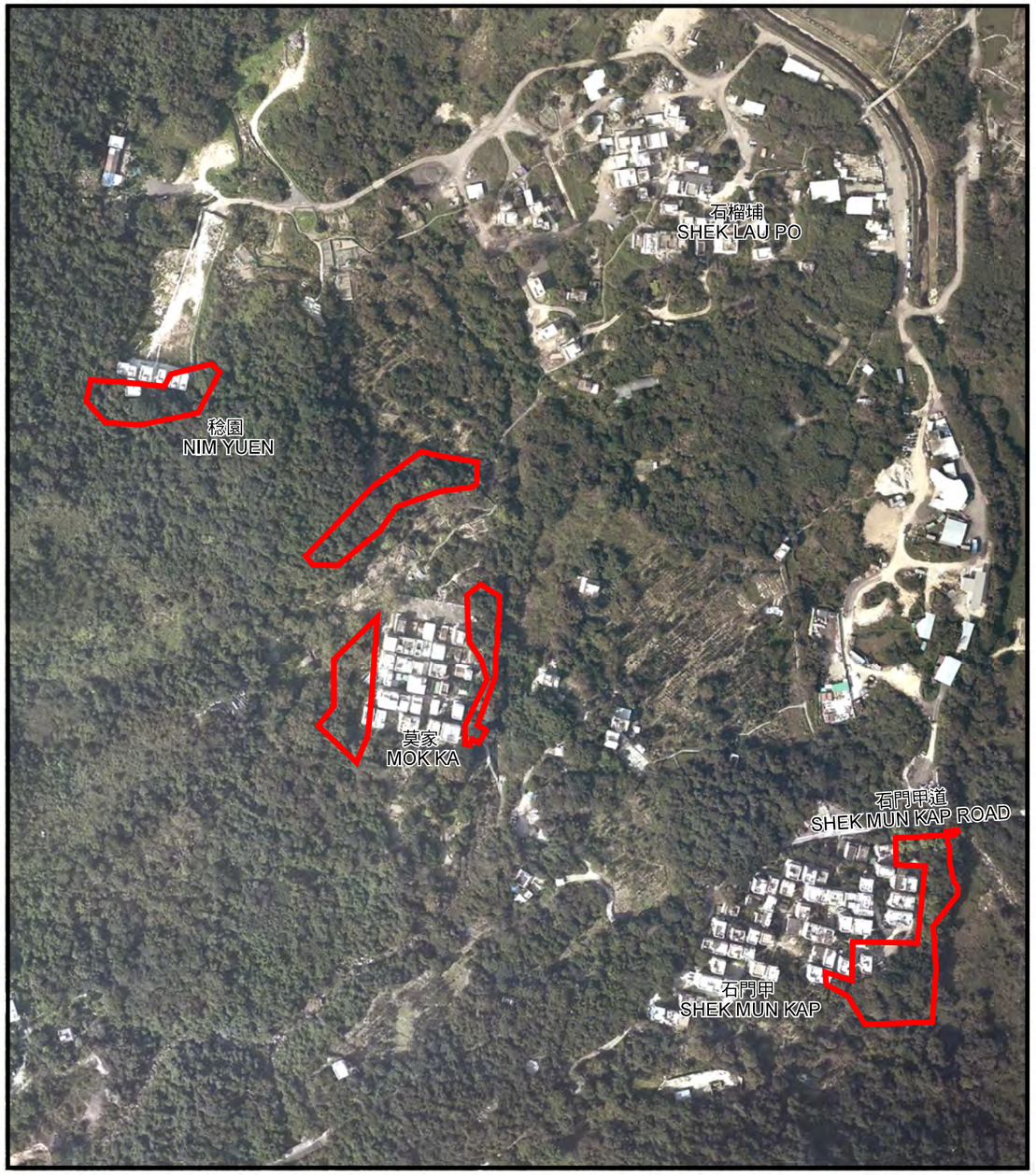
ROAD L876
欣澳第八百五十



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為測量圖編號9-SE-12D、13C、17B及18A
及地政總署於2016年3月1日拍得的航攝照片編號CS64197
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SURVEY SHEETS No.9-SE-12D, 13C, 17B & 18A
AND AERIAL PHOTO No. CS64197 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

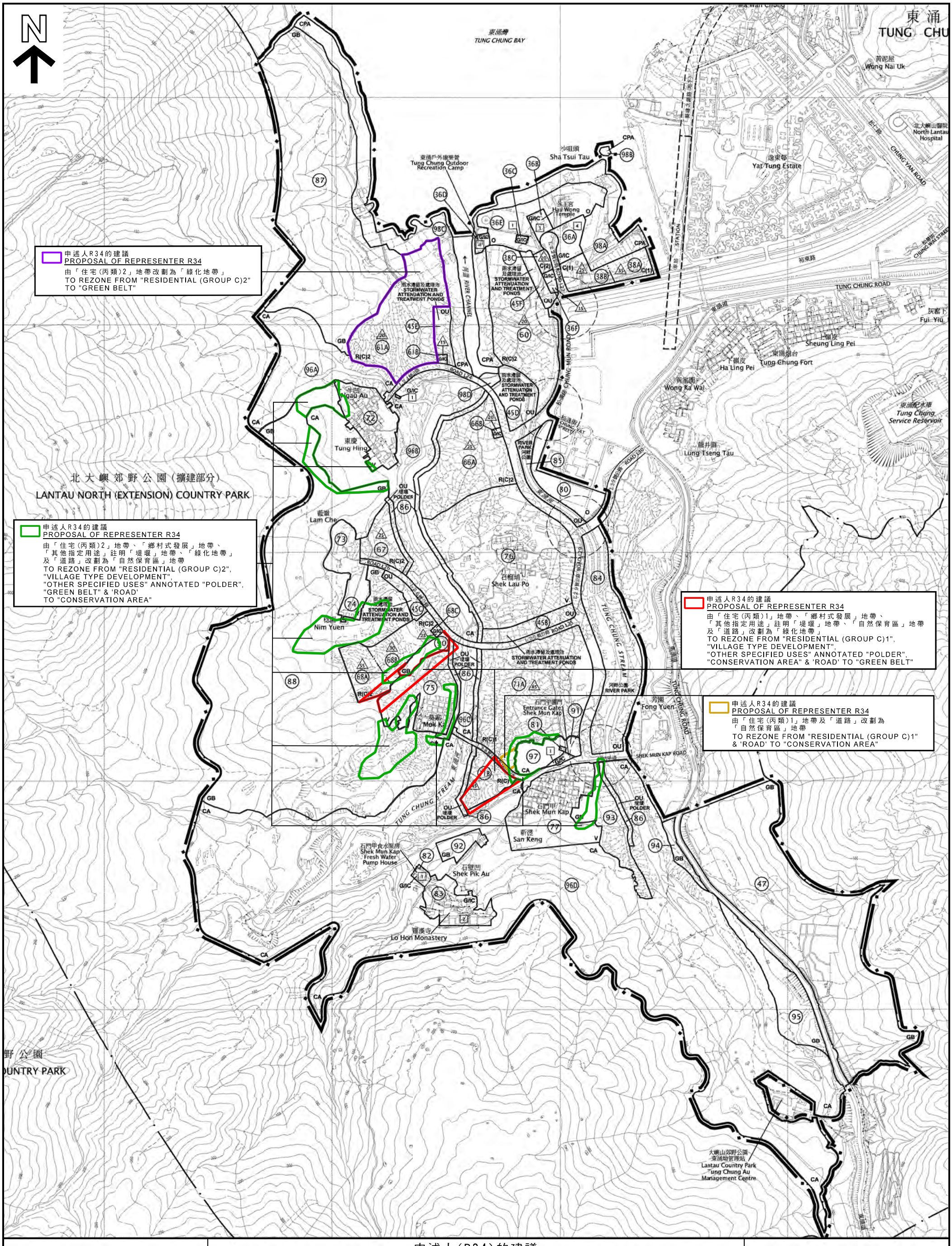
申述人(R33)的建議
PROPOSALS OF REPRESENTER (R33)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 7a



本摘要圖於2016年9月14日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1

EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No. S/I-TCV/1 EXHIBITED ON 8.1.2016

申述人(R34)的建議
PROPOSALS OF REPRESENTER (R34)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

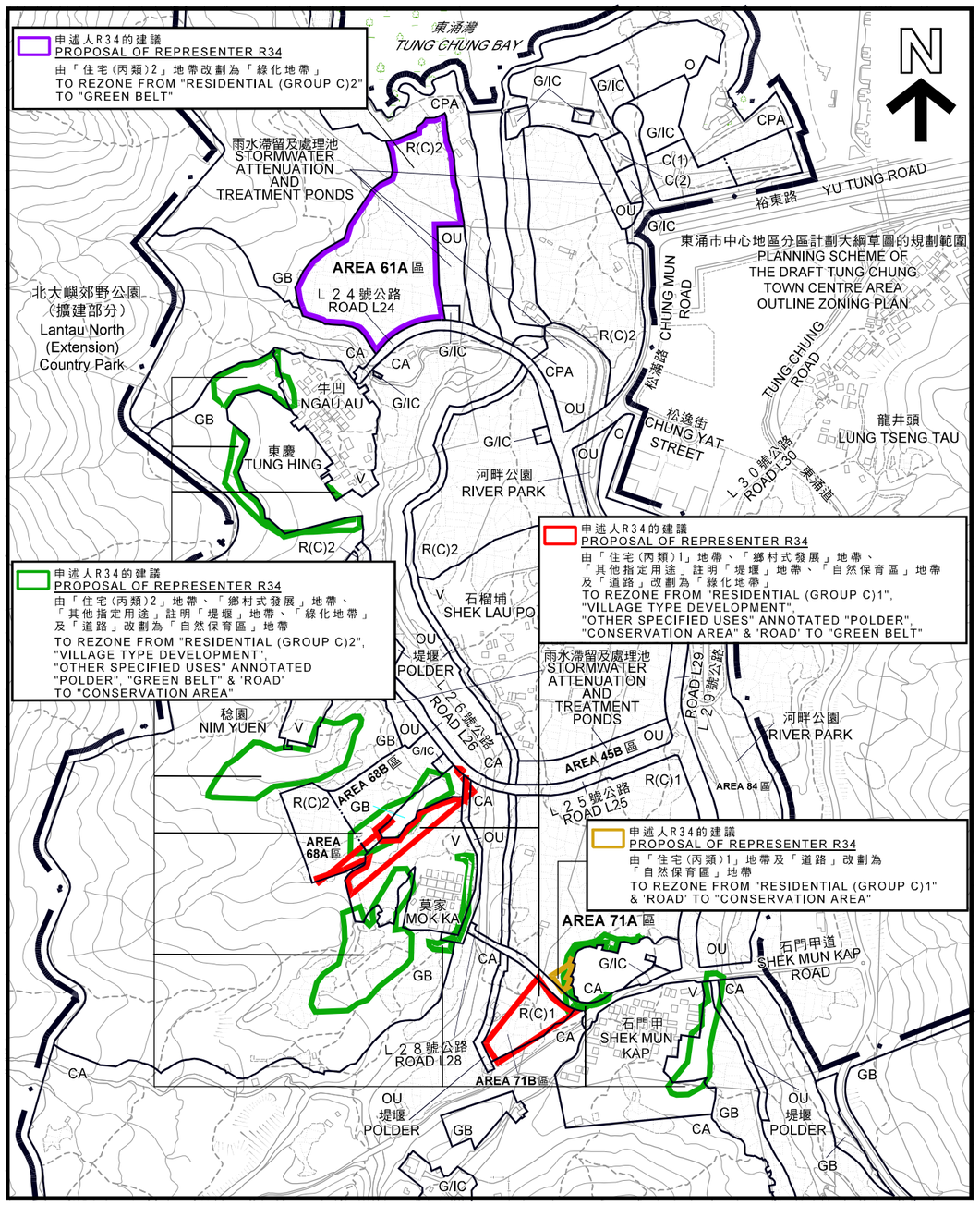
SCALE 1 : 7 500 比例尺

米 METRES 100 0 100 200 300 400 500 600 700 米 METRES

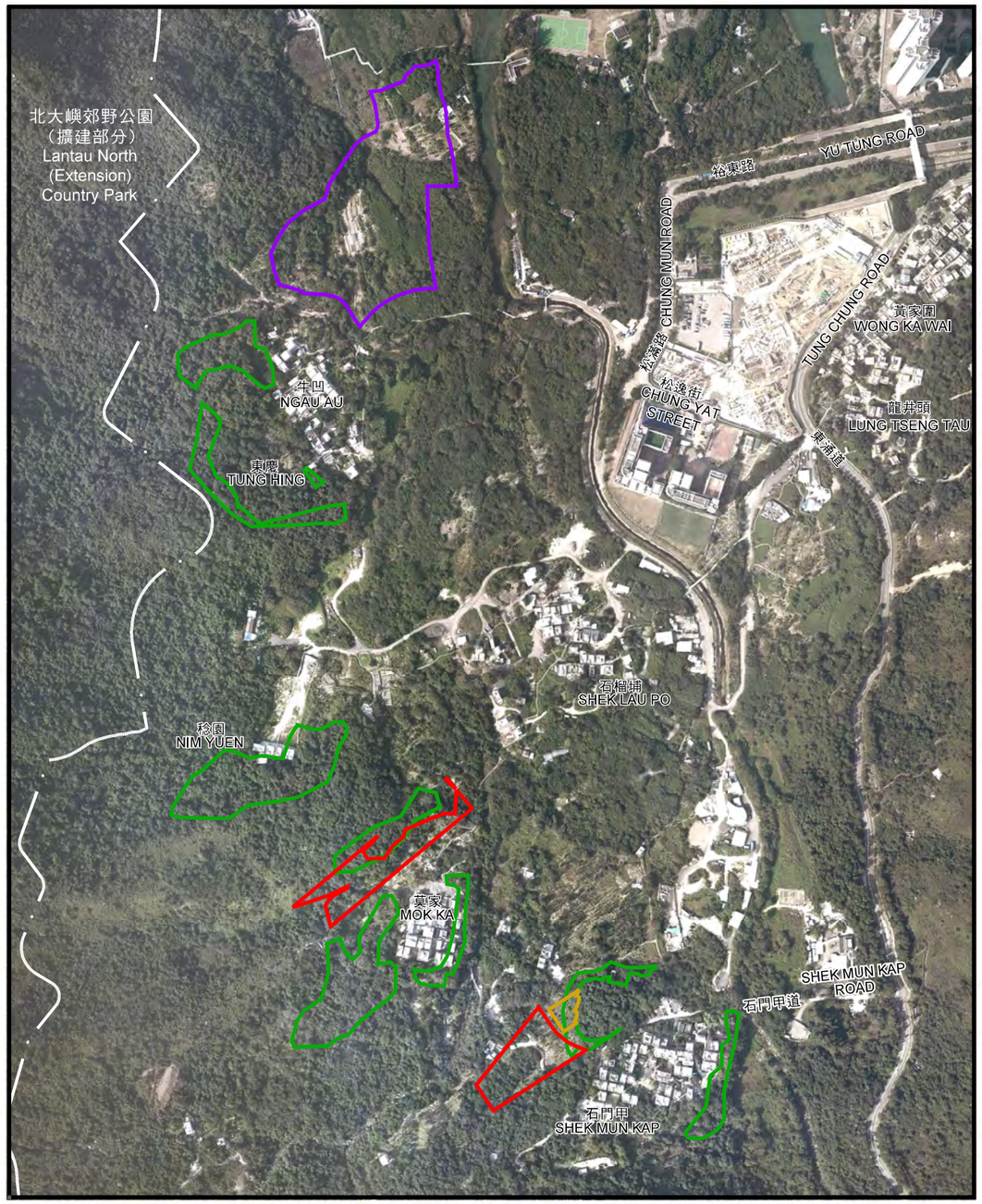
規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 8



平面圖 SITE PLAN



航攝照片 AERIAL PHOTO

本摘要圖於2016年9月14日擬備
所根據的資料為組別HP5C測量圖編號9-SE-A、B、C及D
及地政總署於2016年3月1日拍得的航攝照片編號CS64198
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SERIES HP5C SURVEY SHEETS No.9-SE-A, B, C & D
AND AERIAL PHOTO No. CS64198 TAKEN ON 1.3.2016
BY LANDS DEPARTMENT

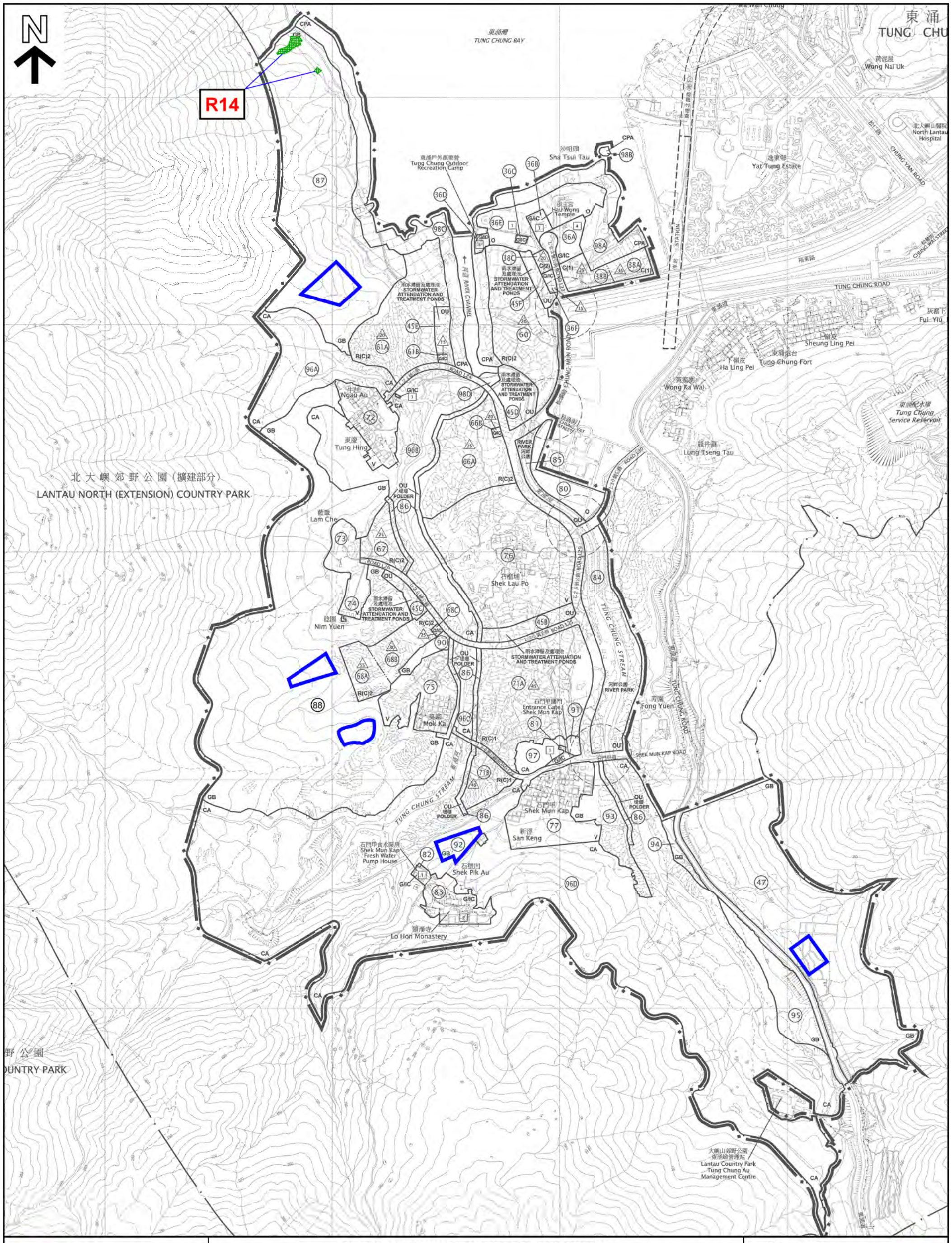
申述人(R34)的建議
PROPOSALS OF REPRESENTER (R34)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 8a



許可的墓地
PERMITTED BURIAL GROUNDS

本摘要圖於2016年9月13日擬備，
所根據的資料為於2016年1月8日
展示的分區計劃大綱草圖編號S/I-TCV/1

EXTRACT PLAN PREPARED ON 13.9.2016
BASED ON DRAFT OUTLINE ZONING PLAN No. S/I-TCV/1 EXHIBITED ON 8.1.2016

現有墓地 EXISTING BURIAL GROUNDS

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

SCALE 1：7 500 比例尺

米 METRES 100 0 100 200 300 400 500 600 700 米 METRES

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 9

N

東涌谷分區計劃大綱草圖的規劃範圍
PLANNING SCHEME OF THE DRAFT
TUNG CHUNG VALLEY OUTLINE ZONING PLAN

東涌鐵路站
Tung Chung
Railway Station

東涌灣
TUNG CHUNG BAY

擬議公共運輸交匯處
Proposed Public Transport Interchange
沙咀頭
Sha Tsui Tau

AREA 38C區

逸東邨
Yat Tung Estate

北大嶼郊野公園
(擴建部分)
Lantau North
(Extension)
Country Park

AREA 38B區

AREA 38A區

東涌市中心地區分區計劃大綱草圖的規劃範圍
PLANNING SCHEME OF THE DRAFT TUNG CHUNG
TOWN CENTRE AREA OUTLINE ZONING PLAN

第39區
公屋房屋地盤
Area 39
Public
Housing Site

擬議東涌西鐵路站
Proposed TCW
Railway Station

TUNG CHUNG ROAD

牛凹
Ngau Au

藍輋
Lam Che

石榴埔
Shek Lau Po

稔園
Nim Yuen

莫家
Mok Ka

石門甲
Shek Mun Kap

擬議小型公共運輸交匯處
Proposed Small Scale Public
Transport Interchange

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
- 現有的單車路線 Existing 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

東涌谷和東涌市中心地區
TUNG CHUNG VALLEY AND TUNG CHUNG TOWN CENTRE AREA

只作顯示用途
FOR INDICATIVE PURPOSE ONLY

分區計劃大綱圖的規劃範圍界線
PLANNING SCHEME BOUNDARY
OF OUTLINE ZONING PLAN

本摘要圖於2016年9月14日擬備
EXTRACT PLAN PREPARED ON 14.9.2016

行人及單車徑網絡概念圖
PLAN FOR PEDESTRIAN AND CYCLING NETWORK CONCEPT

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING
DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 10

N

東涌谷分區計劃大綱草圖的規劃範圍
PLANNING SCHEME OF THE DRAFT
TUNG CHUNG VALLEY OUTLINE ZONING PLAN

東涌灣
Tung Chung Bay

東涌中心區
Tung Chung Centre District

東涌小炮台
Tung Chung Battery

虎地灣灰窯
Fu Tei Wan Kiln

東涌棋盤石刻
Tung Chung Game Board Carving

市鎮公園
Town Park

馬灣涌
Ma Wan Chung

海濱長廊
Waterfront Promenade

黃泥屋
Wong Nai Uk

逸東邨
Yat Tung Estate

AREA 36E區
AREA 36F區
AREA 36A區
AREA 38C區

沙咀頭
Sha Tsui Tau

候王宮
Hau Wong Temple

北大嶼郊野公園
(擴建部分)
Lantau North
(Extension)
Country Park

Yu Tung Road

東涌市中心地區分區計劃大綱草圖的規劃範圍
PLANNING SCHEME OF THE DRAFT TUNG CHUNG
TOWN CENTRE AREA OUTLINE ZONING PLAN

20m
AREA 38B區
AREA 38A區
AREA 61A區
AREA 60區

東涌炮台
Tung Chung Fort

第39區
公屋房屋地盤
Area 39
Public
Housing Site

擬議東涌西鐵路站
Proposed TCW
Railway Station

牛凹
Ngau Au

藍瀝
Lam Che

石榴埔
Shek Lau Po

穩園
Nim Yuen

AREA 71A區
30m

莫家
Mok Ka

石門甲圍門
Shek Mun Kap
Entrance Gate

石門甲
Shek Mun Kap

山巒背景
Mountain Backdrop

圖例 Legend

- 住宅發展密度 Residential Development Intensity (high 高 / low 低)
- 政府、機構或社區 Government, Institution or Community
- 其他指定用途 Other Specified Uses
- 地區商業設施 Local Commercial Facilities
- 休憩用地 Open Space
- 擬議道路 Proposed Road
- 現時道路 Existing Road
- 擬議主要行人路線 Proposed Key Pedestrian Route
- 擬議次要行人路線 Proposed Secondary Pedestrian Route
- 通風廊/ 觀景廊 Breezeway/ View Corridor
- 自然保育廊/ 河畔公園 Conservation Corridor/ Riverpark
- 鄉村式發展 Village-type Development
- 活動樞紐 Activity Node
- 文化遺產 Cultural Heritage
- 具考古價值地點 Site of Archaeological Interest
- 東涌研究的新市鎮擴展區 New Town Extension Area in Tung Chung Study
- 建議的非建築用地 Proposed Non-Building Area

只作顯示用途
FOR INDICATIVE PURPOSE ONLY

東涌谷和東涌市中心地區
TUNG CHUNG VALLEY AND TUNG CHUNG TOWN CENTRE AREA

分區計劃大綱圖的規劃範圍界線
PLANNING SCHEME BOUNDARY OF OUTLINE ZONING PLAN

本摘要圖於2016年9月14日擬備
EXTRACT PLAN PREPARED ON 14.9.2016

城市設計概念 URBAN DESIGN CONCEPT

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 11

N

東涌灣
TUNG CHUNG BAY

馬灣涌
Ma Wan Chung

黃泥屋
Wong Nai Uk

北大嶼山醫院
North Lantau Hospital

松仁路 CHUNG YAN ROAD

逸東邨
Yat Tung Estate

東涌戶外康樂營
Tung Chung Outdoor Recreation Camp

沙咀頭
Sha Tsui Tau

侯王宮
Hau Wong Temple

河道 RIVER CHANNEL

裕東路 YU TUNG ROAD

東涌道 TUNG CHUNG ROAD

上嶺皮
Sheung Ling Pei

下嶺皮
Ha Ling Pei

東涌炮台
Tung Chung Fort

黃家圍
Wong Ka Wai

龍井頓
Lung Tseng Tau

牛凹
Ngau Au

東慶
Tung Hing

藍輋
Lam Che

ⓐ ⓑ ⓒ ⓓ ⓔ ⓕ

碾園
Nim Yuen

石榴埔
Shek Lau Po

東涌河

TUNG CHUNG STREAM

東涌道

TUNG CHUNG ROAD

芳園
Fong Yuen

石門甲園門
Entrance Gate, Shek Mun Kap

莫家
Mok Ka

石門甲道 SHEK MUN KAP ROAD

石門甲
Shek Mun Kap

新徑
San Keng

TUNG CHUNG STREAM 東涌河

羅漢寺
Lo Hon Monastery

石壁凹
Shek Pik Au

大嶼山郊野公園
東涌坳管理站
Lantau Country Park
Tung Chung Au
Management Centre

東涌道

圖例 LEGEND

- 分區計劃大綱草圖的規劃範圍 PLANNING SCHEME OF THE DRAFT OUTLINE ZONING PLAN
- 鄉村範圍 VILLAGE ENVIRONS
- 擬議「鄉村式發展」地帶 PROPOSED "VILLAGE TYPE DEVELOPMENT" ZONE
- 私人土地面積約５５．１４公頃(３３%) PRIVATE LAND AREA ABOUT 55.14 ha (33%)
- ⓐ 實地照片觀景點(參閱圖H-12a) VIEWING POINT OF SITE PHOTOS (REFER TO PLAN H-12a)

本摘要圖於2016年9月14日擬備
EXTRACT PLAN PREPARED ON 14.9.2016

鄉村範圍、土地業權及擬議「鄉村式發展」地帶
VILLAGE ENVIRONS, LAND OWNERSHIP AND PROPOSED "VILLAGE TYPE DEVELOPMENT" ZONE
就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38 AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

比例尺 1 : 7 500 SCALE

米 METRES 100 50 0 100 200 300 400 500 600 700 米 METRES

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 12

ⓐ 牛凹 NGAU AU

ⓑ 藍輋 LAM CHE

ⓒ 稔園 NIM YUEN

ⓓ 莫家 MOK KA

ⓔ 石榴埔 SHEK LAU PO

ⓕ 石門甲 SKEK MUN KAP

ⓐ 觀景點
VIEWING POINT

本摘要圖於2016年8月26日擬備，
所根據的資料為攝於2015年的實地照片
PLAN PREPARED ON 26.8.2016
BASED ON SITE PHOTOS TAKEN IN 2015

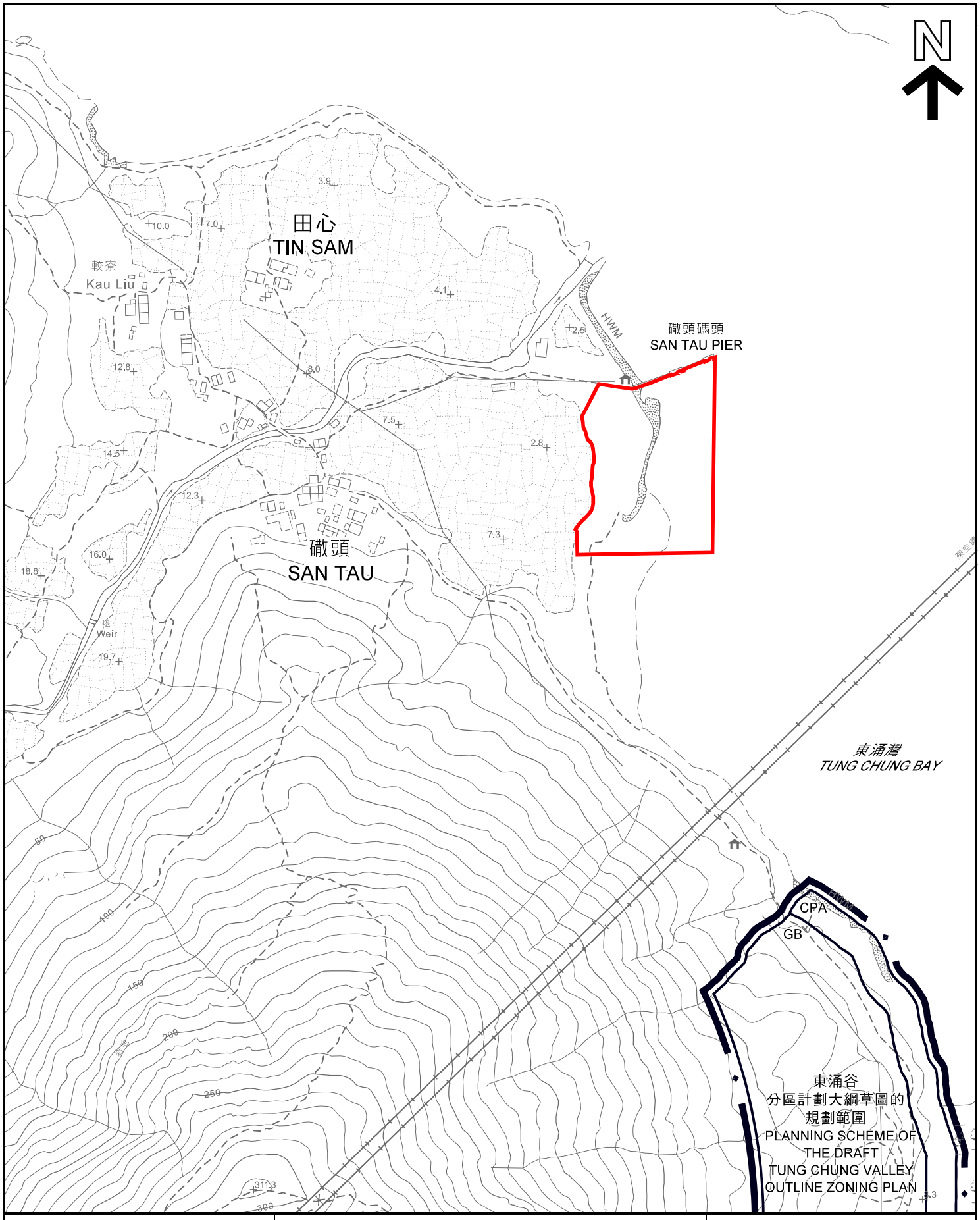
認可鄉村的實地照片 SITE PHOTOS OF RECOGNIZED VILLAGES

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 12a



具特殊科學價值地點
SITE OF SPECIAL SCIENTIFIC INTEREST

本摘要圖於2016年9月14日擬備，
所根據的資料為組別HP5C
的測量圖編號9-SE-A
EXTRACT PLAN PREPARED ON 14.9.2016
BASED ON SERIES HP5C SURVEY SHEET
No.9-SE-A

磯頭海灘具特殊科學價值地點
SAN TAU BEACH SITE OF SPECIAL SCIENTIFIC INTEREST

就東涌谷分區計劃大綱草圖編號S/I-TCV/1
提出的申述個案編號R1-R38號
以及相關意見個案編號C1-C87作出考慮
CONSIDERATION OF REPRESENTATIONS No. R1 - R38
AND RELATED COMMENTS No. C1 - C87
DRAFT TUNG CHUNG VALLEY OUTLINE ZONING PLAN No. S/I-TCV/1

SCALE 1 : 5 000 比例尺

米 METRES 100 0 100 200 米 METRES

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

圖 PLAN
H - 13

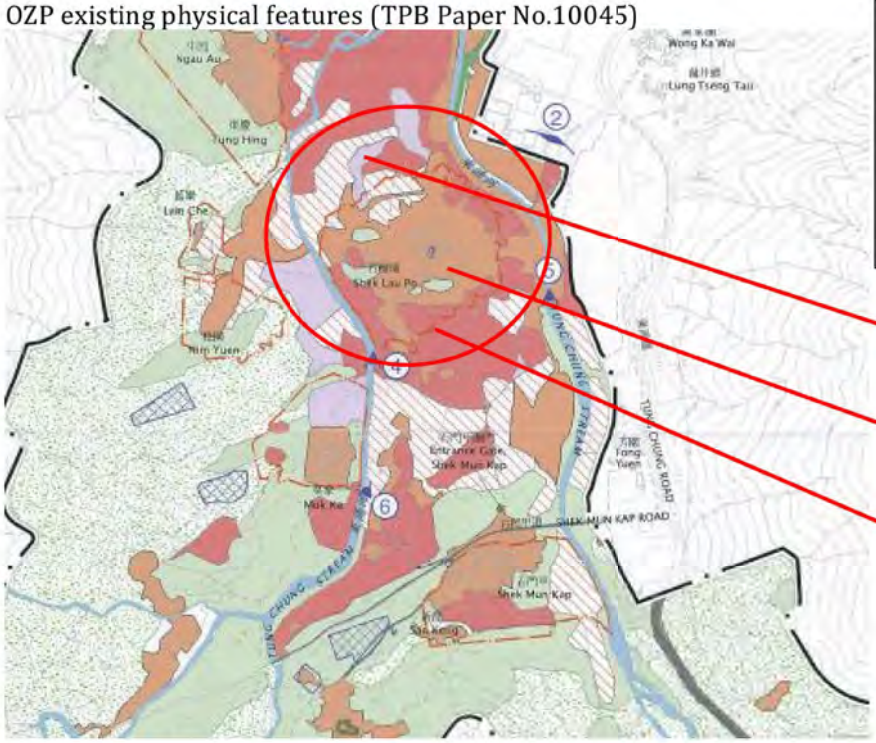
Figure 1

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)

本摘要圖於2016年9月2日擬備
EXTRACT PLAN PREPARED ON 2.9.2016

申述人(R29)提交的繪圖
DRAWING SUBMITTED BY REPRESENTER (R29)

就東涌谷分區計劃大綱草圖編號S/I-TCV/1提出的
申述個案編號R1-R38號以及
相關意見個案編號C1-C87作出考慮

CONSIDERATION OF REPRESENTATIONS No. R1 - R38
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DRAFT TUNG CHUNG VALLEY
OUTLINE ZONING PLAN No. S/I-TCV/1

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-TCV/1-1 to 38

繪圖
DRAWING
H - 1