

赤鱲角分區計劃大綱草圖編號S/I-CLK/13
DRAFT CHEK LAP KOK OUTLINE ZONING PLAN NO. S/I-CLK/13

考慮申述編號 R1 至 R12220 以及 意見編號 C1至 C346
Consideration of Representations No. R1 to R12220 And Comments No. C1 to C346

城市規劃委員會
Town Planning Board
11-12 Jan 2016

規劃署
Planning Department

引言 Introduction

- 2015年5月8日，城規會根據《城市規劃條例》展示《赤鱲角分區計劃大綱草圖編號S/I-CLK/13》(大綱草圖)，供公眾查閱

  On 8.5.2015, the draft Chek Lap Kok OZP No. S/I-CLK/13 was exhibited for public inspection under the Town Planning Ordinance

- 在法定展示期內，共收到12,220份申述書及346份意見書

  During the public inspection period, 12,220 representations and 346 comments were received

- 其中十一名申述人其後表示未有就草圖提交任何申述書，故有效的申述書為12,209份

  11 representers have indicated that they did not make any submission in respect of the draft OZP. Hence, there is a total of 12,209 valid representations.

背景 Background

日期 Date	重要事項 Milestones
2010年年底 Late 2010	機管局制訂《香港國際機場2030規劃大綱》(《2030規劃大綱》) AAHK drew up the "HKIA Master Plan 2030" (MP2030)
2012年3月 March 2012	行政會議原則上批准機管局採用擴建機場成為三跑道系統這個方案，作為機場的規劃方向 The Executive Council (ExCo) gave approval in-principle for AAHK to adopt the 3RS as the future development option for HKIA for planning purpose 之後，機管局便展開所需的規劃工作，包括進行法定的環境影響評估(「環評」)，以及擬訂相關的設計細節和融資安排 Since then, AAHK has embarked on the necessary planning work, namely, the statutory Environmental Impact Assessment (EIA), the associated design details and the financial arrangements
2014年11月7日 7.11.2014	環境保護署署長(「環保署署長」)根據《環境影響評估條例》(「環評條例」)批准三跑道系統的環評報告，並於同日在有附帶條件下發出環境許可證 The 3RS EIA Report was approved by the DEP under the EIA Ordinance. The Environmental Permit (EP) was also granted with conditions on the same day.
2015年3月17日 17.3.2015	行政長官會同行政會議確認必須進行三跑道系統工程計劃 CE in C affirmed the need for the 3RS project
2015年4月10日 10.4.2015	香港機場管理局向城規會簡介三跑道系統的發展建議 AAHK provided a brief overview on the proposed 3RS development to the Board
2015年4月17日 17.4.2015	城規會轄下的鄉郊及新市鎮規劃小組委員會經考慮後同意對分區計劃大綱圖的建議修訂，以便進行機場三跑道系統發展計劃 the Rural and New Town Planning Committee of the Board considered and agreed the proposed amendments to the OZP to facilitate HKIA 3RS development.
2015年5月8日 8.5.2015	同一時間，三跑道系統的填海計劃根據《前濱及海床(填海工程)條例》(第127章)刊憲 In parallel, the 3RS reclamation scheme was gazetted under the Foreshore and Sea-bed (Reclamations) Ordinance (FS(R)O) (Cap. 127)

背景 Background

機管局在公布《2030規劃大綱》後，一直積極聯絡各界持份者，徵詢他們對機場發展計劃的意見。
Since the promulgation of MP2030, AAHK reached out to a wide spectrum of stakeholders to seek their views on the airport's development plans

- 超過1,400次公眾活動
  over 1,400 engagement activities
- 成立四個技術研討小組
  set up 4 Technical Briefing Groups
- 成立五個社區聯絡小組
  set up 5 Community Liaison Groups
- 2014年6月20日至7月19日期間，當局按照環評條例的規定，把三跑道系統的環評報告公開讓公眾查閱
  The 3RS EIA report has been made available for public inspection between 20.6.2014 and 19.7.2014 in accordance with the EIA Ordinance
- 巡迴展覽
  roving exhibition
- 兩場公眾論壇
  2 sessions of public forum
- 2015年3月開始，機管局展開新的一輪公眾溝通和參與活動
  A new round of communication and engagement campaign has been launched by AAHK since March 2015

有關三跑道系統的司法覆核
Judicial Reviews (JRs) in relation to 3RS

- 共有五宗司法覆核申請表示反對機管局、環保署署長及行政長官會同行政會議就三跑道系統工程計劃所作的決定

  A total of five JRs lodged against the decisions of AAHK, DEP and CE in C in relation to the 3RS project

- 還有一宗由一名提意見人(**C340**)提出的司法覆核申請，針對的是草圖的申述程序和諮詢安排

  Another JR lodged by a commenter (**C340**) has also been received against the representation procedure and consultation arrangement of the draft OZP

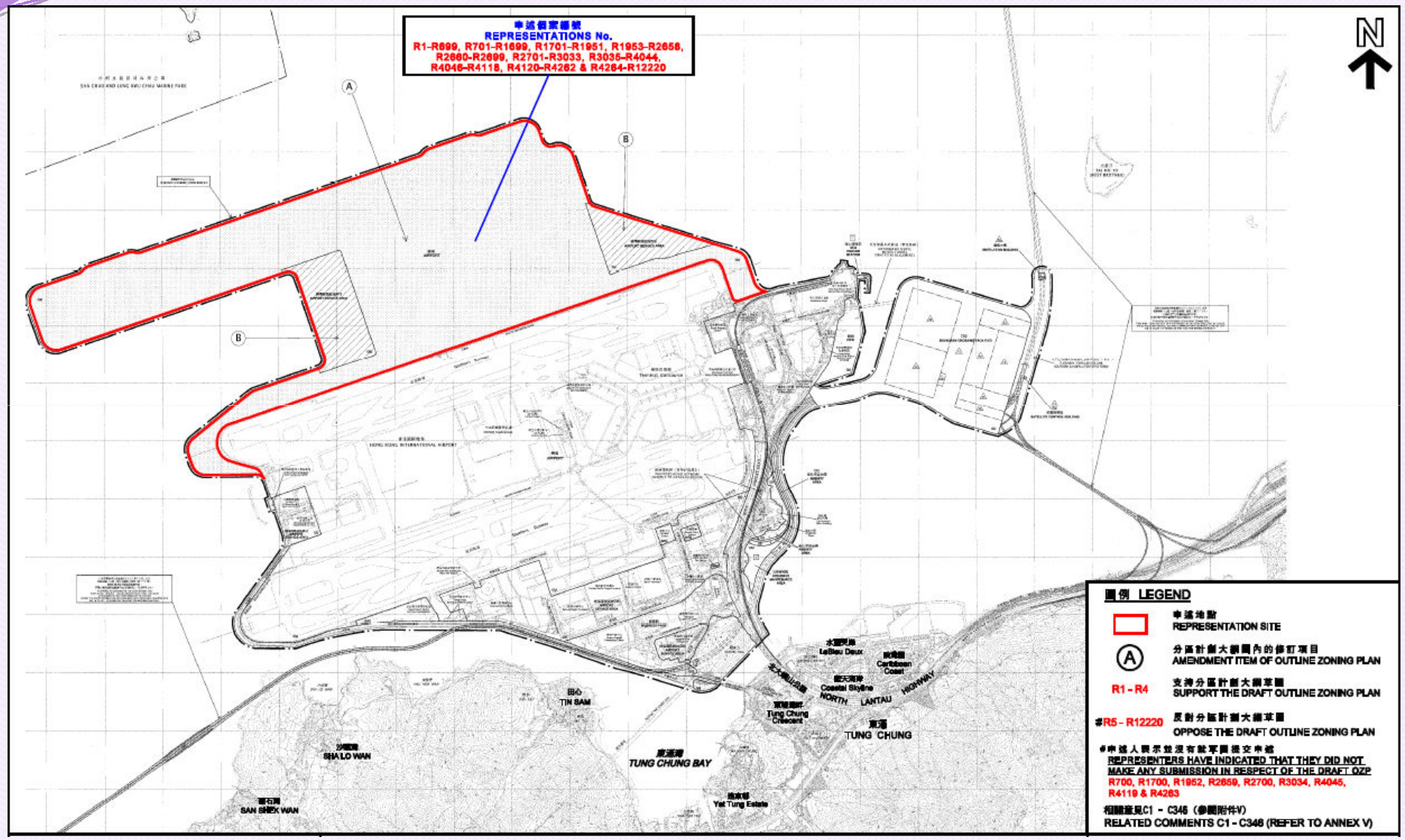
- 法院已向其中兩宗司法覆核申請給予許可，其餘的(包括一宗由提意見人(**C340**)提出的司法覆核申請)則尚未給予許可

  The Court has granted leave to two JRs, but not yet granted leave to the remaining JRs (including the one lodged by the commenter (**C340**))

申述和意見 Representations & Comments

	支持 Support	反對 Oppose
申述 (12,209) **Representations**	**總數 Total: 4** • 香港付貨人委員會 The Hong Kong Shipper's Council (**R1**) • 香港運輸物流學會 The Chartered Institute of Logistics and Transport in Hong Kong (**R2**) • 個別人士Individual (**R3**) • 香港公路學會Hong Kong Institution of Highways and Transportation (**R4**)	**總數 Total: 12,205** • 立法會議員 LegCo Members • 區議員 DC Members • 政黨成員 Political Party members • 關注組織 / 團體 Concern groups/ organisations • 個別人士 Individuals
意見 (346) **Comments**	**總數 Total:126** • 專業學會 Professional institutes • 區議員 DC Members • 航空公司 / 與航空或旅遊業相關的公司 / 組織 Airlines/aviation or tourism related companies/ organisations • 區內組織 Local organisations • 同業公會 Trade associations • 關注組織 / 團體 Concern groups/ organisations • 職工會 Trade unions • 個別人士 Individuals	**總數 Total: 220** • 香港機場管理局(機管局) Airport Authority Hong Kong (AAHK) (**C1**) • 環保 / 關注組織 Green/concern groups • 荃灣區區議員 Tsuen Wan DC Member • 航空公司 / 與航空或旅遊業相關的公司 / 組織 Airlines/aviation or tourism related companies/ organizations • 個別人士 Individuals

申述地點 Representation Site



申述地點 Representation Site



支持申述的主要理據
Major Grounds of Supportive Representations

- 發展三跑道系統有助維持機場的競爭力及增長，鞏固香港作為國際航空樞紐的地位。
  The 3RS would sustain HKIA's competitiveness and growth to strengthen Hong Kong's position as an international aviation hub.

- 發展三跑道系統為本港帶來龐大的經濟利益，亦可創造大量就業機會 (只是**R3**)
  The 3RS development would bring tremendous economic benefits and create ample job opportunities for Hong Kong (**R3** only)

- 機管局就三跑道系統工程計劃所作的環評研究，透徹詳盡，客觀持平。支持劃設新海岸公園的建議 (只是**R3**)
  The EIA study undertaken by AAHK for the 3RS project is considered a thorough and well balanced study. The proposal to designate a new marine park is supported. (**R3** only)

- 要解決發展三跑道系統對環境及生態可能造成的影響，填海時可採用免挖式的深層水泥拌合法 (只是**R3**及**R4**)
  The potential adverse environmental and ecological impacts of the 3RS development could be overcome by adopting deep cement mixing method which is a non-dredging technique for reclamation
  (**R3** and **R4** only)



反對申述的主要理據
Major Grounds of Adverse Representations

發展三跑道系統的需要／現有雙跑道系統的效率和容量
Need for 3RS/Efficiency and capacity of existing 2RS

- 當局未有提供足夠技術評估數據，證明三跑道系統是最可行方案。
  There are insufficient technical assessments to justify that 3RS is the most feasible option.

- 有關現有的雙跑道系統容量已達飽和的說法令人存疑。
  The allegation that the existing 2RS has reached its maximum capacity is doubtful.

- 除建設三跑道系統外，還有其他方案也可以提升雙跑道系統的運作效率，例如與區域內鄰近的機場合作、興建新機場及改善航空交通管理。
  There are other options like cooperation with nearby airports in the region, building a new airport and improvements in air traffic management to enhance the operation efficiency of 2RS instead of establishing 3RS.

- 申述人關注廣深港高速鐵路(「高鐵」)通車後，會對機場現時提供的短程航班造成競爭
  There are concerns that the commissioning of the Express Rail Link (XRL) would compete with the short-haul flights currently provided in HKIA

反對申述的主要理據
Major Grounds of Adverse Representations

環境及生態關注

Environmental and ecological concerns

- 大規模的填海工程，會對自然環境、海洋(包括中華白海豚)生態和漁業資源造成不可逆轉的影響。
  The massive reclamation would brings irreversible impact on the natural environment, marine (including Chinese White Dolphins (CWD)) ecology and the fisheries resources.

- 在三跑道系統落成後才闢設海岸公園的建議，等同「先破壞，後補償」，是不可接受的。
  The proposal of establishing a marine park upon completion of 3RS is not acceptable as it is tantamount to “Destroy First, Compensate Later”.

- 三跑道系統工程計劃會使噪音和空氣污染問題惡化，但當局並沒有提出有效的緩解措施減輕影響。
  The 3RS project would aggravate noise and air pollutions but no effective mitigation measure has been proposed to alleviate the impacts.

- 三跑道系統的建造工程對沙洲鷺鳥林有負面影響。
  The 3RS construction works would have adverse impact on Sha Chau Egretry

- 興建 / 發展機場對馬灣、沙螺灣和磡頭村的自然環境造成了負面影響。
  The construction/development of HKIA has caused adverse impact on the natural environment of Ma Wan, Sha Lo Wan and San Tau Village.

反對申述的主要理據
Major Grounds of Adverse Representations

交通關注

Traffic concerns

- 當局未有公開三跑道系統的交通影響評估的詳細資料。
  No detailed information on the Traffic Impact Assessment (TIA) on 3RS is available for the public.

- 當局沒有就三跑道系統進行海上交通影響評估和水文影響評估。
  There is no Marine Traffic Impact Assessment (MTIA) and hydrodynamics impact assessment conduced for 3RS

- 當局未有按國際民用航空組織(下稱「國際民航組織」)的規定提供三跑道系統的航空交通影響評估及其他相關評估資料。
  No air traffic impact assessment and relevant assessments as required by the International Civil Aviation Organization (ICAO) for 3RS is provided.

反對申述的主要理據
Major Grounds of Adverse Representations

對土地用途及發展的管制不足／成效不彰

Insufficient/Ineffective land use and development controls

- 對修訂項目所涉用途地帶內的准許用途及發展密度的管制非常寬鬆。「行人捷運系統車廠」應屬工業用途，不應把之列為經常准許的用途。
  The control on the permissible uses and development intensity in the zones under the Amendment Items is very loose. 'People Mover Depot' should be regarded as an industrial use and should not be always permitted.

- 由於有關的填海工程仍存在不明朗的因素，城規會實不應進行審議。而且城規會不應修訂涉及尚未存在的土地的分區計劃大綱圖。
  The Board should not consider the land use/amend the OZP given the uncertainty over the reclamation and on land which has not yet existed.

反對申述的主要理據
Major Grounds of Adverse Representations

違反程序公義
Procedural injustice

- 三跑道系統工程計劃的環評報告及獲批的環境許可證涉及司法覆核，在法院仍未就司法覆核作出判決前便修訂分區計劃大綱圖，未免過早。
  It is premature to amend the OZP until a decision on the JRs is made by the Court, given the fact that the EIA Report and the EP granted for 3RS project are subject to JRs

- 除非有關的法律問題已解決，否則政府不應進行有關填海工程及修訂分區計劃大綱圖的法定程序。
  The Government should not proceed with the statutory procedures for reclamation and OZP amendments until such legal issues are resolved.

其他問題
Other issues

空域問題尚未解決

Unresolved airspace issues

- 三跑道系統建成後，空域的使用不會有限制的假設，令人懷疑。
  The assumption of no restriction on the use of airspace upon completion of 3RS is doubtful.
- 成立「南珠三角終端區」的建議可能違反《基本法》第一百三十條
  The proposal to set up “the Southern PRD Terminal Area” may contravene Article 130 of the Basic Law
- 若「空牆」限制問題未能解決，三跑道系統所發揮的效用成疑。
  The effectiveness of 3RS is doubtful if the “Air Wall” constraint issue could not be resolved



其他問題
Other issues

成本效益及財政可行性

Cost-effectiveness and financial viability

- 建築費用高昂，可能有超支風險。發展三跑道系統的開支可用於其他有利於市民的政策方面。
  The construction cost is extravagant and there may be risk for cost overruns. The expenses for 3RS could be used for other policies beneficial to the public.

- 機管局建議採用的融資安排繞過立法會，不經其審批和監察，可能違反《基本法》第七十三條
  AAHK's proposal of 3RS financial arrangement would bypass the approval and monitoring of LegCo. Such arrangement may contravene Article 73 of the Basic Law.

- 三跑道系統所創造的就業機會未必會令本地勞工受惠，因為航空業及建築業現時已有人手不足的問題。
  The employment opportunities created by 3RS may not bring benefits to the local labour as there is currently lack of manpower in aviation and construction sectors.

其他問題
Other issues

向受影響的村民作出補償

Compensation to affected villagers

- 自一九九八年機場開始發展 / 運作，沙螺灣村的小型屋宇申請便一直凍結，但政府並沒有作出補償 / 採取緩解措施
  Applications for Small Houses within Sha Lo Wan Village have been frozen due to the development/operation of HKIA since 1998, and there has been no compensation/mitigation measure

申述人的建議
Representers' Proposals

- 興建一個新機場或把空運貨物業務分流至珠海 (只是**R4**)
  Building a new airport or diverting air-bound cargo operation to Zhuhai (**R4** only)

- 把「其他指定用途」註明「機場」地帶及「其他指定用途」註明「機場服務設施用地」地帶第一欄的用途改列於第二欄
  Transferring the uses in Column 1 to Column 2 under the "OU(Airport)" and "OU(Airport Service Area)" zones

- 規限「其他指定用途」註明「機場」地帶及「其他指定用途」註明「機場服務設施用地」地帶內作商用樓面面積
  Imposing restrictions on the floor area for commercial uses

- 刪除分區計劃大綱圖《註釋》說明頁中的「行人捷運系統車廠」用途
  Deleting 'People Mover Depot' use in the Covering Notes

- 延遲就分區計劃大綱草圖作出決定 / 擱置三跑道系統發展計劃 (只是**R47**及**R48**)
  To defer making a decision on the draft OZP/suspend 3RS development (**R47** and **R48** only)

- 成立基金推動保衞海洋生態的工作，同時保障本地漁業及沙螺灣村民的利益。
  To establish funds to promote protection and safeguard the marine ecology, and interests of the local fishery industry and Sha Lo Wan villagers.

對申述的意見
Comments on Representations

- 機管局(**C1**)對所有表示反對的申述(**R5至R12220**)作出以下方面的回應

  AAHK (**C1**) makes responses to all adverse representations (**R5** to **R12220**) on the following aspects:

a. 三跑道系統發展計劃的規劃過程具透明度，並進行了廣泛的公眾溝通和參與計劃

Planning process for 3RS development is transparent. AAHK also implemented extensive communication and engagement plan

b. 現有雙跑道系統實際可應付的最高飛機升降量應可增至每小時68架次

The practical maximum capacity of the existing 2RS could be increased to 68 movements per hour.

c. 機管局也曾考慮申述人提出的其他方案，以應付預計的航空交通需求。不過，認為這些方案均不能推進或不可行。

AAHK has considered the alternatives raised by the representers to meet the project air traffic demand, but they were neither pursued nor found to be feasible

d. 政府已制訂短、中及長期優化目標和措施，並會在二零二零年前付諸實施，改善珠三角地區的空域結構和航空交通管制安排，以優化空域的使用和加強安全

The Government has formulated short, medium and long-term optimisation targets and measures for implementation before 2020 to improve the airspace structure and air traffic control arrangements in the Pearl River Delta (PRD) region to optimise the use of airspace and enhance safety

e. 根據最新的設計，整座二號客運大樓的地基、下層結構及大部分樓宇設備和機場系統設施均可保留；至於其他樓層則會盡量保留，會進行所需的改建工程，配合二號客運大樓擴建後的布局

According to the latest design, the entire T2 foundation, substructures and most of the building services facilities and airport system works could be retained; whilst other floor levels will be retained as far as possible but with necessary modifications to suit the expanded T2 layout.

對申述的意見
Comments on Representations

f. 高鐵與三跑道系統其實是相輔相成，兩者可以使跨境鐵路服務和航空業的發展發揮協同作用。

XRL and 3RS are in fact complementary and will create synergy between the cross-boundary railway services and aviation industry

g. 機管局預計二零一二至六一年的50年間，三跑道系統帶來的整體經濟收益可達10,460億元(按二零一二年價格計算)。有關的融資方案已經過政府審核並獲認許。政府信納機管局的融資方案總體上合理且切實可行

AAHK estimates that the overall economic benefits of 3RS would be around 1,046 billion (2012 dollars) over the 50-year period from 2012 to 2061. The financial proposals has been vetted and validated by the Government and the Government is satisfied that AAHK's financial proposal is overall reasonable and practicable.

h. 機管局已就三跑道系統工程計劃對環境和交通的影響進行了詳細評估，並提出了適當的緩解措施。機管局一直積極主動推展其計劃，以符合環境許可證訂明的相關規定。

AAHK has conducted robust environmental and traffic impact assessments for the 3RS project and appropriate mitigation measures have been proposed. AAHK has been proactively taking forward its plan to comply with the respective requirements stipulated in the EP.



對申述的意見
Comments on Representations

- 有126名提意見人(**C2至C127**)支持那些表示支持的申述(**R1至R4**)，或主要基於以下理據大致上支持草圖 / 支持三跑道系統

  126 commenters (**C2** to **C127**) support the supportive representations (**R1** to **R4**) or generally support the draft OZP/3RS mainly on the following grounds:

a. *現有的雙跑道系統的容量即將飽和，因此有迫切需要發展三跑道系統。*

   There is an imminent need for development of 3RS in view of the soon-to-be saturated capacity of the current 2RS.

b. *三跑道系統會成為香港經濟的推動力*

   The 3RS will act as an impetus to the economy of Hong Kong

c. *三跑道系統發展再加上周邊各項新的發展和基礎設施發揮協同作用，有助建立一個新旅遊樞紐*

   The 3RS development, together with the surrounding new developments and infrastructures will create a synergy effect for a new tourism hub

d. *若然三跑道系統未能落實，航空網絡便會因為未能增加直航的航點和航機班次而萎縮*

   If 3RS cannot be implemented, the aviation network will be shrunken due to failure in increasing the direct flight destinations and flight frequencies

e. *機管局如能運用最新的科技，並落實所建議的緩解措施，應可以令環境所受到的影響減至最少*

   AAHK will be capable to minimise the environmental impacts with deployment of latest technology, proposed mitigation measures

f. *一些提意見人同意機管局現時提出的「共同承擔」融資方案*

   Some commenters agree with AAHK's current financial proposal of "joint contribution"

對申述的意見
Comments on Representations

- 其餘提意見人(**C128**至**C346**)有些反對支持申述(**R1**至**R4**)，有些則表示支持反對申述(**R5**至**R12220**)。這些意見的理據大致與反對申述所提出的相似

  The remaining commenters (**C128** to **C346**) either object to the supportive representations (**R1** to **R4**) or support the adverse representations (**R5** to **R12220**). The grounds of comments are largely the same as those raised in the adverse representations.

對申述理據的回應
Responses to Grounds of Representations

發展三跑道系統的需要
Need for 3RS

- 由於機場容量的瓶頸是跑道的飛機起降容量，故此擴建中場範圍並不會提升機場的整體處理能力。長遠而言，爲了應付長遠的航空交通需求，實有必要在機場興建第三條跑道。
  Expansion of the midfield will not increase the airport's overall handling capacity as the bottleneck lies in the airport's runway capacity. A third runway is still needed to meet long-term traffic demand.

- 香港的機場若不落實如三跑道系統計劃，最終香港作為航空樞紐的競爭力，將落後於其主要競爭對手。
  Without a major expansion plan like 3RS at HKIA, Hong Kong will eventually lose out on its competitiveness as an aviation hub to major competitors.

- 行政長官會同行政會議亦於二零一五年三月十七日確認香港必須進行三跑道系統工程計劃
  The need for 3RS was also reaffirmed by CE in C on 17 March 2015.

高鐵與短程航班的競爭問題
Competition between XRL and the short-haul flights

- 面臨高鐵競爭的區域性內地航線，其客運量只佔機場二零一四年的總客運量約4%。當局認為高鐵應不會對機場構成重大負面影響。
  The regional mainland routes affected by XRL only contributes about 4% of HKIA's passenger throughput in 2014. The potential adverse impact from XRL on HKIA would unlikely be significant.

對申述理據的回應
Responses to Grounds of Representations

現有雙跑道系統的效率和容量
Efficiency and capacity of existing 2RS

- 當雙跑道系統達到每小時最高實際容量後，再增加每年飛機升降量的空間便非常有限。
  Once the maximum hourly practical capacity is reached, there is little room to further increase the annual air traffic movements of the 2RS.

- 由於機場容量的瓶頸是跑道的飛機起降容量，故此擴建中場範圍並不會提升機場的整體處理能力。
  Expansion of the midfield will not increase the airport's overall handling capacity as the bottleneck lies in the airport's runway capacity.

- 提高現有雙跑道系統容量的其他方案，回應如下:
  Responses to the alternatives to increase the existing 2RS capacity are summarised as follows:

  A. 與區域內鄰近的機場合作 Collaboration with nearby airports in the region
  香港不能依賴鄰近機場來解決本身機場的容量問題。
  Hong Kong cannot rely on its neighbouring airports to help solve its capacity problem

  B. 削除大嶼山東北部的山峯 Removing the peaks in northeastern Lantau
  這建議不可行，因為大嶼山重要的基建設施及地標都得遷移。
  This proposal is not feasible as major infrastructure and landmarks on Lantau would have to be removed.

對申述理據的回應
Responses to Grounds of Representations

C. 減少飛往非熱門地點的航班數目 Reducing flights to less popular destinations

這建議對機場的整體交通量會有深遠的影響。此外，旅客的選擇亦會因此而減少，並會損及本港整體經濟利益

It will have wide ramification to HKIA's overall traffic, and also run counter to consumer choices and undermine the overall economic interests of Hong Kong.

D. 採用廣體飛機 Use of wide-bodied aircrafts

不論機場營運者還是各地政府，都不應作出強制規定，而且不必要的干預亦會損害機場和航空公司的營運效率。事實上，香港國際機場採用廣體飛機的比率已是全球第二高(達62.1%)

It is not for the airport operators or governments to dictate such decision, not to mention that unnecessary interference will undermine the operational efficiencies of both airports and airlines. In fact, HKIA is already one of the world's most efficient airport that has the second-highest proportion of wide-bodied aircraft (62.1%)

E. 提供更多／改善地勤支援設施 Provision/improvement of additional ground support facilities

為了在中短期內提升機場的地面處理能力，機管局正全力推展中場範圍發展計劃，增設20個停機位，期望每年額外處理1 000萬人次的旅客

To increase ground handling capacity in short to medium terms, AAHK is pushing ahead with the Midfield Development Project, which will provide 20 additional parking stands to serve an additional 10 million passengers each year.



對申述理據的回應
Responses to Grounds of Representations

環境及生態關注

Environmental and ecological concerns

- 環保署署長認為，三跑道系統環評報告已充分處理所有這些問題，符合環評研究概要及根據環評條例發出的技術備忘錄的要求。

  DEP considers that all these concerns are adequately addressed in the 3RS EIA Report to meet the requirements of the EIA Study Brief and the EIA Ordinance-Technical Memorandum

- 擬議的機場擴建藍圖已儘量減少填海範圍，並在報告中提出以設立海岸公園作為一種補償措施，以提供一個受保護的海洋生態棲息地。

  The footprint of the airport expansion layout has been minimised and a marine park as a compensatory measure has been proposed in the EIA report which will provide a protected habitat for the marine ecology.

- 環評報告中已建議採取適當的緩解措施，以減輕三跑道系統工程計劃對中華白海豚生活環境、沙洲鷺鳥林和沙螺灣可能造成的負面影響，以及可能產生的噪音和空氣污染問題。

  Appropriate mitigation measures have been proposed to mitigate the potential adverse impact of 3RS project on CWD habitat, Sha Chau Egretry and Sha Lo Wan, as well as the potential adverse noise and air impacts.

對申述理據的回應
Responses to Grounds of Representations

交通關注

Traffic concerns

- 運輸署署長認為，三跑道系統對機場內各道路和毗連的道路網造成的整體交通影響，直至二零二六年之前仍屬可以接受。政府確認有需要多建一條道路通往機場。政府會持續監察及檢討二零二六年後的交通情況。

  C for T considers that the overall traffic impact to roads within HKIA and adjoining road network arising from 3RS is considered acceptable by 2026. The Government acknowledges the need to provide an alternative route to HKIA, the traffic situation beyond 2026 would be constantly monitored and reviewed.

- 海事處表示，海上交通影響評估的結果確認只要實施海上交通緩解和改善措施，三跑道系統工程計劃不會對海上航行構成任何無法克服的風險。

  MD advises that the findings of the MTIA affirmed that with the implementation of the recommended marine traffic mitigation and enhancement measures, the 3RS project would not pose any insurmountable navigational risk.

- 民航處已按照國際民航組織的指引實施安全管理系統。並會在適當階段因應三跑道系統進行所需的安全風險評估。

  CAD has implemented the Safety Management System in accordance with ICAO guidelines and would ensure necessary safety risk assessment for 3RS will be conducted at appropriate stages.

對申述理據的回應
Responses to Grounds of Representations

對土地用途及發展的管制不足／成效不彰

Insufficient/Ineffective land use and development controls

- 擬備草圖的目的是要把赤鱲角的發展項目納入規劃管制範圍

  The draft OZP is prepared to put the development of Chek Lap Kok under planning control.

- 草圖上各個土地用途地帶，及《註釋》說明頁的修訂，是為了配合機場的各項發展而劃定，令機場的運作發展可以有最大的彈性。

  The zonings designated on the draft OZP and the amendments to the covering Notes aim to support the development of HKIA, and to allow maximum flexibility for airport operational development.

- 因為擬議的用途與現時機場的相同，總樓面面積／建築物高度沒有規限，使機場的發展可以有最大的彈性。

  As the proposed uses of the amendment sites are the same as the existing HKIA, no GFA/building height restriction is imposed on these zonings to allow maximum flexibility for airport development.

對申述理據的回應
Responses to Grounds of Representations

對土地用途及發展的管制不足／成效不彰

Insufficient/Ineffective land use and development controls

- 把「行人捷運系統車廠」納入為草圖範圍內經常准許的用途，是為了配合現有及新設的自動化行人捷運系統所提供的服務，此系統是機場及三跑道系統必需的設施。。

  Incorporating 'People Mover Depot' on top of the existing 'People Mover Track' as an use that is always permitted is to facilitate the services of the existing and new automated people mover system which is an essential facility at HKIA and the 3RS.



- 同時於憲報公布擬議的填海工程及填海區的土地用途，可確保能在同一時間就擬議的填海工程和相關的土地用途諮詢公眾，而城規會亦可在填海工程根據《前濱及海床(填海工程)條例》刊憲／授權進行之前，審議這份分區計劃大綱草圖。

  Concurrently gazette reclamation and land use proposals on the reclamation will ensure that the public is consulted concurrently on both the proposed reclamation and the associated land uses, and that the Board can consider the draft OZP before the reclamation is gazetted/authorised under the FS(R)O.

對申述理據的回應
Responses to Grounds of Representations

違反程序公義

Procedural injustice

- 據律政司表示，除非法院指示將該司法覆核申請所關乎的法律程序擱置，否則這些司法覆核申請並不構成任何法例上的限制，阻止城規會繼續進行條例下規定的法定分區計劃大綱圖修訂程序。

  DoJ advises that the JR applications concerned do not constitute legal restriction prohibiting the Board from continuing the ongoing statutory amendment process of the OZP under the Ordinance, unless and until the Court directed that there should be a stay of the proceedings to which the JR application relates.

公眾諮詢工作欠善

Improper public consultation

- 機管局已於二零一一年六月至九月期間就《2030規劃大綱》進行了為期三個月的公眾諮詢，收集公眾對機場未來發展的意見。

  AAHK conducted a 3-month public consultation exercise on MP2030 between June and September 2011 to seek public views on the future development of HKIA.

- 機管局致力向各界介紹三跑道系統工程計劃，又定期舉行三跑道系統的簡介會及機場參觀活動，讓多方持份者參與

  AAHK had reached out to promote the 3RS project and conducted regular 3RS briefings as well as airport visits for a broad range of stakeholder groups

- 機管局亦曾出席立法會數場公眾聆聽會，闡釋三跑道系統工程計劃的有關事宜。

  There have also been several public hearings at the LegCo where AAHK attended to explain issues concerning the 3RS project.

對其他問題的回應
Responses to Other Issues

空域問題尚未解決

Unresolved Airspace issues

- 二零零四年，中國、香港及澳門有關當局組成了三方工作組，制訂措施改善珠三角地區的空域結構和航空交通管理安排。民航處會確保有關安排符合《基本法》有關條文。

  A working group between the authorities of Mainland China, Hong Kong and Macao has been set up in 2004 to formulate measures to rationalise the airspace structure and air traffic management arrangements in the PRD region. CAD will ensure that the arrangements made are in compliance with the relevant provisions of the Basic Law.

成本效益及財政可行性

Cost-effectiveness and financial viability

- 機場三跑道計劃可創造大量就業機會，惠及市民

  The 3RS would create tremendous job opportunities which are beneficial to the public

- 由於機管局建議的融資安排並不涉及稅收或公共開支，所以《基本法》第七十三條的規定並不適用。

  Since the financing arrangement proposed by AAHK does not involve taxation or public expenditure, the requirements under Article 73 of the Basic Law are not applicable

- 機管局正檢討預計所需的建築工人數目，以確保能適時提供人手，應付日後三跑道系統施工時的需求。當局亦提出了多項措施支援航空業人員的培訓和發展，包括在二零一四年成立1億港元的「海運及空運人才培訓基金」

  AAHK is reviewing its projected construction labour requirement to ensure timely provision of labour to meet the future demands of 3RS construction. The Government has proposed various measures to support the training and development of aviation personnel, including the HK$100 million “Maritime and Aviation Training Fund” established in 2014.

對其他問題的回應
Responses to Other issues

向受影響的村民作出補償

Compensation to affected villagers

- 向受三跑道系統工程計劃影響的村民作出補償的問題與這次對分區計劃大綱圖所作的修訂無關

  The issue on compensation to the villagers affected by the 3RS project is not related to the OZP amendments

- 地政總署離島地政專員表示，涉及的飛機噪音預測25等量線範圍以外的小型屋宇申請，將會根據適用的程序恢復進行。

  LandsD advises that the Small House applications outside the NEF25 contour would be resumed in accordance with the applicable procedures.

- 機管局亦已透過「機場鄉郊環境改善計劃」，為北大嶼山七條鄉村(包括沙螺灣)提供一次性的特惠金，協助改善村民的居住環境。

  AAHK has also offered a one-off ex-gratia payment, in the form of “HKIA Village Home Improvement Scheme” to seven villages in North Lantau, including Sha Lo Wan, to help improve villagers' living environment.

對申述人的建議的回應
Responses to Representers' Proposals

興建一個新機場或把空運貨物業務分流至珠海

Building a new airport or diverting air-bound cargo operation to Zhuhai

- 在香港採用雙機場的運作模式，成本不單非常高昂，而且運作亦欠效益。
  The twin airport operation in Hong Kong would be highly costly and operation-wise inefficient.

- 有關把航機分流往其他機場的建議，是不屬於香港的空管管轄範圍
  The suggestion to funnel flights to other airports is outside Hong Kong's jurisdiction

修訂分區計劃大綱草圖的《註釋》

Amendments to the Notes of the draft OZP

- 修訂項目涉及的土地用途地帶及相關的用途，基本上與現時機場範圍內的土地用途地帶一樣，讓機場的運作發展可以有彈性。因此，從土地用途規劃的角度而言是恰當的。

The proposed land use zonings and associated land uses are basically the same as those currently designated to the area covering the existing HKIA to allow flexibility for airport operational development and are considered appropriate from the land use planning perspective.

- 把「行人捷運系統路軌及車廠」列為經常准許的用途是為了配合建議闢設的一個綜合維修車廠，為現有及新設的自動化行人捷運系統提供服務，此系統是機場及三跑道系統必需的設施。
  The 'People Mover Track and Depot' proposed to be incorporated as uses always permitted is to facilitate the proposal to set up an integrated maintenance depot to serve the existing and new automated people mover system, which is an essential facility at HKIA and the 3RS.

對申述人的建議的回應
Responses to Representers' Proposals

其他建議

Other Proposals

- 機管局會成立獨立的改善海洋生態基金，保育香港及珠江口水域內的海洋生物(尤其是中華白海豚)；亦會成立獨立的漁業提升基金，支援漁業及增加漁業資源。

  AAHK will establish an independent Marine Ecology Enhancement Fund for the conservation of marine life particularly the CWD, and an independent Fisheries Enhancement Fund to support the fishing industry and enhancing fisheries resources

規劃署的意見 PlanD's Views

- **備悉R1至R4**表示支持的意見
  Noted the supportive views of **R1 to R4**

- **不支持R4**餘下部分的意見及**R5至R12220**的申述
  Does not support the remaining views of **R4** and the representations of **R5至R12220**

- **不應**順應這些申述修訂草圖
  Should not amend the draft OZP to meet the representations



謝謝

Thank You

規劃署
Planning Department

tpbpd

Annex I-A

寄件者: Joyce Man [redacted]
寄件日期: 07日07月2015年星期二 11:39
收件者: tpbpd@pland.gov.hk
副本: sunny
主旨: Hong Kong International Airport - 3RS
附件: HKIA - 3RS.pdf

Dear Sirs,

Attached pls. find the representation from the Hong Kong Shippers' Council in respect of the amendments to the approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12.

Thanks!

Regards,
The Hong Kong Shippers' Council

006

THE HONG KONG SHIPPERS' COUNCIL

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Secretary,
Town Planning Board,
15th Floor, North Point Government Offices,
333 Java Road, North Point,
Hong Kong

7th July 2015

Dear Sirs,

A Representation from the Hong Kong Shippers' Council in respect of the Amendments to the Approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12

Introduction

The Hong Kong Shippers' Council (HKSC) was established in 1967 and incorporated as a separate legal entity in 1976 in Hong Kong, of which its main objectives are to protect and promote the interests of importers and exporters, traders and manufacturers in relation to freight transport services globally. The Hong Kong International Airport is one of the most important logistics facilities to shippers and HKSC wishes to make the following representation in respect to the gazetted amendments to the approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12.

Item A – Designation of an area on the proposed reclamation to the north of the Hong Kong International Airport as "Other Specified Uses" ("OU") annotated "Airport"

HKSC supports the amendment as Hong Kong needs the 3Rs to sustain competitiveness and growth. The area on the proposed reclamation to the north of HKIA should be dedicated for such use and designation of the area as "Other Specified Uses" ("OU") annotated "Airport" is appropriate.

Item B – Designation of two areas in the east and west of the proposed reclamation as "OU" annotated "Airport Services Ares"

HKSC supports the amendment as the two specified areas in the east and west of the proposed reclamation are integral part of the 3Rs. Therefore, designation of the two areas as "OU" annotated "Airport Services Area" is appropriate.

Yours faithfully,

Willy Lin
Chairman

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150708-160409-57847

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 08/07/2015 16:04:09

提出此宗申述的人士
Person Making This Representation: The Chartered Institute of Logistics and Transport in Hong Kong

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-CLK/13

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**
Item A – Designation of an area on the proposed reclamation to the north of the Hong Kong International Airport as Other Specified Uses" ("OU") annotated "Airport"	支持 Support	The Chartered Institute of Logistics and Transport in Hong Kong (CILTHK) supports the amendments to Matters (Item A) shown on the Approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12. Hong Kong's airport is the world's busiest international cargo airport and the third busiest airport for international air passengers. However, there is no room for complacency and the constraint of runway capacity is a major threat. This proposed designation would support the future development and expansion of HKIA in order to strengthen Hong Kong's position as an international and regional aviation hub.
Item B – Designation of two areas in the east and west of the proposed reclamation as "OU" annotated "Airport Service Area"	支持 Support	CILTHK supports the amendments to Matters (Item B) shown on the Approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12. The airport expansion is essential to cater for Hong Kong's medium and long-term air traffic demand and maintain the competitiveness of HKIA

		amidst intensifying competition from other airports in the region. This proposed designation would provide extra land for airport supporting services which is consistent to our support to the expansion in HKIA.

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-CLK/13-3

參考編號
Reference Number: 150706-110149-13753

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 06/07/2015 11:01:49

提出此宗申述的人士
Person Making This Representation: 先生 Mr. Leong Kam Ho

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-CLK/13

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

有關事項 Subject Matters	性質 Nature	理由 Reason
the Chek Lap Kok Outline Zoning Plan for the 3rd Runway Systems of the Hong Kong Internaltional Airport	支持 Support	HKCA fully support the development of the 3rd Runway System that should be considered as one of the key infrastructure for maintaining economic competitiveness of Hong Kong, especially when facing the rapid growth of the nearby regions. The expanded Airport combined with the Tung Chung New Town Extension Development, a Meetings and Incentives Conventions Exhibitions (MICE) region will be emerged for a new tourism hub for the PDR Region with retail and commercial facilities. The synergy effects of HZM Bridge, TM-CLKL and HKIA will bring tremendous economic benefits and creates ample opportunities for the Hong Kong workforce. The expansion will also become a new economic powerhouse propelling for the Hong Kong economy in the next decade. HKCA considers the Environmental Impact Assessment (EIA) Report of the Three-Runway System published by the Hong Kong Airport Authority a thorough and well balanced study that have examined the critical elements for protecting the environment. The proposal to establish a new Marine Park will ensure the prosperity of marine life in the Hong Kong water yet maintaining the growth engine for the economy. Over the past decades, many of the HKCA Members have been involved in building some of the landmark infrastructures including reclamations of Tung Chung regions, Disney Theme Park and Chek Lap Kwok Hong Kong International Airport. Marine Life including Chinese White Dolphin has been observed to repopulate the regions soon

		after completion of the development works. To control the disturbance of the surrounding water, a non-dredging technique known as the "Deep Cement Mixing" method has been id entified for the reclaimed land of the airport. The state of art reclama tion technique has been used internationally, countries in Scandinavi a, Europe, Japan, Korea and US have been deployed the renounced t echnique for reclaiming lands.

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

tpbpd

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 11:04
收件者: tpbpd@pland.gov.hk
副本: [redacted]
主旨: Representation relating S/I-CLK/13
附件: S6x1x_from HKIHT.pdf

For the attention of Secretary of Town Planning Board:

Please find attached representation for the amendments to the approved Chek Lap Kok Outline Zoning Plan for your retention.

Yours faithfully,
Ir Shirley Cheng
Hon Secretary of Hong Kong Institution of Highways and Transportation
Hong Kong Institution of Highways and Transportation (HKIHT)

[redacted]

Hong Kong Institution of Highways and Transportation (...
Welcome to the website of the Hong Kong Institution of Highways and Transportation (??????).
View on www.hkiht.org
Preview by Yahoo

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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*)

Hong Kong Institution of Highways and Transportation

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*)

NA

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-CLK/13

* 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
Expansion of Hong Kong International Airport into a Three-Runway System	☑ support 支持 ☐ oppose 反對	see attached sheets
	☐ 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。

NA

@ 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

香港公路學會

Hong Kong Institution of Highways and Transportation

[redacted]

Written Submission to TPB by Hong Kong Institution of Highways and Transportation

Date: 8 July 2015

1) HKIHT supports the timely completion of the Third Runway System (3RS) to ensure our infrastructures can support the future growth of our economy and the long term development of Hong Kong as a World Class City.

2) HKIHT believes that the 3RS can increase Hong Kong's airport services competitiveness in the region.

3) HKIHT also believes that the 3RS can strengthen Hong Kong's air cargo business as it is still the most efficient airport in south east China

4) HKIHT understands that construction technologies can minimize adverse effects to marine habitats and our environment. The current proposal of using non-dredged method for reclamation and deep cement mixing to stabilize the marine clay due to environmental concerns, results in a high land formation cost almost half of the total 3RS costs. While AAHK should always consider methods to reduce negative effects, AAHK should also balance costs and benefits to achieve optimal results for both the public and the environment.

5) HKIHT is of the opinion that the sustainability of a major infrastructural project requires the achievement of economic success, social success and high environmental quality at the same time. AAHK should give equal weights to all three aspects in the development of the 3RS.

6) Hong Kong is currently facing severe manpower shortage problems in the construction sector. Construction of the 3RS will aggravate the situation. HKIHT considers that the HKSAR Government may need to help to address and resolve the problem.

7) Beyond 2030

Upon completion of the 3RS by the target date of 2023, in order to maintain sustained growth of the Hong Kong International Airport beyond 2030, HKIHT considers that a separate airport for cargo should be investigated.

[redacted]

Option 1 is to divert the cargo arrivals and departures to Zhuhai airport currently managed by AAHK, and relay the cargo back to Hong Kong via an airside to airside bonded road.

Option 2 is to construct a new airport on south Lantau for cargo only. Construction of supporting infrastructure would be less complicated than Option 1, as it would be implemented within Hong Kong territory.

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。

NA

5. Signature 簽署

Signature 簽署 .....

CHENG SHU WAI, SHIRLEY
Name in Block Letters 姓名（以正楷填寫）

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

Honorary Secretary of HKIHT
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 Hong Kong Institution of Highways and Transportation (HKIHT)

on behalf of 代表 Hong Kong Institution of Highways and Transportation
Company/Organization Name and Chop (if applicable)
公司/機構名稱及蓋章（如適用）

Date 日期 8 July 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

Annex I-B

就草圖作出申述
Representation Relating to Draft Plan TPB/R/S/I-CLK/13-5

參考編號
Reference Number: 150708-113212-44095

提交限期
Deadline for submission: 08/07/2015

0868

提交日期及時間
Date and time of submission: 08/07/2015 11:32:12

提出此宗申述的人士
Person Making This Representation: 先生 Mr. Tse King Tin (San Tau Village Indigenous Inhabitants Representative)

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-CLK/13

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
赤角分區計劃大綱核准圖編號 S/I-CLK/12 的修訂	反對 Oppose	Sha Lo Wan and San Tau Village in the vicinity of Chek Lap Kok is over 300 years old. The original peaceful village environment, fresh air, beautiful starry nights that we enjoyed in the past ended in 1992 when construction of the The Hong Kong International Airport (HKIA) at Chek Lap Kok began. The HKIA began operations in 1997. The success and growth of HKIA has not provided any benefits to us, but we suffered levels of pollution that far exceeded our expectation. The operation of the HKIA brings constant aircraft noise even into the early hours of the morning; various air poisoning emissions and particulates and strong tides that make it difficult for our small craft to use our pier. All these things are damaging our living. We reported to our Village Representative and Tai O Rural Committee member and asked for a joint meeting with HKIA. We wanted to directly communicate our grievances to you over the past 16 years but HKIA has refused to come to the table all this time. Suddenly over the past month they called us to attend a meeting with them and it was because they wanted to explain the creation of the third runway. So when they want something, then they will talk. We object to the third runway because it will make the environment unacceptable to our village. HKIA presented their "Environmental Impact Assessment Report - Exe

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cutive Summary" (hereinafter referred to as EIA) which is in their HKI A Master Plan 2030 regarding it's Three-Runway System (3RS),

We question:

Operation Phase (est. in 2023)

In the EIA, Pg 20 - 5.3.3.7 - Air Sensitive Receivers (ASRs) within 5 k m of the project boundary have been identified, including Sha Lo Wan Village & North Lantau New Town Phase IIB Area (San Tau Village i nvolved).

In the report, the HKIA states the environmental impact is acceptable. Our view is that they have used extreme optimal circumstances to mak e the estimations, as shown in EIA, P.g. 21 - 5.3.3.12. They even sugge st that the 3RS will bring environmental benefit to Sha Lo Wan (which is in the area of San Tau Village).

They said the reasons of Sha Lo Wan and San Tau Village will have a better environment if there is a third runway are:

Shifting of dominant aircraft departure from the South Runway to th e centre runway.
o (Are they now admitting that their South Runway has all these years caused a huge air and noise impact?)
Assigning the South Runway as a standby runway whenever practic able during the night-time period between 23:00 and 06:59.

This offer is not a solution and what's the definition of its standby mod e? The clause "whenever practicable" is not a commitment but a licenc e to do what they want.

In 1999 there were 4,720 planes landing between 0001 and 0700hrs. B ut in 2013 records show that there were 24,111 arrivals between these hours . That's an enormous increase in noise and pollution.

The North & South Runway became fully operational in Aug. 1999. H KIA said the two runways are managed by segregating usage i.e. the so uthern runway would be used for departures and the northern runway f or arrivals. However they didn't mention that in practice, cargo flights and Government Flying Service flights would also use the South Runw ay. HKIA haven't mentioned what the arrangements will be for these t wo categories of flights if the 3RS is up and running.

HKIA operates a single runway when they decide it is in their best inte rests. For example, when there is maintenance to be performed after mi d-night and they want to earn more money, they use the South Runway without restrictions or any penalties. Residents of Sha Lo Wan and cert ain villages along North Lantau shoreline, including Sau Tau Village p ay the cost.

We experienced the unfair and inaccurate EIA report, when an advisor y council on the environment was appointed in 1991 to evaluate the noi

se impact generated by the new HKIA. It stated in section 3.1.1, the air craft noise exposure has fulfilled the internationally acceptable standar ds. Exceptions are noted in a small number of villages in Sha Lo Wan, where the population falls over the NEF25 contour but within NEF 30 contour. Are we residents to suffer even more than now, more than the 16 years we have suffered already? HKIA ignored our basic rights to a reasonably quiet and peaceful living.

Look at Pg 21 - Table 5.1 : Sha Lo Wan - Airport Related Emissions (g/m3)– it shows that the emissions are 6 times that of other location s in the vicinity of HKIA they tested. How is it reasonable for a major i nfrastructure project be designed so that the area of Sha Lo Wan suffer s 6 times more than other nearby spots?

The statement at 5.3.3.14 – "In view of the above assessment findings, it can be concluded that operation of the project will not result in adver se residual air quality impacts". That's hard to believe given their recor d of greatly underestimating impact. Compare all the estimations they gave before HKIA was built and what the pollution figures are in actua l operation.

Construction Phase

HKIA replied that the proposed third runway would be "an improveme nt scheme to our village", because noise would affect the village during the Construction Phase only.

In EIA, P.g.20 - 5.5.2.7 - AAHK (Airport Authority Hong Kong) will o ffer to provide window insulation and air-conditioning for all houses sit uated within the newly affected villages before the operation of the 3R S in order to alleviate the potential aircraft noise impact on the resident s.

They haven't mentioned any of the many other ways our living conditio n would be impacted as in Construction Noise 5.5.4, Road Traffic Nois e 5.5.5, Marine Traffic Noise 5.5.6 and Water pollution 5.6.

They used a separate statement and assessment with no mention of our village.

At this moment we are also suffering from the construction of the HK-Zhuhai-Macau Bridge. The EIA has not examined the cumulative effec t of both of these projects to affected villagers.

In conclusion we are standing against the Three-Runway System due to additional potential environmental impacts to our environment. We hav e suffered through 16 years of operation of the HKIA plus the construct ion period and now the construction of the HK-Zhuhai-Macau Bridge.

We ask that our original village life be preserved.

Say No to the third runway

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

致　城市規劃委員會

機場第三條跑道一旦建成　馬灣居民勢必受害

反對機場第三條跑道工程及規劃

馬灣長期以來深受飛機噪音所害，居民無不叫苦連天，生活日常分分秒秒被困擾。儘管過去向民航處及機管局極力投訴，要求改善問題，可恨是當局持大欺小，除了官腔回應，所謂改善措施從沒有實際效果，承諾皆為空言，至今每日在珀麗灣及馬灣村頭上，仍然是飛機聲隆隆作響。

至近年機管局為推銷第三條跑道，主動向馬灣居民宣傳工程完成後，飛機可以向北直飛，飛越馬灣的飛機將會減少，噪音問題就得到長遠解決。但是，有前民航處長就公開表示，要做到飛機向北直飛，中港跨境空域問題需先得到解決，而此事的可能性極微。後有環保團體發表研究及專業機師於報章撰文，揭發如果香港空域受大陸空牆限制的問題持續，屆時珀麗灣上空將有比現在更多的飛機飛過，噪音只會有增無減！按團體的專業估計，馬灣北面及珀麗灣全苑都很可能在 NEF 25 噪音影響的範圍內，問題極之嚴重，但機管局對此半聲不響，在工程環評報告內亦全無提及，有意蒙馬灣居民在鼓裡，實在欺人太甚！

當然，機場第三條跑道的問題不只馬灣居民受影響。工程大規模填海對海洋生態的破壞、香港要為興建機場而要支付的金錢及社會成本、所謂經濟回報是如何計算、大型基建一旦超支又如何解決等，當局均一直沒有公佈資料及誠實回應。香港市民不能認同這種自以為是，不顧民情的規劃方式。

有關機場環評報告及行政會議決定正被司法覆核挑戰中，本人於政府及機管局未清楚交代以上環境、噪音、生態、經濟問題及官司有結果之前，<u>強烈反對機場第三條跑道工程，要求城規會聽從民意，反對機場相關的整份 S/I-CLK/13 赤鱲角分區計劃大綱圖。</u>

姓名：一批馬灣居民 (名字必須清楚)

聯絡方法：（電郵或電話）

037

FROM : FAX NO. [redacted] 8 Jul. 2015 19:45 P1

08-JUL-2015 19:29 96% P.001

日期：2015年7月8日

致 ： 城規會

有關 ：擴建香港國際機場成為三跑道系統

本人是大嶼山沙螺灣村的原居民，長期受到香港國際機場影響最嚴重的「持份者」，堅決反對擴建三跑道系統！

沙螺灣村，位處於香港國際機場跑道以南的一條村，我們的碼頭距離機場島不足100米。長期受飛機噪音困擾、承受飛機輪胎磨擦地面發出危害健康的臭氣。

香港國際機場自1998年啟用至今，對沙螺灣村已造成重大的破壞，包括環境、交通及居住等問題。

1) 沙螺灣以擁有美麗的沙灘聞名，每年的旅遊人士眾多，地方興旺，原本可以安居樂業。自興建香港國際機場開始，因為泵走大量海底沙泥興建機場島地台，導致沙螺灣的海沙嚴重流失，變成今天的「爛泥石灘」，令沙螺灣村居民損失原有的基本生活條件。
2) 自90年代初興建赤鱲角機場，已經令到周邊的環境劇變，但政府只顧興建機場，對鄰近受影響的鄉村置之不理，政府又諸多理由，不做基建設施，令到周邊的鄉村開始沒落，多年來面對沉重的問題
3) 飛機的噪音，導致沙螺灣村被NEF25噪音等量線覆蓋，問題完全由香港國際機場造成，但香港特區政府竟然用此理由，自1998年開始，凍結審批居民建屋居住，年期已經長達18年，期間有居民不幸離世，損失慘重！這問題不知持續到何年何月！持續影響「民生」！

當香港機場管理局(機管局)公布要拓建三跑道系統，應該會受環保條例監管，滿以為機管局會為過去及持續性的問題安排援解措施，但環評報告的內容中，機管局並沒有為造成的問題制定任何援解措施！但環境保護署署長竟然批發環境許可證予香港機場管理局，本人質疑環境保護署的決定，明顯是偏袒「機管局」，為三跑道系統護航！

Cont. p.2…

A) 海洋生態方面
- 為了保育約70條的中華白海豚，機管局需要建造2400公頃的海岸公園予海豚棲息，減少船隻與中華白海豚碰撞及造成滋擾。
- 成立獨立的改善海洋生態基金，「基金」的資源須足以達到長遠和具持續性的保育目標。
- 亦須成立「基金」管理委員會，由不同持份者組成，以便有效推行計劃。

B) 漁業方面
- 成立獨立的漁業提升基金，須聯同漁民訂定計劃，以支援漁業及提升香港西水域的漁業資源。
- 亦須成立「基金」管理委員會，由漁民及相關持份者擔任委員，以確保漁業管理計劃可有效實施。

C) 沙螺灣村約800名村民？
- 建屋方面
  無限期凍結審批建屋 - 沒有任何援解措施，亦沒有合理安置，再加建築通貨膨脹壓力，環評報告在這方面隻字不提！
- 空氣方面
  飛機輪胎磨擦地面發出危害健康的臭氣，環評報告沒有長遠的援解措施及解決方案。
- 噪音方面
  沙螺灣長期受嚴重的飛機噪音困擾，環評報告沒有長遠的援解措施及解決方案。
- 環境方面
  破壞沙螺灣沙灘環境，環評報告並沒有補救方案。
- 交通方面
  機場開始使用後，政府無理凍結擬建道路！環評報告亦隻字不提。
- 「基金」方面
  中華白海豚有「海洋生態基金」、漁民有「漁業提升基金」，但機場造成多項直接影響「民生」問題，為何沒有為沙螺灣村成立持續援解措施基金？可以有效長遠及持續解決問題。

基於香港國際機場對沙螺灣村的破壞、環評報告避談機場造成的問題、機管局逃避對造成的「民生」問題負責任、環保署處事不公。本人堅決反對拓建三跑道系統。

姓名： 李大鵬
地址： [redacted]
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寄件者: AKo [redacted]
寄件日期: 08日07月2015年星期三 20:09
收件者: tpbpd@pland.gov.hk; tpbpd@pland.gov.hk
主旨: 立法會議員陳家洛就《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》的申述意見書
附件: 2015年7月8日 立法會議員陳家洛意見書.docx

城規會,

附件是公民黨陳家洛就《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》的申述。請查看並處理。

謝謝。

Anthony Ko

立法會 Legislative Council
陳家洛議員 Hon Chan Ka Lok Kenneth
公民黨 CIVIC PARTY

立法會議員陳家洛就《赤角分區計劃大綱草圖編號 S/I-CLK/13》的意見書

針對《赤角分區計劃大綱草圖編號 S/I-CLK/13》，本人反對有關修訂項目，並提出以下質疑：

1. 香港國際機場第三條跑道的運作涉及空域問題，政府曾指出將會實行「空域共享」。有報導指空域共享是建立包括香港、澳門、深圳及珠海各機場在內的「南珠三角終端區」，屆時航機由粵港共同管理。但根據《基本法》第一百三十條：「香港特別行政區自行負責民用航空的日常業務和技術管理，包括機場管理，在香港特別行政區飛行情報區內提供空中交通服務，和履行國際民用航空組織的區域性航行規劃程序所規定的其他職責。」公民黨質疑有關「空域共享」的概念有可能違反《基本法》第一百三十條。

飛行情報區(Flight Infirmation Region, FIR)是由國際民航組織(Internatonal Civic Avaition Organization, ICAO)所劃定，通常除了包括該國領空之外，亦可能包括附近的公海。飛行情報區可以包括多於一個國家或城市，並以該航空管制中心所在地而命名。香港飛行情報區十分廣闊，有 276,000 平方公里之大，覆蓋範圍包括香港及澳門及部分南中國海。在這空域之內，香港航空管制中心須要提供交通管制服務，航空資料服務及飛機事故警報這三種服務。

若政府提出的「南珠三角終端區」真的如報導所指可以管理香港飛行情報區內的飛機，就明顯不是由香港「自行」提供空中交通服務。可惜民航處在回答公民黨梁家傑立法會議員的質詢時，竟表示未有就這潛在問題徵詢律政司意見。公民黨認為，當局必須盡快釐清憲法問題，並公開回應「空域共享」的做法會否違反《基本法》第一百三十條，若否，原因為何？

2. 當局有否就興建機場第三條跑的融資安排是否符合《基本法》第七十三條徵詢法律意見？如有，詳情為何；如否，當局有否評估上述融資安排的法律風險？

3. 全球絕大部份國家管理空域時，都使用呎為高度單位，只有少數國家如中國、北韓及俄羅斯等是使用米為高度單位。當飛機進入有關地區時，空中管理員會指示飛機調整飛行高度以符合標準飛行層。政府曾表示將會統一度量衡標準，是否代表香港航空度量衡將會跟從內地，以米為高度單位？國際民航機師協會「IFALPA」 就高度單位的立場是爭取全球一體化使用呎來作標準(請參考下段)，有關安排不單將會一改香港沿用多年的空域管理制度，亦與「IFALPA」的建議相反，當局可有就這個安排諮詢業界？

"As the use of different altimetry units seriously affects flight safety, only one unit should be used for altimetry. The foot is by far the most commonly used unit for reporting vertical position and vertical intervals and lends itself to a

simple rational system of cruising levels. Therefore, the worldwide use of the foot should be implemented as the basic unit of measurement for vertical distances and feet per minute for the vertical speed.", Air Traffic Service Committee, International Federation of Air Line Pilot' s Associations

4. 當香港國際機場第三條跑道建成後，假如由香港起飛的航班仍然受制於空域問題而不能向北飛，當局有否估算每小時飛機升降量由預計的102班次下降至多少班次？面對飛機每小時升降量受空域限制而下降時，當局可有重新評估機場第三條跑道的經濟效益及對環境構成的影響？如有，有關資料為何？另外如果在沒有空域限制之下，雙跑道就可以由現時的分隔模式(Segregated Mode)運作改為更有效率的雙跑道混合模式(Mixed Mode)運作，請問每小時的升降量可以由68班增加至多少？

5. 有報導指將來珠三角多個機場將會成立「南珠三角終端區」，日後由香港進入國內航道的先後分配是否由管理「南珠三角終端區」的聯合中心安排？成立「南珠三角終端區」後，香港是否仍然保留獨立權力與內地個別飛行情報區直接就航道使用交涉？

6. 請詳列當局與內地相關部門就空域問題開始磋商至今，其會議日期、地點及出席人士名單；當局於2007年就空域問題，與內地相關部門達成協議，其詳情為何；當局有否就珠三角空域問題，訂下時間表，重新劃定內地與本港空域分界，如有，詳情為何？

7. 機場管理局聲稱擬議三跑項目可以同時保育環境的說法自相矛盾，加上港珠澳大橋工程對自然環境及海洋生態的永久破壞實在難以彌補，當局會否同意要求香港機場管理局立即提交海天客運碼頭高速船的海上交通路線及管理計劃，並由政府當局負責監察有關計劃之執行，停止危害中華白海豚及破壞海洋生態的活動？若會，商討詳情、進度及時間表？

8. 香港國際機場一直影響甚至破壞大嶼山一帶的空氣質素、噪音、自然環境等，就擬議三跑項目，當局在提交予立法會的文件中，認為機場管理局「應該加陪努力，使香港國際機場成為全球最環保的機場之一」，到底機場管理局在哪些方面應加倍努力？擬議三跑項目又怎可能令香港國際機場成為全球最環保的機場之一？環保署署長已經發出環境許可證，又是否只符合最低要求，跟當局的期望有明顯落差，甚至自相矛盾？

9. 三跑工程的舉債詳情為何；當局有否在機管局報告以外，製作獨立財務風險評估報告，如有，其詳情為何；當局有否評估如日後三跑出現超支或回報率不及預期等情況，對債務的影響；當局有否評估機場管理局如未能償還債務，其財務及法律後果為何；屆時當局會否協助機場管理局應付債務，例如承擔部分或全部債務，如會，其詳情為何？

10. 機場管理局為何未能公布三跑的內部回報率；機場管理局有否向當局提供內部回報率，如有，其詳情為何；如否，原因為何；當局有否充分評估如空域問題不獲解決，會否影響對三跑帶來的經濟收益的評估，如有，其詳情為何？

有關當局對保護自然生態顯然缺乏承擔，為基建發展而放棄環境保護的偏執思維令人憤怒。針對工程對海洋生態的影響，有關三跑工程開展前，理應設立的海岸公園及一系列保育措施，環保署卻未作出任何具體承諾。

本人認為，機管局及特區政府在是次三跑工程的環評程序中，扭曲相關環評法規，為「先破壞，後補償」的歪風開綠燈。現時，基於三跑項目的土地規劃，城規會被牽涉在內。本人極度擔心城規會將繼環境諮詢委員會後，淪為另一橡皮圖章，面對壓力時助紂為虐，把海洋生物推向滅絕邊緣。

基本上，回顧整個環評程序，機管局從未全面和詳盡地披露或提供有關環境影響資訊；環諮會對機場管理局的遮掩行徑則「隻眼開隻眼閉」，審核環評報告時「先硬後軟」，終讓機管局蒙混過關；期間漁護署突施「掩眼法」，公佈設立大嶼山西南海岸公園和索罟群島海岸公園的計劃，企圖為環諮會鋪設下台階；環保署不僅未有履行自身把關責任，更盲目地發出環境許可證，根本有違常理、程序公義、自身使命、保育精神及市民期望

本人提醒城規會，立法會環境事務委員曾在 2012 年 4 月 23 日會議中，跨黨派一致通過下方動議：

"本事務委員會要求香港機場管理局就興建第三條機場跑道工程，進行策略環境評估、社會回報成本及碳審計等環境研究，以保護香港及鄰近地區的環境。"

就此，本人一再要求政府就三跑項目進行上述研究和評估工作，並就研究結果重新進行為期不少於三個月的公眾諮詢。如有關當局未展開任何正當的公眾諮詢，反而借城規會的程序包裝和掩飾其不負責任的真相，城規會就不應展開任何與三跑項目的土地用途有關的討論及作出任何決定，並暫緩處理有關申請，方為負責任的做法。

本人認為，因上述種種質疑和疑點，城規會不應自甘成為橡皮圖章、環境殺手或謀殺海豚的幫兇。

公民黨立法會議員陳家洛
2015 年 7 月 8 日

tpbpd

寄件者: AKo [redacted]
寄件日期: 08日07月2015年星期三 20:12
收件者: tpbpd@pland.gov.hk; tpbpd@pland.gov.hk
主旨: RE: 立法會議員陳家洛就《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》的申述意見書
附件: 2015年7月8日 立法會議員陳家洛意見書.docx

城規會,

有關陳家洛議員就《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》的申述意見書(附件)。現補充聯絡資料：

聯絡人：Anthony Ko
聯絡電話：[redacted]
聯絡電郵：[redacted]

敬請注意。

謝謝。

Anthony Ko
陳家洛立法會議員辦事處

From: AKo [mailto:[redacted]
Sent: Wednesday, July 08, 2015 8:09 PM
To: 'tpbpd@pland.gov.hk'; 'tpbpd@pland.gov.hk'
Subject: 立法會議員陳家洛就《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》的申述意見書

城規會,

附件是公民黨陳家洛就《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》的申述。請查看並處理。

謝謝。

Anthony Ko

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陳家洛議員 Hon Chan Ka Lok Kenneth
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立法會議員陳家洛就《赤角分區計劃大綱草圖編號 S/I-CLK/13》的意見書

針對《赤角分區計劃大綱草圖編號 S/I-CLK/13》，本人反對有關修訂項目，並提出以下質疑：

1. 香港國際機場第三條跑道的運作涉及空域問題，政府曾指出將會實行「空域共享」。有報導指空域共享是建立包括香港、澳門、深圳及珠海各機場在內的「南珠三角終端區」，屆時航機由粵港共同管理。但根據《基本法》第一百三十條：「香港特別行政區自行負責民用航空的日常業務和技術管理，包括機場管理，在香港特別行政區飛行情報區內提供空中交通服務，和履行國際民用航空組織的區域性航行規劃程序所規定的其他職責。」公民黨質疑有關「空域共享」的概念有可能違反《基本法》第一百三十條。

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若政府提出的「南珠三角終端區」真的如報導所指可以管理香港飛行情報區內的飛機，就明顯不是由香港「自行」提供空中交通服務。可惜民航處在回答公民黨梁家傑立法會議員的質詢時，竟表示未有就這潛在問題徵詢律政司意見。公民黨認為，當局必須盡快釐清憲法問題，並公開回應「空域共享」的做法會否違反《基本法》第一百三十條，若否，原因為何？

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3. 全球絕大部份國家管理空域時，都使用呎為高度單位，只有少數國家如中國、北韓及俄羅斯等是使用米為高度單位。當飛機進入有關地區時，空中管理員會指示飛機調整飛行高度以符合標準飛行層。政府曾表示將會統一度量衡標準，是否代表香港航空度量衡將會跟從內地，以米為高度單位？國際民航機師協會「IFALPA」 就高度單位的立場是爭取全球一體化使用呎來作標準(請參考下段)，有關安排不單將會一改香港沿用多年的空域管理制度，亦與「IFALPA」的建議相反，當局可有就這個安排諮詢業界？

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4. 當香港國際機場第三條跑道建成後，假如由香港起飛的航班仍然受制於空域問題而不能向北飛，當局有否估算每小時飛機升降量由預計的 102 班次下降至多少班次？面對飛機每小時升降量受空域限制而下降時，當局可有重新評估機場第三條跑道的經濟效益及對環境構成的影響？如有，有關資料為何？另外如果在沒有空域限制之下，雙跑道就可以由現時的分隔模式(Segregated Mode)運作改為更有效率的雙跑道混合模式(Mixed Mode)運作，請問每小時的升降量可以由 68 班增加至多少？

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6. 請詳列當局與內地相關部門就空域問題開始磋商至今，其會議日期、地點及出席人士名單；當局於 2007 年就空域問題，與內地相關部門達成協議，其詳情為何；當局有否就珠三角空域問題，訂下時間表，重新劃定內地與本港空域分界，如有，詳情為何？

7. 機場管理局聲稱擬議三跑項目可以同時保育環境的說法自相矛盾，加上港珠澳大橋工程對自然環境及海洋生態的永久破壞實在難以彌補，當局會否同意要求香港機場管理局立即提交海天客運碼頭高速船的海上交通路線及管理計劃，並由政府當局負責監察有關計劃之執行，停止危害中華白海豚及破壞海洋生態的活動？若會，商討詳情、進度及時間表？

8. 香港國際機場一直影響甚至破壞大嶼山一帶的空氣質素、噪音、自然環境等，就擬議三跑項目，當局在提交予立法會的文件中，認為機場管理局「應該加陪努力，使香港國際機場成為全球最環保的機場之一」，到底機場管理局在哪些方面應加倍努力？擬議三跑項目又怎可能令香港國際機場成為全球最環保的機場之一？環保署署長已經發出環境許可證，又是否只符合最低要求，跟當局的期望有明顯落差，甚至自相矛盾？

9. 三跑工程的舉債詳情為何；當局有否在機管局報告以外，製作獨立財務風險評估報告，如有，其詳情為何；當局有否評估如日後三跑出現超支或回報率不及預期等情況，對債務的影響；當局有否評估機場管理局如未能償還債務，其財務及法律後果為何；屆時當局會否協助機場管理局應付債務，例如承擔部分或全部債務，如會，其詳情為何？

10. 機場管理局為何未能公布三跑的內部回報率；機場管理局有否向當局提供內部回報率，如有，其詳情為何；如否，原因為何；當局有否充分評估如空域問題不獲解決，會否影響對三跑帶來的經濟收益的評估，如有，其詳情為何？

有關當局對保護自然生態顯然缺乏承擔，為基建發展而放棄環境保護的偏執思維令人憤怒。針對工程對海洋生態的影響，有關三跑工程開展前，理應設立的海岸公園及一系列保育措施，環保署卻未作出任何具體承諾。

本人認為，機管局及特區政府在是次三跑工程的環評程序中，扭曲相關環評法規，為「先破壞，後補償」的歪風開綠燈。現時，基於三跑項目的土地規劃，城規會被牽涉在內。本人極度擔心城規會將繼環境諮詢委員會後，淪為另一橡皮圖章，面對壓力時助紂為虐，把海洋生物推向滅絕邊緣。

基本上，回顧整個環評程序，機管局從未全面和詳盡地披露或提供有關環境影響資訊；環諮會對機場管理局的遮掩行徑則「隻眼開隻眼閉」，審核環評報告時「先硬後軟」，終讓機管局蒙混過關；期間漁護署突施「掩眼法」，公佈設立大嶼山西南海岸公園和索罟群島海岸公園的計劃，企圖為環諮會鋪設下台階；環保署不僅未有履行自身把關責任，更盲目地發出環境許可證，根本有違常理、程序公義、自身使命、保育精神及市民期望。

本人提醒城規會，立法會環境事務委員曾在 2012 年 4 月 23 日會議中，跨黨派一致通過下方動議：

"本事務委員會要求香港機場管理局就興建第三條機場跑道工程，進行策略環境評估、社會回報成本及碳審計等環境研究，以保護香港及鄰近地區的環境。"

就此，本人一再要求政府就三跑項目進行上述研究和評估工作，並就研究結果重新進行為期不少於三個月的公眾諮詢。如有關當局未展開任何正當的公眾諮詢，反而借城規會的程序包裝和掩飾其不負責任的真相，城規會就不應展開任何與三跑項目的土地用途有關的討論及作出任何決定，並暫緩處理有關申請，方為負責任的做法。

本人認為，因上述種種質疑和疑點，城規會不應自甘成為橡皮圖章、環境殺手或謀殺海豚的幫兇。

公民黨立法會議員陳家洛
2015 年 7 月 8 日

就草圖作出申述
Representation Relating to Draft Plan **TPB/R/S/I-CLK/13-48**

參考編號
Reference Number: 150708-183341-43618

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 08/07/2015 18:33:41

提出此宗申述的人士
Person Making This Representation: 郭家麒醫生

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-CLK/13

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
反對興建機場第三跑道 浪費一千四佰億如倒錢落海	反對 Oppose	香港國際機場是世界頂級的航空樞紐，更是全球航空發展不可或缺的拼圖。過去十多年，香港國際機場對我城作出極大經濟貢獻，把香港的軟實力展現於世界舞台，成就有目共睹，也是港人的驕傲。最近，特區政府通過發展香港國際機場第三條跑道，新跑道造價高達 1,415 億元，預計 2023 年落成。 我當然支持推動香港國際機場不斷發展，保住區域優勢，持續地對全球航空事業作出貢獻。但目前的方案在財務預算、技術安排、環境保育、空域管理及法律問題等多個範疇都有不足之處，引起社會爭議。政府至今仍未能釋除社會就以上範疇的疑慮，我認為當局有責任審慎研究此大型基建項目對香港各領域的影響及潛在問題，並在三個月前發信給運輸及房屋局局長張炳良，希望當局能就興建機場第三跑道的一些疑問和困難作出解答，可惜至今仍未收到有關回覆，可見政府在計劃興建機場第三跑道時並沒有作出充份的考慮和規劃。當中的問題包括： 違法疑團 1. 香港國際機場第三條跑道的運作涉及空域問題，當局曾指出將會實行「空域共享」。有報導指空域共享是建立包括香港、澳門、深圳及珠海各機場在內的「南珠三角終端區」，屆時航機由粵港共同管理。但根據《基本法》第一百三十條：「香港特別行政區自行負責民用航空的日常業務和技術管理，包括機場管理，

在香港特別行政區飛行情報區內提供空中交通服務，和履行國際民用航空組織的區域性航行規劃程序所規定的其他職責。」若政府提出的「南珠三角終端區」真的如報導所指可以管理香港飛行情報區內的飛機，就明顯不是由香港「自行」提供空中交通服務。因此，有關「空域共享」的概念有可能違反《基本法》第一百三十條。

2. 機場管理局以暫停向政府派息為三跑工程集資，金額高達五百億元，但有關派息是政府收入之一，加上機管局徵收機場建設費，變相繞過立法會監察，可能違反《基本法》第七十三條第三節規定立法會有權批准稅收和公共開支的安排。

空域管理

3. 當飛機進入有關地區時，空中管理員會指示飛機調整飛行高度以符合標準飛行層。香港使用呎為高度單位管理空域，但是中國使用米為高度單位。政府曾表示將會統一度量衡標準，那麼是否代表香港航空度量衡將會跟從內地，以米為高度單位？然而，國際民航機師協會IFALPA 就高度單位的立場是爭取全球一體化使用呎來作標準，有關安排不單將會一改香港沿用多年的空域管理制度，亦與IFALPA的建議相反，對香港航空業未來發展有重大影響。而當局至今仍未就這個安排諮詢業界。

4. 當香港國際機場第三條跑道建成後，當局估算每小時飛機升降量會增加至102班次。然而，中國人民解放軍廣州軍區在廣東省南部設立了航空管制區，從南飛進大陸領空的飛機，必須在一萬五千呎以上空域。假如由香港起飛的航班仍然受制於空域問題而不能向北飛，飛機每小時升降量必定受空域限制而下降。可見政府對興建機場第三條跑道估算的經濟效益成疑。

環境影響

5. 興建新機場跑道對自然環境及海洋生態的永久破壞實在難以彌補，環評指出第三跑道的填海範圍、大嶼山西北水域被視為中華白海豚的重要棲息地，香港海豚保育學會指出進行大型填海不可能如環評所指只對中華白海豚造成「中度影響」。而且，2016至2017年原是中華白海豚經歷港珠澳大橋工程影響後的「休養生息期」，緊接着展開第三跑道工程，會令海豚無法恢復元氣。環評報告提出增設海岸公園，但公園須待2023年完工後才成立，屆時水域已被污染了。

現時，政府就上述問題仍未有具體的解決方案，在多個民間團體反對下依然一意孤行地推動興建三跑。機管局透過私人集資的方式籌集1400億，計劃由行政會議拍板通過，當中繞過了立法會的審議，企圖避開立法會和市民的監察。而目前中港空域使用談判未完成，興建第三跑的環評亦備受其他環保團體質疑。我擔心興建機場第三跑道的經濟效益未能如當局所想，三跑最終會淪為大白象工程，浪費約1400億的政府儲備。

我的訴求：

在未有具體方案去解決上述問題及社會未有共識前，政府必需盡

		快停止有關工程。

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

tpbpd

寄件者: AKo [redacted]
寄件日期: 08日07月2015年星期三 19:40
收件者: tpbpd@pland.gov.hk; tpbpd@pland.gov.hk
主旨: 公民黨郭榮鏗就《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》的申述
附件: 公民黨郭榮鏗 《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》.docx

城規會,

附件是公民黨郭榮鏗就《赤鱲角分區計劃大綱核准圖編號 SI - CLK 13》的申述。請查看並處理。

謝謝。

Anthony Ko

015

致 城規會：

就赤鱲角分區計劃大綱核准圖編號 S/I-CLK/13 的修訂，本人提出以下申述：

1.就香港國際機場第三條跑道的運作涉及空域問題，政府曾指出將實行「空域共享」，但有關概念有可能違反《基本法》第一百三十條。

2.機管局以暫停向政府派息，以為三跑工程集資。但有關派息是政府收入之一，加上機管局徵收機場建設費，變相繞過立法會監察，可能違反《基本法》第七十三條第三節規定，立法會有權批准稅收和公共開支的安排。

3.香港使用「呎」為飛機飛行的高度單位，但是中國使用的單位為「米」。政府曾表示會統一度量衡標準，是否代表香港將會跟從內地，以「米」為單位？有關安排將會一改香港沿用多年的空域管理制度，亦與國際民航機師協會的建議相反。當局至今仍未就這個安排諮詢業界。

4.當第三條跑道建成後，香港起飛的航班仍然因空域問題而不能向北飛，飛機每小時升降量必定受限而下降。本人對於政府對第三條跑道估算的經濟效益成疑。

5.興建新跑道對自然環境及海洋生態的永久破壞難以彌補，尤其對中華白海豚的棲息做成嚴重影響。

上述五項仍未有具體的解決方案，本人因此強烈反對以下修訂項目：

A項－ 把香港國際機場北面的擬議填海區的一塊土地劃為「其他指定用途」註明「機場」地帶；及

B項－ 把擬議填海區東面和西面兩塊土地劃為「其他指定用途」註明「機場服務設施用地」地帶

申述人

公民黨郭榮鏗

聯絡方法

聯絡人：Anthony Ko

電話：[redacted]

電郵：[redacted]

2015 年 7 月 8 日

致 城規會： TPB/R/S/I-CLK/13-54

就赤鱲角分區計劃大綱核准圖編號 S/I-CLK/13 的修訂，本人提出以下申述：

1.就香港國際機場第三條跑道的運作涉及空域問題，政府曾指出將實行「空域共享」，但有關概念有可能違反《基本法》第一百三十條。

2.機管局以暫停向政府派息，以為三跑工程集資。但有關派息是政府收入之一，加上機管局徵收機場建設費，變相繞過立法會監察，可能違反《基本法》第七十三條第三節規定，立法會有權批准稅收和公共開支的安排。

3.香港使用「呎」為飛機飛行的高度單位，但是中國使用的單位為「米」。政府曾表示會統一度量衡標準，是否代表香港將會跟從內地，以「米」為單位？有關安排將會一改香港沿用多年的空域管理制度，亦與國際民航機師協會的建議相反。當局至今仍未就這個安排諮詢業界。

4.當第三條跑道建成後，香港起飛的航班仍然因空域問題而不能向北飛，飛機每小時升降量必定受限而下降。本人對於政府對第三條跑道估算的經濟效益成疑。

5.興建新跑道對自然環境及海洋生態的永久破壞難以彌補，尤其對中華白海豚的棲息做成嚴重影響。

上述五項仍未有具體的解決方案，本人因此強烈反對以下修訂項目：

A項 - 把香港國際機場北面的擬議填海區的一塊土地劃為「其他指定用途」註明「機場」地帶；及

B項 - 把擬議填海區東面和西面兩塊土地劃為「其他指定用途」註明「機場服務設施用地」地帶

RECEIVED
- 9 JUL 2015
Town Planning Board

申述人姓名：

0069 電郵地址：[redacted]



目前機場三跑方案在財務預算、技術安排、環境保育、空域管理及法律問題等未解決，更引起社會爭議。政府更自行集資興建三跑，繞過立法會監察。

城規會正就劃定機場北面填海區為「機場」用途，作公眾諮詢，公民黨已草擬意見書，我們將閣下的反對意見轉交城規會。

你亦可填寫城規會的網上表格（http://www.info.gov.hk/tpb/tc/plan_making/draft_plan.html 選擇 S/I-CLK/13）、將意見郵寄（香港北角渣華道 333 號北角政府合署 15 樓）或電郵至 tpbpd@pland.gov.hk。

公眾諮詢截止日期：7 月 8 日(星期三)

tpbpd

寄件者: 馬鞍山新民主同盟辦事處 [redacted]
寄件日期: 08日07月2015年星期三 23:13
收件者: tpbpd@pland.gov.hk
主旨: 赤角分區計劃大綱核准圖編號S/I-CLK/12申述
附件: (1) in MY150718-TPB.pdf

城規會：

本處現就赤角分區計劃大綱核准圖編號 S/I-CLK/12 作申述，盼貴會考慮。謝謝。

容溟舟沙田區議員辦事處
The Office of Yung Ming Chau Michael Shatin District Councilor

富安花園辦事處：
地址：新界沙田馬鞍山富安花園商場富安廊地下 18B13 號舖
電話：35270751 傳真：35270784
辦公時間：星期一、三、五 中午十二時至下午四時
星期二、四 中午十二時至晚上八時
星期六、日及公眾假期休息

欣安邨辦事處：
地址：新界沙田馬鞍山欣安邨欣喜樓地下 01 室
電話：35270753 傳真：35270784
辦公時間：星期一、三、五 下午四時至晚上八時
星期二、四 中午十二時至晚上八時
星期六、日及公眾假期休息

容溟舟沙田區議員辦事處

The Office of Yung Ming Chau Michael Shatin District Councilor

覆函/回電請註明本處檔號：(1) in MY150718-TPB

敬啟者：

赤臘角分區計劃大綱圖 S/I-CLK/13 修訂的意見

行政會議就第三條跑道向城規會申請擬定位置用途改劃為「機場」，本處現反對有關申請，希望城規會各委員就下列事項作考慮：

噪音影響

根據機管局所提供的建議，為避開深圳機場與及解放軍的航空管制局，第三條跑道在凌晨以外時間只會容許降落，當中再因應風勢而決定使用 07L 航道或 25R 航道，而根據過往數據，約有 45%航班以 25 航道降落。現時 25 航道途經沙田、馬鞍山、葵涌一帶，飛行高度約為四千米，馬鞍山各屋苑都受一定程度的航班噪音影響，以本人選區內的富安花園、大水坑村為例，日間由航班帶來的噪音達 67 分貝，接近環保署的標準 70 分貝。如沿用現時的航機升降航道安排，興建第三條跑道將會加劇噪音問題，而在復飛航道附近的黃金海岸更是首當其衝。在早前公佈的第三條環評報告中，未有措施減少地面噪音，故本處反對興建第三條跑道。

海洋保育

當局在去年的環境評估報告中，計劃在西北大嶼山水域設立海岸公園，以作為第三條跑道的補償。本處在諮詢階段已指出海岸公園設於本港高速航道之上，每日都有大量高速船往來港澳，情況有如在高速公路上設立郊野公園。與此同時，香港各海岸公園每個周末都會吸引大量觀賞船，倘當局開放新海岸公園作海上觀光，只會造成海事上的混亂。

興建第三條跑道帶來大量污染問題，然而公眾只能親身到城規會才能查閱環境評估報告及其他文件，有損公眾對公共事務的知情權，尤其申請機構為政府部門，更應該提高透明度，本處對此非常遺憾，促請當局公佈文件後重新申請，以示公正。

空域爭議

本處翻查《香港國際機場 2030 規劃大綱技術報告》，英國國家航空交通服務有限公司提出多項建議，當中 5.16 段指出第三條跑道長度將為 3,800 米，以便日後改為混合運作，即同時供起飛及降落。在同一份報告的 5.18 段，該公司建議第三條跑道只作降落之用，以免影響深圳機場降落航道，但在根據《技術報告》第 233 頁圖 7 所示，晚上十一時至翌日凌晨八時第三條跑道可改為混合運作，可見第三條跑道起飛的 07 航道受制於深圳機場的運作。倘日後深圳機場開放深夜降落，或不改變現有航道，第三條跑道日後只能作降落之用，無助於增加香港航空吞吐量，更無從透過改變航道改善噪音問題。除此以外，《技術報告》第 232 頁圖 6 顯示，用作降落的 5 航道和起飛的 3 航道有所重疊，而降落用的 3 航道亦與起飛用的 5 航道重疊，但技術報告未有闡

Contact Address : Shop 18B13, G/F, Commercial Complex, Chevalier Garden, Ma On Shan, Shatin, N.T.

容溟舟沙田區議員辦事處

The Office of Yung Ming Chau Michael Shatin District Councilor

明當中所帶來的容量限制。由此可見，香港航空吞吐量絕非受制於地面空間，而是鄰近機場以至於空域限制，興建第三條跑道不過是藥石亂投。

財務預算

當局指興建第三條跑道的資金會透過機管局融資與及收取機場興建費集資，而融資的擔保人由香港政府所擔任，變相香港市民承受相關風險。近年多項大型基建都出現超支，往往需要向立法會申請額外撥款，雖然第三條跑道由機管局斥資興建，但政府或要承擔有關開支。

第三條跑道當中涉及大規模填海，如項目的財政因財政問題而爛尾，屆時不會帶來任何經濟效益，只會對週遭海域帶來不能復原的破壞。雖然城規會的職責並非審議基建的財政健康，然而財務安排對是次申請有凌駕性的影響，本處希望城規會在審議項目時與環境影響、定量風險等因素一併考慮。

就以上理由，本處反對是次規劃申請，專此敬告，盼　貴會備悉。如有任何查詢，請於中午12時至晚上8時的辦公時間內，致電35270751或35270753與本處職員聯絡。謝謝。順祝

工作愉快！

候覆，此致

城市規劃委員會主席——周達明先生

沙田區議員

容溟舟　上

（陳珮明　代行）

二零一五年七月八日

Contact Address : Shop 18B13, G/F, Commercial Complex, Chevalier Garden, Ma On Shan, Shatin, N.T.

tpbpd

寄件者: 馬鞍山新民主同盟辦事處 [redacted]
寄件日期: 08日07月2015年星期三 23:16
收件者: tpbpd@pland.gov.hk
副本: tspd@pland.gov.hk
主旨: 赤角分區計劃大綱核准圖編號S/I-CLK/12申述
附件: (1) in MY150718-TPB.pdf

城規會：

本處現就赤角分區計劃大綱核准圖編號 S/I-CLK/12 作申述，盼貴會考慮。謝謝。

容溟舟沙田區議員辦事處
The Office of Yung Ming Chau Michael Shatin District Councilor

富安花園辦事處：
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辦公時間：星期一、三、五 中午十二時至下午四時
星期二、四 中午十二時至晚上八時
星期六、日及公眾假期休息

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星期二、四 中午十二時至晚上八時
星期六、日及公眾假期休息

023

bpd

寄件者: Andrew Chan (Local Biodiversity) [redacted]
寄件日期: 18日06月2015年星期四 17:26
收件者: tpbpd@pland.gov.hk
主旨: OZP Amendment_S_I_CLK_12_WWF_Jun2015
附件: OZP Amendment_S_I_CLK_12_WWF_Jun2015.pdf

Dear Sir/Madam,

Please find attached our submission on the captioned.

Thank you for your attention.

Yours faithfully,

Andrew Chan
Conservation Officer, Local Biodiversity
World Wide Fund For Nature Hong Kong
世界自然(香港)基金會
15/F, Manhattan Centre,
8 Kwai Cheong Road,
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Website: www.wwf.org.hk

WWF Hong Kong works to ensure a better environment for present and future generations in Hong Kong (See attached: OZP Amendment_S_I_CLK_12_WWF_Jun2015)

Registered Name 註冊名稱: World Wide Fund For Nature Hong Kong 世界自然(香港)基金會 (Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

WWF for a living planet®

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香港分會

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Our Ref.: SHK/LDD 5 (i)/ 14
19 June 2015

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: Proposed Amendments to the Approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12

Over the past 20 years, over 2,000 hectares Hong Kong's irreplaceable marine habitat in the western waters has been destroyed or degraded by dredging, dumping and reclamation work. The direct loss of sea area resulting from the reclamation work of the Third Runway project will be 650 hectares and during the construction phase an additional 981 hectares will also be heavily impacted.

The reclamation area for the third runway will be in the middle of CWD habitat, and is adding further stress to a species whose population has already shown signs of collapsing. The population has dropped by more than 60% in the past decade in Hong Kong waters[1], and projected to continue to decline[2] and reported to suffer a 30% in the Pearl River Estuary[3]. The Third Runway project could well deliver the final blow to the dolphins in Hong Kong.

As a conservation organisation, WWF-Hong Kong's main focus on this proposed project is its impact on the marine ecology and is deeply disappointed with the quality of Environmental Impact Assessment (EIA) report. It has failed to properly address the impacts to the marine ecology, in particular Chinese white dolphins (CWD), as well as fisheries resources. **We urge the members of the Town Planning Board to reject the captioned Proposed Amendments of the Outline Zoning Plan in Chek Lap Kok.**

[1] The dolphin number in Hong Kong has dropped from 158 individuals in 2003 to 62 individuals in 2013.
[2] Huang SL, Karczmarski L. *et al.* 2012. Demography and population trends of the largest population of Indo-Pacific humpback dolphins. Biological Conservation 147: 234-242

贊助人： 香港特區行政長官
梁振英先生, GBM
會 長： 鄧佐恩先生
副會長： 施逸朗博士
施成渠先生
主 席： 楊宇俊先生
行政總裁： 麥顯揚先生

核數師：均富會計師行
秘書公司秘書：合眾秘書服務有限公司
律師：孖士打律師行
銀行顧問：匯豐銀行
註冊慈善機構

Patron: The Honourable Donald Tsang, GBM, Chief Executive of the HKSAR
President: Mr. Markus Shaw
Vice-President: The Hon. Sir David Akers-Jones, GBM, KBE, JP
Mr. Hans Michael Jebsen, BBS
Chairman: Mr. Trevor Yang
CEO: Mr. Eric Bohm

Honorary Auditors: Grant Thornton
Honorary Company Secretary: United Secretaries Limited
Honorary Solicitors: JSM
Honorary Treasurer: HSBC
Registered Charity
(Incorporated With Limited Liability)

Registered Name: World Wide Fund For Nature Hong Kong

The main reasons for rejection are summarized as follows:

- Ineffectiveness of the compensation measures – new Marine Park in north Lantau;
- Lessons learned from the Hong Kong-Zhuhai-Macao Bridge (HZMB) Project;
- Ineffectiveness of the on-site mitigation measures;
- Overlapped construction period of various development work in western waters.

The above rejection reasons will be further elaborated in details in the following paragraphs:

Ineffectiveness of the compensation measure – new Marine Park in north Lantau

The impact of the proposed project on the Chinese white dolphins is deemed of moderate to high significance in the Environmental Impact Assessment. In order to compensate for the permanent habitat loss of 650 ha and a temporary impact on an even larger sea area of 981 ha during construction phase, the project proponent proposed the establishment of a new Marine Park which would comprise an area of ~2,400 ha surrounding the water areas of the Third Runway. However, such a Marine Park will only be designated in 2023 after the construction is completed. WWF believes that this cannot mitigate the serious impact due to the following reasons:

i. *Wrong Timing* – Large-scale impacts and disturbance (both direct and indirect) will be posed to the marine environment in the north Lantau waters during the construction phase. However, the proposed marine park **will only be designated in 2023 (after the completion of all the construction works, which will take at least 8 years).** The local dolphin population is expected to be impacted and decline further over the next 9 years should this proposed project go ahead, and there is no measure proposed to mitigate this. Similarly, there is no measure to mitigate for the impact on the marine biodiversity.

ii. *Wrong Location* – The Marine Park proposed in the EIA will be adjacent to the Third Runway itself which is **not the most core dolphin habitat** or important fisheries spawning/ nursery ground.

iii. *Disturbance from High Volume of Marine Traffic* – The proposed Marine Park area will cover the navigation channel between Sha Chau and Lung Kwu Chau Marine Park and north of the Airport, which is heavily used by fishermen, river-trade vessels and high speed vessels. If the Marine Park is designated, the stakeholders who use this channel with be seriously affected, as the vessel speed will be restricted down to 10 knots. According to the Appendix.13.13 of the EIA report, at least 250 trips made by marine vessels per day will continue to use this narrowed navigation channel after the completion of the Project, before the establishment of the Marine Park (*Figure 1*). **Such high volume of marine traffic inside the proposed Marine Park will cause significant disturbance to the CWD inhabiting in the area and affect the function of the Marine Park.** In addition, not all the affected stakeholders were consulted and aware of the details of such plan. As

[3] Approximately 30% decline of Chinese white dolphin in Pearl River Estuary was recorded in seven years, from 2,500 individuals in 2006 down to 1,800 individuals in 2013.

such, conflicts and resistance from the stakeholders could turn high during the consultation stage of the proposed Marine Park and may delay or even kill the setting up of the Marine Park.

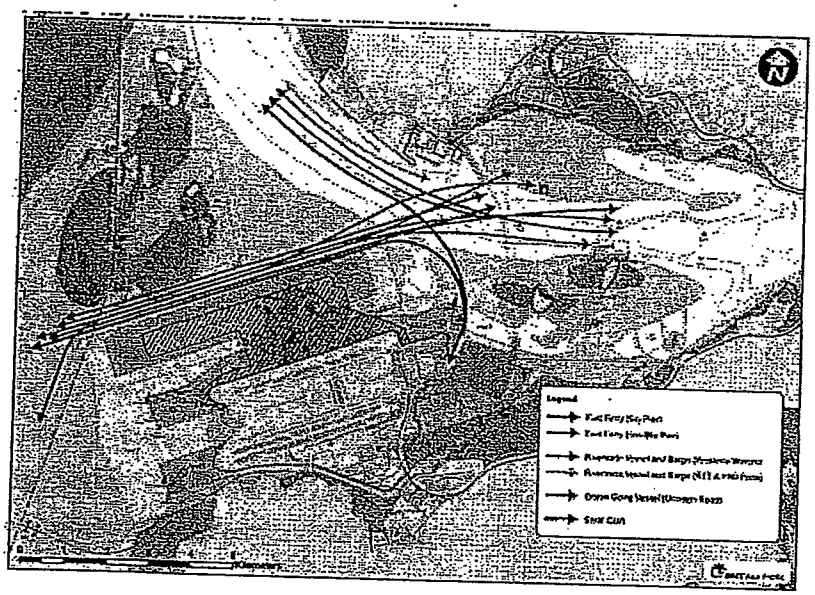


Figure 1. Key traffic routes for future traffic environment. (Extracted from Appendix 13.13 of EIA report)

iv. *Uncertainty on Return of Dolphins* - The project proponent has been emphasising both in the EIA report and public that dolphins would return and utilize the enhanced habitat (the proposed north Lantau Marine Park). This is a hugely unsubstantiated assumption made without backing by any hard science. The example stated in the report (oceanic dolphin species of high adaptability) would not be applicable in the case of Chinese white dolphin (estuarine species). **It is not guaranteed that the majority of the displaced dolphins (i.e. the proportion) will return and continue to use the areas in the new Marine Park.**

To conclude, by proposing the designation of a Marine Park after the completion of construction and in the wrong location, then further impacts to the Chinese white dolphin are likely. The regional context in which this project is being proposed is largely ignored, and the already declining CWD will be further threatened by the reclamation work.

Lessons learned from the Hong Kong-Zhuhai-Macao Bridge (HZMB) Project

The purpose of setting up a marine protected area is to conserve the marine environment and provide a sanctuary for the marine species to inhabit, with human disturbance being kept to a minimum (e.g. development-free, vessel speed restriction, regulated human activities). However, the establishment of a Marine Park in Hong Kong has recently been used as a compensation measure for large-scale development project after the construction works have been completed.

One example is the Hong Kong-Zuhai-Macao Bridge project. The Brothers Island Marine Park will be designated in late 2016 as the operational phase compensation measure of the project, while there is no targeted measure to safeguard and conserve the disturbed population during the construction phase. The EM&A data show there is a sharp decline of dolphins using the NE Lantau waters (*Figure 2*) where the HZMB-associated construction works (including the reclamation works of HKBCF and HKLR as well as bored piling activities of TMCLKL) are located. Very few or no dolphins could be sighted in the project area since early 2013 – after the commencement of reclamation. Concerns have been raised on the viability and effectiveness of the future Brothers Island Marine Park – whether none or only very few dolphins will return to use the Marine Park area, which was once a core area of activities for CWDs (please also refer to *Appendix 1 – CWD infographic*).

In addition, the latest AFCD dolphin monitoring survey[4] shows that the majority of dolphin individuals surveyed shifted their overall ranges away from the Brothers Islands to north Lantau after the commencement of HZMB construction work. According to the report, ***"In NEL, the decline was even more alarming, dropping from the highest in 2001 (20 dolphins) to the lowest in 2014 (one dolphin). The most noticeable decline occurred between 2011 and 2014, with a 91% drop in just three years "***. Therefore, it is clear that the construction work of HZMB does pose an adverse impact to the dolphins in the NE Lantau area and has not been mitigated.

The scale of the footprint of Third Runway project (650ha) is five times bigger than that of HZMB (130ha), and the impact duration is at least a double (8 years versus 4 years). WWF is deeply worried about the negative impacts that will pose to the dolphins in the Lantau waters.

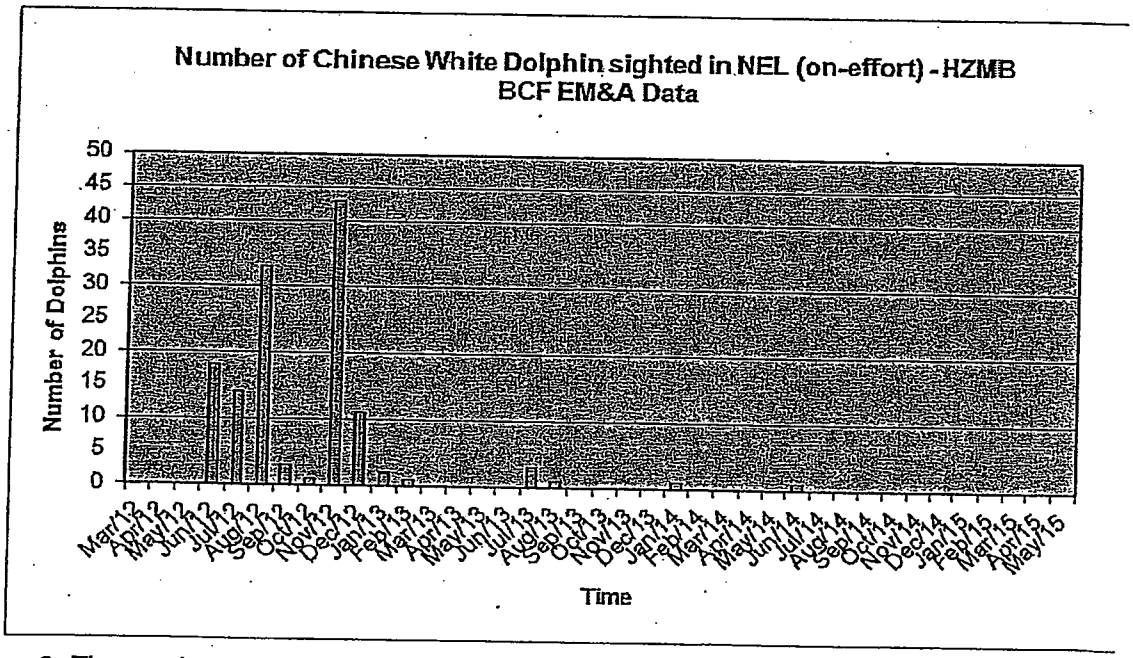


Figure 2. The number of Chinese white dolphin sighted in northeast Lantau (on-effort) – EM&A data of the Hong Kong Zhuhai-Macao Bridge Border Crossing Facility project.

Ineffectiveness of the on-site mitigation measures

A number of on-site measures was proposed to mitigate the impacts incurred during the construction phase; however, six out of these eight measures are those which have been adopted in the construction of Hong Kong-Zhuhai-Macao Bridge (e.g. installation of silt curtain, establishment of dolphin exclusion zone), and **have proven to be ineffective** as EM&A data shows that there is a drastic decline of dolphin numbers in NE Lantau (*Figure 2*) from the HZMB project.

Overlapped construction period of various development work in western waters

Prior to or right after the completion of the HZMB project, a pile of projects, such as Third Runway, Tung Chun new town development, Lung Kwu Tan, Siu Ho Wan, Sunny Bay reclamation is in the queue be he conducted in the western waters. If they are approved as scheduled, the reclamation will **cost another 1,400 hectares of dolphin habitats, and importantly, the construction period of these projects will all be overlapped with others in next 10 years.** The cumulative impacts could be unimaginable.

In addition, these consecutive development works will greatly lower the conservation effectiveness of the Brother Islands Marine Park, which supposes to be designated as the compensation measure of HZMB. However, it has already been questioned by experts and stakeholders that if the dolphins will return and utilize the area of HZMB.

[4] Hung SKY 2015. Monitoring of Marine Mammals in Hong Kong Waters (2014-15). Final Report (1April 2014 to 31 March 2015). Report prepared by Hong Kong Cetacean Research Project and submitted to AFCD.

Other Technical Comments

i. Chinese White Dolphins

Impacts incurred from Marine Traffic

The EIA only focuses on the evaluation of the risk of collision of the marine vessels to the CWD, but did not assess the disturbance impact brought by the traffic volume (number of vessels and trips) during the construction and operation phase.

Impacts from Marine Traffic during Construction Stage

According to Session 13.9.2.93, during the construction phase, large numbers of construction barges and other vessels will be required. During the peak construction time for reclamation (2016/17), the maximum vessel movement will be 120 per day, and 120 stationary vessels will be located within the works area. Together with the traffic contributed from other vessel types, more than 400 vessel movement will be expected in the vicinity of Project Area daily (*Figure 3*). Such large volume of vessel traffic certainly will pose adverse impacts and disturbance to the CWD in the North Lantau area.

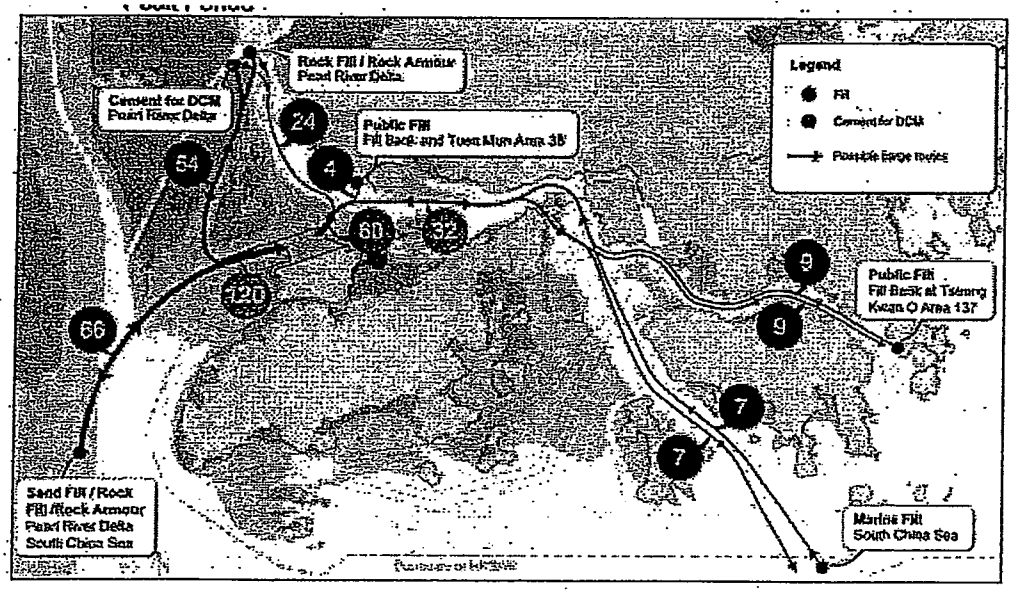


Figure 3. Forecast daily construction traffic movements associated with barging activities during peak period. (Extracted from Appendix 13.13 of EIA report)

Impacts from Marine Traffic during Operation Stage

There is a navigation channel between the Sha Chau and Lung Kwu Chau Marine Park and Third Runway. The marine vessels still could make use of such navigation channel before the establishment of proposed N Lantau Marine Park. Although one of the mitigation measures is to set speed restriction and/or re-route the SkyPier high speed vessels, the project proponent has not proposed any measure in addressing the traffic impacts contributing by other marine vessels and high speed vessels operating by

other companies (*Figure 1*). As the navigation channel between the Sha Chau and Lung Kwu Chau Marine Park and the Third Runway will become much narrower should the project go ahead (less than 800 metres), less space will be available for the vessels and the channel will become more congested. Hence the collision risk to the dolphins will be higher and such mitigation measure (i.e. those for managing the vessels from the SkyPier only) proposed by AAHK will not be able to fully address and alleviate the impact.

In addition, it was estimated that there will be growth of marine traffic volume in the North Lantau areas (in 2030, there will be a 43% increase of marine traffic making use of the navigation channel between Sha Chau and Lung Kwu Chau Marine Park and the Third Runway, and 50% increase at Urmston Road; see below table extracted from Appendix 13.13). The project proponent did not identify such impacts and provide any mitigation measures to alleviate the impact from the growing marine traffic, which **cannot fulfil the requirement stated in the Study Brief** Appendix F (vii)(e) – "*identify and recommend practicable mitigation measures to.....reducing the volume of marine traffic, especially those to and from the SkyPier....*".

Table 2 Daily Average of High-Speed Ferries and Total Marine Traffic in Year 2011 and projection to Year 2030

	Year	Daily Average (High-Speed Ferries) SkyPier	Non-SkyPier	Daily Average (Total Marine Traffic)
Gate 3				
	2011	34	24	Approx. 230
	2021	Approx. 45	Approx. 30	NA
	2030	Approx. 50	Approx. 35	Approx. 330
Gate 4				
	2011	54	54	Approx. 540
	2021	Approx. 70	Approx. 70	NA
	2030	Approx. 80	Approx. 80	Approx. 810

Impacts on the Existing Sha Chau and Lung Kwu Chau Marine Park

The level of impact on the Sha Chau and Lung Kwu Chau Marine Park will increase during the construction phase, as it is in the close proximity of the construction site. The large volume of marine traffic from different vessel types (including the work barge) would add extra stress and disturbance to the dolphins in the Marine Park area for at least 7-8 years, hence affecting its effectiveness in conserving the CWD. This impact is not mitigated in the EIA.

Usage of Project Footprint Area

Although not many dolphins were sighted at the project footprint area during the daytime (dolphins are observed less in areas where vessel traffic is high, as stated in Session 13.4.6.91), the hydrophones used during the passive acoustic monitoring recorded the clicks and whistles of CWD at the stations at and surrounding the footprint during the nighttime. It implies that dolphins do make use the waters of the Project Area.

Data showed that the Third Runway project will be located in a CWD preferred travel area during the daytime and also important for nighttime use. The loss of this habitat would be a notable source of disturbance to the CWDs currently utilized this area during the night time. This is not mitigated in the EIA.

ii. Marine Ecology

Destroying the 16-years "No Take Zone"

The Hong Kong International Airport Approach Area (HKIAAA) has been established in the northern extent of the airport since its establishment in 1998. It is considered as a "non-statutory" no-take marine protected area as no fishing activity is allowed.

Since the area has remained undisturbed for almost 16 years, and in particular as no trawling has occurred, a richer and higher abundance of marine fauna and vulnerable fish species were found within land formation footprint and the immediately adjacent area, compared to the surrounding unprotected area. According to Table 5-3 and 5-4 of Appendix 13.5 (see below) of the trawl survey results, the species diversity, abundance and yield were found higher (highlighted in yellow) within the HKIAAA in both dry and wet season when compared with other areas in the western waters. Sadly, a total of 240 ha of HKIAAA will all be destroyed and lost due to the proposed reclamation work. No measure was proposed to mitigate or compensate such loss.

Table 5-3 Summary Table for Fish Trawl Survey Results (Dry Season)

Location	Transects	Avg. No. of Species	Avg. *H'*	Avg. *J'*	Avg. Abundance	Avg. Yield (g)
Within land formation footprint and the immediately adjacent area	F1A, F1B	36	2.05	0.57	402.2	6,927
	F2A, F2B	28	1.65	0.50	375.0	9,483
	F3A, F3B	34	2.20	0.63	633.7	7,958
Western Waters of Chek Lap Kok	F4A, F4B	27	1.83	0.56	450.7	6,807
Northern Waters of Chek	F5A, F5B	26	1.61	0.50	384.0	5,006
Lap Kok	F6A, F6B	29	1.85	0.55	274.7	4,195
Overall	F1A – F6B	71	2.25	0.53	2520.2	40,374

Table 5-4 Summary Table for Fish Trawl Survey Results (Wet Season)

Location	Transects	Avg. No. of Species	Avg. *H'*	Avg. *J'*	Avg. Abundance	Avg. Yield (g)
Within land formation footprint and the immediately adjacent area	F1A, F1B	36	1.84	0.52	1176.5	17,354
	F2A, F2B	32	1.73	0.51	934.3	16,895
	F3A, F3B	37	2.21	0.62	720.2	11,529
Western Waters of Chek Lap Kok	F4A, F4B	31	1.58	0.46	955.8	11,979
Northern Waters of Chek Lap Kok	F5A, F5B	33	2.14	0.61	428.0	5,766
	F6A, F6B	31	2.28	0.67	581.8	8,022
Overall	F1A – F6B	76	2.25	0.52	4796.7	73,544

Undermining the conservation importance of a gorgonian species.

According to a territory-wide octocoral study commissioned by the AFCD in 200[5], of 67 octocorals recorded in Hong Kong waters, only one gorgonian species – classified as globally rare and named *Guaiagorgia* – has been found in the western waters, as well as in the vicinity of the Project Area. Although due to a lack of research, no gorgonian species are currently listed in any protection regulations, this species is of potential conservation concern due to its restricted global distribution. WWF urges the conservation importance of this species should be evaluated and appropriate measures adopted to mitigate the impacts.

iii. Fisheries

The whole Fisheries section is geared to downplaying the importance of losses to fisheries. While to be expected, it is particularly obvious for this project which has a huge marine footprint.

The EIA Fails to Account for the Forthcoming Recovery of the Marine Environment and Fish Stocks

Fisheries modeling is widely accepted as a valid and extremely useful tool globally. Several fisheries modeling studies for Hong Kong waters have been conducted by fisheries experts at the University of British Columbia (UBC), one of which were commissioned by the AFCD, and another[6] was highly influential in the decision to ban all trawling.

Fundamentally, there is anecdotal evidence that seabed communities and fish stocks are starting to recover in Hong Kong waters following the trawling ban 18 months ago, from a depleted and degraded state and major increases in fish stocks are anticipated in decades to come[6]. The most recent study by

[5] P Ang, MW Lee, HL Fung. 2008. Provision of services on reference collection and study on octocorals and black corals in Hong Kong waters. Study was commissioned by AFCD.

[6] Sumaila UR, Cheung WWL, Teh L. 2007. Rebuilding Hong Honh's Marine Fishery – An evaluation of management options. Study commissioned by WWF-Hong Kong.

UBC[7] represents the best available knowledge on the likely future impacts to fish stocks and fisheries, and if the study is believed to be flawed as the EIA states, an alternative method for evaluating future impacts should be adopted.

In the UBC study, it projected the impacts of the 650 hectares third runway reclamation on the recovery of the marine ecosystem and the development of sustainable fisheries in the wake of the trawling ban (which was implemented in Dec 2012) and ban on commercial fishing in Marine Parks. It showed that the fishing industry would likely suffer losses in value of their catches of HK$48 million and losses in net profit of HK$11 million over a 18-year period[8].

In the EIA report, the project proponent did not take into account the benefit to the fisheries resources has been brought by the trawling ban over years, nor provide any figure on the total loss of production or total cost.

According to the UBC study, the fishing industry will suffer losses in landed value and net benefit, over a 20 year time-frame, of HK$129 million and HK$ 30 million, respectively. The UBC study calculated the loss against the more healthy marine ecosystem and fishery resources that will occur when trawling stops in late 2012.

The project proponent has a clear vested interest in evaluating the fishery impacts while still in a degraded state, and this bias should not be permitted to defy the foundation on which the HKSAR Government based its decision to ban trawling, and the best available scientific knowledge, and ignore the future recovery of fish stocks and benefits to fisheries.

The proponent fails to quantify the loss of fisheries production, and to demonstrate that the benefits of compensation measures are commensurate with the loss

As the abundance of different fish species in a given area is difficult to directly quantify, it is reasonable to use annual catch i.e. production figures as a proxy.

Fundamentally, compensation measures should attempt to benefit the environment to the same degree as the amount of damage done. The EIA notes that the direct loss of fishing ground is moderate, and therefore requires mitigation. It states (without justification) that the Port Survey 2006 data is "still applicable" and while quoting the production values per hectare for the area affected from the Port Surveys, the total loss of production is inexplicably not calculated.

[7] UR Sumaila and WWL Cheung. 2012. Modeling the Socio-economic Impacts of Two Large Reclamations on the Recovery of the Marine Ecosystem and Fisheries in Hong Kong.

Without quantification of the impacts to both species and production, any claims that fisheries compensation/mitigations will reduce impacts to fisheries habitat and grounds to an acceptable level are without basis. The EIA is fundamentally flawed in this respect.

As the most recent Port Survey data is 8 years old, and as 18 months have passed since the trawling ban (removing 80% of fishing effort), the Port Survey production data is out of date and likely an underestimate. As the proponent conducted their own fisheries surveys, these should be used to "groundtruth" the Port Survey data with regards to current production (these figures can then be adjusted for future production, see above).

Compounding earlier deficiencies, the proponent fails to quantify any perceived benefits to species and production from the proposed compensation measures, making it impossible to assess whether the benefits of compensation measures are commensurate with the loss. As already stated, this is a fundamental flaw in the EIA.

There is little justification for an expectation that an extended marine park will compensate for the permanent loss of approximately 672 ha of habitat to fish populations

The same marine park as proposed for the dolphins is the main compensation measure proposed to compensate for fisheries (after various techniques have been employed to reduce disturbance during construction). However, no data is presented that fishing pressure is less inside a marine park than outside, or that other management measures would permit a greater increase of fish populations inside the proposed marine park extension, than adjacent areas. In reality, the fishing pressure post trawling-ban inside the existing Sha Chau and Lung Kwu Chau Marine Park, where approximately 400 mixed-gear commercial fishing vessels are still allowed to conduct unlimited fishing per vessel, is unlikely to be much different to adjacent areas.

It should be noted that the Tam et al. 2013 reference cited in the EIA covers the period when trawling was still permitted in Hong Kong, and when fishing pressure would certainly have been less in marine parks where trawling was not permitted. Statements such as "*Therefore, it is indicative that there is a certain protection effect on fisheries resources within these protected areas*" (4.9.1.23) reflect past, but not current reality.

In a similar vein, comparisons with overseas marine protected areas where fishing is banned (see 4.9.1.25) are highly misleading as there is no commitment in the EIA that fishing would be banned in the proposed marine park (even if the HKIAAA extension is no-take).

[8] This study projects the losses in landed value and net benefit over a 20-year time frame starting in 2012. It was assumed that the ecological and fisheries impacts would start to occur once the reclamation project starts in 2014.

Banning all fishing in the existing and proposed extension of the Sha Chau and Lung Kwu Chau Marine Park would certainly be an appropriate compensation measure expected to increase fish populations (although the scale of the benefits would need to be calculated and commensurate with the loss, see above), but there is no suggestion in the EIA that this will be the case.

The EIA completely fails to demonstrate that management measures in the proposed marine park will facilitate an increase in fish populations over and above those predicted for all of Hong Kong waters following the trawling ban, and is fundamentally flawed in this regard.

Overall, as can be seen, statements such as the following "4.10.1.3 *The total area of the new marine park to be established for this project is approximately 2,400 ha, which is much greater than the lost habitat and fishing ground of 672 ha / 768 ha respectively. With full implementation of all proposed mitigation measures in place, it would be expected that there would be no adverse residual impacts on the loss of fisheries habitats / fishing ground. There will be a positive impact on the conservation of fisheries resources with the connection of existing and planned / potential Marine Parks in place*" are without scientific basis and demonstrate a fundamental lack of understanding of fisheries fundamentals.

Species of Conservation Importance Recorded

A number of fish species of conservation importance were recorded within the project footprint and its adjacent areas from the in-situ fisheries survey, which are:

- Longheaded eagle ray (IUCN Red List: Endangered)
- Pale edged sting ray (IUCN Red List: Near Threatened)
- Goatee croaker (China Species Red List: Vulnerable)
- Long tooth grouper (IUCN Red List: Vulnerable)
- Orange spotted grouper (IUCN Red List: Near Threatened)
- Tiger toothed croaker (China Species Red List: Vulnerable)

The project proponent stated that these species were highly mobile, the affected populations were small and there was an availability of suitable habitats in other areas. WWF is concerned that the impact is underestimated, with no mitigation measures being proposed for the fisheries resources during the construction phase. In addition, as the local population status of these species is unknown, the impacts such as the destruction of the habitat of species of conservation importance were not being assessed properly.

Fail to Fill in the Information Gap of Artificial Reefs

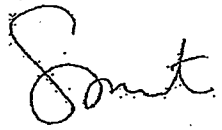
According to Session 14.3.5.4, "*Fisheries data around the ARs deployed in SCLKCMP were identified as an information gap under this EIA*". However, no fisheries data related to the artificial reefs were

provided as the survey team failed to conduct underwater visual count for fisheries data collection due to high turbidity and low observation range during two dive visits. The effectiveness for such artificial reef in enhancing fisheries resources remains unknown.

WWF considers it was inappropriate for the Project Proponent to evaluate the impact to the artificial reefs as "Low" without referring to any updated data (the latest data used in the EIA report was in 2001) and conducting a complete dive survey. In addition, this part of the impact assessment **cannot fulfil the requirement stated in the Study Brief** Appendix F (viii)(a) – "*if artificial reef deployment is proposed as a mitigation measure for enhancing prey resources for Chinese white dolphins, supporting information should be provided to demonstrate that existing artificial reefs in western waters are effective in enhancing fisheries resources*".

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

Yours sincerely,



Samantha Lee
Assistant Conservation Manager, Marine
WWF – Hong Kong

bpd

寄件者: HKDCS Info [redacted]
寄件日期: 07日07月2015年星期二 12:36
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主旨: Representation in relation to the Draft Chek Lap Kok Outline Zoning Plan No. S/I-CLK/13
附件: HKDCS offical comment (Town Planning).pdf

Dear Town Planning Board Members,

Attached please find our letter to strongly object to the amendments to the subject Draft Chek Lap Kok Outline Zoning Plan). Your acknowledgement on the receipt of our objection would be kindly appreciated.

Best regards,
Hong Kong Dolphin Conservation Society

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Hong Kong Dolphin Conservation Society
香港海豚保育學會

Representation made in accordance with S6(1) of the Town Planning Ordinance in respect of Draft Chek Lap Kok Outline Zoning Plan No. S/I-CLK/13

The Hong Kong Dolphin Conservation Society strongly objects to the amendments to the subject Draft Plan (i.e. The Draft Chek Lap Kok Outline Zoning Plan No. S/I-CLK/13 gazetted on 8 May 2015) covering a proposed reclamation area for the implementation of the new third runway proposed by the Airport Authority Hong Kong for the following reasons:

1) Currently, two applications for leave to judicial review against the decision of Director of Environment Protection Department (DEP) to approve the Third Runway System (3RS) Environmental Impact Assessment (EIA) report and grant the Environmental Permit (EP) were received by the High Court. Therefore, it is premature at this stage to propose any amendment of the subject OZP to facilitate the implementation of 3RS until a decision is made by the court, especially in light of the various environmental impacts not being fully established yet due to the incompetence of the EIA report and associated EIA process. The decision of TPB to amend the subject Draft Plan with some uncertainties of the environmental impacts can be subject to further legal challenges.

2) The reclamation works for the 3RS project will result in severe and irreversible impacts on the local Chinese White Dolphins in Hong Kong. However, the proposed mitigation and compensation measures presented in the 3RS EIA report byt the Airport Authority Hong Kong (AAHK) to deal with such impacts are largely inappropriate and inadequate, and cannot match the magnitude of the serious impacts posed on the Chinese White Dolphins during and after the massive reclamation works. Below are the particular concerns on the impacts of 3RS project on the local Chinese White Dolphins:

   i) Habitat loss

   The 3RS project will eliminate 650 hectares of sea area permanently, where the

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reclamation footprint is also identified as important dolphin habitat under the 3RS EIA report and by the long-term marine mammal monitoring study conducted by AFCD. In addition, 981 hectares of open waters will also be affected temporarily during the construction phase, which will bring further disturbance to the dolphins during the seven-year construction period. Even though this area will not be completely blocked off, there will be a huge volume of moving and stationary vessels in this area (at least 300 during the peak of construction as mentioned in the 3RS EIA report) that would displace dolphins from this general area, and the silt curtain with floating booms may also affect dolphins in gaining access to this habitat during the construction phase. Along with the 650 hectares of permanent habitat loss of the 3RS footprint to the dolphins, the total area of 1,631 hectares will not be available to dolphins during the projected seven-year construction phase.

In addition, the temporary works area on top of the third runway footprint can seriously affect dolphin movements between the Sha Chau and Lung Kwu Chau Marine Park and West Lantau waters, which in turn would affect the interactions between the two social clusters of Chinese White Dolphins in Hong Kong. The overall large works area also overlaps with the important dolphin foraging areas to the west of the airport platform as shown in the 3RS EIA study. Moreover, the temporary works area can potentially disrupt the remaining traveling corridor of dolphins to move from Northwest Lantau into Northeast Lantau waters, thereby eliminating the use of the entire Northeast Lantau region for the dolphins, and resulting in a much larger affected area of temporary habitat loss in addition to the 1,631 hectares of temporary works area and third runway footprint during the construction phase.

Notably, the massive habitat loss of 3RS will pose the biggest threat to the dolphins in North Lantau since the reclamation in the mid-1990s for the Chek Lap Kok Airport. This tremendous impact will affect the future survival of local dolphins in light of their significant decline in abundance as well as cumulative impacts in North Lantau waters since the original airport construction including the on-going construction of the Hong Kong-Zhuhai-Macau Bridge (Hung 2013, 2014).

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ii) Traveling Corridor

The 3RS footprint is situated at two important traveling corridors between the important feeding habitats at Brothers Islands and Sha Chau and Lung Kwu Chau Marine Park, as well as between the ones along the West Lantau waters and the Sha Chau and Lung Kwu Chau Marine Park. This will seriously affect the movement of the dolphins within their home ranges, and will eliminate suitable habitats for them due to the limited access to these favourable habitats from the potential blockage of their traveling corridors. In fact, recent studies (Hung 2015) have already indicated that the construction of the Hong Kong Boundary Crossing Facilities with 160 hectares of reclamation has severely limited the movement of dolphins to the Brothers Islands from the Northwest Lantau waters. It is expected that the adjacent 3RS reclamation with much larger footprint (650 hectares) will significantly further reduce the capacity of dolphins to travel through the narrow channel between the 3RS footprint and the existing Urmston Road.

iii) Vessel Traffic

According to the 3RS EIA study, the acoustic study found that there was a four-fold increase in loudness of high-speed ferries (HSFs) from less than 10 knots to 26-30 knots vessel speed at 500 metres away, but such noise increase could possibly be even higher at closer distances according to another research by Sims et al. (2012). In fact, numerous studies have indicated the impacts of vessel traffic on local Chinese White Dolphins in various ways in Hong Kong waters (Hung 2012; Marcotte et al. 2015; Sims et al. 2012). During the construction and operation of 3RS, the the realigned high-speed ferry traffic to and from the Sky Pier will become even more congested in North Lantau waters with the new 3RS footprint, and inevitably cause a lot more disturbance to the dolphins. Unfortunately, the proposed management plan by AAHK merely focused on managing the speed of the boats and the associated impacts, but completely ignored the critical issue of vessel traffic volume (and the actual sounds produced by the high volume of vessels). From the current situation of the HZMB construction, it was learnt that even slow-moving vessels can be harmful and disturbing to dolphins if overall volume is high. Therefore, it is expected that the significant increase in volume of vessel traffic in association with the 3RS project will seriously affect the dolphin occurrence in the North Lantau region.

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iv) Impacts to Nearby Marine Parks

The commencement of seven-year long 3RS construction programme (2016-2023) will overlap with the near completion of HZMB works in 2016/17, and dolphins will surely have no time to recover their usage of the waters of the Brothers Islands Marine Park (the most significant compensation measure for the habitat loss due to HKBCF reclamation) during and after the seven years of construction, as their passage to this soon-to-be established marine park will be significantly narrowed. Notably, there are solid evidences that the on-going HZMB works have been seriously affecting the dolphins' access to NEL waters (Hung 2014, 2015), which will last until 2016/17, while the Highways Department and AFCD are aiming for a recovery of dolphin usage of the Brothers Islands Marine Park after 2016 when the HZMB works are completed. Such recovery is very unlikely to happen if the 3RS project is allowed to proceed, which will be a serious negative impact to the future survival of the local dolphin population.

In light of the significant impacts of the HKBCF reclamation project on the dolphins' usage of the nearby Brothers Islands (Hung 2014, 2015), AAHK has seriously underestimated the impacts of the 3RS reclamation (four times the size of HKBCF) on the nearby Sha Chau and Lung Kwu Chau Marine Park, which is only 900 metres away from the 3RS footprint, and much closer to the temporary work area during the construction phase. With the current evidence of the severe impact of HKBCF on the nearby dolphin habitat around the Brothers Islands, undoubtedly the 3RS reclamation will bring even more severe impacts to the nearby Sha Chau and Lung Kwu Chau Marine Park and the Brothers Islands Marine Park, seriously undermining the effectiveness of these marine parks as key conservation measures for the local Chinese White Dolphins.

Under the 3RS EIA report, it is proposed to divert the Sky Pier vessel traffic to the north of Lung Kwu Chau, which can also seriously affect the long-term functionality of the Sha Chau and Lung Kwu Chau Marine Park as it will bring even more high-speed ferry traffic closer to the northern boundary of the marine park, a critical dolphin habitat in North Lantau waters in the past decade (Hung 2014). Even though speed limits would be enforced, the increased volume of HSF traffic and the increased

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associated noise can still severely affect these critical dolphin habitats around Sha Chau and Lung Kwu Chau.

v) Cumulative Impacts

The cumulative impacts of the 3RS reclamation have been gravely underestimated along with the on-going construction of HZMB as well as future proposed reclamation projects at Siu Ho Wan, Sunny Bay, Lung Kwu Tan, Tung Chung East and the mega artificial island in East Lantau waters. These cumulative impacts with massive habitat loss and other associated disturbance would certainly hamper the future survival of the local dolphins, but such impacts have not been quantitatively established by AAHK.

3) Under the current Town Planning Process, we also found that the subject Draft Plan has failed to provide details of traffic impact assessment at sea, on land and in the air. In particular, the channel between the Urmston Road and the airport platform will become much narrower during and after the 3RS construction. As a result, the marine traffic route would become much more congested with many high-speed ferries and construction vessels in addition to the hundreds of container boats and other boats currently using the Urmston Road daily. This will not only pose serious impacts on the Chinese White Dolphins with the acoustic disturbance and increased risk of vessel collision, but also a serious passenger safety issue for the ferry passengers.

Moreover, with the airport expansion, the road traffic will inevitably increase within and around the airport island, but no road traffic impact assessment has been presented by AAHK so far under the present subject Draft Plan. In the past several years, there have also been heated debates centered on the air traffic control issues, but no details on the air traffic impact assessment have been provided thus far by the AAHK to present various scenarios, especially for the scenario if the air traffic constraints are not properly resolved with the Mainland Chinese authorities. With the lack of such thorough traffic impact assessments at sea, on land and in the air, the subject Draft Plan should be rejected.

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With the above grounds, we strongly object to the amendments to the subject Draft Plan and respectfully request the two amendments be deleted.

Regards,
Hong Kong Dolphin Conservation Society
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tpbpd

寄件者: WOO Ming Chuan [redacted]
寄件日期: 08日07月2015年星期三 18:22
收件者: Town Planning Board
主旨: HKBWS's comments on Chek Lap Kok OZP No. S/I-CLK/13
附件: 20150708_HKBWS_ThirdRunway_OZP.pdf

Dear Sir/Madam,

Our submission regarding the captioned is attached.

Best Regards,
WOO Ming Chuan (Ms)
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Secretary, Town Planning Board
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By email only

8 July 2015

香港觀鳥會
THE HONG KONG BIRD WATCHING SOCIETY
Since 1957 成立

Dear Sir/Madam,

Objection to the Amendments to the Approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12

The Hong Kong Bird Watching Society (HKBWS) would like to raise an objection on the Amendments to the Approved Chek Lap Kok Outline Zoning Plan (OZP) No. S/I-CLK/12. Our reasons are stated below:

BirdLife INTERNATIONAL PARTNER
國際鳥盟成員

1. **The decision of Director on Environmental Protection (DEP) to approve the 3RS is under Judicial Review**
   In May 2015, the High Court accepted an application for judicial review against the decision of the DEP to approve the expansion of Hong Kong International Airport (HKIA) into a Three-runway System (3RS). The HKBWS considers that all preparation works for the implementation of the 3RS (e.g., the amendments of the Chek Lap Kok OZP, and achieving the approval from the Lands Department for land formation works at the foreshore and sea-bed next to HKIA) should NOT commence until the High Court has made a final decision on the case.

2. **Concerns on construction works adjacent to Sha Chau egretry**
   Sha Chau Egretry is the second largest egretry in Hong Kong in 2013. Eighty-three nests were recorded at Sha Chau Egretry last year, making up 10.9% of the total number of nests in Hong Kong. This colony is comprised of Black-crowned Night Heron (*Nycticorax nycticorax*), Little Egret (*Egretta garzetta*) and Great Egret (*Ardea modesta*)[1]. As mentioned in the Environmental Impact Assessment of the 3RS project, diversion of submarine pipelines is required for the ground improvement works for the third runway land formation. The area next to the egretry has been proposed as the daylighting location of the Horizontal Directional Drilling (HDD) for the diversion of pipelines (Figure 1). Breeding egrets are susceptible to disturbance

[1] Egretry Counts in Hong Kong, with particular reference to The Mai Po Inner Deep Bay Ramsar Site – Summer 2013 Report

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by human activity, which may lead to abandonment of their breeding areas or nestlings. Yet, the EIA report has failed avoid this sensitive location and failed to address the need for ecological monitoring from pre-construction to post-construction.

3. **Loss of marine habitats from 3RS reclamation and concurrent projects**

The tentative schedule for the construction of the 3RS from 2015 to 2023 overlaps with the construction phase of the Hong Kong-Zhuhai-Macao Bridge Boundary Crossing Facility (HKZMB BCF), Hong Kong Link Road (HKLR) and Tuen Mun-Chek Lap Kok Link (TMCLKL), which would continue until 2016 (Figures 2 – 4, Table 1). There is also the possibility of overlapping construction period with the Sunny Bay development which consists of approximately 80 ha of reclamation works, and the reclamation for land supply at Lung Kwu Tan which is approximately of 200 – 300 hectares in area. Based on the information extracted from the EIAs of these projects, for the first four years (2015-2018) of 3RS's construction, there will be concurrent reclamation projects taking place (Table 1). **For the duration of four years (2015-2018), the marine habitat loss at north Lantau waters (including temporary and permanent) from these projects amounts to 1,991.3 ha[2].** This is a significant amount of habitat loss for Chinese White Dolphins (CWD), which is globally "Near Threatened" with a declining population and is found in the North Lantau Waters of Hong Kong. It is likely that CWDs will completely avoid the North Lantau Waters. **The total permanent loss of marine habitats from all four projects amounts to 854.7 ha, and the 3RS alone is responsible for 76%[3] of this total area.**

[2] 1,600 ha from 3RS; 140.3 ha from TMCLKL; 64 ha from HKLR; and 364 ha from HKZMB BCF.

[3] 650 ha from 3RS / 854.7 total ha

Table 1. The loss of marine habitats for different projects in the North Lantau Waters

Project	Temporary loss of marine habitat (ha)	Permanent loss of marine habitat (ha)	Total*	Construction Phase								
				2011	2012	2013	2014	2015	2016	2017	2018	2018-23
3RS	981	650	1631					x	x	x	x	X
TMCLKL	92.6	47.7	140.3	x	x	x	x	x	X	x	X	
HKLR	37	27	64		x	x	x	x	X			
HKZMB BCF	26	130	156	x	x	x	x	X	x			
Sunny Bay Reclamation	Not available	80	>80							?	?	?
Lung Kwu Tan Reclamation	Not available	200-300	>200							?	?	?

*Total = temporary loss + permanent loss

4. **Ineffective compensatory mitigation measure**

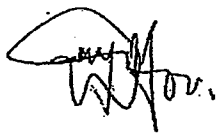
In order to mitigate the temporary and permanent loss of 1,631 ha marine habitat, the project proponent proposed to establish a 2,400 ha Marine Park (MP) in the surrounding waters of the airport new extension. However, the MP will be designated after the completion of the 3RS project in 2023. During the 8 – 9 years of construction period for the 3RS project, the continuously declining population of the globally "Near Threatened" Chinese White Dolphin (CWD) is expected to be adversely affected by the 3RS project and other concurrent projects leading to a further decline. It is uncertain if the CWD would return and inhabit the protected habitats within the new MP. We consider that this so-called mitigation measure is in fact a "destroy first, conserve later" approach, where the conservation promises made from the early stages of the development proposal are still not solidified but destruction has already been taken place. Therefore, the proposed new MP cannot effectively mitigate the ecological impacts caused by the 3RS project and thus the project should not proceed.

5. **Justifications for the decision made by the Town Planning Board (TPB)**

As said in the previous section, the decision of DEP to approve the 3RS project is under judicial review. If the TPB decided to approve the amendment in the OZP, and if such approval is against the judgement of the High Court in the future, we urge that detailed and comprehensive justifications from TPB should be provided.

Given that the 3RS project would lead to a significant loss of marine habitats, threatened the globally endangered CWD, and the fact that the mitigation measures proposed are ineffective and the DEP's decision is under judicial review, the HKBWS considers that the proposed ground improvement and filling of sea-bed for the 3RS project should not proceed, and therefore, we respectfully request the TPB to **reject** the amendments to the Approved Chek Lap Kok OZP No. S/I-CLK/12.

Yours sincerely,



Woo Ming Chuan
Conservation Officer
Hong Kong Bird Watching Society

Figure 1. Approximate location of the daylighting locations

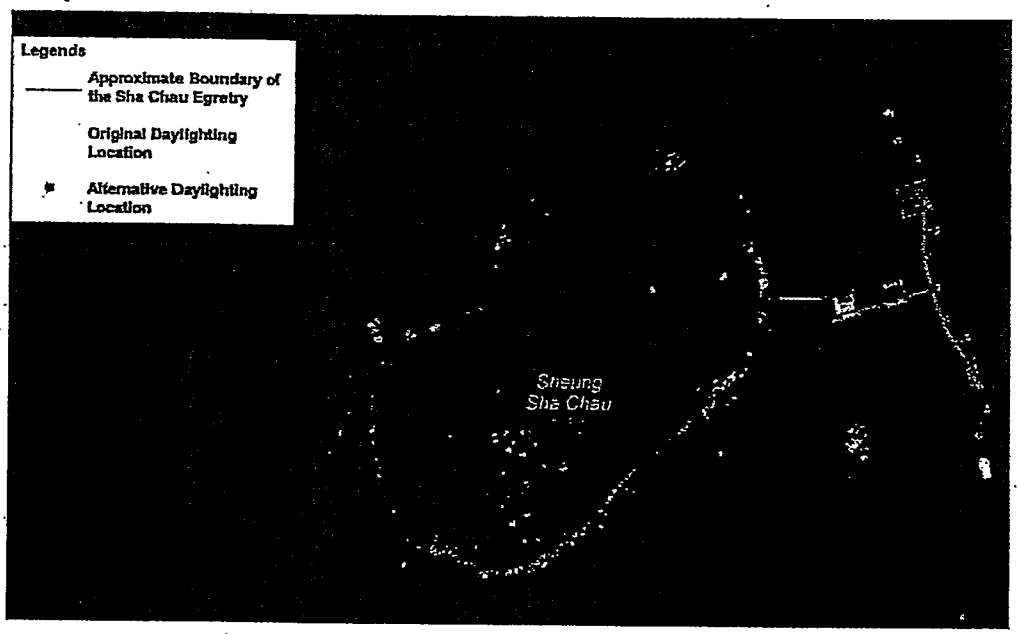


Figure 2. Habitat loss from the 3RS reclamation

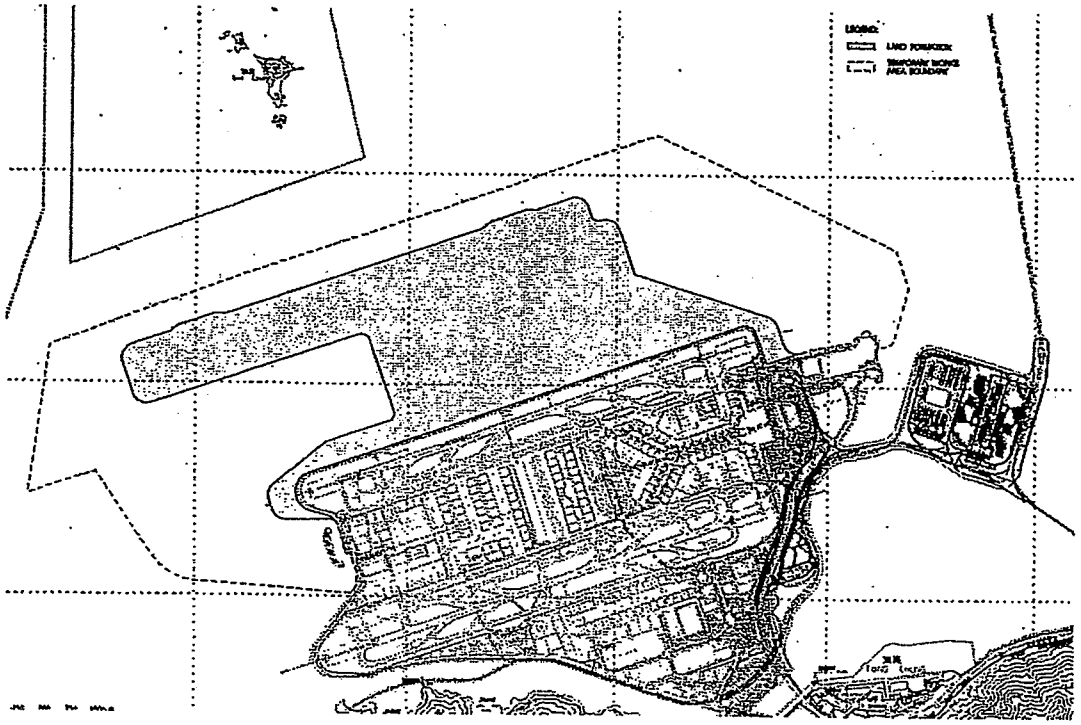


Figure 3. Habitat loss from HKZMB BCF reclamation

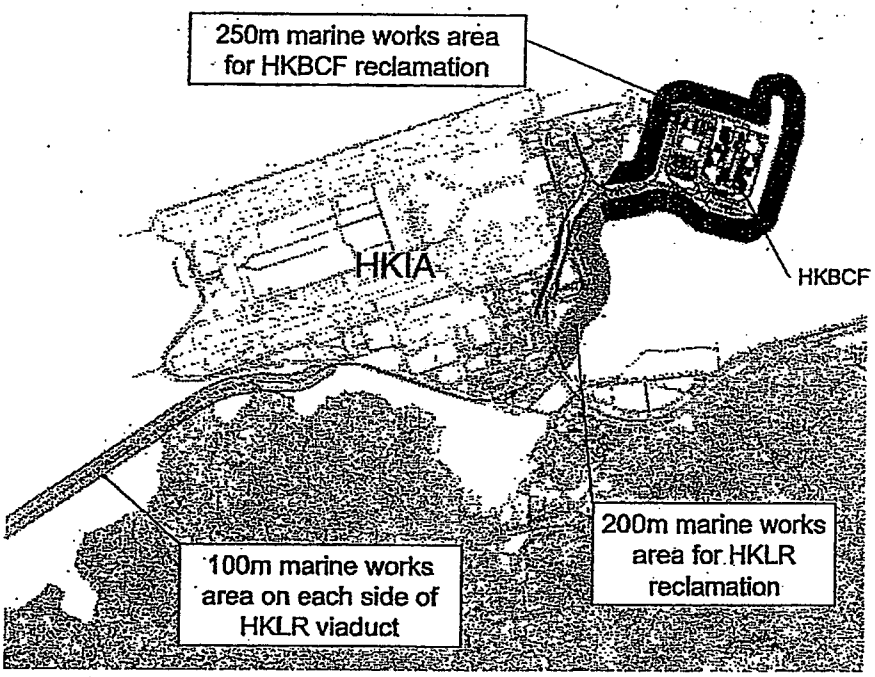
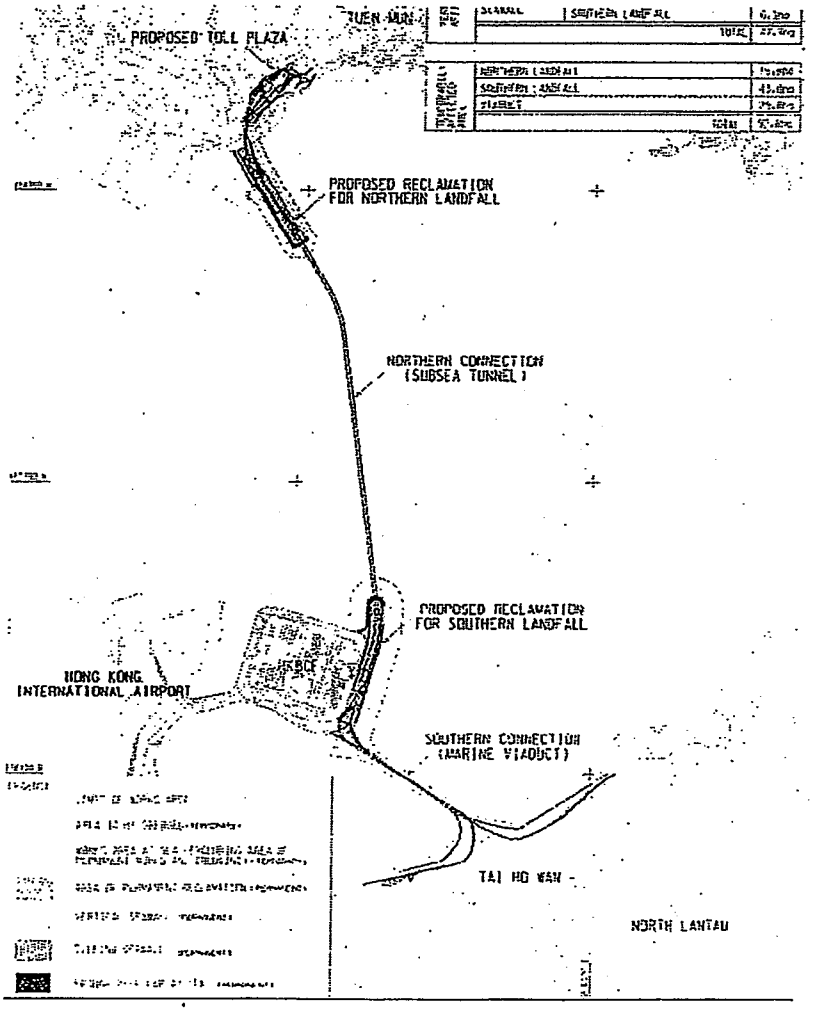


Figure 4. Habitat loss from TMCLKL



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致　城市規劃委員會

TPB/R/S/I-CLK/13-390

有關：S/I-CLK/13 號赤鱲角分區計劃大綱草圖

環保觸覺意見書
反對機場第三條跑道規劃

環保觸覺（本會）多年來關注機場興建第三條跑道計劃，並多次就計劃發表意見，現特函城市規劃委員會要求否決通過上述草圖，理由如下：

工程的公眾認受性、必要及可行性

此大綱草圖的目的為把機場現址北面的擬議填海區劃定為「機場」，用以他日機場擴建成為三跑道系統所用。

但其實機場第三跑計劃第三跑工程只靠機場管理局的偏頗、於機場進行的意見調查支持，卻未經由政府進行的公開及獨立的全面公眾諮詢，工程沒有得到公眾的認受及共識。及後有民間團體委託大學進行專業跟進調查，發現大部分市民了解到工程更多資料，例如是成本、融資、生態影響、噪音、空氣污染之後，不支持擴建工程。

過去多月亦本會及多個團體均曾公佈研究數據，提出香港目前的雙跑道系統容量其實並未飽和，第三跑更不是最佳增加機場效益的方法。機場現有的雙跑道看似飽和，主因是機管局管理不善，未有妥善選擇航點、任由航空公司使用細飛機佔用跑道資源，還有未按 1992 年《機場設計總綱》

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如期提升機場設施和附近地形。本會和市民要求機管局向公眾及城規會全面公開營運情況，包括例如航班目的地分佈、平均每航班客量、航機種類等，使城規會及公眾人士有能力檢視機場營運情況，及驗證所謂「工程需要」是否真確。而機管局亦應解釋為何未有根據計劃，提升機場設備，盡用雙跑道。

城市規劃應以市民福祉為依歸，如大眾未同意工程，而工程對香港是否有益極度成疑，城規會應否決相關的規劃。

工程的效用

機管局及政府當局未有清楚交代航道限制問題，令到規劃中的第三條跑道最後即使興建，亦不能達到預期的效益。

因為地理限制，香港、深圳、澳門和廣州機場之間的距離太近，中國必須於香港北面空域對香港民航機實施航空管制，要求飛機先爬升至 15,700 英呎高度（俗稱「空牆」），方可出入中國空域，以確保各機場升降安全。相關限制令到原本北向的飛機（例如飛往中國或歐洲），起飛後不能直接轉向北方（因民航機不能在短程內爬升至 15,700 英呎），只可在本港上空繞飛，利用更長航程爬升。這個空牆問題，使 1992 年《機場規劃大綱》原設計的五條北面航道不能使用，大大減少飛機離場航道，令香港機場未能提升至原設計的航班數字。

同理，由北面來港的航班，亦須於香港上空繞飛緩降。此舉變相迫使來回北面的飛機佔用香港空域，使得實際供飛機使用空間減少。

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可惜至今機管局及政府當局只單方面樂觀假設未來相關進出香港北面中國空域的高度限制問題可能得到解決，實際卻未能公開有效文件，證明已取得中國相關部門承諾或保證。有前民航處長就公開表示，中港跨境空域問題得到解決的可能性極微。如果限制一直存在，香港未能盡用空域空間，航道仍然受阻，飛機的進出香港的效率將持續低下，升降量永不能按預期增加，如此則興建第三條跑道亦於事無補，得物無所用。

本會認為城規會考慮分區計劃大綱圖時應考慮相關工程的效益及影響，對於只靠樂觀假設，而根本未有明確可行方案的超大型基建的規劃，城規會應否決，保障市民珍貴的土地及海洋資源。

<u>工程破壞環境、摧毀海洋生態</u>

由建造屯門新市鎮開始，到十多年前的赤鱲角機場、大嶼山北高速公路、小蠔灣等等，再到進行中的港珠澳大橋工程、香港口岸人工島，還未計算政府現正計劃中的欣澳市鎮、小蠔灣擴建、東涌東、東涌西、龍鼓灘、石鼓洲焚化爐、中部水域人工島等等，數十年間香港中西部的海域有數之不盡的工程，填海造地規模之大，令人吃驚。

除了諸多填海工程，其他人類活動例如棄置受污染泥料的污泥坑、高速船隻往來等，已經破壞了大片海洋生物的棲息地，而大嶼山北部多年以來的發展，亦令海岸、海洋及海底生態受創甚深。最明顯的證據就是過去數年間的中華白海豚的數字已大幅下降至危險水平，無論是政府部門抑或是民間關注海豚團體所公布的觀察數字，均顯示同一個問題：香港的海洋

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生態已臨危急存亡之時。

機場第三跑的環評報告中承認工程所需填海的位置是中華白海豚及其他海洋生物的重要棲息地，填海之後海洋面積就會永久消失，影響極之嚴重。政府當局及機管局以「先破壞、後補償」的概念，即「先填海、再設立海岸公園」，最令市民及各環境團體不滿。皆因香港的海洋生態已經因為長年多項發展被嚴重打擊，危如累卵，實在不容更多破壞。政府及機管局應先持保守態度，先行保護該帶海洋環境，待自然生態休養生息，生機回復至一合理水平，才再提議考慮進行工程。

而今次的分區計劃大綱區亦只涉及機場填海工程，沒有觸及機場附近的將要設立的海岸公園，可見政府本身對設立海岸公園不甚熱衷。若論設立海岸公園，政府其實有多個承諾過的海岸公園仍未有設立，就如 2002 年的時候，香港政府擬備設立「索罟群島海岸公園」及「西南大嶼山海岸公園」，目標為保護中華白海豚與江豚，及存護該兩處的的優美海岸環境，但當局拖延至今仍未有具體進度，但偏偏大型工程就可以「極速展開」。

本會認為城規會應全面了解填海及將土地劃為機場用途後的環境問題，並應否決這項可謂是環境災難的工程規劃。

噪音及空氣污染

根據運輸及房屋局回應立法會陳偉業議員的文件，2013 及 2014 年間，沿現時飛機航道下而受 70 分貝以上飛機噪音影響的民居很多，包含青龍頭、東涌市、馬灣、汀九等等。而且其受影響次數更由數十至數百次不等，居

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民飽受困擾，問題已是極之嚴重。

（參考：http://www.info.gov.hk/gia/general/201406/11/P201406110406.htm）

因此，當政府及機管局預測於 2030 年，機場擴建完成並達至最高使用率，即使來港飛機數目比現時更多時，噪音污染問題卻沒有大改變，繼續停留在現時其聲稱的「可接受水平」，實在令人難以置信，更叫現在各區飛機噪音受害人情何以堪。

本會及機場發展關注網絡與民航專家曾公開發表研究，發現第三跑建成後，空域問題仍未解決的話，飛機起飛後不能直向北飛，新增的航班有很大機會將依舊先向南飛，即進一步增加經過馬灣上空附近的航班，加劇噪音問題及令空氣質素惡化。

當局及機管局現時公開的噪音評估是依據空牆消失的航道安排而進行，本會認為城規會為保障機場規劃下的市民健康及福祉，必須要求當局提交上述情況下的噪音及空氣影響研究報告，及要求公開手上所有噪音數據，使公眾可以得悉噪音問題的實際嚴重程度，否則不應通過大綱草圖。

海上航道安全風險

前天文台長林超英等專家提出，於機場現址以北大規模填海，將令龍鼓水道的航道將大幅收窄，提高每隻經過龍鼓水道船隻與船上人員的安全風險。另外，船隻集中行駛及他日流量增加之後，相關的海洋污染、空氣污染、噪音模式亦會隨之改變，本會未有發現當局向公眾及城規會公佈相關的評估資料。

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本會認為城規會有責任清楚了解上述安全及健康風險問題，要求政府及機管局公開相關的評估報告，使公眾得知機場以北一帶填海及劃為機場後的潛在安全風險。

司法程序問題

機場擴建相關的環評報告及行政會議決定正被司法覆核挑戰中，當中環評報告的司法覆核申請經已獲批，證明法庭認為有需要檢視報告及批出環境許可證的程序到底是否合法。

本會認為城市規劃委員會須尊重法庭，在有關機場第三條跑道的官司有最終結果後，確認計劃至今各程序是否合法合理，才處理第三跑相關的規劃程序；在此之前，應擱置處理有關規劃程序。

總結

本會已多番要求政府及機管局認真評估計劃的營運可行性，與空氣污染、噪音影響及破壞海洋生態等等問題，並應就項目取得市民共識。可惜，最後政府及機管局一意孤行，堅持強推計劃。

有關是項工程計劃，社會中表示反對的專業團體、專業人士及環保團體眾多，他們提出的理由亦包括各個領域，由世界發展趨勢、及至香港整體政策方向、再小至如公共資源運用、過量基建投資、經濟效益低下、社

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會成本分析、人文及自然環境問題等等。這些反對的意見均由專業人士撰寫，內容更非常詳盡。

本會並非反對一切發展，乃是堅信「發展」絕不只有工程基建一途。政府當局應有更高層次的思維，必須明白香港環境承載力有限，「破壞式」、「基建式」的發展是過時概念，亦未能回應氣候變化、海洋生態等世界大問題。

是項工程的由政府及機管局提出的理據均充滿誤導成份，所謂工程需要、工程效益、空氣污染、噪音問題、海洋生態影響等等，均不盡不實。政府及機管局未有盡力尋求及實施「非工程」的應行方案，而在中國空域限制及航道短缺的問題均未見有機會解決的曙光，機場第三條跑道建成亦只會得物無所用。若為擴建而擴建，機場第三條跑道只會淪為浪費社會資源，損害市民健康福祉，破壞環境至深的「千億世紀大白象」工程！

本會再三要求城規會擱置程序，反對通過 S/I-CLK/13 號赤鱲角分區計劃大綱圖。

本會隨同此函向城規會轉交本會收集的逾三千份公眾意見書，均與本會反對通過草圖之立場相同，請各城規會委員務必仔細參考。

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

二零一五年七月八日

tpbpd

寄件者: Mark Mak [redacted]
寄件日期: 08日07月2015年星期三 19:56
收件者: tpbpd
主旨: 赤鱲角_S/I-CLK/13_環保觸覺意見書
附件: 城規會_赤鱲角_S-I-CLK-13_環保觸覺意見書_FINAL_20150708.pdf

致 城規會

請參閱附件。

環保觸覺 7 月 18 日 賣旗日招募義工！
請瀏覽：[redacted]

Mark C.K. Mak
Green Sense
Tel: [redacted]
Fax: [redacted]
Website: [redacted]
Facebook: [redacted]

022

Melonie Chau [redacted]
07日07月2015年星期二 10:39
主旨: tpbpd@pland.gov.hk
附件: Object to Draft Chak Lap Kok Outline Zoning Plan No.S/I-CLK/13
OZP-Rep 3 FoE.pdf

Knowledge of receipt is appreciated.

Melonie Chau 周月翔
Assistant Environmental Affairs Manager 助理環境事務經理
Friends of the Earth (HK) 香港地球之友
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A: [redacted]

地球之友 friends of the earth

007

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Representation made in accordance with S6(1) of the Town Planning Ordinance in respect of Draft Chak Lap Kok Outline Zoning Plan No.S/I-CLK/13

Friends of the Earth (HK) strongly objects to the amendment to the subject draft plan (Chak Lap Kok Outline Zoning Plan No. S/I-CLK/13), which was gazetted on 8 May 2015..

The two Amendments include:

Item A - Designation of an area on the proposed reclamation to the north of the Hong Kong International Airport as "Other Specified Uses" ("OU") annotated "Airport"; and

Item B – Designation of two areas in the east and west of the proposed reclamation as "OU" annotated "Airport Service Area"

We strongly object to the amendments to the subject Draft Plan for the following reasons:

1. Air quality in Hong Kong get worsen in recent year. From 2010 to 2012, Nitrogen oxides level increase 6%. Tung Chung and Tuen Mun have suffered from air pollution severely, we believe that the proposed development would intensify the bad situation.

2. It is recognized that 'excessive levels of noise often interfere with verbal communication, disturb concentration, disrupt sleep, contribute to stress or otherwise detract significantly from the quality of life' . Airport Authority Hong Kong (HKAA) does not consider the records from the Hong Kong government monitoring stations. According to those records, aircraft noise exceeded 70dB during the night (between 2300 and 0700 during 2013 and 2014) is marked at different monitoring stations throughout Hong Kong. People living in Tung Chung, Ma Wan, Sam Tseng, Tsuen Wan and Tsing Yi often suffer from loud aircraft noise during the night.

3. Chinese White Dolphin (CWD) is listed in the UN Biodiversity Treaty as a protected species and is classified in Appendix I of the Convention on the International Trade in Endangered Species of Flora and Fauna (CITES). The population of CWD has decreased drastically since the construction of HKZHMB started and with the increase of high speed vessels travelling between Hong Kong and mainland. Simultaneously, government is planning several reclamation projects north of Lantau. The cumulative

impacts of the various infrastructure projects in the Lantau area are having a devastating impact on dolphin numbers.

4. AAHK Has Failed to Explained How the 3RS was Selected

The amendments are intended to make provision for the implementation of the 3RS. The AAHK has failed to demonstrate to the public that proper feasibilities studies had been carried out with proper assessments done to identify the most feasible option in terms of financial feasibility, future expansion and environmental impact. Whether the 3RS is the most feasible option for the expansion of the HKIA is questionable. Neither the Town Planning Board (TPB) Paper No. 9877 prepared by AAHK for the consideration of the TPB on 10 April 2015 nor the Rural and New Territories Planning Committee (RNTPC) Paper (for consideration of the RNTPC in its meeting dated 17 April 2015) have provided substantial and adequate information to justify the 3RS advocated by AAHK. The TPB papers failed to provide adequate justification for the decision of selecting the 3RS. In this respect the decision of the TPB arrived at based on the information provided in the subject TPB paper is improper.

5. Interfering with the Judicial Review of the Granting of the Environmental Permit

The AAHK presented to the members of the TPB meeting that the EIA study conducted for the 3RS was the most comprehensive one ever done in Hong Kong. The fact is that two applications for leave to judicial review against the decision of DEP to approve the 3RS EIA report and grant the EP were received by the High Court. In this respect the environmental impact on the reclamation area has not been ascertained. Para 13 of TPB Paper No.9877 has failed to mention this point. The RNTPC paper only showed it as a footnote. As the environmental impact is the most important aspect of the assessment for this project AAHK is suspected of misleading members of the TPB intentionally. It is therefore premature to amend the subject OZP to facilitate the implementation of the 3RS at this stage until a decision is made by the court. The decision of the Town Planning Board to amend the subject Draft Plan with no certainty of the environmental impact is subject to challenge.

6. Potential Vicious Competition between the XRL and Expanded HKIA

6.1 The representative, Mr Wilson Fung Wing Yip in the TPB meeting dated 10 April 2015 admitted that "it was expected that the Mainland flights would remain to be

around 25% of the total flight movements of HKIA in the foreseeable future up to 2030". Nevertheless, he claimed that "it was considered that for those destinations that were within six hours of travelling time by express rail, direct competition between express rail and air flight did exist" but "they overlapped with less than 5% of the current flight destination of HKIA".

6.2 However, in the LegCo Paper of promoting the benefits of the Express Rail Link (XRL) prepared by Transport and Housing Bureau (THB) in Nov 2009 (LC Paper No. CB(1)503/09-10(2)[1] refers), THB quoted the case in UK that the carbon emission on an Eurostar journey is only about 15% of that by plan on a per passenger-kilometre basis. The Government attempted to promote XRL would be more environmentally-friendly than flights.

6.3 Now it is a question whether THB attempted to have strategic planning to coordinate the passenger flow between XRL and the expanded HKIA. AAHK have also claimed that it is the airlines (not the Government nor the airport) which determine the level of air services (including destination and frequency) in response to market situation (LC Paper No. CB(4)259/14-15(02)[2] refers). So it is worrying that it turns out to be a vicious competition between the XRL and the airlines providing short-haul flights. And Hong Kong people are the ones paying the social and environmental costs for this uncoordinated transport planning.

7. Very Loose Control on the Permissible Uses regarding Amendment A

The proposed Amendment A designates an area on the proposed reclamation "OU" annotated "Airport". There is **no restriction on maximum GFA and all the uses permitted are in Column 1**. Recently AAHK announced that the less than 10-year old T2 will be demolished to make way for the construction of the 3RS. This is a clear demonstration that AAHK operate and plan on an ad hoc basis with no overall co-ordination on the expansion of the airport. Such ad hoc manner is not acceptable and is not sustainable. In view of the incompetence of AAHK there

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1 http://www.legco.gov.hk/yr09-10/english/panels/tp/tp_rdp/papers/tp_rdp1116cb1-503-2-e.pdf (please delete the footnotes in final submission)

2 http://www.legco.gov.hk/yr13-14/english/panels/edev/papers/eaedev0930cb4-259-2-e.pdf (please delete the footnotes in final submission)

should be sufficient development control on the overall planning of the airport under the OZP. The "HKIA 2030 Master Plan", though has gained in-principle support by CE in Council, was just a blue-print framework without statutory binding effect. The public would not know and have no way to get involved in decision making if HKIA are going to make minor amendments to the plan. In this respect all the permissible use should be put in Column 2 to allow control by the TPB to avoid repeated mistakes by AAHK in the future.

8. Very Loose Control on the Permissible Uses regarding Amendment B

Likewise the proposed Amendment B designates two areas on the proposed reclamation "OU" annotated "Airport Service Area". All the permissible uses should be placed under Column 2 particularly there are commercial uses such as eating places and shops and services etc. Such uses should be well defined in terms of GFA as these are uses which should attract premium and should be included in the assessment of traffic impact.

9. No Air Traffic Impact Assessment (ATIA) is Presented

AAHK did not provide an Air Traffic Impact Assessment (ATIA) report when it presented the 3RS to the Town Planning Board (TPB). The TIA is an indispensible technical document whenever a development proposal is submitted to the TPB for consideration.

According to AAHK's estimation, the total passenger throughput of major airports atop the PRD estuary would reach 300 million by 2030. Yet, there is no agreed multilateral collaborative air traffic management scheme. No Safety Risk Assessment as required by the International Civil Aviation Organisation (ICAO) Annex 19. No Real Time Simulation test (not only Fast Time Simulation) of aircraft movement patterns under different scenarios considering flight paths, escape avenues and queuing loops. These uncertainties will cast doubts on the operation-effectiveness of the 3RS

bpd

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主旨: Representation made in accordance with S6(1) of the Town Planning Ordinance in respect of Draft Chak Lap Kok Outline Zoning Plan No.S/I-CLK/13
附件: OZP-Rep 3RS PAW.pdf

People's Aviation Watch's objection

Contact: Melonie Chau [redacted]

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監機會PAW

6th July, 2015

Representation made in accordance with S6(1) of the Town Planning Ordinance in respect of Draft Chak Lap Kok Outline Zoning Plan No.S/I-CLK/13

The Draft Chak Lap Kok Outline Zoning Plan No. S/I-CLK/13 ("Draft Plan") was gazetted on 8 May 2015, which include the amendments covering a proposed reclamation area to facilitate the implementation of the new third runway proposed by the Airport Authority Hong Kong (AAHK). It has been claimed by the AAHK that the current two runway system has not been able to meet the current as well as projected demand. Increase of capacity is necessary to address such demand.

The two Amendments include:

Item A - Designation of an area on the proposed reclamation to the north of the Hong Kong International Airport as "Other Specified Uses" ("OU") annotated "Airport"; and

Item B – Designation of two areas in the east and west of the proposed reclamation as "OU" annotated "Airport Service Area"

For the past few years the (AAHK has not acted in a responsible and professional manner to inform the general public of options of how and where capacity can increase. All along the general public has only been given the third runway system "option" by AAHK. There has not been any proper public consultation conducted by the AAHK on the pros and cons of alternatives. It is not clear whether proper feasibility studies, which propose, examine and assess different options on the basis of a set of criteria agreed by the general public, have been carried out by the AAHK. For a project of this scale in terms of financial commitment as well as environmental impact it is not at all clear how and what the AAHK has done to arrive at the conclusion that the 3RS is the option to be adopted. The general public is entitled to be involved in the process as well as to have access to such information.

There is no doubt that the airport plays an important role on the economic development and competitiveness of Hong Kong. The public demands that proper studies be carried out and the assessment of options and public consultation to be conducted in a transparent and professional manner. Unfortunately the AAHK has failed to do so. Due to the lack of proper consultation carried out by the AAHK the Town Planning Ordinance

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procedure become the only possible channel for the public to express their view under the Town Planning Ordinance.

Against the above background **People's Aviation Watch** strongly objects to the amendments to the subject Draft Plan for the following reasons:

1. AAHK Has Failed to Explained <u>How the 3RS was Selected</u>

1.1 The amendments are intended to make provision for the implementation of the 3RS. The AAHK has failed to demonstrate to the public that proper feasibilities studies had been carried out with proper assessments done to identify the most feasible option in terms of financial feasibility, future expansion and environmental impact. Whether the 3RS is the most feasible option for the expansion of the HKIA is questionable. Neither the Town Planning Board (TPB) Paper No. 9877 prepared by AAHK for the consideration of the TPB on 10 April 2015 nor the Rural and New Territories Planning Committee (RNTPC) Paper (for consideration of the RNTPC in its meeting dated 17 April 2015) have provided substantial and adequate information to justify the 3RS advocated by AAHK. The TPB papers failed to provide adequate justification for the decision of selecting the 3RS. In this respect the decision of the TPB arrived at based on the information provided in the subject TPB paper is improper.

2. No Full Discussion on "Options"

2.1 The public have in the past few years proposed various options for the expansion of the capacity of the airport including terrain removal recommended in the original Master Plan, co-ordination with neighbouring airports, installation of advanced technological equipment like the Heathrow Airport which operate on 2-runway system and training of air traffic controllers, etc. The AAHK has repeatedly fended off these options saying they are not feasible without any substantial figures or reasons, sometimes even using wrong information. It seems the AAHK has all along decided on the 3R system "option". The way the studies and consultation were conducted by the AAHK has been promoting the 3R system instead of finding the most feasible option for the expansion of the HKIA. We do not even know what the criteria for selection are. As there is nothing to substantiate that 3R system is the most feasible option the amendments which relate to new reclamation should be deleted and AAHK should be requested to conduct proper technical studies in a professional and transparent manner.

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3. Interfering with the Judicial Review of the Granting of the Environmental Permit

3.1 The AAHK presented to the members of the TPB meeting that the EIA study conducted for the 3RS was the most comprehensive one ever done in Hong Kong. The fact is that two applications for leave to judicial review against the decision of DEP to approve the 3RS EIA report and grant the EP were received by the High Court. In this respect the environmental impact on the reclamation area has not been ascertained. Para 13 of TPB Paper No.9877 has failed to mention this point. The RNTPC paper only showed it as a footnote. As the environmental impact is the most important aspect of the assessment for this project AAHK is suspected of misleading members of the TPB intentionally. It is therefore premature to amend the subject OZP to facilitate the implementation of the 3RS at this stage until a decision is made by the court. The decision of the Town Planning Board to amend the subject Draft Plan with no certainty of the environmental impact is subject to challenge.

4. Potential Vicious Competition between the XRL and Expanded HKIA

4.1 The representative, Mr Wilson Fung Wing Yip in the TPB meeting dated 10 April 2015 admitted that "it was expected that the Mainland flights would remain to be around 25% of the total flight movements of HKIA in the foreseeable future up to 2030". Nevertheless, he claimed that "it was considered that for those destinations that were within six hours of travelling time by express rail, direct competition between express rail and air flight did exist" but "they overlapped with less than 5% of the current flight destination of HKIA".

4.2 However, in the LegCo Paper of promoting the benefits of the Express Rail Link (XRL) prepared by Transport and Housing Bureau (THB) in Nov 2009 (LC Paper No. CB(1)503/09-10(2)[1] refers), THB quoted the case in UK that the carbon emission on an Eurostar journey is only about 15% of that by plan on a per passenger-kilometre basis. The Government attempted to promote XRL would be more environmentally-friendly than flights.

4.3 Now it is a question whether THB attempted to have strategic planning to coordinate the passenger flow between XRL and the expanded HKIA. AAHK have also claimed that it is the airlines (not the Government nor the airport) which determine the level of air services (including destination and frequency) in response to market situation (LC Paper No. CB(4)259/14-15(02)[2] refers). So it is

worrying that it turns out to be a vicious competition between the XRL and the airlines providing short-haul flights. And Hong Kong people are the ones paying the social and environmental costs for this uncoordinated transport planning.

5. No details of TIA Available

5.1 There are no details of the Traffic Impact Assessment available for the consideration of the TPB or the public. AAHK has made known to the public its intention to build a huge shopping mall in the North Commercial District (NCD), the first phase alone would be about 2 million sq ft,. AAHK has explicitly made known to the press that the mall will aim to attract Hong Kong people. AAHK further indicated at the TPB meeting that it was expected that with the completion of the NCD and the 3RS the demand for convention and exhibition spaces at the AWE would be further increased. It is however not known if the capacity of the AEL is capable of carrying the additional traffic generated by HK shoppers, users of the airport and that of the AWE or if other means of public transport as well as parking spaces would be sufficient to cater for the demand of all these shoppers. Regrettably the TIA is only summarized in four lines in Para 14 of the TPB paper stating that " The forecast results showed that all major roads will operate within the practical capacity in ...". Even when questioned by the member of the TPB about the capacity of the AEL the response was that the AEL would be able to accommodate the additional traffic demand. Such oversimplified response was not supported by any accompanied traffic studies. The 1 page summary of the TIA in the RNTPC paper also failed to address this issue. 5.2 The AAHK did not mention how many phases of development in the NCD nor the total commercial GFA envisaged. As a proper TIA requires information such as GFAs for various uses for calculation of trip generation. It will not be possible to carry out a proper TIA without such information, especially commercial GFA and convention and exhibition facilities which all generate large volume of traffic. The TIA is thus entirely not acceptable. It is not sure if the TIA is supported by the Transport Department without the benefit of the GFA breakdown. We must stress that priority should be given to airport passengers and proper studies should be shown that all means of transport should be able to meet the demand.

6. No Hydrodynamics Study

6.1 The AAHK claimed that the EIA conducted was the more comprehensive one ever done in Hong Kong. It seems one important one which is missing is the hydrodynamic impact assessment. The water channel between Tuen Mun and Chap Lap Kok will become narrower as a result of the 650 ha of reclamation. The impact of the reclamation

on existing marine traffic, such as the express ferry service between Macau and HKIA at the SkyPier and container traffic etc are not known. The constricted channel may create higher waves which may result in less marine traffic permissible or even limit the type of vessels to be used. There was absolutely nothing mentioned on this topic. On the other hand the AAHK indicated at the TPB meeting that there is a plan to expand SkyPier to cater for the increase of passengers from the Pearl River Delta region who come to HKIA by ferries. AAHK should be required to produce study results to show the impact of the reclamation on existing and future marine traffic before the approval of the reclamation.

7. Very Loose Control on the Permissible Uses regarding Amendment A

7.1 The proposed Amendment A designates an area on the proposed reclamation "OU" annotated "Airport". There is **no restriction on maximum GFA and all the uses permitted are in Column 1.** Recently AAHK announced that the less than 10-year old T2 will be demolished to make way for the construction of the 3RS. This is a clear demonstration that AAHK operate and plan on an ad hoc basis with no overall co-ordination on the expansion of the airport. Such ad hoc manner is not acceptable and is not sustainable. In view of the incompetence of AAHK there should be sufficient development control on the overall planning of the airport under the OZP. The "HKIA 2030 Master Plan", though has gained in-principle support by CE in Council, was just a blue-print framework without statutory binding effect. The public would not know and have no way to get involved in decision making if HKIA are going to make minor amendments to the plan. In this respect all the permissible use should be put in Column 2 to allow control by the TPB to avoid repeated mistakes by AAHK in the future.

8. Very Loose Control on the Permissible Uses regarding Amendment B

8.1 Likewise the proposed Amendment B designates two areas on the proposed reclamation "OU" annotated "Airport Service Area". All the permissible uses should be placed under Column 2 particularly there are commercial uses such as eating places and shops and services etc. Such uses should be well defined in terms of GFA as these are uses which should attract premium and should be included in the assessment of traffic impact.

9. Issues on Airspace Unresolved

9.1 There is no mention of airspace in the TPB paper nor the RNTPC paper. A member questioned at the RNTPC meeting whether the use of the proposed reclamation area should be considered without addressing the unresolved issue. The Chairman said that the Committee should focus on the land uses taking into

account the relevant environmental and traffic issues of the proposed land uses. Unfortunately whether the 3RS could fulfil the promise of AAHK that it would accommodate the HKIA's growing demand depends entirely on whether the third runway could reach the desired capacity upon its completion on the assumption that there is no restriction on the use of airspace under the control of the Mainland. Although both the Government and the AAHK claimed that agreement has been made between Hong Kong and the Mainland there is however no evident that this is the case. 9.2 The situation is similar to that of the XRL: the Government claimed at the LegCo Finance Committee that the co-existence of border control would be resolved. However to this day the issue is yet to be resolved. In the event history repeats itself that the airspace issue could not be resolved upon the completion of the 3R system, which party would be responsible? By then the investment of over HK$140 billion would not only be a complete waste but also incur unnecessary and irreversible environmental cost. The prime objective of amending the subject Draft Plan is to facilitate the implementation of the 3RS. The amendment should only be made when it is certain that the 3RS can achieve the claimed capacity. The amendments should thus be postponed until the issue is satisfactory resolved with solid proof.

10. No Air Traffic Impact Assessment (ATIA) is Presented

10.1 AAHK did not provide an Air Traffic Impact Assessment (ATIA) report when it presented the 3RS to the Town Planning Board (TPB). The TIA is an indispensible technical document whenever a development proposal is submitted to the TPB for consideration.

10.2 According to AAHK's estimation, the total passenger throughput of major airports atop the PRD estuary would reach 300 million by 2030. Yet, there is no agreed multilateral collaborative air traffic management scheme. No Safety Risk Assessment as required by the International Civil Aviation Organisation (ICAO) Annex 19. No Real Time Simulation test (not only Fast Time Simulation) of aircraft movement patterns under different scenarios considering flight paths, escape avenues and queuing loops. These uncertainties will cast doubts on the operation-effectiveness of the 3RS

11. Improper Public Consultation

11.1 For a project of this importance the AAHK failed to conduct proper consultation with the public. Only information favouring the scenario of the 3RS screened by the AAHK has been released to the public. The consultation so conducted by the AAHK is biased and misleading, depriving the public of their rights of access to unbiased information. It is understood that the AAHK has spent huge amount of money on studies. It is however not known what AAHK has not done to arrive at the 3RS.The public however are denied of access to the outcome of these studies. It is also astounding that not only the public but also the TPB has been denied of unbiased information.

12. As a matter of due diligence the AAHK has to explain why the original planning capacity of 86 million pax and 9 million tonnes of cargo under the 2R system cannot be achieved and what measures have been used to mitigate before the expansion plan. Similarly why should the public trust that this 3R system can achieve the projected capacity if the 2R system cannot achieve what was originally anticipated. Furthermore there seems to be no more opportunity for further expansion of the HKIA beyond the 3R system. Has AAHK done anything to look into this aspect when they realised the capacity of AAHK fall short of future demand? AAHK is requested to provide for satisfactory answer otherwise there is no justification for the new reclamation to be implemented.

13. Amendment to the Notes of the Plan

Paragraph 7(a) of the Covering Notes has been revised to include people mover depot. Depot is usually regarded as Industrial use and should only be allowed in such zoning. There is good reason for being the case as such use may result in potential hazard and should only be allowed at location which would not cause risk for the adjacent uses. Such use may not be appropriate to be situated in the vicinity of uses where large volume of people is expected. Appropriate measures are likely required to ensure such use would not result in potential hazard to its neighbourhood. The amendment however would always permit such use on land falling within the boundaries of the Plan. This is against good planning principle and set bad example as safety and welfare of the people of Hong Kong should be important consideration of the Board.

The existing depot under T2 is already in violation of the previous version of the OZP. It appears that this amendment is an attempt to legitimize the use which was not previously permitted. Unless there is a change of Government policy towards depot and if it is the case the Board should make known of the change to the public. Otherwise such gesture can only be considered as double standard. In this regard the amendment to the Notes of the Plan should not be made.

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Conclusion

14. TPB's decision to amend the Draft Plan to facilitate the implementation of the 3R system practically support AAHK's claim that the only feasible "option" to the expansion of the capacity of HKIA is the 3RS and that the implementation of the 3RS will achieve the capacity claimed by the AAHK. TPB should make it clear to the public that on what basis the decision was made. It was recorded in the minutes of the RNTPC meeting that the Chairman said that the Committee should focus on the land use taking into account the relevant environmental and traffic issues of the proposed land uses. As mentioned above the environmental impact assessment is subject to judicial review and traffic impact of the proposed use could not be ascertained due to lack of sufficient information. In this respect we do believe that the decision of the TPB to amend the Draft Plan has been made in the absence of relevant information. We thus strongly object to the amendments to the subject Draft Plan and amendment to the notes of the Plan and request the three amendments be deleted.

In addition, before the Board has completed with the consultation procedure any submission of plans including General Building Plans and application for land grant or surrender and exchange by the AAHK in relation to the 3RS should not be entertained.

Reference :

即將於本月底任滿的機場管理局主席羅康瑞透露，佔地達 14 公頃的機場北商業區將於今年推出第一期的招標，希望藉此引入世界級有零售經驗的財團參與，目標是建造一個全香港最大型的購物城及新地標，吸引旅客之外，同時可成為本地人的消閑去處。

他昨日與傳媒茶敘時表示，首期的 5 公頃提供兩幅土地，可建 200 萬方呎樓面，希望最早可於 2018 年建成。機管局將以分紅或佔股等形式與發展商合作，細節尚未有定案，視乎發展商的建議。他認為機場北商業區與港珠澳大橋距離僅 500 碼，加上機場的龐大人流，發展潛力極高，價值以百億元計。

擬分多期發展

根據最新規劃圖，機場北商業區毗連機場二號客運大樓，可分多期發展，並有一個海旁休憩區，更可設行人天橋連接港珠澳大橋口岸。



機管局成員杜彼得指，希望商業區可做到重現市區街道的特色，如新加坡的克拉碼頭一樣，同時吸引本地人與遊客。機管局早前已委託 3 間設計公司，分別為機場北商業區研究不同的發展構思方案，以可持續發展及環保為基礎，供入標的發展商參考。其中最重要的是具備香港傳統元素，例如加入大牌檔設計，「要懷舊得來又有新思維」。

問到可會直接賣地套現以支持建三跑，而不用向旅客抽機場稅，羅回應指，正研究減低稅率的方法，很快有結果，但「塊地有好條件，唔捨得賣斷佢」。機管局另一成員鄭維新補充，董事會有共識，購物城必須吸引本地人，並期望與有零售經驗的發展商合作，增加成功機會。

tpbpd

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主旨: 根據城市規劃條例第6(1)條就赤鱲角分區計劃大綱草圖編號S/I-CLK/13所作的申述

赤鱲角分區計劃大綱草圖編號 S/I-CLK/13（「草圖」）已於 2015 年 5 月 8 日刊憲，當中包含的修訂是關於機場管理局（機管局）就擬議的香港國際機場第三條跑道發展所作的填海工程。

所牽涉的兩項修訂包括：

A 項 – 把香港國際機場北面的擬議填海區的一塊土地劃為「其他指定用途」註明「機場」地帶；

B 項 – 把擬議填海區東面和西面兩塊土地劃為「其他指定用途」註明「機場服務設施用地」地帶

一直以來，機場管理局（「機管局」）未有作好負責任及專業的角色，向公眾清楚解釋如何從多個方案中選取「興建第三跑道」這個方案，又為何這是唯一方案。機管局未清楚解釋到底有否基於一套公眾認同的準則作為方案選取標準，以進行其可行性研究。公眾理應有權參與整個決策過程，可是一直被排諸門外。因此，我們希望藉城市規劃條例下提供的公眾參與渠道，表達對這次草圖修訂及整個三跑發展計劃的意見。

在以上前提下，本人譚榮禧強烈反對這次草圖包含的兩項修訂，原因如下：

原因 *

[]（一）機管局未有解釋「興建第三跑道」此方案如何選出， 機管局一直未有清楚展示「興建第三跑道」此方案如何選出，而此方案又為何在財政可行性、容量擴充效益及環境影響方面上為最可行的方案。在四月的兩次城規會會議文件上(2015 年 4 月 10 日的會議文件 TPB Paper No. 9877 及 2015 年 4 月 17 日的會議文件 RNTPC Paper)，都未有提供充份理據支持 興建第三跑道。 []（二）未有就方案選取上讓公眾作全面的討論 過往幾年，民間有就機場擴充容量上提供不同方案作參考，包括原來的機場發展總綱所提出的「削山方案」、與鄰近機場互相合作、提升科技裝置以增加機場效率等等。但機管局只是草草回應，指其不可行，但又未能提供具說服力的理據和相關技術評估研究。機管局一直的公眾諮詢文件，只呈現「興建第三跑道」為唯一選擇，公眾亦無從得知其方案選取的準則和判斷理據，缺乏透明度和專業精神。 []（三）若城規批准圖則修訂將與排期中的司法覆核案有牴觸 現時正有兩宗司法覆核申請，要求推翻環保署署長就三跑發展批出環境許可的決定。，兩宗申請已獲高等法院接納，正排期等候審議中。是次草圖修訂涉及就興建三跑而作的填海範圍，但其環境影響仍有待商榷，可是城規文件(TPB Paper No. 9877)未有交待，而 RNTPC Paper 中亦僅以一註釋交代而已。因其環境影響事關重大機管局有誤導城規會委員之嫌，因此城規會並不適合在司法覆核案未有結果前就圖則修訂作出決定。城規會在未徹底清楚其環境影響問題前就對法定圖則修訂作出決定，有可能受到法律挑戰。 []（四）廣深港高鐵與機場擴充之間的潛在惡性競爭 機管局代表馮永業先生曾在 2015 年 4 月 10 日的城規會會議上，聲稱估計到 2030 年來往中國內地的航班總數約佔整體航班量 25%，但又指估計只有就高鐵 6 小時內能到底的地區，才存在高鐵與航運之間的競爭，而估計這類航線只佔整體航線 5%。 然而，於 2009 年運房局在推銷高鐵效益的立法會文件上(LC Paper No. CB(1)503/09-10(2))，引述英國政府的數字，指歐洲之星高鐵的人均碳排放量，只佔乘搭飛機的人均碳排放量 15%。運房局以此作為推銷高鐵相對比飛機較為環保。 值得質疑的是，運房局會否就高鐵與航運之間的旅客流量作策略性的協調。而機管局亦曾聲稱航空公司會因應市場調整其航線和航班量，而非政府或機管局可控制那到底高鐵和短程航線之間出現惡性競爭，浪費資源，而又要公眾承受其社會和環境成本？ []（五）缺乏交通影響評估細節 機管局未有向城規會及公眾提交交通影響評估報告。機管局已聲稱將計劃於機場北面土地興建大型商業城，第一期將提供樓面面積約二百萬平方呎，並稱其商業城主要顧客對象包括本地人。但機管局亦已在城規會表示，隨著商業城及三跑落成，機場的會議及展覽場地將吸引更多人。其時機場快線的載客量及機場泊車位是

足夠應付需求是一大疑問。然而，在城規會文件上只就交通影響評估部分作簡短的四行文字概述，即使有城規會委員就機場快線的容量提出疑問，機管局代表只簡單回應，未有提供實質數據支持。RNTPC Paper亦只有一頁關於交通影響評估的摘要，未有詳細回應。 機管局亦未有提及到底整個商業城及其他商業場地興建會分多少期進行。交通影響評估一般要就著不同用途的樓面面積估計會帶來的交通需求作評估。但在缺乏以上資料下，根本無法作有效的交通影響評估。我們不清楚這份欠缺各類用途分佈資料的交通影響評估是否已得到運輸署同意。我們強調，各類相關交通基建應優先配合機場乘客需要（先於前往機場北商業城及各類商業場所的顧客），而且有系統的交通影響評估是必須的，故此，機管局提供的交通影響評估報告是不能接受的。 [ ]（六）欠缺完整的水文影響研究 水文影響研究沒有包括在機管局提交的環境影響評估報告內。事實上，在650公頃的填海工程完成後，屯門與赤鱲角之間的水域將更狹窄。對現有海上交通，如在海天客運碼頭、來往香港國際機場及澳門的特快渡輪及大型貨櫃船等，填海所帶來的影響並未有作出評估。水域被收窄，可能帶來更的海浪，而影響可容納的船隻流量，但其環評報告並未提及。另一方面，機管局在城規會上亦聲稱會計劃擴展其海天客運碼頭，以增加來自珠江三角洲前往香港國際機場的客量，那城規會應要求機管局就水文影響作出評估，證明沒有影響，才可批准圖則修訂。 [ ]（七）關於修訂A項的發展要求過於寬鬆 擬議修訂A項牽涉將一大填海範圍劃作「其他指定用途」註明「機場」地帶，但未有限定最高樓面面積，而所有准許用途都列入第一欄而非第二欄。最近公眾都清楚，機管局承認為要配合興建第三跑發展，落成不超過十年的二號客運大樓T2需要拆卸，顯然機管局在經營和規劃機場時欠缺周全考慮，沒有長遠計劃，亦有違可持續發展觀。而且，在機管局能完全壟斷機場發展、欠缺競爭下，對機場範圍的法定圖則應實施一定程度的發展密度及用途規管。「香港國際機場2030規劃大綱」雖已得到行政長官會同行政會議原則上同意，但此不過是沒有法定約束力的藍圖總綱。日後若機管局就計劃內容作改動，公眾亦無從得知，也無渠道參與決策。因此，所有在「其他指定用途」註明「機場」地帶中的准許用途，亦撥入第二欄，讓城規會有權對其用途作出限制及審批，以避免機管局重覆錯誤。 [ ]（八）關於修訂B項的發展要求過於寬鬆 同時，修訂B項牽涉將兩幅土地劃作「其他指定用途」註明「機場服務設施用地」地帶。基於以上原因，此地帶內所有准許用途亦應撥入第二欄。尤其是商業用途如食肆、零售及服務用途等，此類用途應列明最高非住用樓面面積，因這類用途需要補地價，關乎庫房得益；而且這些非住用樓面面積，是交通影響評估需要的資料。 [ ]（九）空域問題仍未解決 兩份相關城規會文件未有提及空域問題。在2015年4月17日的鄉郊及新市鎞規劃小組委員會會議上，一城規會委員亦質疑在空域問題未解決前應否決定填海範圍的土地用途，但主席認為委員只需集中考慮其土地用途的相關影響（如環境及交通影響等）。然而，機管局所期望的擴展機場容量能否透過興建三跑而達到以及所期望的航班承接量，是建基於香港可用空域不受中方所限制的假設。即使特區政府及機管局均聲稱香港與中央已就空域安排上達成協議，但從未向公眾提供足夠證據。 此情況與高鐵十分相似。政府一方在立法會財委會上聲稱「一地兩檢」能處理，但到目前仍未解決。若結果有如歷史教訓一樣，空域問題不可能在三跑落成前解決該誰去負責？到時那1,400億港元的投資，不但帶來經濟損失，更帶來無可逆轉的環境破壞。 是次圖則修訂是配合其機場三跑發展，但若三跑根本無法達到機管局所聲稱的航班容量，城規會根本不應批准修訂。相關圖則修訂應留待空域問題妥善解決才作決定。 [ ]（十）缺乏空中交通影響評估 機管局向城規會介紹三跑發展計劃時，未有提供空中交通影響評估報告。在任何向城規會提交的發展計劃，交通影響評估乃是相當重要的技術評估文件。根據機管局的估計，到2030年總過珠江三角洲河口幾個主要機場的總乘客量會達到3億人次。然而，各相關機場的地方政府與特區政府之間一直未有就航空交通管理上制訂到多方協議，亦未有根據國際民航組織(International Civil Aviation Organisation, ICAO)所要求作安全風險評估。 [ ]（十一）缺乏全面公眾諮詢 對於如此大規模的發展計劃，機管局以完全沒有尊重公眾的心態去進行所謂的公眾諮詢。機管局所提供的所有資料，旨在呈現興建三跑為唯一選擇，其他方案考慮的資料已被機管局篩選，整個公眾諮詢只提供了偏頗的資訊。雖然機管局花了巨大金額進行相關可行性研究，但公眾仍無從得知興建三跑方案如何選出來。而機管局也沒有向城規會提交相關資料，有誤導城規會之嫌。 [ ]（十二）目標存疑，規劃短視 雙跑道系統原先預計可容納最高8千6百萬客量及9百萬公噸貨運量，但卻未達預期規模，在此基礎下，公眾又如何能夠相信將來的三跑系統能達至機管局聲稱的目標呢? 更重要的是，赤鱲角機場在興建三跑之後已不可能再有空間興建跑道，機管局到時又應如何應對需求增加呢?如此龐大的填海工程卻換來如此短視的規劃，這是機管局應向城規會清楚解釋的。

就草圖作出申述
Representation Relating to Draft Plan

TPB/R/S/I-CLK/13-398

參考編號
Reference Number: 150706-151308-75504

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 06/07/2015 15:13:08

提出此宗申述的人士
Person Making This Representation: 女士 Ms. Pong Yuen Yee

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-CLK/13

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**
Amendment A	反對 Oppose	There is no development control on the use. All uses should be placed under Colume 2 and a Master Layout Plan should be required to be submitted to the TPB for approval.
Amendment B	反對 Oppose	Same as above.
Amendment to the Notes of the Plan	反對 Oppose	The people mover depot should be Industrial use and should not be always permitted. Plans should be submitted to TPB for approval.

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

All three amendments should be deleted as the EIA of the 3 Runway System is subject to judicial review. The eventual impact on the environmental impact is not known. As such the consideration of the land use for the reclamation is not appropriate. There is insufficient information in the TIA for the consideration of the Town planning Board to ascertain the traffic impact as there is no information on GFA for the assessment of future traffic.
AAHK has not sufficiently demonstrated that the 3RS is the only feasible option for increase of capacity of the airport. AAHK should show the public how the study process for the expansion of capacity for the airport was conducted, the criteria for assessment and the evaluation process.

tpbpd

寄件者: Chiu Ying Lam [redacted]
寄件日期: 07日07月2015年星期二 12:20
收件者: tpbpd@pland.gov.hk
主旨: 就赤鱲角分區計劃大綱草圖編號S/I-CLK/13所作的申述
附件: 20150707A_林超英_城規會__三跑申述.pdf; 20150706_submission_to_Director_of_Lands.pdf

致城市規劃委員會

請查收就赤鱲角分區計劃大綱草圖編號 S/I-CLK/13 所作的申述一份，以及其附件一份。

請回覆收到，感謝。

林超英

004

發送： 城市規劃委員會
發自： 林超英　香港中文大學地理與資源管理學系客座教授
事宜： 就赤鱲角分區計劃大綱草圖編號 S/I-CLK/13 所作的申述
日期： 2015 年 7 月 7 日

1. 2015 年 5 月 8 日憲報刊登了赤鱲角分區計劃大綱草圖編號 S/I-CLK/13（「草圖」），包含的修訂反映機場管理局（機管局）就擬議的香港國際機場第三條跑道（「三跑」）的填海工程，涉及兩兩項修訂：
   (a) 把香港國際機場北面的擬議填海區的一塊土地劃為「其他指定用途」註明「機場」地帶
   (b) 把擬議填海區東面和西面兩塊土地劃為「其他指定用途」註明「機場服務設施用地」地帶。
2. 由於提出這些修訂過程違反香港城市規劃長期以來建立的基本原則，謹此表示反對。
3. 機場管理局（「機管局」）未能證明「興建第三跑道」方案是解決機場擠迫的唯一最佳方案，而且填海工程仍未通過前濱和海床（填海）條例所需的批准，圖中的「填海土地」目前屬於虛無的概念，城規會無權就未能確定出現的土地進行「規劃」。
4. 兩宗要求推翻環保署署長就三跑發展批出環境許可的決定的司法覆核申請已獲高等法院接納，排期等候審議，在案件審結之前通過草圖修訂有蔑視法院之嫌。
5. 任何牽涉到到產生大量人流和車輛流的分區計劃大綱草圖修訂，一向要求有未來地面交通的詳盡量化分析，確定不會製造堵塞才可進行討論通過。今次所見文件，機管局根本沒有提交交通影響評估報告，既然興建第三條跑道的目的是接待每年以千萬計人次的旅客，機管局又計劃於機場北面土地興建大型商業城，同樣牽涉大量人流及車輛流，詳細的交通影響評估更加不可缺少。機管局提供的、極為粗糙的交通影響簡述遠遠低於既定的要求水平，因此是不可接受的
6. 填海工程完成後，屯門與赤鱲角之間的龍鼓水道的可航行通道將變得非常狹窄，造成海上交通擠迫和提高海上意外風險，連帶人命傷亡和海上污染風險大升，詳細資料見我向地政總署署長提交的、反對填海工程的正式文件（附件 1），機管局又聲稱擴展海天客運碼頭，增加往來珠江三角洲的航班，情況更加惡化。人命關天，在機管局就水文影響及海上交通影響提交詳盡評估報告前，城規會不可以批准圖則修訂。
7. 涉及數百公頃的大規模發展計劃，一般必然通過廣泛和充分的公眾諮詢，才交城規會審議。今次機管局做得極差，沒有進行類似洪水橋或東北新界發展等項目的有層次諮詢，市民從來沒有機會有效參與，城規會收到的文件在這方面是不及格的，城規會不可能在這個情況下貿然作出決定。

8. 第三條跑道引申出的空域問題未解決前，城規會不可能決定填海範圍和相關土地用途。
9. 以上討論顯示有關修訂基於多項未經證實的假設，以及未有得到符合過往匹配規模項目同等水平的資料和論證。城規會作為負責任的法定機構，不能以「假設」為行事依歸，也不可接受低於過去水平的資料和論證，否則會建立極為惡劣的先例，動搖香港城市規劃的基石。

林超英

附件 1

"Objection to the undertaking described in Schedule of G.N. 3319" : sent to Director of Lands, dated 6 July 2015

To: Director of Lands

From: Lam Chiu Ying
Adjunct Professor
Department of Geography and Resource Management
Chinese University of Hong Kong

Subject: Objection to the undertaking described in Schedule of G.N. 3319

Date: 6 August 2015

The Objection

1. In response to Gazette Notice 3319 dated 8 May 2015, **this is to lodge a formal objection to the undertaking described in Schedule of that Notice**, under section 6 of Foreshore and Sea-bed (Reclamation) Ordinance Cap. 127.
2. I have travelled and shall travel to and from Macau 澳門, Zhuhai 珠海, Shekou 蛇口, Furong 福永, Fumen 虎門, Guangzhou 廣州 and other destinations in the Pearl River Delta 珠江三角洲. The routes to these destinations pass through Urmston Road, the sea channel with deep draught off the coast of Tuen Mum and Lung Kwu Tan, to the north of Hong Kong International Airport (HKIA).
3. Numerous Hong Kong citizens also travel to these destinations. We have an established right of safe passage through this sea channel.
4. It is the duty and responsibility of the HKSAR Government to protect the lives of its citizens by ensuring that marine traffic in the area is safe.
5. **The proposed reclamation would greatly reduce the navigable width of this sea channel. It would increase substantially the risk of maritime accidents (including collisions and capsizes) and the risk to the lives of passengers heading for the above-mentioned destinations.**
6. We are particularly mindful of the risk of maritime accidents after repeated occurrences of capsizes in Hong Kong and elsewhere in the world. The Lamma Island tragedy of 2012 is a poignant reminder to Government that maritime safety cannot be taken for granted in Hong Kong.
7. I fear for my safety and the safety of all who travel through Urmston Road if the proposed reclamation takes place, owing to the combined effects of narrower channel (paragraph 13), diversion of SkyPier traffic (see paragraph 15) and projected increase in ship traffic to Shekou Container Terminals.

8. I and fellow travelers consider that our established right of safe passage through the sea channel would be seriously compromised by the proposed reclamation.
9. Another consequence of the proposed reclamation is the increased risk of marine pollution in the form of oil leakage after collisions and capsizes, which would affect all residents of Hong Kong, especially those living in Tung Chung and along Castle Peak Road between Tuen Mun and Tsuen Wan.
10. **We object to the proposed reclamation in the absence of any published, in-depth, professional evaluation of the cumulative risk of maritime accidents and loss of lives as well as that of marine pollution, engendered by the proposed reclamation.**
11. The Government is also reminded that, if the reclamation goes ahead in spite of being warned about increased risk to the safety of marine navigation and human lives, it would be liable to public outcry and eventually hefty claims for compensation arising from alleged "dereliction of duty" in the unlucky event of fatal accidents occurring in this sea area.

The Increased Risks of Maritime Accidents and Marine Pollution

12. The gravity of the issue is explained below with the help of an illustrative diagram (fig. 1). The base map is derived fro G.N. 3319. "D_{1998}" marks the position of buoy D in Marine Department Notice No. 65 of 1998 dated 4 May 1998, which designates the northernmost position of the "no go" restricted marine zone to protect aviation safety. "D_{2023}" marks the inferred position of a similar buoy to designate the new northernmost point of the restricted marine zone of the expanded airport after reclamation.
13. The distance between Buoy D and the River Port is taken to represent the width of the navigable channel on and near Urmston Road (assuming that vessels could sail right next to the River Port). From fig. 1, it is immediately evident that, if the proposed reclamation goes ahead, the width of the navigable channel would be reduced by HALF.
14. In practice, bigger vessels have to maintain a safe distance from the coast. If this margin is taken off the "navigable channel", then the percentage reduction of the width of the navigable channel after reclamation would be even severe. The impact on maritime safety is therefore of major concern and requires in-depth, professional evaluation.

15. A second relevant point is the change in routes of vessels leaving SkyPier on the airport island after the reclamation. At present most if not all of the vessels would sail south of D_{2023}. After the reclamation, for the protection of Chinese White Dolphins, they have to avoid Sha Chau and Lung Kwu Chau Marine Park and so could no longer use the existing route sandwiched between Sha Chau and HKIA. They will divert northward, turn left to enter Urmston Road **north of D_{2023}** (to avoid the airport restricted zone), and then sail round the perimeter of the Marine Park before joining the present routes. There will be increased traffic from SkyPier on Urmston Road in the area marked with a black circle in fig. 1.

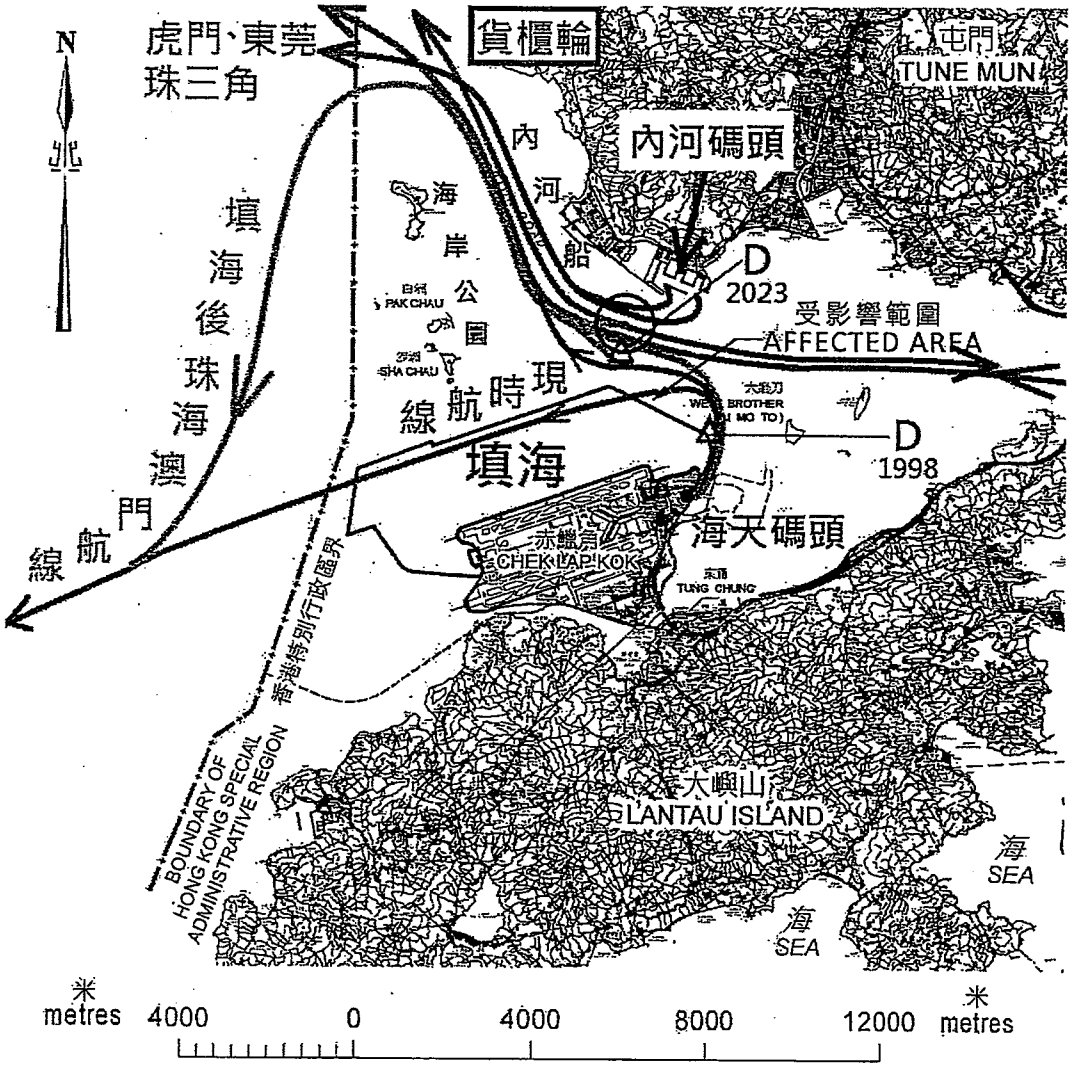


Fig. 1 Marine traffic affected by the proposed reclamation. Blue lines show present routes; orange lines, revised routes of vessels departing from SkyPier after reclamation; brown line, container ship routes; red line, river boat routes. For illustration purpose, not for navigation.

16. Thirdly, the same applies to ferries heading for Pearl River delta destinations from Hong Kong Macau Ferry Terminal and Hong Kong China Ferry Terminal. They would all have to sail north of D_{2023}, instead of having some leeway to the south now. Thus all would be squeezed through the black circle in fig. 1, resulting in a higher density of traffic there.
17. Fourthly, the same applies also to numerous river cargo vessels bringing supplies to the River Port at Tuen Mun, merchant vessels travelling to Guangzhou Port as well as container ships visiting Shekou Container Terminals. After the reclamation, they would also be squeezed through the same bottleneck, increasing traffic density even further.
18. Finally, according to the statistics of Shekou Container Terminals Ltd, the traffic volume of SCT Terminals in TEUs increased by 51% between 2009 and 2014. The amount of container ship traffic is projected to increase significantly and quickly in the next decade or so. This aggravates further the magnitude of the maritime safety problem at the black-circle bottleneck.
19. Part of the reason for the navigable channel becoming very narrow is the need to safeguard aviation safety by designating a "no-go" marine restriction zone around the expanded HKIA. Thus it is a situation in which maritime safety is traded off for aviation safety. However, there is no *a priori* reason why aviation safety should prevail over maritime safety.
20. While maritime safety is a safety issue of critical importance (as explained above), the public is not aware of the results of any in-depth, professional evaluation conducted by Government regarding the increases in the risk of maritime accidents and associated issues like passenger safety and marine pollution.

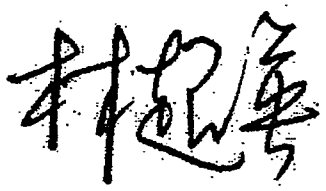
Conclusions

21. The proposed reclamation and the need to provide marine restricted zones to safeguard aviation safety will result in a reduction (by half or more) in the width of the navigable channel on and around Urmston Road. Maritime safety inclusive of passenger safety would be compromised to a very significant degree. The associated risk of marine pollution would rise too.
22. The problem is aggravated by the diversion of all SkyPier ferry services into this narrow channel as well as the projected increase in container ship traffic.
23. Life should be the foremost concern of HKSAR Government and the precautionary principle definitely applies.

24. Maritime safety must not be compromised by economic consideration. It also should not be eclipsed by aviation safety consideration.

25. In the absence of any in-depth, quantitative, professional evaluation of the life-threatening risks arising from the proposed reclamation, Government would be acquiring unwarranted liability by letting the reclamation to go ahead in spite of being warned about the risks to shipping and to human lives.

26. I reaffirm the objection to the proposed reclamation and strongly recommend to Government that no permission should be given at this point in time.



Lam Chiu Ying 林超英

TPB/R/S/I-CLK/13-400

Your ref:
Our ref: 3RS/TPB/I/01/150702

2 July 2015

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

by Fax: 28770245

Dear Sirs/Madams,

PROPOSED AMENDMENTS TO THE APPROVED CHEK LAP KOK OUTLINE ZONING PLAN NO. S/I - CLK/12

We refer to the Government Gazette dated 8 May 2015 in regard to the captioned.

We read the RNTPC Paper No. 5/15 which was considered by the Town Planning Board (TPB or the Board) – Rural and New Town Planning Committee (RNTPC) on 17.4.2015. We are making reference to the content of the Planning Report appended therein depicting the background information and development scheme of the proposed Three-Runway System (3RS) of The Hong Kong International Airport (HKIA).

The Airport Authority Hong Kong (AAHK) is the proponent of the airport expansion scheme in form of the proposed 3RS of the HKIA, and hence has triggered the proposed Amendments to the Approved Chek Lap Kok Outline Zoning Plan (OZP) No. S/I – CLK/12 in form of a draft Chek Lap Kok OZP No. S/I – CLK/13 .

We write to make representation under section 6(1) of the Town Planning Ordinance (Chapter 131) in objecting to the proposed Amendments. Specifically, our representation refers to the objection to extending the planning scheme boundary of the Chek Lap Kok OZP to cover the proposed reclamation area for the new third runway of the HKIA.

Reasons for our representation are:

1) Since 2008 and at all material times, AAHK fails to present to the Administration, the Executive Council and the general public (for public consultation purpose) other viable options (such as a second airport or collaboration schemes with other airports in the Pearl River Delta region) as HKIA's expansion plan, but rather restrict the choice to either maintaining the existing two-runway system (2RS) or expanding into the three-runway system (3RS).

2) AAHK also fails to alert the Administration and Executive Council that a more long-term plan should have also be considered; noting the fact that the 3RS as they projected could only cater for Hong Kong's aviation traffic needs up to 2030 – less than 7 years after 3RS's earliest anticipated completion date. It is almost certain that immediately HKIA needs to plan its Fourth Runway or a Second Airport, if 3RS were to eventuate.

3) Nonetheless, the ability of 3RS to achieve its design capacity so as to meet Hong Kong's aviation traffic needs up to 2030 as projected depends very much on the effectiveness of airspace management atop the Pearl River Delta estuary – where situate within 150 kilometers geodesic distance five airports, namely, Guangzhou Baiyun International Airport (GZIA), Shenzhen Bao'an International Airport (SZIA), Macau International Airport (MIA), Zhuhai Airport (ZHA), and HKIA.

The said air traffic control and airspace management will certainly be a collaborative effort of implementing agreeable measures, systems and standards to enhance the air traffic control mechanism by Hong Kong Civil Aviation Department, Civil Aviation Administration of China and Civil Aviation Authority of Macau. Agreements in these regards have yet been made.

4) Typically, the Traffic Impact Assessment (TIA) report is the most essential technical appraisal to support a planning application to enable a proposed development. For projects such as Pak Shek Kok (East) and the Baroque on Lamma, the applicants have been required by the Board to submit a MTIA (Marine Traffic Impact Assessment). In the Planning Report of the subject application for amendment of plan, AAHK did not provide adequately essential technical assessments among which the Air Traffic Impact Assessment (ATIA) should be an indispensable component. The ATIA will verify or otherwise the assumptions underpinning the effective operation and design capacity of the proposed 3RS.

It can be easily envisaged by the year 2030 and beyond; the aircraft movements of the other four airports will grow tremendously and likely impose adverse impacts on the then airspace architecture concerned.

5) : In the absence of an ATIA, AAHK also fails to provide a comprehensive Safety Case (SC), in accordance with the standards and recommended practices of the Safety Management System (SMS) so stipulated in International Civil Aviation Organization (ICAO) Annex 19. This SC is particularly purposeful when changes to a major aviation infrastructure (in air or on ground) and/or air traffic management (ATM) system / operational procedures are introduced.

As per the above ICAO requirements, a Safety Risk Assessment (SRA) must be conducted, taking into consideration a wide range of permutations of traffic scenarios including air traffic control (ATC) and airport operations in peak traffic hours, bad weather situations, missed approach and multiple missed approaches situations, communication breakdown, aircraft and/or ATM system (such as radio or radar) failures, etc.

Moreover, the study through "Fast-time simulation" (a computer-based analyzing process without taking into consideration human factors) in management of anticipated traffic in future is deemed inadequate, if not unsafe. On the contrary, it is considered prudent by most ATM professionals that a "Real-time simulation" must be carried out extensively and in an authentic manner, whereby anticipated traffic volume / patterns, flight paths for both arrivals and departures as well as those in missed approaches, air traffic flow management (ATFM), en-route holding, aircraft mechanical or engine failures, etc. must be carefully designed, simulated, analyzed and assessed.

Without a comprehensive study on the above-mentioned elements of the aviation system, it can hardly demonstrate if the assumed design capacity of the 3RS could be achieved or otherwise. This uncertainty will cast doubts on the safety of air traffic operations within Hong Kong airspace and atop the Pearl River Delta estuary, not to mention the operation-effectiveness and cost-effectiveness of the 3RS itself.

While we fully agree and support that HKIA needs a robust expansion plan for maintaining Hong Kong's competitiveness as a global and regional aviation hub, and for catering to Hong Kong's long-term economic and development needs; the Planning Report embodying the 3RS as it presents cannot convince us that it is the most viable, sustainable and cost-effective scheme. Hong Kong indeed needs a flexible and expandable airport planning framework and spatial provision for our next generations to cater for their future needs. A critical comparative analysis of various options including that of a second airport will help the general public have informed debates and our top leaders make the right decision.

We therefore call for the comprehensive review of the HKIA's expansion plan in the best interests of the community.

Based on the above reasons, we oppose the subject Amendments.

Yours faithfully,

Francis Neoton Cheung
Convenor,
Doctoral Exchange

Doctoral Exchange (doctoralexchange.hk) is a policy collective founded in 2010 committed to conducting research in identifying constructive alternatives and outside-the-box solutions for complex issues of concern to the community, with a special focus in the areas of urban and infrastructure developments.

tpbpd

寄件者: Francis Neoton Cheung [redacted]
寄件日期: .02日07月2015年星期四 16:30
收件者: tpbpd@pland.gov.hk
主旨: PROPOSED AMENDMENTS TO THE APPROVED CHEK LAP KOK OUTLINE ZONING PLAN NO. S/I - CLK/12 - objection letter
附件: 3RS objection ltr2TPB - FC 20150702 - FINAL.pdf

Dear Sirs,

We submit herewith our objection letter to the captioned draft plan.

Regards,

Francis Neoton Cheung
HKIA, HKIUD, B A (AS), B Arch, M Urban Design (Distinctions), M Sc (MRS), DBA candidate
Doctoral Exchange
[redacted]

tpbpd

寄件者: Jackie Kwan [redacted]
寄件日期: 08日07月2015年星期三 14:36
收件者: tpbpd@pland.gov.hk
主旨: 反對有關三跑的規劃修訂
附件: Objection to the undertaking described in Schedule of G.N. 3319 sent to Director of Lands.doc

發送：城市規劃委員會
發自：
關穎嘉
事宜：就赤鱲角分區計劃大綱草圖編號 S/I-CLK/13 所作的申述
日期： 2015 年 7 月 8 日

1. 2015 年 5 月 8 日 憲報刊登了赤鱲角分區計劃大綱草圖編號 S/I-CLK/13（「草圖」），包含的修訂反映機場管理局（機管局）就擬議的香港國際機場第三條跑道（「三跑」）的填海工程，涉及 兩兩 項修訂：
(a) 把香港國際機場北面的擬議填海區的一塊土地劃為「其他指定用途」註明「機場」地帶
(b) 把擬議填海區東面和西面兩塊土地劃為「其他指定用途」註明「機場服務設施用地」地帶

2. 由於提出這些修訂過程違反香港城市規劃長期以來建立的基本原則，謹此表示反對。

3. 機場管理局（「機管局」） 未能證明「興建第三跑道」方案是解決機場擠迫的唯一最佳方案，而且填海工程仍未通過前濱和海床（填海）條例所需的批准，圖中的「填海土地」目前屬於虛無的概念，城規會無權就未能確定出現的土地進行「規劃」。

4. 兩宗要求推翻環保署署長就三跑發展批出環境許可的決定的司法覆核申請已獲高等法院接納，排期等候審議，在案件審結之前通過草圖修訂有蔑視法院之嫌。

5. 任何牽涉到到產生大量人流和車輛流的分區計劃大綱草圖修訂，一向要求有未來地面交通的詳盡量化分析，確定不會製造堵塞才可進行討論通過。今次所見文件，機管局根本沒有提交交通影響評估報告，既然興建第三條跑道的目的是接待每年以千萬計人次的旅客，機管局又計劃於機場北面土地興建大型商業城，同樣牽涉大量人流及車輛流，詳細的交通影響評估更加不可缺少。機管局提供的、極為粗糙的交通影響簡述遠遠低於既定的要求水平，因此是不可接受的

6. 填海工程完成後，屯門與赤鱲角之間的龍鼓水道的可航行通道將變得非常狹窄，造成海上交通擠迫和提高海上意外風險，連帶人命傷亡和海上污染風險大升，詳細資料見我向地政總署署長提交的、反對填海工程的正式文件（附件 1），機管局又聲稱擴展海天客運碼頭，增加往來珠江三角洲的航班，情況更加惡化。人命關天，在機管局就水文影響及海上交通影響提交詳盡評估報告前，城規會不可以批准圖則修訂。

7. 涉及數百公頃的大規模發展計劃，一般必然通過廣泛和充分的公眾諮詢，才交城規會審議。今次機管局做得極差，沒有進行類似洪水橋或東北新界發展等項目的有層次諮詢，市民從來沒有機會有效參與，城規會收到的文件在這方面是不及格的，城規會不可能在這個情況下貿然作出決定。

8. 第三條跑道引申出的空域問題未解決前，城規會不可能決定填海範圍和相關土地用途。

9. 以上討論顯示有關修訂基於多項未經證實的假設，以及未有得到符合過往匹配規模項目同等水平的資料和論證。城規會作為負責任的法定機構，不能以「假設」為行事依歸，也不可接受低於過去水平的資料和論證，否則會建立極為惡劣的先例，動搖香港城市規劃的基石。

關穎嘉

1. 根據前濱及海床（填海工程）條例第 6 節，我對 5 月 8 日 憲報第 3319 號公告描述的填海工程提出反對。

2. 我曾經和將會往來香港及以下地點： 澳門、珠海、蛇口、福永、虎門、廣州及其他珠江三角洲港口，航線經過屯門和赤鱲角機之間的龍鼓水道。

3. 每年經過這片水域的香港市民（及遊客）數以百萬人次計，我們有安全通過龍鼓水道的權利。

4. 香港特別行政區政府有責任保障市民的生命，因此必須確保船隻在龍鼓水道的航海安全。

5. 公告描述的填海將會令船隻通過龍鼓水道時的可使用海面大幅收窄一半以上，顯著提高海上意外（包括碰撞和翻沉）的風險，以及乘客傷亡風險。

6. 過去幾年香港及世界各地多番出現造成重大傷亡的翻船事故，令我們特別關注海事意外的風險， 2012 年南丫海難的發生，警惕香港人和香港政府，海事安全不是理所當然，而是必須用心用力經營才能保證。

7. 假如公告第 3319 號的填海進行，考慮到：

(a) 龍鼓水道可用航道將大幅收窄一半或以上
(b) 海天碼頭出發的航線將全數改道和擠入這條航道
(c) 從維港中港碼頭和信德碼頭前往以上目的地航線也將擠入收窄了的航道
(e) 往來屯門內河碼頭的內河貨船也使用同一航道
(d) 路經龍鼓水道的、往來蛇口的貨櫃船預計將大幅和急促增加

我和香港市民憂慮此後乘船經過龍鼓水道是否安全。

8. 公告描述的填海將嚴重影響我及其他旅客通過龍鼓水道時的海上安全。

9. 由於填海提高船隻碰撞風險，連帶海上污染尤其是油污風險也同時升高，影響全港市民，尤其是居住東涌和屯門與荃灣之間青山道的居民。

10. 批准公告描述的填海，事先必須有公開和量化的專業報告，評核填海引起海上意外增加的風險、相關的乘客傷亡風險和海上污染風險。

11. 政府必須留意，明知工程提高海上意外風險而批准工程進行，等於埋下計時炸彈，將來不幸出現事故時，將要面對全港市民的譴責和可能的龐大索償。

12. 經濟因素及航空安全，不可凌駕每年數百萬人次乘客的航海安全之上。

13. 我們鄭重反對公告描述的填海工程。

就草圖作出申述
Representation Relating to Draft Plan

TPB/R/S/I-CLK/13-502

參考編號
Reference Number: 150708-120752-99544

提交限期
Deadline for submission: 08/07/2015

0864

提交日期及時間
Date and time of submission: 08/07/2015 12:07:52

提出此宗申述的人士
Person Making This Representation: 小姐 Miss Choicy Wan

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-CLK/13

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**
第I項	反對 Oppose	1. 這修訂過程違反香港城市規劃長期以來建立的基本原則。 2. 機場管理局（「機管局」）未能證明「興建第三跑道」方案是解決機場擠迫的唯一最佳方案，而且填海工程仍未通過前濱和海床（填海）條例所需的批准，圖中的「填海土地」目前屬於虛無的概念，城規會無權就未能確定出現的土地進行「規劃」。 3. 兩宗要求推翻環保署署長就三跑發展批出環境許可的決定的司法覆核申請已獲高等法院接納，排期等候審議，在案件審結之前通過草圖修訂有蔑視法院之嫌。 4. 任何牽涉到到產生大量人流和車輛流的分區計劃大綱草圖修訂，一向要求有未來地面交通的詳盡量化分析，確定不會製造堵塞才可進行討論通過。今次所見文件，機管局根本沒有提交交通影響評估報告，既然興建第三條跑道的目的是接待每年以千萬計人次的旅客，機管局又計劃於機場北面土地興建大型商業城，同樣牽涉大量人流及車輛流，詳細的交通影響評估更加不可缺少。機管局提供的、極

		為粗糙的交通影響簡述遠遠低於既定的要求水平，因此是不可接受的 5. 填海工程完成後，屯門與赤鱲角之間的龍鼓水道的可航行通道將變得非常狹窄，造成海上交通擠迫和提高海上意外風險，連帶人命傷亡和海上污染風險大升，機管局又聲稱擴展海天客運碼頭，增加往來珠江三角洲的航班，情況更加惡化。人命關天，在機管局就水文影響及海上交通影響提交詳盡評估報告前，城規會不可以批准圖則修訂。 6. 涉及數百公頃的大規模發展計劃，一般必然通過廣泛和充分的公眾諮詢，才交城規會審議。今次機管局做得極差，沒有進行類似洪水橋或東北新界發展等項目的有層次諮詢，市民從來沒有機會有效參與，城規會收到的文件在這方面是不及格的，城規會不可能在這個情況下貿然作出決定。 7. 第三條跑道引申出的空域問題未解決前，城規會不可能決定填海範圍和相關土地用途。 8. 以上討論顯示有關修訂基於多項未經證實的假設，以及未有得到符合過往匹配規模項目同等水平的資料和論證。城規會作為負責任的法定機構，不能以「假設」為行事依歸，也不可接受低於過去水平的資料和論證，否則會建立極為惡劣的先例，動搖香港城市規劃的基石。
第II項	反對 Oppose	理由同第I項

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

tpbpd

寄件者: 守護大嶼SaveLantau [redacted]
寄件日期: 07日07月2015年星期二 12:01
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三跑及不同意於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖
附件: 反對機場第三跑_城規會_20150708.pdf

致：城市規劃委員會
由：守護大嶼聯盟[redacted]
日：2015年7月7日
有關：反對興建機場第三跑及不同意於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖

005

守護大嶼聯盟

致：城市規劃委員會

有關：<u>反對興建機場第三跑及不同意於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖</u>

基於機場使用率、空牆限制、生態破壞、空氣及噪音污染、影響市民的健康等因素，興建機場第三跑將會成爲香港「超及大白象工程」，亦不同意於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖，聯盟強烈反對，理由如下：

1. 假飽和

機場現有雙跑道系統容量仍未用盡，現時的客運和貨運量分別只及原設計容量的 70% 及 50%，僅及設計的六成效率，未提升航道管理系統及機場航運設備。此外，在《新機場設計總綱》預計於 2010 年啓用的衞星客運廊，機管局在 2011 年才動工興建，而且規模由原設計修訂案的 40 個登機橋位縮減至 20 個。製造「飽和」的假象；

2. 「空牆」問題無法解決，三跑變成「空跑」

廣州軍區的「空牆」令進出航班須「兜大圈」，須額外多飛 10 至 20 分鐘，空牆令北面航道未完全發揮原先設計容量。機場原設計每小時可以有 82 至 86 班航班升降，受空牆影響，現在每小時只能有 68 航班升降。問題不解決，三跑根本不能增加航班的升降率。

3. 機管局隱瞞事實，空氣質素勢必惡化，居民健康大受影響

早年港珠澳大橋環評：2031 年氮氧化物排放量約爲 52 萬噸，沙螺灣及東涌空氣污染將會超標！現時建議興建「第三跑」將會大大增加飛機的升降量，由現時每年約 37 萬架次增至 2030 年的約 60 萬架次，增幅約 6 成，理應會加劇空氣污染。不過，「第三跑」環評的結論表示「三跑」建成後，空氣質素指標比未計及第三跑影響的港珠澳大橋環評的結果還要好。你信嗎？機管局卻隱瞞事實！東涌受風向及地形影響，該區居民長久以來受飛機排放物及珠三角地區空氣污染，若增加港珠澳大橋每天 5,000 架次車輛及增建機場第三跑的話，後果堪虞！

4. 加劇噪音

2005 年，馬灣錄得的晚間飛機噪音數據約有 7300 架次；2013 年，相關數字已升至超過 8000 架次。三跑道工程完成後，東涌、青衣北、深井及馬灣一帶居民的噪音問題勢必更見嚴重。

5. 中華白海豚生存空間被毀

中華白海豚屬瀕危物種，是香港特區回歸的吉祥物。赤鱲角一帶水域原是白海豚活動的主要範圍，興建赤鱲角機場後，白海豚的數量已不斷減少；現時興建中的口岸人工島，已破壞了中華白海豚的棲息地，海豚就只剩下 61 條！興建第三跑會令海豚永久失去 650 公頃的棲息地，到時他們就很可能絕跡香港，我們的孩子再無機會看見可愛的海豚。

6. 1415 億大白象拖累民生

最新預算第三條跑道工程費用超過 1415 億，金額幾近香港政府財政儲備的三分之一，而每年帶給香港的經濟利益只有 96 億，只佔香港 2013 年 GDP 的 0.4%。另外，三跑道方案比雙跑道方案需要多 4 萬個直接職位，現時香港的失業率僅爲 3.1% ，近乎全民就業，不少行業都出現招聘困難的情況，在未來的日子勞動力也不見得會有大增長，第三跑的興建和營運會令香港勞動市場更加緊張。興建三跑期間大幅扯高建造、運輸業的人手需求，以過去建新機場和大型基建的經驗，在層層外包、判頭制之下，只會成爲老闆僱用黑工、輸入更多外勞,甚或從中國內地引入勞工/增加更多內地人來香港定居配額的藉口(而來港的不一定是需求的工種技工！)因此，第三條跑道勢必成爲拖累民生的「大白象」！機管局聲稱自行融資興建三跑，企圖繞過立法會的審批監管，而 1415 億中，逾六成、約九百億元來自政府免收股息及旅客支付的建設費，變相動用公帑，若立法會未通過而偷步進行，勢必牽起一輪司法覆核。

7. 第三跑高碳排放，背離香港減排目標

機管局預測第三跑會爲香港每年額外帶來 538 萬噸二氧化碳排放量，佔 2011 年香港整體排放量的 12.6%。以碳強度計算，第三條跑道每帶來$1 的經濟收益，會產生 0.56 公斤二氧化碳排放量，遠遠高於現時香港的碳強度，每一元國民生產總值（GDP）只產生 0.022 公斤二氧化碳。興建第三跑勢必阻礙香港政府達致碳強度減少 50%-60%的減排目標。

基於以上原因，守護大嶼聯盟強烈反對興建機場第三條跑道及不同意於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖。

守護大嶼聯盟
7/7/2015

tbpd

寄件者: 坪洲新聞 Peng Chau News [redacted]
寄件日期: 08日07月2015年星期三 23:22
收件者: tpbpd@pland.gov.hk; landsd@landsd.gov.hk
主旨: Re: 強烈反對興建機場第三條跑道，不同意按《前濱及海床條例》於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖

註明圖則編號 S/I-CLK/13
註明憲報第 3319 號公告

致：城規會、地政總署

本人反對興建機場第三條跑道，不同意按《前濱及海床條例》於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

海洋是大眾資產 不容私有化
海洋是公共擁有，在海洋上進行填海等不可逆轉的發展更是要小心和保守。就此填海為機場興建第三條跑道為例，第三跑工程卻未經透明公開及獨立的全面公眾諮詢，政府其實不應就這未得公眾認受的工程進行法定填海程序。現在當局按《前濱及海床條例》刊憲，當中已有「工程將會進行」的前設，是本末倒置，不符政府程序公義及合理期望。

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坪洲新聞
Peng Chau News
facebook [redacted]

坪洲新聞 Peng Chau News [redacted] 於 2015 年 7 月 8 日 下午 11:13 寫道：
致：城規會、地政總署

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坪洲新聞
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寄件者: 坪洲新聞 Peng Chau News [redacted]
寄件日期: 08日07月2015年星期三 23:14
收件者: tpbpd@pland.gov.hk; landsd@landsd.gov.hk
主旨: 強烈反對興建機場第三條跑道，不同意按《前濱及海床條例》於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖

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寄件者: Kong Frontier [redacted]
寄件日期: 08日07月2015年星期三 19:51
收件者: tpbpd@pland.gov.hk
主旨: 第三條跑道的城市規劃修訂諮詢

敬啟者：

香港政府及機場管理局開始了有關香港赤鱲角機場建造第三跑道(下稱三跑)環評的公眾諮詢本會(港地陣線)不滿政府沒有針對香港航空的根本問題，亦因其沒有深慮資金成本高昂，回報成疑及所引致的環境問題等弊端。以下是本人對於整個諮詢文件與當中的方案提出的質疑與意見:

1，三跑造價高昂達千億，成效收益難確保，影響香港流動儲備

根據政府公佈，三跑預計的成本約 1,415 億。引用社民連成員黃浩銘成員所言「因為三跑興建價格非常之高，令機管局需要向市場大量舉債，所以，機管局的決定是違反機管局條例的要求，此外，機管局的股權百分百由港府擁有，為了興建三跑，港府計劃免收十年股息，料金額涉及數百億元，故三跑的開支，是成為未經立法會批准的公共開支。」

有見及此，本會(本人)認為三跑是需要受公眾廣泛支持才興建，原因在於興建三跑會影響公眾利益。就上述提及，港府計劃免收十年股息，變相令港府收入減少，因此政府在公共開支亦會減少同時，1,415 億的三跑成本，由港府間接支出。換而言之，當興建三跑的時侯，政府的公共開支減少，有可能使民生方面的福利亦因此減少，影響市民生活質素。

及後，港府是次投資過量資金於新跑道，未有確切考慮其成本與收益，即使轉介建造費於用家，亦未能獲得肯定的收支平衡日期，更會因附加費用影響使用本港航空服務之意欲。在航空成效收益存疑之際難以接受花費進行高風險，低回報的基建投資。

另外，香港亦同時興建不同大型基建，就例如港珠澳大橋，高鐵等等。截至上年七月，香港各項工程已經動用約一萬二千億港元，只要再多幾項昂貴工程，香港儲備將會盡耗，同時，因為那些建設，未能即時為香港帶來收益，所以，香港將會變得缺少儲備，令到公眾開支大幅減少，進一步導致香港人基層生活變得困苦和公共服務水平下降。

此外，在各類工程建築材料價格，工資上升及通脹下，預料最後成本會遠遠超過 1,415 億。參考近來高鐵嚴重超支事件，三跑亦大有可能會步高鐵後塵。因此，在未經公眾廣泛同意及政府當局詳細考慮下通過三跑，是危害公眾利益。

考慮到三跑建設成本高，效益存疑，又會使政府之公眾開支減少;動用大量儲備，令公帑流通性下降，最終價格亦可能大幅超支下，建設三跑其實弊過其利。

2，三跑建造欠環保，嚴重影響生態平衡，有欠保償不利持續發展

興建三跑咨詢文件列明要以大範圍填海獲地建路。除了破壞了原有海岸的景觀、風景和水質，更嚴重地增加了水流的速度並且威脅附近的航海交通及海洋生態。

此外，三跑填海工程進行時，傾倒的沙泥嚴重破壞海洋生態，填海工程除了會掩沒了附近海洋生物的棲息地，還對海洋的能見度大幅下降。構成不同海洋生物及海鳥生態亟大威脅。根據「海豚三十」所提出: 當興建三跑時，填海工程將會大幅減少白海豚的棲息地，填海範圍和工程所造成的噪音將會干擾白海豚的活動，最終令白海豚的數量下跌以及生存受到威脅。另一方面，填海工程的建築廢料會大幅污染海洋，導致海洋生物生活受到威脅，嚴重影響食物鏈和海洋生態及海鳥生存。加上，必然的大量建築廢料會運輸往堆填區，不但加速堆填區飽和，過程中亦會造成大量空氣污染和惡臭，影響區內居民生活。

雖然環評報告中，提出了興建海岸公園以吸引白海豚回流。但值得深慮是，當白海豚都被趕離其棲息地，甚至被污染物殺死，以及海岸公園的建設亦需不少時間(環評報告指出會在工程後才建設海岸公園，海岸公園亦要另外審批)。海岸公園能夠再次吸引白海豚的功效亦存疑，有過於樂觀之嫌。參考林光宇先生所寫的文章「香港機場的第三條出路」，當中提出填海工程施工範圍的水深和水底有大量複雜的因素，令工程難度提高，咨詢文件採用之定向鑽挖法，能否考慮所有因素，達至減少對海床的干擾亦是未知之數。

根據可持續發展城市之原則，比起未經考慮的急速發展和建造之城市，一個平衡自然環境的共生成長更能提升社會整體的質素及保障生活水平。城市非人性化發展對環境的破壞乃不可逆轉，如覆水難收。為保存珍貴的自然資源及環境，理應將環保作為發展首要考量，而非急功近利、好大喜功，妄顧自然生態。

每當建設一項大型基建，對環境破壞是少不免，但關鍵在於政府對環境的補償及保護不足，難以抵消三跑填海工程所帶來的破壞。政府對地區環境之保護理應責無旁貸。若未恰當處理所帶來之生態禍害，各界難以接受三跑之倉促成事。

3，三跑建築需長時，或會淪為明日黃花，構成經濟轉型負擔

三跑至少需待至 2023 年方可落成，若現時開始建築工程，亦需 8 年之多方可完工。然而建築工程往往因各種不同之原由而延誤。如天氣因素，工作人手不足，建材運輸延誤等，需時更多，難以跟上經濟步伐。

然而，三跑只是顧及擴充旅遊和物流，面向中國，但香港對中國旅客承載力卻是有限的，目前各種香港人對中國旅客的不滿和衝突就正好引證此飽和狀態不遠矣。此類「面向中國消費旅遊」模式是不可再加以擴充，對未來經濟增長毫無建樹。此外航空貨運物流業的增長因內地機場的進步及貨源位於內地而持續放緩，未來可見香港機場轉口貿易市場定必被瓜分而下降，興建三跑難以有利香港未來發展。

據林超英教授分析，建造第三條跑道並不符合經濟發展原則。擴建赤鱲角機場第三跑道並不能提升其競爭力。皆因受其他附近中國機場地緣關係影響，所以赤鱲角機場競爭力下降實屬自然。相比起機管局策略錯誤，誤將內地客為主要客源導致服務質素及競爭力下降，三跑落成及啟用實未可解決問題，更未能論及作為發展經濟之用。三跑是落伍經濟思維的概念，無助香港未來必須轉型的經濟發展。

香港一直面對國際形勢而不斷地作出經濟轉型，政府亦打算將香港從地產，轉口貿易，旅遊及服務業轉型至六項新產業（檢測和認證、醫療、創新科技、文化及創意、環保以及教育）。以上之重點發展行業均屬本土產業，未必會為香港帶來更多航空運輸流量。三跑花費大量資金增加過量航空運輸流量，讓政府難以撥款至其他更有潛力的本土新產業，構成經濟轉型負擔，難以面對香港長遠未來的新挑戰。

4，三跑增添業界負擔，難以創造長遠就業，未有高瞻遠慮

現時航空業界正面臨人手不足，前線員工工時過長，三跑建成後，人手定必更為緊拙。三跑工程附帶額外的工作，勢令前線員工百上加斤。此外，諮詢文件中提及建造三跑需重新規劃現時機場已有之基建，當中包括新建落成只有約三年的新客運大樓，因此改建工程所作出的人手調配影響甚廣，機管局如此朝令夕改，除浪費資源和時間外，實令前線員工及工程人員難以適從。

建造三跑如近年來各大基建工程或創造不少建造業的職位。但建築工程乃高技術、高勞動的工種難以短時間投入工作，或許難以應付不斷增加的大型基建工程。倘若輸入外勞以應付是次項目，又會引起本土工權之爭議，興建三跑勢必令業界陷入兩難困境。

及後，建築技工在各類大型工程完工後，因長時間投入指定工種而難以轉職。若社會上只有過量的單元技術工人，會構成經濟發展斷層，不利未來經濟轉型和面對外來挑戰。長遠整體而言，三跑工程所帶來的單元短期就業模式絕對不利香港。

5，三跑效益成疑，增航線可行性堪憂，或成大白象工程

支持興建三跑的與事者一直誤導公眾，詫騙香港的機場有第三條跑道後的起降量會自然大幅上升但其實香港機場的起降量仍然受制於深圳空域問題。現時所有航班若要經深圳上空，必須達到一定高度才可以通過該區空域，這正是導致了赤鱲角機場飛機升降的效率低下主因。即使建造三跑亦未能增加新航道以增加航班昇降量，實屬緣木求魚，未有對症下藥。

此外，現時的兩條跑道的起降量亦未見飽和，亦沒有跡象顯示兩條跑道的起降量即將飽和。現存航空效率低皆因以上提及的空域限制問題所而致。揮金如土，興建第三條跑道其實對現存問題毫無幫助。

建造三跑花費至少 1,415 億，其實是只是浪費金錢的行為。甚至讓市民公眾懷疑當中涉及利益輸送，當中三跑只利及建造業、中國旅遊業和地產界的高層，卻無助基層就業或香港產業多元化，甚至影響部份行業生存，例如生態旅遊，該行業每年可為香港帶來龐大的外地收益，但基於興建三跑所造成的破壞環境，導致香港生態旅遊業損失慘重。三跑對社會大眾，創新行業百害而無一利，1,415 億如同白白投進大海餵鯊魚，一去不復返。三跑其實帶給社會整體的經濟效益將成負值。成為香港未來的長期債務。

6，停止興建三跑，考慮開放空域，善用政府資金助民生。

三跑對香港百害而無一利，建造三跑只會為香港帶來難以之補救的破壞和長期債務。為保護香港未來，停止三跑，政府責無旁貸。本會堅拒三跑濫建，並促請政府與中國協相開放深圳空域。此外，政府理應利民舒困，考慮善用公帑在各種公眾民生議題，以解民怨，以免造成浪費。而非好大喜功，胡亂大興土木，搶盡民脂民膏，浪費公帑，勞民傷財。

此致
城市規劃委員會

港地陣線

收：
城市規劃委員會全體成員

發信人：
Airport Development Concern Network

我們的訴求：
反對政府偷步改劃赤鱲角大綱圖 及 反對於機場北面填海

TPB/R/S/I-CLK/13-513

聯署信：
本人反對興建機場第三條跑道，不同意於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

空域問題未解決， 三跑得物無所用
第三條跑道不是香港單方面可以落實，需要澳門及深圳機場作配合。現時珠三角多個機場太近，樽頸並非的跑道，而是空域及航道。港深空域矛盾難解決，政府一直拒絕公開與三地空域協議 ，卻欺騙市民打算「邊興建商討」，非常不負責任 。

1415億造價太昂貴
三跑乃香港主權移交後後最貴工程，而現時方案中只有半個客運大樓， 工程隨時大幅超支。政府建議的三種融資計劃 ，包括免機管局未來十年股息 ，令庫房減少500 億收入，以及向市民收取$180機場建設費，都是出自市民口袋，理應用作有利民生的社會政策如教育和福利等。

應先增加雙跑道容量及改善機場效率
現時雙跑道容量其實未用盡，應先從以下方向提升機場容量 ，這些方法成本極低，不需巨額工程費 ，包括：減少中國二三線城市航班， 放眼國際； 使用載客量較大的飛機 ，珍惜跑道空間； 興建中場客運大樓及登機橋，改善旅客體驗， 提升機場效率。

破壞海洋生態， 摧毀中華白海豚生境
本來於填海一帶域生活及覓食，或需經過該的洋物 ，將永久損 失超過 650公頃棲息地 棲息地 ，進一步危及中華白海豚 中華白海豚 的生存； 機管局提出七年後 建海岸公園乃「先破壞、後補償」，於事無補，因為海豚已因工程影響離開或死亡。

加劇噪音問題及空氣污染
飛機發出的噪音對航道沿途居民影響嚴重，滋擾日常生活多年來未見有效解決方法，興建第三條跑道將會加劇有關問題 ；航空業乃高污染行業， 三跑興建後將大大增加臭氧及氮化物等空氣污染物濃度， 整體市民健康受損。

收集簽名（請參閱下頁）：
452

簽名收集網：
撐香港

參考網址：
http://supporthk.org/i.php/View/472

聯署期間：
29/六月/2015 - 08/七月/2015

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聯署發起人簽署：

Airport Development Concern Network

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不要步高鐵後塵，超支延誤！！！

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長井人致城規會反對興建機場第三條跑道聯署信：

簽署	屋苑	簽署	屋苑

機場第三跑

bpd

寄件者: Civil anti Third Runway [redacted]
寄件日期: 08日07月2015年星期三 19:42
收件者: tpbpd@pland.gov.hk
主旨: Re: 就赤鱲角分區計劃大綱草圖編號S/I-CLK/13所作的申述

下載市民簽名表格 https://drive.google.com/file/d/0B68v2I76eODFSlRBTlB4eUNyS3c/view?usp=sharing

Civil anti Third Runway ([redacted]) 在 2015 年 7 月 8 日 下午 7:37 寫道：
致：城市規劃委員會

行政長官聯同行政會議於 3 月 17 日通過機場管理局興建香港國際機場三跑道系統，有關工程預算 1,415 億港元，決定引起頗大迴響，反對聲音不絕。

基於下列理由我們強烈反對興建三跑項目：

1. 空域問題未解決，且避談經濟效益評估；
2. 繞過立法會撥款程序，違反程序公義，逃避公眾監察；
3. 提升雙跑效益，才能解決真正需要；
4. 環境、噪音及空氣污染，影響市民生活；
5. 政府缺乏保障本地勞工就業機會政策。

民間反三跑
聯絡人：蘇偉洋

參與團體（排名不分先後）：
1. 拾。念
2. 傘下爸媽
3. 港民領域
4. 香港空中服務員總工會籌委會
(包括：港龍航空公司空勤人員協會、
英航香港機艙服務員工會、
國泰航空有限公司空中服務員工會)
5. 進步教師同盟
6. 香港社會工作者總工會
7. 保衛香港自由聯盟
8. 香港民主宣傳小組
9. 前線科技人員
10. 公義聯盟
11. 下環有樂
12. 學生覺醒
13. 美孚家。政
14. 撐傘落區
15. 社工復興運動
16. 中大學生會
17. 城大學生會
18. 嶺大學生會
19. 新婦女協進會

013

20. 香港女社工協會
21. 雨傘無盡
22. Um dot dot dot

並附上「民間反三跑」收集的反對市民簽名及意見。
下載市民簽名表格市民簽名表格

tpbpd

寄件者: Civil anti Third Runway[redacted]
寄件日期: 08日07月2015年星期三 19:38
收件者: tpbpd@pland.gov.hk
主旨: 就赤鱲角分區計劃大綱草圖編號S/I-CLK/13所作的申述
附件: 「民間反三跑」簽名運動.xlsx

致：城市規劃委員會

行政長官聯同行政會議於 3 月 17 日通過機場管理局興建香港國際機場三跑道系統，有關工程預算 1,415 億港元，決定引起頗大迴響，反對聲音不絕。

基於下列理由我們強烈反對興建三跑項目：

1. 空域問題未解決，且避談經濟效益評估；
2. 繞過立法會撥款程序，違反程序公義，逃避公眾監察；
3. 提升雙跑效益，才能解決真正需要；
4. 環境、噪音及空氣污染，影響市民生活；
5. 政府缺乏保障本地勞工就業機會政策。

民間反三跑
聯絡人：蘇偉洋

參與團體（排名不分先後）：
1. 拾。念
2. 傘下爸媽
3. 港民領域
4. 香港空中服務員總工會籌委會
(包括：港龍航空公司空勤人員協會、
英航香港機艙服務員工會、
國泰航空有限公司空中服務員工會）
5. 進步教師同盟
6. 香港社會工作者總工會
7. 保衛香港自由聯盟
8. 香港民主宣傳小組
9. 前線科技人員
10. 公義聯盟
11. 下環有樂
12. 學生覺醒
13. 美孚家。政
14. 撐傘落區
15. 社工復興運動
16. 中大學生會
17. 城大學生會
18. 嶺大學生會
19. 新婦女協進會
20. 香港女社工協會
21. 雨傘無盡

013

2. Um dot dot dot

並附上「民間反三跑」收集的反對市民簽名及意見。
下載市民簽名表格市民簽名表格

成規會反對興建機場第三條跑道聯署信：

11964 - 11997

簽署	屋苑	簽署	屋苑
	Ocean Pointe		
	Ocean Pointe		Sea Crest Villa
	Bellagio		Bellagio
	Bellagio		Bellagio
	Bellagio		Rhine Garden
	Bellagio		Bellagio
	Sham Tseng Village Chau		Rhine Garden
	Bellagio		愛琴
InniePoon	Rhine		〃
Frances Wat	Bellagio		〃
	Rhine Garden		〃
	Rhine Garden		海韻
	海韻		海韻
	Sea Crest Ville		碧堤
	海韻花園		碧堤
	海韻		
	海韻		
	海韻花園		
	海韻花園		

5. 城規會反對興建機場第三條跑道聯署信：

TPB/R/S/I-CLK/13-11998 - 12013

簽署	屋苑	簽署	屋苑
	碧堤		
	碧景		
	碧堤		
	碧堤		
	浪翠		
	碧堤		
	海韻花園		
	碧堤		
	碧堤		
	浪翠園		
	〃		
	Bolton		
	浪翠園		
	浪翠園		

TPB/R/S/I-CLK/13-543

Objection to the Hong Kong Airport Third Runway Project

I, SOPHIE WALKER *(name)*, object to the Hong Kong Airport 3rd Runway Project because of the following reasons *(please put a tick in the box(es) if suitable)*:

☑ **The 3rd Runway Project further threatens the survival of Chinese White Dolphin.** The proposed construction area leads to a permanent loss of 650 hectares of habitats of marine lives.. Dolphins may be died or left before the building of the new marine park.

☑ **The Shenzhen-Hong Kong Airspace conflict is unsolved.** The maximum numbers of flights of our airport will be greatly limited, i.e. the third runway will be wasted and can never achieve the efficiency as proposed.

☑ **The construction cost of 141.5 billion is far too expensive.** We can make better use of the money, for example, more resources for education and public health.

☑ **"Increasing employment rate" is not required in full employment.** The aviation and construction sectors already lack manpower. The 3rd Runway Project may not bring benefits to Hong Kong labour but worsen the problems.

☑ **The government and the Airport Authority ought to improve the airport management and make the best use of current two-runway systems first.**

Signature: _____

E-mail address / Contact number: [redacted]

RECEIVED
- 6 JUL 2015
Town Planning Board

tpbpd

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 23:55
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖

本人反對興建機場第三條跑道，不同意按《前濱及海床條例》於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

2007年，機管局聘請的顧問NATS提交了《空域及跑道容量研究第一期終期報告》，值得我們注意的有「行政摘要」以下兩段：

1. 顧問的意見是現有的空域系統在目前的狀態，已經接近飽和。（原文：It is the view of the consultants that the existing airspace system, as currently configured, is close to capacity.）

2. 本報告指出由於已知的限制，現有系統不改變的話，不能應付本機場及珠江三角洲地區空中交通的預測增長。（原文：The limitations identified in this report mean that, without change, the current system will not be able to cope with the predicted traffic growth at the airfield or in the Pearl River Delta area.）

簡單地說，香港的天空已經塞滿飛機，到了「上天無路」的境地，就算跑道有空位，離港的飛機也無法起飛。制約機場升降架次的主因，是空中航道的擠迫，而不是沒有跑道。

就算多建一條跑道，天上的一條出路依然是瓶頸，不可能有更多的飛機離開，所以是徒勞無功。

情況跟一個原本有兩個月台的火車站一樣，交通繁忙，列車不斷出入車站，兩邊的唯一路軌擠滿了密麻麻的火車，一架緊貼一架，已經達到飽和狀態，但是站長提出要多建一個月台，說是解決交通量飽和的唯一方法，還要人家投資一千多億，你說是不是腦筋有問題？

機管局不管天空有限和空中航道已經飽和，只顧大力推銷第三條跑道，等如建月台不建路軌，荒謬到極。

他們最近大賣廣告，企圖製造壓力，挾迫政府匆匆通過項目，對民間的種種嚴肅提問，則永遠只以寥寥一兩句無關痛癢的說話打發，甚或不應不答，但求含混過關。

針對第三條跑道，我們道理講了不少，從不同角度論證項目的荒謬性質，如果這樣不合理的項目政府都可以通過，我想香港社會的將來是沒有希望的。

行政會議成員們，請你們認真弄清楚三跑的真正內涵，否則被誠信可疑的機管局牽着鼻子走，將來可能要背黑鑊！

PS:
海洋是大眾資產 不容私有化

0847

TPB/R/S/I-CLK/13-2401

反對機場第三條跑道
反對政府偷步改劃赤鱲角大綱圖 及
反對於機場北面填海

致：香港北角渣華道路333號北角政府合署15樓城市規劃委員會
tpbpd@pland.gov.hk　傳真號碼:2877 0245

本人反對興建機場第三條跑道，不同意於機楊北面填海及
不同意修訂赤鱲角分區計劃大綱圖，理由如下：

空域問題未解決，三跑得物無所用

第三條跑道不是香港單方面可以落實，需要澳門及深圳機場作配合。現時珠三角多個機場太近，樽頸並非的跑道，而是空域及航道。港深空域矛盾難解決，政府一直拒絕公開與三地空域協議，卻欺騙市民打算「邊興建商討」，非常不負責任。

1415億造價太昂貴

三跑乃香港主權移交後後最貴工程，而現時方案中只有半個客運大樓，工程隨時大幅超支。政府建議的三種融資計劃，包括免機管局未來十年股息，令庫房減少500 億收入，以及向市民收取$180機場建設費，都是出自市民口袋，理應用作有利民生的社會政策如教育和福利等。

應先增加雙跑道容量及改善機場效率

現時雙跑道容量其實未用盡，應先從以下方向提升機場容量，這些方法成本極低，不需巨額工程費，包括：減少中國二三線城市航班，放眼國際；使用載客量較大的飛機，珍惜跑道空間；興建中場客運大樓及登機橋，改善旅客體驗，提升機場效率。

破壞海洋生態，摧毀中華白海豚生境

本來於填海一帶域生活及覓食，或需經過該的洋物，將永久損 失超過 650公頃棲息地，進一步危及中華白海豚 中華白海豚 的生存；機管局提出七年後 建海岸公園乃「先破壞、後補償」，於事無補，因為海豚已因工程影響離開或死亡。

加劇噪音問題及空氣污染

飛機發出的噪音對航道沿途居民影響嚴重，滋擾日常生活多年來未見有效解決方法，興建第三條跑道將會加劇有關問題；航空業乃高污染行業，三跑興建後將大大增加臭氧及氮化物等空氣污染物濃度，整體市民健康受損。

提意見人姓名：

提意見人電郵：[redacted]

提意見人簽名：

2134

機場發展關注網絡

2015 Q2
反三跑戰報 #002

尚有城規及填海刊憲一役
一人一信 反對三跑大白象

政府現正啟用第三條跑道填海的相關程序，包括取得城規會土地規劃許可
公眾意見收集期，皆於本年7月8日截止。

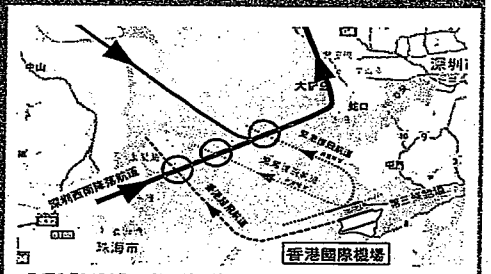
立即行動
一人一信反三跑

到www.no3rdrunway.com/tpb 或掃描以下QR Code
填寫表格

或填妥背頁表格，以電郵、傳單或郵寄方式
交回城規會

第三條跑道致命缺陷

- 建造費達1315億
  為香港迄今最昂貴
  基建工程



機場鄰近中國空域邊界
升降航道受到對方掣肘
影響新跑到潛在效率



為做細盤數 客運大樓起得一半

反對興建機場第三條跑道

三跑工程自推出至今，反對聲音一直不絕於耳。行政會議於 3 月 17 日閉門通過機場管理局興建香港國際機場三跑道系統，並以停派股息予政府和增收$180 機場建設費，以集資 1,415 億元用作興建三跑，企圖繞過立法會監察。本人反對興建機場第三條跑道，理由如下：

☑ **空域問題未解決，三跑得物無所用：**

第三條跑道不是香港單方面可以落實，需要澳門及深圳機場作配合。現時珠三角多個機場太近，樽頸並非機場的跑道，而是空域及航道。港深空域矛盾難解決，政府一直拒絕公開與三地空域協議，卻欺騙市民打算「邊興建邊商討」，非常不負責任。

☑ **1,415 億造價太昂貴：**

三跑乃香港主權移交後最貴工程，工程隨時大幅超支。政府建議的三種融資計劃，包括免機管局未來十年股息，令庫房減少近 500 億收入，以及向市民收取$180 機場建設費，都是出自市民口袋，理應用作有利民生的社會政策如教育和福利等。

☑ **應先增加雙跑道容量及改善機場效率：**

現時雙跑道容量其實未用盡，應先從以下方向提升機場容量，這些方法成本極低，不需巨額工程費，包括：減少中國二三線城市航班，使用載客量較大的飛機，珍惜跑道空間；興建中場客運大樓及登機橋，改善旅客體驗

☑ **破壞海洋生態，摧毀中華白海豚生境：**

本來於填海一帶海域生活及覓食的海洋生物，將永久損失超過 650 公頃棲息地，進一步危及中華白海豚的生存；機管局提出七年後建海岸公園乃「先破壞、後補償」，於事無補，因為海豚或已因工程影響離開或死亡。

☑ **加劇噪音問題及空氣污染：**

飛機發出的噪音對航道沿途的居民影響嚴重，滋擾日常生活，多年來未見有效解決方法，興建第三條跑道將會加劇有關問題；航空業乃高污染行業，三跑興建後將大大增加臭氧及氮化物等空氣污染物濃度，整體市民健康受損。

姓名：余偉志

電郵／電話：[redacted]

必須填寫資料政府方承認意見

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- 8 JUL 2015
Town Planning Board

3929

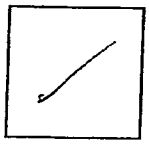
致　城市規劃委員會：

TPB/R/S/I-CLK/13-3201

有關：機場第三條跑道計劃意見書

我反對機場第三條跑道工程，亦反對政府進行相關填海及土地用途規劃程序，理由如下：

未有就工程做公開諮詢



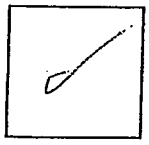
計劃至今未有由政府部門進行的公開諮詢，只由行政會議相信機管局的報告就作出決定，程序不公。有民間團體委託大學進行的民意調查就顯示市民對三跑計劃有很大的保留。政府應先停止程序，先向公眾解釋清楚工程細節，得到市民共識才進行。

中華白海豚生境被破壞



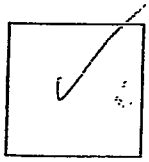
三跑道的填海範圍是中華白海豚生活的心臟位置，工程將令海豚永久損失超過 650 公頃棲息地；機管局提出工程開始七年後才成立海岸公園保護海豚，將於事無補，因為海豚或已因工程影響離開或死亡。

三跑被空牆影響，最終效益存疑



有航空專家就第三條跑道做空域分析，認為現時珠三角多個機場太近，機場效益的樽頸實際是空域及航道，並非機場的跑道。但空域問題關係中港澳三地，香港政府卻拒絕公開與三地空域協議供市民了解，欲「邊興建邊商討」，最後一旦協調非常不負責任。

1,415 億造價，應用作有利民生的社會政策



工程的涉及大量金錢及社會成本，其中的工程支出融資計劃，當中包括免機管局未來十年股息，令庫房減少近 500 億收入，以及向市民收取$180 機場建設費等等，都無異由市民血汗錢負擔。莫說今天基建工程很可能大幅超支，1,415 億理應用作更緊急更有利民生的社會政策如教育和福利等，而不是基建無底深淵。

我要求城市規劃委員會否決計劃相關的圖則。

RECEIVED
- 8 JUL 2015
Town Planning Board

姓名：[redacted]

聯絡電郵：[redacted]

3780

tpbpd

寄件者: [redacted]
寄件日期: 07日07月2015年星期二 14:52
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道：反對政府偷步改劃赤鱲角大綱圖 及 反對於機場北面填海

TPB/R/S/I-CLK/13-3340

本人反對興建機場第三條跑道，不同意於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖。

政府深明此項目破壞香港生態、造價昂貴，而且目前雙跑道仍有容量可供使用，故此，如項目上馬就是故意浪費香港公帑；再者，空域問題未解決，三跑得物無所用，到底此項目對香港有什麼好處論經濟發展，香港還發展不夠嗎？香港庫房缺錢嗎？香港地少、天然資源欠奉，硬件及機建發展永遠受其面積所限，盲目追求硬體容量是不切實際，也令香港人失去僅有的生活空間。

本人認為此項目必須撤回，香港資源應投放在香港最欠缺的產業：文化和環保。文化和環保才是香港這個小地方應該發展的，因為此兩項項目也是中國大陸最為欠缺的。如果香港能領導此兩項產業則不用擔心在大中華地區失去競爭力。現在中國經濟已經起飛，進入了產能過剩階段，正需要轉型尤其需要環保技術和再生能源，以求持續發展。現在香港竟然還在盲目追求硬件容量，是不是笑話

259

tpbpd

TPB/R/S/I-CLK/13-3343

寄件者: kevinho'[redacted]
寄件日期: 07日07月2015年星期二 14:49
收件者: tpbpd@pland.gov.hk
主旨: 對S/I-CLK/13分區計劃大綱圖及興建機場三跑之意見書

強烈反對機場興建第三條跑道

本人對以下三項建議強烈反對
1）興建機場第三條跑道
2）於機場北面填海
3）修訂赤鱲角分區計劃大綱圖

以下為反對理由：

政府若未能落實及公開與澳門及內地商討之三地空域協議，將未能釋除市民對三跑成效的疑慮。另外，造價之昂貴，並未能有效運用金錢，現時雙跑容量未滿，只要先於機場中心地帶興建新客運大樓，將有效地分流客機，減少航班滯留於跑道的時間，提升效率。 基於政府過往對基建造價的估算本人甚為質疑將來會否需要追加撥款，令總造價再為提升，所帶來的經濟效益亦未見明確，甚有入不敷支之嫌。

除此以外，進一步的填海工程將令本已受港珠澳填海工程影響的海洋生物更受滋擾，甚至引致物種滅絕的問題。機管局設立海岸公園的建議並未能夠確保棲息於該地海域的海洋生物能夠於興建期內不受直接（遭機器、船隻撞死）或間接（缺糧）生命威脅。所謂的「先破壞、後補償」於事無補嚴重影響物種多樣性並香港的可持續發展平衡。

香港市民
Ho King Him

270

tpbpd

TPB/R/S/I-CLK/13-3350

寄件者: [redacted]
寄件日期: 07日07月2015年星期二 23:10
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖

本人反對興建機場第三條跑道，不同意於機楊北面填海，亦不同意修訂赤鱲角的計劃，因為：

1. 填海建跑道只係小部份人的方便，而犧牲大眾共享和自然的資產；並嚴重破壞自然生態和附近民居環境；例如中華白海豚之生存環境、噪音和空氣污染等等。

2. 空域問題遲遲未解決，通過建三跑係挪用公帑作賭博、冒險，一旦不成事則血本無歸。

3. 1415 億造價太昂貴，將儲備耗用於單一項工程太不智和冒險。

4. 社會有比三跑更迫切需要，如教育、醫療、福利、房屋等，建 3 跑而不顧社會眼前需要，更惹人反感。

4. 第三條跑道面對周邊機場競，成效未知，政府、社會得益並無保障。

5. 強行建造，不理反對，予人只為財團有工程、有錢賺之感；難道政府只為商業服務？

6. 現時已有高鉄工程大幅超支，且經常出現預算不準問題，更大型工程則更大危機。無周詳及穩健計劃、預算、政策等不能建。

7. 建議中的融資計劃，可謂要由普羅大眾分擔，於理不合。

8. 機場管理連續醜聞，包括要拆第二客運大樓，暴露管理、行政和規劃的失誤，不能叫人信服 3 跑係好計劃；而未來又有何保證？

495

tpbpd

TPB/R/S/I-CLK/13-3354

寄件者: 盧為正[redacted]
寄件日期: 08日07月2015年星期三 20:51
收件者: tpbpd@pland.gov.hk
主旨: 就S/I-CLK/13機場第三條跑道的意見

1. 大嶼北近年來已經做了很多建設工程，已嚴重破壞生態，加上這項計劃的工程，對海上生態更是災難性，更不要提附近有海岸公園。
2. 機場跑道或者有需要，但在香港東面建機場是否完全不可行？在小小的珠江口有三個機場實在不可思議。加上空域問題完全未有向公眾釋疑。
3. 內河碼頭附近航道已經不寬，計劃會令內河碼頭附近航道過窄（因為沙洲的存在），易生意外。對於來往香港至珠江船隻來說，計劃所影響的航道是很多船隻的必經之路，包括很多大型船隻。
4. 如前述，如果空域問題不解決，三跑工程就是又一項大白象工程。

總結：強烈反對 S/I-CLK/13 計劃。

市民 盧為正

0767

TPB/R/S/I-CLK/13-3521

反對興建機場第三條跑道

三跑工程自推出至今，反對聲音一直不絕於耳。行政會議於 3 月 17 日閉門通過機場管理局興建香港國際機場三跑道系統，並以停派股息予政府和增收$180 機場建設費，以集資 1,415 億元用作興建三跑，企圖繞過立法會監察。本人反對興建機場第三條跑道，理由如下：

☑ **趕絕中華白海豚、破壞海洋生態：**

現時在香港存活的中華白海豚只餘約 60 條，三跑填海將令海豚進一步永久損失超過 650 公頃棲息地；機管局提出七年後建海岸公園乃「先破壞、後補償」，於事無補，因為海豚或已因工程影響離開或死亡。

☑ **三跑成效存疑，中港空域問題難以解決：**

第三條跑道不是香港單方面可以落實，需要澳門及深圳機場作配合。現時珠三角多個機場太近，樽頸並非機場的跑道，而是空域及航道。港深空域矛盾難解決，政府一直拒絕公開與三地空域協議，卻欺騙市民打算「邊興建邊商討」，非常不負責任。

☐ **1,415 億造價，應用作有利民生的社會政策：**

政府建議的三種融資計劃，最終都是從市民口袋取出血汗錢，當中包括免機管局未來十年股息，令庫房減少近 500 億收入，以及向市民收取$180 機場建設費。這筆金額理應用作有利民生的社會政策如教育和福利等。三跑乃香港主權移交後最貴工程，工程隨時大幅超支。

☐ **機場及建造業人手短缺，無須三跑「增加就業」：**

現時香港近乎全民就業，無須靠興建三跑來提供就業機會。反而近年各項大型工程同時上馬，以致建造業常需要輸入外勞；機場方面，亦出現人手不足以處理航班工作如上落行李等，興建三跑可能增加此等問題。

☐ **應先增加雙跑道容量及改善機場效率：**

現時雙跑道容量其實未用盡，應先從以下方向提升機場容量，這些方法成本極低，不需巨額工程費，包括：減少中國二三線城市航班，使用載客量較大的飛機，珍惜跑道空間；興建中場客運大樓及登機橋，改善旅客體驗。

姓名：Chung Kwun Ching

電郵／電話：[redacted]

必須填寫資料政府方承認意見

RECEIVED
- 8 JUL 2015
Town Planning Board

4199

寄件者: [redacted]
寄件日期: 07日07月2015年星期二 10:03
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道：反對於機場北面填海 影響海洋生態及航道

本人反對興建機場第三條跑道，不同意於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

破壞海洋生態， 摧毀中華白海豚生境
本來於填海一帶域生活及覓食，或需經過該的洋物 ，將永久損失棲息地 棲息地 ，進一步危及中華白海豚 中華白海豚 的生存； 機管局提出七年後 建海岸公園乃「先破壞、後補償」，於事無補，因為海豚已因工程影響離開或死亡。

機長面積增加近一倍，出入珠江口的通道再收窄一些令到航道緊張。

應先增加雙跑道容量及改善機場效率
現時雙跑道容量其實未用盡，應先從以下方向提升機場容量 ，這些方法成本極低，不需巨額工程費 ，包括：減少中國二三線城市航班， 放眼國際； 使用載客量較大的飛機 ，珍惜跑道空間； 興建中場客運大樓及登機橋，改善旅客體驗， 提升機場效率。

加劇噪音問題及空氣污染
現在晚間經常受飛機發出的噪音影響，多年來未見有效解決方法，興建第三條跑道將會加劇有關問題。

1415 億造價太昂貴
三跑乃香港主權移交後後最貴工程，而現時方案中只有半個客運大樓， 工程隨時大幅超支。

寄件者: May [redacted]
寄件日期: 07日07月2015年星期二 18:48
收件者: tpbpd@pland.gov.hk
主旨: Objection on the 3rd runway of HK international airport

Dear sir/madam,

I strongly object building the 3rd runway of HKIA. The reasons are as follows:
1. It creates too much pollutant that will seriously harm our environment 2. HKIA has not yet optimize usage on the current 2 runways 3. HK has already spent too much money on these kind of infrastructure in recent years. How about the other social aspects such as elderly care and mentally retarded person? Their development has not caught up with the needs.

I hope the related departments would act according to their kindness and professional judgement on making these kind of decision related to the well being of all citizen in HK

Regards,
Miss Yan

寄件者: Besnon Cheng [redacted]
寄件日期: 07日07月2015年星期二 21:55
收件者: tpbpd@pland.gov.hk
主旨: 3rd Runway

Dear Sirs

I wouldnot support and would rejectto build the 3rd Runway in the near future. The reasons are given as below:

1. The estimate cost is hugh and not worthwhile spending
2. The supporting evidence is fairwithout any cost effectiveness and efficiency
3. There is a lot of uncertainty
4. The proposed contribution cost to all people leaving and coming to Hong Kong is unreasonable and unacceptable
5. This is a big project that has to be considered more in details before reaching decision.

Thanks for your consideration.

Regards
Benson Cheng
Email: [redacted]

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 0:44
收件者: tpbpd@pland.gov.hk
主旨: 不同意興建機場第三條跑道

我反對香港興建機場第三條跑道，反對按《前濱及海床條例》於機楊北面填海及，和反對修訂赤鱲角分區計劃大綱圖，因為 1415 億造價太昂貴！現時方案中更只有半個客運大樓， 工程隨時大幅超支，理應用作有利民生的用途如教育和福利，醫療等。

應先增加雙跑道容量及改善機場效率
現時雙跑道容量其實未用盡，應先從以下方向提升機場容量 ，這些方法成本極低，不需巨額工程費 ，包括：減少中國二三線城市航班， 放眼國際； 使用載客量較大的飛機 ，珍惜跑道空間； 興建中場客運大樓及登機橋，改善旅客體驗， 提升機場效率

531

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 23:58
收件者: tpbpd@pland.gov.hk
主旨: 本人反對香港赤臘角機場 興建第三條跑道！反對機場北面填海！並認為當局修訂赤鱲角分區計劃大綱圖前需要讓市民有更清晰了解！

本人之反對理由：

機場第三跑道工程未經 透明、公開及獨立、全面的公眾諮詢，政府當局未得到公眾認受即已刊憲進行法定填海程序，儼然 霸王硬上弓！進一步削弱市民對政府管治的信心，當局日後推行政策時更加難以取得支持。

而上千億造價 只做上 半個客運大樓，本人不見得此項目能惠及廣大市民；觀乎工程又隨時超支，需要市民填補，實在非市民所願！取之於民，理應用之於民！本人建議政府踏實做事，關顧日益嚴重的民生政策問題，如教育、全民退休保障及長者福利等。

加上現時雙跑道設計仍有 提升機場效率之空間，建議增建登機橋，亦能事半功倍。

而填海令海洋生態破壞，影響無法逆轉！請各位決策者尊重大自然生態！香港名物「中華白海豚」會否在香港消失，實在有賴各位高抬貴手！

TPB/R/S/I-CLK/13-3658

Objection to the Hong Kong Airport Third Runway Project

I, Wong Wai Lok *(name)*, object to the Hong Kong Airport 3rd Runway Project because of the following reasons *(please put a tick in the box(es) if suitable)*:

☐ 1. The Shenzhen-Hong Kong Airspace conflict is unsolved. The maximum numbers of flights of our airport will be greatly limited, i.e. the third runway will be wasted and can never achieve the efficiency as proposed.

☑ 2. The construction cost of 141.5 billion is far too expensive. We can make better use of the money, for example, more resources for education and public health.

☑ 3. The government and the Airport Authority ought to improve the airport management and make the best use of current two-runway systems first.

☐ 4. To protect Hong Kong's ocean and marine habitats, especially the Chinese White Dolphin living in the proposed construction area.

☐ 5. The Project brings severe noise and air pollution to the residents along the flight tracks.

Signature: Wong Wai

E-mail address / Contact number: [redacted]

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- 8 JUL 2015
Town Planning Board

3391

寄件者: [redacted]
寄件日期: 07日07月2015年星期二 17:22
收件者: tpbpd@pland.gov.hk
主旨: 反對S/I-CLK/13赤鱲角分區計劃大綱圖 反對機場第三條跑道規劃及工程

I strongly against the third runway for being implemented in the Airport and the on going construction.

One of the main reason is that lots of problems like air pollutions and noise pollution which immensely affecting the nature wild life and residents has yet having a full solution to this issue. Furthermore, there are none solid evidence in pointing out no affect will be made to the citizens and wild life.

And it seems like totally non efficient and non effective in building the 3rd runway instead of fully utilizing the existing the runways in dealing with those air crafts traffic issue. Moreover the 3rd runway only allows the flight for landing and the airzone problems is yet clarified among the china and hk government is totally unacceptable.

Therefore i strongly oppose for the construction for the 3rd runway of the HK airport.

寄件者: lewis fong[redacted]
寄件日期: 07日07月2015年星期二 22:58
收件者: tpbpd@pland.gov.hk
主旨: Opinions about S/I-CLK/13

Dear,

I am writing here to oppose the plan S/I-CLK/13.

It has been informed by the Executive Council several weeks ago that the plan S/I-CLK/13 is for the construction of a new runway (the 3rd runway) in the Hong Kong Chek Lap Kwok International Airport. The argument of the Council in support of such plan was that the Airport would become fully utilized and in face of increasing amount of air traffics in the future, there would be a need to build a new runway.

1. The claim of the Council is not justified as no detailed figures and numbers have been published to support it so far. Hong Kong people are generally not convinced about the need.
2. HKD 141.5bn is a huge sum of money that should not be spent without careful thoughts and planning.
3. No alternatives have been announced so far. It is doubtful that a 3rd runway is the only solution.
4. The reclamation will damage the habitat of sea lives, leading to the deaths of sea creatures. Such issue has not be addressed as well.

The Government should address points 1-4 first. At the moment, the plan S/I-CLK/13 is not convincing and should be dropped. Thank you.

Best regards,
Lewis Fong

寄件者: Takon Lau[redacted]
寄件日期: 08日07月2015年星期三 0:42
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場三跑 [計劃編號S/I-CLK/13]

本人堅決反對城規會就機場第三條跑道所修訂的計劃。

1． 已有機構研究指出，目前香港國際機場的航班升降效率問題並不出自跑道的數目，而是地勤人員調度失當，導致航班往往未能依時起飛或降落。本人因工作等關係，較常經赤鱲角離港，近年亦感到機場的營運狀況有惡化的趨勢。
2． 內地航班通常延誤最多，原因是內地的空域管制，和內地民航和軍航航道重疊等問題。多一條跑道，只會令空域重疊問題加劇。

因此，多建一條跑道完全不是對症下藥的做法。港府或許在第 2 項上面無能為力，但是完全有必要而且有責任改善第 1 點問題。

赤鱲角機場啟用初期也曾經遇到航班升降安排不當等問題，但往後數年有可觀的改進，更連續數年取得全球最佳機場的榮譽。可惜近年的經營倒退，冠軍之位早已雙手奉送他人，現在更倒行逆施，不檢討現行服務，還妄想擴建。

希望城規會中止興建三跑的計劃。

TO Lau

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 6:35
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖

本人反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，因為空域問題未解決， 更加不是香港單方面可以解決，需要澳門及深圳機場作配合。現時珠三角多個機場太近，樽頸並非的跑道，而是空域及航道。港深空域矛盾難解決，政府一直拒絕公開與三地空域協議 ，卻欺騙市民打算「邊興建商討」，非常不負責任 。

現時雙跑道容量其實未用盡，應先減少中國二三線城市航班， 及鼓勵航空公司使用載客量較大的飛機 ，珍惜跑道空間， 提升機場效率。

結論:無謂浪費金錢，立即擱置三跑。

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 16:11
收件者: tpbpd@pland.gov.hk
主旨: 建第三?????

建第三跑道反對書

致城規會:

本人反對興建第三跑道因為:-

- 空中航道未得中國，澳門答應讓香港優先使用。
- 第三跑祇能降落，那甚可能改善客量。
- 公眾諮詢欠缺，城規會不可能貿然作出決定。

鄧潔英

0690

TPB/R/S/I-CLK/13-3770

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150708-011601-44088

0862

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 08/07/2015 01:16:01

提出此宗申述的人士
Person Making This Representation: 先生 Mr. Wong Ngau Fu

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-CLK/13

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
赤鱲角分區計劃大綱核准圖編號 S/I-CLK/12 的修訂	反對 Oppose	1. 第三條跑道引申出的空域問題未解決前，城規會不可能決定填海範圍和相關土地用途。 2. 機管局未能證明「興建第三跑道」方案是解決機場擠迫的唯一最佳方案，而且填海工程仍未通過前濱和海床（填海）條例所需的批准，圖中的「填海土地」目前屬於虛無的概念，城規會無權就未能確定出現的土地進行「規劃」。 3. 涉及數百公頃的大規模發展計劃，一般必然通過廣泛和充分的公眾諮詢，才交城規會審議。今次機管局做得極差，沒有進行類似洪水橋或東北新界發展等項目的有層次諮詢，市民從來沒有機會有效參與，城規會收到的文件在這方面是不及格的，城規會不可能在這個情況下貿然作出決定。

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

867

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 23:27
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖

本人強烈反對興建機場第三條跑道，不同意按《前濱及海床條例》於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

第三跑工程沒有透明公開及獨立的全面公眾諮詢，現在當局按《前濱及海床條例》刊憲，當中已有「工程將會進行」的前設，從程序公義上來說無法令人接受。無論是填海工程對香港地理所構成的改變及其所需要的昂貴費用都是全港市民需付出的代價，絕不能夠未經公平公正公開的公眾諮詢就繼續通過計劃。

興建第三條跑道所涉及的空域問題現時仍未有確實的解決方案，而政府亦未能提供可以令人信服的資訊去證明空域問題不會影響第三跑工程的時間，財政等的預算。一個不能夠確認成果的計劃並不具有任何意義，興建高鐵計劃的超支及延誤對香港社會及市民的負面影響記憶猶新，絕不能夠如此魯莽去通過第三跑工程的計劃。

0819

寄件者: [redacted]
寄件日期: 20日05月2015年星期三 16:52
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道：反對政府偷步改劃赤鱲角大綱圖 及 反對於機場北面填海

本人反對興建機場第三條跑道，原因:

一、1415 億的跑道只能降落，荒唐!

二、據高鐵預算，政府開支有增無減，超支、延期無需負責任

三、趕走中華白海豚，起 100 個人造公園都比不上天然生態環境

140

寄件者: [redacted]
寄件日期: 20日05月2015年星期三 20:50
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道：反對政府偷步改劃赤鱲角大綱圖 及 反對於機場北面填海

I strongly oppose this plan, waste money, not necessary, destory envirnment.
Please stop betraying Hong Kong.

Dawn Lam

寄件者: [redacted]
寄件日期: 20日05月2015年星期三 20:33
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道：反對政府偷步改劃赤鱲角大綱圖 及 反對於機場北面填海

一千四百億可解決香港目前很多有關民生的燃燒之急，第三條跑道相對不必要、唔值。

146

寄件者: [redacted]
寄件日期: 28日05月2015年星期四 11:23
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道：反對政府偷步改劃赤鱲角大綱圖 及 反對於機場北面填海

本人反對興建機場第三條跑道，不同意於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

聖經說："神說：我們要照著我們的形像、按著我們的樣式造人，使他們管理海裡的魚、空中的鳥、地上的牲畜，和全地，並地上所爬的一切昆蟲。神就照著自己的形像造人，乃是照著他的形像造男造女。"人要保護自然，不可破壞。

破壞海洋生態， 摧毀中華白海豚生境
本來於填海一帶域生活及覓食，或需經過該的洋物 ，將永久損 失超過 650 公頃棲息地 棲息地 ，進一步危及中華白海豚 中華白海豚 的生存； 機管局提出七年後 建海岸公園乃「先破壞、後補償」，於事無補，因為海豚已因工程影響離開或死亡。

183

tpbpd

寄件者: [redacted]
寄件日期: 02日07月2015年星期四 12:31
收件者: tpbpd@pland.gov.hk
主旨: 反對機場興建第三條跑道

香港已有太多的大白象工程，像高鐵，西九，眼見不斷超資，完工日又一再推遲，過千億的投資何不擺放在民生事務上？
再者，政府當初推銷興建高鐵其中之一的理據是可以舒緩機場壓力，所以第三條跑道是否應該在高鐵通車後才作檢討研究，不應隨便浪費納稅人的金錢。

226

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150707-082929-32514

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 07/07/2015 08:29:29

提出此宗申述的人士
Person Making This Representation: 女士 Ms. Taco Han

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-CLK/13

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

有關事項 **Subject Matters**	性質 **Nature**	理由 **Reason**
S/I-CLK/13	反對 Oppose	waste money
The project S/I-CLK/13	反對 Oppose	dont agree to extend airport
S/I-CLK/13	反對 Oppose	better spend money on housing !!!!!!

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

Please do not waste money! We do not need to extend the airport!!!!!!

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150707-122723-38258

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 07/07/2015 12:27:23

提出此宗申述的人士
Person Making This Representation: 女士 Ms. LUI SUK LIN

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-CLK/13

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**
Tunnel 3 foof HK International airport	反對 Oppose	unreasonable too expansive,air restricted,unreasonable tax $180 user, non protect environment

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

寄件者: [redacted]
寄件日期: 07日07月2015年星期二 11:39
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道及在機場北面填海

城規會及地政總署：

本人絕對不贊成興建機場第三條跑道，原因如下：

(1) 破壞中華白海豚的生存環境
採砂會破壞海床環境、進而威脅中華白海豚及其他海洋生物的生存空間。

(2) 過千億的造價完全不合理
高鐵工程已持續超支延誤，一波未平一波又起，政府不可以再胡亂洗錢！
政府建議的融資計劃，其中包括向市民收取$180 機場建設費，全不合理。若將這千億用於其他非商業及民生項目，相信整體效益高於盲目投資三跑。

331

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 0:10
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖

本人反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

對周圍環境造成破壞、經濟效益低、太大資本投資名香港財政構成壓力、破壞海洋生態。

522

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 12:30
收件者: tpbpd@pland.gov.hk
主旨: 反對起三跑

浪費立稅人的錢，三跑不是比港人用，又要港人比錢，反對！深圳過來香港飛，為何他們深圳人不用付，我寧要你起公屋，居屋，甲屋，也不要三跑

從我的 iPhone 傳送

622

tpbpd

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 14:54
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖

本人反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

1415 億造價太昂貴, 再者 香港即將有高鐵， 高鐵可大大減輕航班負荷， 三跑已沒需要

0660

tpbpd

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 18:42
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不應按《前濱及海床條例》於機楊北面填海及不應修訂赤鱲角分區計劃大綱圖

本人反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

加劇噪音問題及空氣污染
飛機發出的噪音對航道沿途居民影響嚴重，滋擾日常生活多年來未見有效解決方法，興建第三條跑道將會加劇有關問題；航空業乃高污染行業，三跑興建後將大大增加臭氧及氮化物等空氣污染物濃度，整體市民健康受損。
與鄰近地區的環評報告比較時，明顯發現報告之間有矛盾，包括互相的數據不配合，包括在互相影響下，噪音肯定會超標。所以特要求重新計算噪音及空氣質素水平，並永久公開予公眾審閱。

謝謝，
Edmond Lau

0730

寄件者: 李好嗎[redacted]
寄件日期: 08日07月2015年星期三 19:38
收件者: tpbpd@pland.gov.hk
主旨: 反對第三條跑道規劃意見書

本人反對機場興建第三條跑道。因為興建三跑道耗資極鉅，卻取巧毋須經立會審批。無論在金錢、環境和社會，都要為之付出極大成本，卻未必能得到相應回報。

機場原來設計，根本沒有預期再建跑道，架床疊屋，再行填海重建，不過令整個機場和當地環境超出負荷。從行政、規劃上改善機場效率，遠遠勝於勞民傷財。

蕭雲龍　謹啟

0738

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 23:45
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機場北面填海及不同意修訂赤鱲角分區計劃大綱圖

該海域屬於本港中華白海豚 Sousa chinensis 的最重要生境。第三條跑道會徹底破壞海豚生存環境！

0832

TPB/R/S/I-CLK/13-3800

就草圖作出申述
Representation Relating to Draft Plan

0855

參考編號
Reference Number: 150707-202251-12109

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 07/07/2015 20:22:51

提出此宗申述的人士
Person Making This Representation: 小姐 Miss Ivy Hau

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-CLK/13

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
X	反對 Oppose	做價太貴
X	反對 Oppose	兩條跑道已足夠，而且只落不能升，不能接受

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

P55

TPB/R/S/I-CLK/13-3801

就草圖作出申述
Representation Relating to Draft Plan

0856

參考編號 **Reference Number:**	150707-203233-02635
提交限期 **Deadline for submission:**	08/07/2015
提交日期及時間 **Date and time of submission:**	07/07/2015 20:32:33
提出此宗申述的人士 **Person Making This Representation:**	小姐 Miss Rainbow Hau

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-CLK/13

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
反對起第三跑道X	反對 Oppose	太貴
X	反對 Oppose	不需要
X	反對 Oppose	隣近而太多机場

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

856

TPB/R/S/I-CLK/13-3803

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150707-211924-63267

0858

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 07/07/2015 21:19:24

提出此宗申述的人士
Person Making This Representation: 小姐 Miss Venus Lau

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-CLK/13

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**
興建機場第三條跑道	反對 Oppose	1415億工程費鉅大,不值得! 應先考慮物盡其用雙跑道容量,提升飛機載客量,減少中國線航班,三管齊下以達到改善現時國際機場目的.
為「三跑」而設的大嶼山填海工程	反對 Oppose	嚴重破壞海洋生態,尤其進一步危害中華白海豚的棲息地!所謂多年後的海岸公園計劃,無法補償我們失去的. 此為港人無法容忍,無法樂觀看待的事情.

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

858

TPB/R/S/I-CLK/13-3804

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150708-010610-30841

0861

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 08/07/2015 01:06:10

提出此宗申述的人士
Person Making This Representation: 女士 Ms. Goretti

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-CLK/13

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**
反對3跑，造價太貴，效益很少	反對 Oppose	反對3跑，造價太高，效益很少，破壞香港的自然生態

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

861

TPB/R/S/I-CLK/13-3805

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150708-134037-77593

0867

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 08/07/2015 13:40:37

提出此宗申述的人士
Person Making This Representation: 先生 Mr. Chau Ka Fai

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-CLK/13

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**
把香港國際機場北面的擬議填海區的一 塊 土地 劃為「其他指定用途」註明「機場」地帶	反對 Oppose	對附近海面生物及附近地區居民造成永久及不可補償的健康損失. 即使日後有補償措施亦不保證物種多樣性仍存在.
把擬議填海區東面和西面兩塊 土 地劃為「其他 指定用途」註明「機場服務設施用地」地帶	反對 Oppose	現有機場用地並未全面運用, 而且在航權未清晰而貿然改劃, 對整體機場發展並不有利.

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

867

TPB/R/S/I-CLK/13-3806

就草圖作出申述
Representation Relating to Draft Plan

0869

參考編號
Reference Number: 150708-185758-55317

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 08/07/2015 18:57:58

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

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-CLK/13

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
我反對將機場北面的填海區土地改劃為「機場」用途	反對 Oppose	機場三跑方案在財務預算、空域管理、環境保育等問題未解決的情況下，政府已急急推行方案。機管局更繞過立法會，自行集資，巧立名目向旅客收取「建設費」。 在缺乏監管的情況下，未來「建設費」根本可以隨時調升，而社會根本無法阻止。 就此，我反對機場興建三跑，反對將機場北面填海區土地改劃為「機場」用途。

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

869

tpbpd

寄件者: Chi-keung TANG [redacted]
寄件日期: 07日07月2015年星期二 13:36
收件者: tpbpd@pland.gov.hk
副本: Thomas Tang
主旨: 反對未傾妥空域問題而興建三跑

敬啓者，

本人反對未傾妥空域問題而急於興建第三條跑道。這是高鐵的翻版，在未傾妥一地兩檢問題而急於興建，浪費龐大人力物力來建一條廢鐵！ 前車可鑑！

小市民
Thomas

[redacted]

304

tpbpd

寄件者: [redacted]
寄件日期: 07日07月2015年星期二 10:54
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道：反對政府偷步改劃赤鱲角大綱圖 及 反對於機場北面填海

本人反對興建機場第三條跑道，不同意於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

跟高鐵項目爭資源。
必先落實空域使用權，否則，跟一地兩檢政策一樣不成事，未能實現答應港人的運輸效率。

336

tpbpd

寄件者: [redacted]
寄件日期: 07日07月2015年星期二 16:49
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道工程

第三跑所需要的空域問題，至今政府當局仍未可以提出具體文件及數據提出如何可以解決，沒有理由要贊成

寄件者: [redacted]
寄件日期: 07日07月2015年星期二 15:49
收件者: tpbpd@pland.gov.hk
主旨: 反對機場第三條跑道：

本人反對興建機場第三條跑道，不同意於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，從來反對理由只有一個,就是 1415 億造價太昂貴。
如收購中國上市機場 5 成 1 股權,如上海機場,白雲機場,廈門機場和首都機場。以現時各機場市值計都不需要 1415 億。何不收購他們再重新規劃航道以舒緩香港機場跑道擠塞問題? 咁貴買一條只能降落的第三條跑道有乜成本效益?

376

tpbpd

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 12:35
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖

本人反對興建機場第三條跑道，請先解決空域問題，勿拋錢落海，謝謝！

0624

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 15:48
收件者: tpbpd@pland.gov.hk
主旨: 反對有關三跑的規劃修訂

致: 城市規劃委員會

堅決反對香港政府興建第三條機場跑道,
請別漠視民意的反對聲音及
請正視興建沒用跑道為環境帶上的嚴重傷害。
請別再浪費納稅人的金錢。

香港市民 賴敏芝 上

tpbpd

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 16:00
收件者: tpbpd@pland.gov.hk
主旨: 有關第三條跑道的城市規劃修訂

發送： 城市規劃委員會
事宜： 赤鱲角分區計劃大綱草圖編號S/I-CLK/13
日期： 2015年7月8日

敬啟者:

本人強烈反對在第三條跑道引申出的空域問題未解決前，就決定興建第三條跑道. 這個要用上千億的基建, 不可能這樣草率便開始, 計劃更有心繞過立法會, 使工程不用受監督下進行, 完全不可接受.
還有引述自林超英先生的反對書:
『城規會作為負責任的法定機構，不能以「假設」為行事依歸，也不可接受低於過去水平的資料和論證，否則會建立極為惡劣的先例，動搖香港城市規劃的基石』, 希望城規會能堅守專業, 不要為政治服務, 大開方便之門.

LEE YIP FAI

0690

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 21:55
收件者: tpbpd@pland.gov.hk
主旨: 反對機三跑項目

致有關委員會，有腦之仕，

機三跑是無效益大白象項目，空牆未解決是無能用途，停止興建。
應在原雙跑道中庭建原 X 型大樓便可。
倫敦希斯魯機場五個大樓雙跑道都應付自如，香港也能。
再填海不如建設全新機場，香港南部沒有空牆，可廿四小時運作。

講完！

Leo Tung

[redacted]

0781

bpd

寄件者: [redacted]
寄件日期: 08日07月2015年星期三 23:08
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖

本人反對興建機場第三條跑道，不同意按《前濱及海床條例》於機楊北面填海及不同意修訂赤鱲角分區計劃大綱圖，理由如下：

空域問題未解決！正如高鐵的「一地兩檢」，都是一相情願，一旦得不到解決，整項工程就變成浪費！

三種融資計劃都是取巧，實際是要市民承擔工程開支，又繞過立法會、不受監察！

現有的兩條跑道和客運大樓未盡用，已有很多專家指出如果盡用現有設施，也指出二號客運大樓如何浪費、得物無所用，這些都令市民不能信任你們！！！

TPB/R/S/I-CLK/13-4019

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150617-091244-08666

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 17/06/2015 09:12:44

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

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-CLK/13

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
Item A	反對 Oppose	The third-runway project proposed by the government has not gone through enough public consultation; and there are many scientific, political concerns that will affect the efficiency of the third runway which have not been fully addressed by the government until this moment. There is no reason to support any land use change before the aforementioned doubts have been clarified by the officials.
Item B	反對 Oppose	There is no reason to support any land use change before the aforementioned doubts have been clarified by the officials.

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

196

TPB/R/S/I-CLK/13-4020

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 150704-161506-38446

提交限期
Deadline for submission: 08/07/2015

提交日期及時間
Date and time of submission: 04/07/2015 16:15:06

提出此宗申述的人士
Person Making This Representation: 先生 Mr. Fung Kam Lam

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-CLK/13

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
第A項	反對 Oppose	理由扼要如下 1.城規會在2014年9月5日第1066次會議閉門啟動是次修訂規劃圖的程序，直至現在仍未向公眾交代是次會議的9703號文件及決定過程。現時城規會要求公眾在缺乏完整相關資料的情況下作出申述，有違公平原則，是次修訂應予終止。 2.城市規劃委員會在去年第1066次會議處理有關赤鱲角分區計劃大綱圖的議程並同意尋求特首發還大綱圖作出修訂當日，機場第三跑道系統的環境影響評估報告仍未獲環境諮詢委員會支持。 詳述如下 城市規劃委員會轄下鄉郊及新市鎮規劃小組委員會於2015年4月17日舉行第531次會議討論「擬修訂《赤鱲角分區計劃大綱核准圖》S/I-CLK/12」。該議程的文件RNTPC Paper No. 5/15透露了城市規劃委員會早在2014年9月5日的第1066次會議上，已考慮了一份編號為9703的文件，當時城規

		會同意根據《城市規劃條例》，須請行政長官會同行政會議發還《赤鱲角分區計劃大綱核准圖》予城規會修改。原文（英文）如下： 2.2 On 5.9.2014, the Board considered TPB Paper No. 9703 and agreed that CE in C should be requested under s.12(1)(b)(ii) of the Ordinance to refer the Chek Lap Kok OZP to the Board for amendment. 上述9703號文件一直沒有上載至城規會網頁，現時可見有關第1066次會議的公開資料，包括議程、會議紀錄（英文）以至「決定摘要」均找不到相關資料或討論痕跡，顯然是項議程是在閉門中進行。公眾只能從會議紀錄中猜測是議程9或10討論有關事項。即使在2014年9月5日，公眾也完全不知悉原來城規會已在當日會議首肯啟動《赤鱲角分區計劃大綱圖》的修改。 由始至終，公眾無從知悉9703號文件及城規會1066次會議作出決定的過程。在資訊不完整情況下，城規會現時要求公眾作出申述是明顯不公平，因此，城市規劃委員會應終止是次修訂。 最後必須指出，環境諮詢委員會（環諮會）是在2014年9月15日的會議才討論並通過機管局的環評報告。因此，城規會在9月5日會議處理《赤鱲角分區計劃大綱圖》的修改時其實是在環諮會未有定奪時搶先作出，城規會是無視及不尊重其他法定組織的角色及作用。
第B項	反對 Oppose	同上

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

寄件者: Leung Hoi Cheung[redacted]
寄件日期: 08日07月2015年星期三 16:44
收件者: [redacted]pland.gov.hk
主旨: 香港國際機場第三跑道

您好，

就本港機場使用未達上限及未完全使用最高使用量，另新三跑空域未有清晰可用前題下，本人反對香港國際機場興建第三跑道。

謝謝
梁凱翔

寄件者: Kaiser Kwok [redacted]
寄件日期: 08日07月2015年星期三 21:26
收件者: tpbpd@pland.gov.hk
主旨: 就赤鱲角分區計劃(興建赤鱲角機場第三條跑道)作出評論

敬啟者：

三跑增添業界負擔，難以創造長遠就業，未有高瞻遠慮此外，三跑填海工程進行時，傾倒的沙泥嚴重破壞海洋生態，填海工程除了會掩沒了附近海洋生物的棲息地，還對海洋的能見度大幅下降。構成不同海洋生物及海鳥生態亟大威脅。根據「海豚三十」所提出:

當興建三跑時，填海工程將會大幅減少白海豚的棲息地，填海範圍和工程所造成的噪音將會干擾白海豚的活動，最終令白海豚的數量下跌以及生存受到威脅。另一方面，填海工程的建築廢料會大幅污染海洋，導致海洋生物生活受到威脅，嚴重影響食物鏈和海洋生態及海鳥生存。加上，必然的大量建築廢料會運輸往堆填區，不但加速堆填區飽和，過程中亦會造成大量空氣污染和惡臭，影響區內居民生活。然而，三跑只是顧及擴充旅遊和物流，面向中國，但香港對中國旅客承載力卻是有限的，目前各種香港人對中國旅客的不滿和衝突就正好引證此飽和狀態不遠矣。此類「面向中國消費旅遊」模式是不可再加以擴充，對未來經濟增長毫無建樹。此外航空貨運物流業的增長因內地機場的進步及貨源位於內地而持續放緩，未來可見香港機場轉口貿易市場定必被瓜分而下降
，興建三跑難以有利香港未來發展。

此政
城市規劃委員會

香港城市大學學生會幹事會外務幹事 郭嘉平

tpbpd

寄件者: Miffy Ng [redacted]
寄件日期: 08日07月2015年星期三 16:21
收件者: tpbpd
主旨: DHK comments on Chek Lap Kok Outline Zoning Plan No. S/I-CLK/13 (8 July 2015)
附件: 20150708 DHK OZP Chek Lap Kok S I-CLK 13.pdf

Dear Sirs,

Please see our comment on Chek Lap Kok Outline Zoning Plan No. S/I-CLK/13 attached.

Best Regards,
Miffy, Ng Chun Wing
Designing Hong Kong Limited
Tel: [redacted]
Fax: [redacted]
[redacted]
Website: [redacted]
Facebook Page: [redacted]

011

創建
DesigningHongKong
香港 .com

Hong Kong, 8 July 2015

Mr. Thomas Chow Tat Ming
Chairman of the Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Email: tpbpd@pland.gov.hk

Re: Draft Chek Lap Kok Outline Zoning Plan
No. S/I-CLK/13

Dear Chairman and Members,

Kindly consider our following concerns with **Item A and B** of the captioned draft plan:

The rezoning will violate long established planning principles

- The reclamation for the proposed development has not yet been approved as required under the Foreshore and Sea-bed (Reclamation) Ordinance (G.N. 3319). The Board should not consider the matter given the uncertainty over the reclamation.

- For **Item A**, it is proposed to have a long list of broadly defined airport facilities all under column one. The result would be that the Board and the Public lose their right of oversight over developments for the entire area, and the Airport Authority could amend plans and developments without informing the Board and public.

Demand and estimated efficiency of the proposed Three Runway System has yet to be justified

- The air traffic demand forecast is based on Master Plan 2030, which was published in 2007. The expected economic and local population growth are incorrect.

- The increase in demand will slow down in the near future. Customers and cargos from Mainland occupy a large portion of the existing and planned capacity. When ground traffic between Hong Kong and Mainland improve and airports in Mainland China are more mature, the demand would drop.

- Current Hong Kong International Airport was designed for 87million customers per year, but we have 60million passengers only. On the other hand, the maximum cargo design capacity was 9million tonnes, but we have now 4 million only. The two-runway system's (2RS) is not fully utilized. HKAA should increase the facilities to enhance the efficiency for aircrafts and customers, and address the serious shortage in manpower (around 2000 vacant jobs at the Airport) which is adversely affecting the efficiency and safety of the airport operations.

- The capacity of proposed development and large land area is overstated as air traffic is limited by the surrounding terrain and air space management.

- There is insufficient information on traffic impact assessment provided to the Town Planning Board paper. From the capacity of Airport Express to parking and road capacity, no information has been provided to confirm the sustainability of the proposed development. A detailed traffic assessment to estimate the

Unit 7, 5/F, Eastern Harbour Centre,28 Hoi Chak Street, Quarry Bay,
Tel: +852 3104 2765 Fax:+852 2187 2305

capacity of North Lantau, and Urmston Road between Chek Lap Kok and Tuen Mun should be provided and disclosed to the public.

Environmental impact has yet be assessed

- The proposed Three Runway System will bring tremendous irreversible environmental impact to the ecology, the air quality, noise and traffic, and impact surrounding residents and those affected by the flight path of aircraft. Some members of the public have filed Judicial Reviews of the decision to issue an Environmental Permit and leave was granted by the High Court. As the environmental impacts have yet to be assessed, the Board should hold off considering the proposals.

- The Chinese White Dolphin (CWD) is listed in the UN Biodiversity Treaty as a protected species and is classified in Appendix I of the Convention on the International Trade in Endangered Species of Flora and Fauna (CITES). The population of CWD has decreased drastically since the construction of HKZHMB started and with the increase of high-speed vessels travelling between Hong Kong and mainland. Simultaneously, government is planning several reclamation projects north of Lantau. The cumulative impacts of the various infrastructure projects in the Lantau area are having a devastating impact on dolphin numbers, and should be considered by the Board.

- CWD relies on sound to find prey and avoid predators to maintain family and pod structures, and to find mates, yet no noise impact assessment on underwater construction show how CWD will be impacted.

- It is recognized that 'excessive levels of noise often interfere with verbal communication, disturb concentration, disrupt sleep, contribute to stress or otherwise detract significantly from the quality of life' [1]. Airport Authority Hong Kong (HKAA) does not consider the records from the Hong Kong government monitoring stations. According to those records, aircraft noise exceeded 70dB during the night (between 2300 and 0700 during 2013 and 2014) is marked at different monitoring stations throughout Hong Kong. People living in Tung Chung, Ma Wan, Sam Tseng, Tsuen Wan and Tsing Yi often suffer from loud aircraft noise during the night. However, this information is surprisingly absent from the EIA prepared by the airport. HKAA would only offer indirect noise mitigation measures to several villages at North Lantau Island that are inevitably suffered while the affected area is enlarged due to the project.

- Air quality in Hong Kong get worsen in recent year. From 2010 to 2012, Nitrogen oxides level increase 6%. Tung Chung has suffered from air pollution severely; we believe that the proposed development would intensify the bad situation.

Here we submit our concerns for your consideration.

Designing Hong Kong Limited
July 2015

Unit 7, 5/F, Eastern Harbour Centre,28 Hoi Chak Street, Quarry Bay,
Tel: +852 3104 2765 Fax:+852 2187 2305

Annex II

寄件者: Collin H W Chan [redacted]
寄件日期: 08日09月2015年星期二 13:40
收件者: tpbpd@pland.gov.hk
副本: Collin H W Chan; Ernestina Y K Wong; Benny H C Fung
主旨: Comments on Representations Relating to the Draft Chek Lap Kok Outline Zoning Plan No. S/I-CLK/13
附件: Comments on TPB Representations ver 8 (20150908).pdf; Letter to TPB.PDF; TPO Form.pdf

To: The Secretary, Town Planning Board

Dear Sirs,

The Airport Authority Hong Kong ("AAHK") notes that in response to the draft Chek Lap Kok Outline Zoning Plan ("OZP") No. S/I-CLK/13 published in G.N.3268 on 8 May 2015, 12,200 representations have been made to the Town Planning Board ("TPB"). In accordance with Section 6A(1) of the Town Planning Ordinance (Cap. 131), AAHK is writing to provide comments in response to the representations TPB/R/S/I-CLK/13-1 to 12220.

Attached please find a copy of AAHK's formal letter enclosing comments on the representations as set out in the duly completed Form No. S6A, with an attached paper entitled "Comments on Representations Relating to the Draft Plan".

Should you require further information, please feel free to contact me at 2188 7351. Thank you for your attention.

Regards,

Collin Chan
Deputy General Manager, Engineering
Projects Department, Airport Authority Hong Kong
Tel: 21887351

Follow us at HKIA website | HKIA Blog | Three-Runway System website

The 2015/16 Skytrax World's Best Airport election is now accepting votes. Click HERE and vote for your favourite airport!
2015/16年度的Skytrax全球最佳機場選舉現正接受投票，請按此投選你最喜愛的機場!

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香港 | HONG KONG
國際機場 | INTERNATIONAL AIRPORT

8 September 2015

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

(BY HAND)

Dear Sir,

Comments on Representations Relating to the Draft Chek Lap Kok Outline Zoning Plan No. S/I-CLK/13

The Airport Authority Hong Kong ("AAHK") notes that in response to the draft Chek Lap Kok Outline Zoning Plan ("OZP") No. S/I-CLK/13 published in G.N.3268 on 8 May 2015, 12,200 representations have been made to the Town Planning Board ("TPB"). In accordance with Section 6A(1) of the Town Planning Ordinance (Cap. 131), AAHK is writing to provide comments in response to the representations TPB/R/S/I-CLK/13-1 to 12220.

Attached please find AAHK's comments on the representations as set out in the duly completed Form No. S6A, with an attached paper entitled "Comments on Representations Relating to the Draft Plan".

We understand that public hearings may be held by the TPB or a Representation Hearing Committee as appointed by the TPB, to hear representations made to the draft Plan and comments in respect of the representations. AAHK requests to be present at the future hearings, if any, to present its views on the needs for the Three Runway System and hence the changes necessary to the approved Chek Lap Kok OZP No. S/I-CLK/12 as well as to present our comments on the representations made.

AIRPORT AUTHORITY HONG KONG 香港機場管理局
HKIA TOWER, 1 SKY PLAZA ROAD, HONG KONG INTERNATIONAL AIRPORT, LANTAU, HONG KONG
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香港 HONG KONG
國際機場 INTERNATIONAL AIRPORT

Please feel free to contact Mr Tommy Leung, General Manager, Projects at [redacted] or [redacted] should you require further information. Thank you.

Yours faithfully,

(Wilson Fung)
Executive Director, Corporate Development
Airport Authority Hong Kong

Attachment:
1. Completed Form S6A
2. Comments on Representations Relating to the Draft Plan

AIRPORT AUTHORITY HONG KONG 香港機場管理局
HKIA TOWER, 1 SKY PLAZA ROAD, HONG KONG INTERNATIONAL AIRPORT, LANTAU, HONG KONG
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Form No. S6A
表格第S 6 A號

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

根據《城市規劃條例》（第131章）第6A(1)條對草圖的申述提出意見

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	
	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（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 comment may be treated as not having been made if the required information is not provided.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出意見的人士須以打印方式或以正楷填寫表格，填寫的資料宜中英文兼備。倘若未能提供所需資料，則委員會可把有關意見視爲不曾提出論。

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*)

Airport Authority Hong Kong

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*)

Not Applicable

3. Details of the Comment
意見詳情

Draft plan to which the comment relates 與意見相關的草圖	Draft Chek Lap Kok Outline Zoning Plan No. S/I-CLK/13
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-CLK/13-1 to 12220

* 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 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

Please see the attached Comment.

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 comment. 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.

請列明連同意見一併遞交的位置圖、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。

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.....

5. Signature 簽署

Signature 簽署 .....

Mr. Wilson Fung Wing-yip

Name in Block Letters 姓名（以正楷填寫）

"Commenter" /Authorized Agent*
「提意見人」/獲授權代理人*

Executive Director, Corporate Development

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 Airport Authority Hong Kong

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

Date 日期 8th September 2015

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this comment will be used by the Secretary of the Board and Government departments for the following purposes:
   (a) the processing of this comment which includes making available the name of the "commenter" for public inspection when making available this comment for public inspection; and
   (b) facilitating communication between the "commenter" 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.

   委員會就這份意見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) 處理這份意見，包括公布這份意見供公眾查閱，同時公布「提意見人」的姓名供公眾查閱；以及
   (b) 方便「提意見人」與委員會秘書及政府部門之間進行聯絡。

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

   「提意見人」就這份意見提供的個人資料，或亦會向其他人士披露，以作上述第1段提及的用途。

3. A "commenter" 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，「提意見人」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

Town Planning Ordinance (Chapter 131)

Amendments to the Approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12

Comments on Representations Relating to the Draft Plan

This paper sets out Airport Authority Hong Kong's ("AAHK's") comments on representations (Representation Numbers from TPB/R/S/I-CLK/13-1 to 12220) relating to the draft Chek Lap Kok Outline Zoning Plan ("OZP") No. S/I-CLK/13 published in G.N. 3268 on 8 May 2015 that are relevant to AAHK. The comments below are categorized largely according to the broad nature of the representations received by the Town Planning Board which were made available for public inspections.

I. Planning of Expansion of the Hong Kong International Airport ("HKIA")

(A) The Planning Process for the Development of the Three-Runway System Option

2. A number of representations expressed concerns about the planning process for the expansion of the HKIA into a Three-Runway System ("3RS"). Specifically, some alleged that there was a lack of feasibility studies to support the need for the 3RS. Some comments said that the airport expansion plan is restricted to the two options of either maintaining the existing two-runway system ("2RS") or expanding into the 3RS and questioned whether the 3RS is the most suitable option.

3. AAHK does not agree to the comments expressed in the representations. Since the commissioning of HKIA in 1998, AAHK has adopted a forward looking approach in addressing the airport's long term needs. AAHK sets out the strategic direction of the future development of the airport through the preparation of a 20-year Master Plan, which has been reviewed and updated once every five years. The preparation of the Master Plan 2030 ("MP2030") began in 2008. To ensure a transparent, professional and unbiased planning process, AAHK commissioned nine independent consultants to research into different strategic aspects of airport development such as air traffic forecasts, economic impact, preliminary engineering feasibility and environmental assessment to cover broadly all the key areas required for making an informed recommendation on HKIA's future development strategy.

4. While MP2030 sets out two development options for HKIA, i.e. maintaining the existing 2RS but expanding terminal and apron facilities and expanding into a 3RS, each of them has been examined in great detail. Specifically for the 3RS option, 15 runway alignment options were generated, two of which were located away from Chek Lap Kok (namely south of Lantau Island and west of Lung Kwu Tan), for comparative evaluation broadly in terms of operational safety and effectiveness. Consideration of these two options was tantamount to considering developing a second airport. They were eventually discarded due to the very inconvenient and time-consuming landside flight connections between the two airports, heavy infrastructural cost, operational inefficiency for airlines as it requires their split operation, etc. All these would completely negate HKIA's long standing competitive edge as an efficient aviation hub. After careful evaluation against a broad spectrum of criteria, three runway options were shortlisted and further developed into a total of 18 airport layout options, covering all possible permutations of apron, passenger terminal and concourse expansion and locations. These 18 options were then evaluated against a number of operational and functional criteria, which resulted in a final shortlist of four airport layout options that were subsequently taken forward for preliminary engineering feasibility and environmental assessment. Based on the comparative performance evaluation in terms of airfield efficiency, passenger convenience, surface access, cargo operations efficiency and degree of environmental impact, the preferred airport layout option for the 3RS was finally recommended in the MP2030.

5. In the course of evaluating further this preferred option, additional environmental enhancements were identified and subsequently taken forward. These included a substantial reduction of the land formation area (from approximately 827 hectares to approximately 650 hectares). Other major components of the airport, including Terminal 2 ("T2") expansion and the new third runway concourse ("TRC") layout, were also evaluated against various criteria to determine the best-performing option. As a result of these evaluation, the ultimate airport layout has been selected and subsequently adopted in the 3RS Environmental Impact Assessment ("EIA") Study.

6. In the light of the above, it is clear that sufficient studies have been conducted to support the expansion of the HKIA into the 3RS. The need and urgency of the 3RS were explained in TPB Paper No. 9877 which, in short, are for maintaining Hong Kong's competitiveness as a global and regional aviation hub and for catering our long-term economic and development needs. Alternatives to meet the projected air traffic demand, apart from expanding HKIA into a 3RS, have in fact been considered during the MP2030 Study but these alternatives were neither pursued nor found to be feasible. Details are elaborated in the ensuing paragraphs.

(B) Maintaining the Existing Two-Runway ("2RS") System and Maximizing its Capacity

7. The MP2030 sets out two development options for HKIA. Apart from expanding HKIA into a 3RS, the other option is to maintain the existing 2RS but expand terminal and apron facilities. This option, however, would only enable HKIA to meet the estimated demand for air traffic up to sometime between 2019 and 2022.

8. The capacity of the 2RS has been considered and reviewed thoroughly in the MP2030. Indeed, runway capacity of an airport is affected by a whole host of factors, including the terrain, the separation standards between aircraft, the surrounding airspace, the aircraft mix at HKIA and the airport's infrastructure. Various studies in the past, including the 1992 New Airport Master Plan ("NAMP"), the consultancy study commissioned by the Civil Aviation Department ("CAD") in 1994 and the study conducted by National Air Traffic Services ("NATS") in 2008, have been conducted to assess the capacity of the 2RS at HKIA.

9. In response to the references made by some of the representations to the 1992 NAMP, it should be noted that 1992 NAMP is a master plan (not an airspace and runway study) which pointed out very broadly that HKIA's capacity could **in theory** reach between 52 and 86 movements per hour, subject to runway operation mode to be adopted ("independent mixed mode" is the pre-requisite to achieving 86 movements per hour). However, the NAMP report also made clear that due to the terrain of Lantau Island, HKIA cannot operate under the "independent mixed mode" since such mode of operation could not fully comply with relevant International Civil Aviation Organization ("ICAO") standards on flight procedure, hence independent mixed mode was neither safe nor practicable. The consultant commissioned by the CAD in 1994 also pointed out that, due to the constraints from surrounding terrain, the maximum capacity of the 2RS could only be about 63 movements per hour.

10. In 2008, AAHK commissioned the NATS to conduct the "Airspace and Runway Capacity Study" for HKIA. NATS had carefully analyzed factors including the surrounding terrain, the infrastructure and the airspace of the HKIA, and confirmed that after implementing some 40 improvement recommendations, in full compliance with ICAO safety standards/ requirements, the practical maximum capacity of the two runways of the HKIA could be increased to 68 movements per hour.

11. Some comments suggested that if the peaks of Tai Yam Teng (610 feet) and Fa Peng Teng (810 feet), which are located at the North East of Lantau, were removed, the runway capacity of 2RS at HKIA could be further increased. It should be noted that such a recommendation was made in the NAMP report in connection with possible options to enhance the climb gradient of contingency departure procedures for departures on "one engine out" during initial climb (i.e. to reduce restriction on the aircraft engine out climb performance). The NAMP report has never suggested that the levelling of the two hills would enable "independent mixed mode" operation to increase runway capacity.

12. Indeed, if the theoretical maximum runway capacity outlined in the NAMP report, i.e. 86 movements per hour were to be achieved, while conforming to the safety standards/requirements of the ICAO, most of the high mountains on Lantau Island, including Lantau Peak, Sunset Peak and other high mountains on Lantau Island would have to be levelled. Major infrastructure and landmarks such as the Ngong Ping Cable Car, Big Buddha and Po Lin Monastery, would be affected, not to mention that most of these areas fall within the boundaries of the Lantau Country Parks. The proposed removal of high peaks is therefore neither practical nor feasible.

13. As regards suggestions of implementing Time-Based Separation ("TBS"), it should be noted that TBS is a strategic air traffic control measure that was recently introduced at Heathrow Airport with a view to reducing the impacts of flight delays or cancellations caused by strong headwinds. However, this measure is not intended to be used for increasing runway capacity nor conducting seasonal capacity planning. Both NATS and EUROCONTROL have indicated that the use of TBS will not increase the capacity of the runways.

(C) Other Suggestions on Ways to Overcome Capacity Constraints at HKIA

(i) <u>Cooperation with Neighbouring Airports</u>

14. There have been comments suggesting that the capacity constraint at HKIA could be relieved/resolved through means such as cooperation with neighbouring airports. However, such cooperation/collaboration cannot solve the capacity crunch problem of HKIA. Around the globe, demand for aviation services is outstripping supply, and the situation is particularly serious in the Mainland. According to IATA Consulting, the combined supply of the five Pearl River Delta ("PRD") airports in 2030 will fall short of forecast demand by 82 million passenger trips – even after factoring in all the anticipated increases in the handling capacity of their airport expansion plans. In addition, the

passenger profiles of HKIA and Mainland airports are different. Also, air services are regulated by individual jurisdiction and governed internationally through a network of bilateral air service agreements. HKAA simply does not have the authority to divert flights to other airports.

(ii) Reduction of non-major destinations in Mainland to increase airport's operation efficiency

15. The "non-major destinations" in the Mainland only account for less than 2% of the total flight movements at HKIA. The decision to operate routes is driven by the market, not airport operators. Airlines operate flights to destinations with business potential and based on market demand. Having an extensive flight network is one of the core elements in maintaining HKIA's connectivity and arbitrarily curtailing Hong Kong's aviation network would seriously undermine Hong Kong's status as an international aviation hub; and ultimately Hong Kong's competitiveness as a world city. Most fundamentally, cancelling these destinations would not help reduce the traffic demand significantly.

(iii) Airlines to use more wide-bodied aircraft to increase the airport's efficiency

16. HKIA is currently one of the world's most efficient airports. Among the world's top 100 airports, HKIA has the second-highest proportion of wide-bodied aircraft (at 63.3%). The aircraft mix (wide-bodied and narrow-bodied) at the airport is driven by market demand and determined by airlines. Airlines may deploy whichever aircraft they deem appropriate based on the market situation, and airport operators have no authority to dictate their decision. In fact, the aircraft mix at major aviation hubs around the world reflects the market situation of individual airports, and it also depends on airlines' business decisions. Taking London Heathrow Airport as an example, the airport's capacity has been saturated for many years, but the majority of flights remain narrow-bodied aircraft (62.4%) due to market need. Even if AAHK were able to encourage airlines to use more wide-bodied aircraft, we would still face the capacity constraints of 2RS and fail to cope with the traffic demand at HKIA in the long run.

(iv) Building a Second Airport

17. There were suggestions to build a second airport altogether. It would, however, be irresponsible and imprudent of AAHK to recommend the building of a second airport in Hong Kong before the development potential of the existing airport at Chek Lap Kok has been exhausted. This refers both to

the airport infrastructure as well as all other transport and support infrastructure provided by the government. It should be noted that during the initial planning of HKIA, it was concluded that Chek Lap Kok was the preferred airport site. Even if there were other suitable sites within Hong Kong, it would similarly require substantial land reclamation and investment in the necessary support transport infrastructure. One of the critical success factors of HKIA is passenger convenience which is made possible by the excellent connectivity to most parts of Hong Kong via the Airport Express Line ("AEL") and major trunk roads. Similar transport infrastructure would probably have to be provided to make the second airport viable. The capital investment in the associated infrastructure would far exceed that required for expanding HKIA into the 3RS.

18. Cost aside, research has indicated that inter-airport connection is inconvenient to travelers. According to a research conducted by an independent consultant in 2011, among the 12 cities studied which are served by two or more airports, there seemed to be insufficient collaboration between the airports, notwithstanding that most of these airport pairs are within the same jurisdiction. Synergies were not apparent amongst airports, with each airport basically operating independently and/or in competition. In cities such as Tokyo, Washington, Seoul, Osaka and Taipei, authorities restricted one airport to serve domestic destinations only, but this appeared to be the limit of synergistic development. Twin airport operation very often leads to backtracking, resulting in passenger complaint. Even if problems related to coordination and connection amongst different airports could be overcome, twin airport operation would be highly costly and operation-wise inefficient for airlines as they would have to make substantial investment in split operation.

19. In short, whether and how feasible to have a second airport to serve the future growth in demand exceeding the ultimate capacity of the 3RS will probably require detailed assessment and studies in a separate context.

(D) Medium Term Facilities Upgrading and Enhancement to Cope with the air traffic growth under the 2RS

20. Despite the capacity constraint of the 2RS, AAHK has undertaken various facilities upgrading and expansion plans at HKIA to meet medium-term air traffic growth under 2RS. The West Apron Expansion Project, recently completed in February 2015, involves the construction of 28 additional aircraft parking stands on the West Apron. The Midfield Development Project, targeted for completion in 2015, involves a passenger concourse to provide 20 additional parking stands and cater for an additional 10 million passengers each year. Upon completion of these expansion projects, the number of aircraft parking stands at HKIA will increase to around 180.

21. It is important to note that upon completion of the above enhancement facilities, there is in practice limited room for any further expansion at HKIA under 2RS. Indeed, the bottleneck of airport capacity lies in the flight movements on the runways, not ground facilities such as passenger terminals. Currently, HKIA handles around 1,100 daily flight movements, which is very close to the 2RS' maximum runway capacity of 1,200. Expanding the apron passenger terminal facilities cannot ease the airport's long-term capacity constraints; and hence the need for the third runway.

II. The 3RS Design Capacity and Expansion of Terminal 2

22. In connection with the 3RS, a number of concerns were expressed in the representations, including whether the design capacity of the 3RS could be achieved. In particular, some representations considered that before the "Air Wall" and airspace issues are resolved, the 3RS should not be pursued. Furthermore, as T2 will have to be modified and expanded as part of the 3RS project, doubts on the planning for T2 have been raised. There are also concerns about the potential competition between the expanded HKIA and the operation of the High Speed Rail. AAHK also notes that some representations touched on the use of different aviation measurement standards in Hong Kong and the Mainland.

(A) "Air Wall" Constraint

23. There are concerns about the constraints imposed by the so-called "air wall" in achieving the design capacity of the 3RS. In fact, this is not an appropriate term as in reality there is no "wall"-type segregation between different airspace. To ensure that aircraft in adjacent airspace can operate concurrently in a safe and efficient manner, every aircraft must reach a certain altitude and geographic location before an air traffic control ("ATC") unit may hand over control of that aircraft to another ATC unit. This air traffic management arrangement of "transfer of control point" aims to safeguard flight safety, and is commonly applied at busy airports all over the world, including those in London and New York.

24. In short, the requirement for transfer of control point is not relevant to runway capacity. The constraints of runway capacity are determined by the time interval and space separation between successive runway movements.

(B) Pearl River Delta Airspace

25. Airspace planning and air traffic control arrangements are formulated by the CAD. We understand from the Government that in view of the phenomenal growth in the volume of air traffic serving the five airports in the PRD region (namely, Guangzhou Baiyun Airport, HKIA, Macau International Airport, Shenzhen Bao'an Airport and Zhuhai Airport), the Civil Aviation Administration of China ("CAAC"), the CAD of Hong Kong and the Civil Aviation Authority of Macao ("CAAM") have set up a Tripartite Working Group ("TWG") since 2004 to formulate measures to improve the airspace structure and air traffic control arrangements in the PRD region to optimize the use of airspace and enhance safety. In 2007, the TWG drew up and agreed to the "PRD Region Air Traffic Management Planning and Implementation Plan (Version 2.0)" ("the PRD Airspace Plan"), which clearly stipulated the short, medium and long term optimization targets and measures to be achieved and implemented before 2020.

26. The principle of the PRD Airspace Plan is to adopt joint airspace planning, use of common standards and harmonized flight procedure design for air traffic in the region, thereby ensuring safe and efficient use of the airspace in the PRD region. We understand from the government that the Plan has fully taken into account the operational needs of HKIA's 3RS, as well as the planned development of other airports within in the PRD. Enhancement measures in the Plan including new peripheral air routes in the PRD area, additional handover points between ATC units and adjusted Zhuhai Terminal Airspace have been successfully implemented. The implementation of the Plan, which was agreed by the three civil aviation authorities concerned, is the basis for achieving the target maximum capacity of 102 Air Traffic Movements ("ATMs") per hour under the 3RS operation at HKIA.

(C) Planning and Expansion of Terminal 2

27. As part of the 3RS project, the existing T2 building will be modified and expanded to provide arrivals, departures and full-fledged passenger services to further support the imminent need of the airport expansion.

28. The development of T2, which was opened in 2007, has gone through careful study in each and every of the airport master plans to arrive at its current layout. According to the MP2020 and MP2025 published in 2001 and 2006 respectively, expansion of Terminal 1 ("T1") was considered to be sufficient to meet the ultimate 2RS capacity. In 2003, AAHK decided to develop T2 into a "Sky Plaza" – a commercial development to strengthen

HKIA's positioning as a regional aviation hub with quality facilities for passengers and the airport community, and to increase non-aeronautical revenues. The decision was taken before the commencement of the MP2030 study and long before the need for 3RS was firmly established.

29. During the 3RS Scheme Design, a total of 8 different approaches to modify/expand T2 have been reviewed. Taking into account the need to handle an additional 30 million passengers per annum ("mppa"), the modified/expanded T2, together with the existing 70mppa design capacity of T1, would be able to meet demand up to 2030.

30. It is estimated that the existing construction floor area of about 180,000m^2 at T2 will be expanded to about 300,000m^2 to handle the additional 30mppa. Careful consideration has been given to retaining the existing structures and facilities. According to the latest design, the entire T2 foundation, substructures, and coach hall at Level 3, together with most of the building services facilities and airport system works, such as generators and transformers, chillers, lifts etc, could be retained. Other floor levels will also be retained as far as possible but with modifications necessary to suit the expanded T2 layout. In this connection, the materials demolished from the T2 would be reused or recycled in the 3RS project.

(D) Competition between the expanded HKIA and the High Speed Rail

31. With regard to concerns about the 3RS competing with the Guangzhou-Shenzhen-Hong Kong Express Rail Link ("XRL"), while it is estimated that XRL would have some impact on short haul Mainland destinations, it should be noted that overall, the XRL and the 3RS are in fact complementary and will create synergy between the cross-boundary railway services and the aviation industry. The high-speed rail would cut current rail travel time by nearly two thirds and is therefore generally expected to compete with air services on short-haul and overlapping markets. With the development of the XRL connecting Hong Kong to the Mainland's high-speed train network, and further expansion of the high-speed rail network within the Mainland, the high-speed rail could potentially affect the competitiveness of air travel between Hong Kong and short-haul Mainland destinations like Shantou, Changsha, Nanning, Xiamen, Wuhan, Nanjing, Nanchang and Fuzhou. However, all these regional Mainland routes combined contributed only about 4% of HKIA's passenger throughput in 2014. Therefore, any negative impact from XRL on HKIA would unlikely be significant. On the other hand, trains provide convenient and frequent link-up to second-tier and third-tier locations outside major cities, thus potentially enlarging the catchment area for HKIA. Experiences in Europe and Japan indicate that the introduction of high-speed

rail may increase people's willingness to travel and, in the medium to long term, increase the overall market size for both rail and air transportation, thereby compensating (or, as in most cases, over-compensating) for the potential air traffic loss on individual short-haul routes.

(E) Aviation Safety and Coordination with Mainland Counterparts on Aviation Measurement Standards

32. Some comments said that the Air Traffic Impact Assessment and relevant assessments as required by the ICAO were not provided. There were also doubts as to whether management of the anticipated traffic and operational safety can be verified through the studying from "fast-time simulation". In fact, fast-time simulation is an evaluation tool widely used in the aviation industry internationally. Fast-time simulation was adopted during the planning stage of the three-runway operation to verify such operation would be safe and viable. Detailed design and safety assessment would be conducted in accordance with ICAO requirements prior to the implementation of all required changes to ensure operational safety.

33. In the PRD Airspace Plan, the three sides had agreed to optimize the use of airspace resources in PRD region through the adoption of common units of measurement in a mutually beneficial manner. The agreement should help alleviate concerns about aviation measurement standards.

III. Economic Benefits and Financial Arrangements for 3RS

34. Concerns have been expressed regarding the high construction cost and doubts have been cast on the economic return of the 3RS. Specifically, in respect of the financial arrangement proposals, there were concerns about the high level of airport construction fee ("ACF") and the perception that by withholding dividends, the proposed financial arrangements are indeed circumventing the scrutiny of the Legislative Council ("LegCo").

(A) Estimated Project Cost

35. Having reviewed critically the scope of the 3RS project and on completion of the scheme design, AAHK estimated that the capital cost of the 3RS is about $141.5 billion in money-of-the day prices. The 3RS is more than building an additional runway. The project includes seven core components:

(a) formation of approximately 650 hectares of land north of the existing airport island by reclamation partly on top of disused contaminated mud pits using non-dredged methods including deep

cement mixing ("DCM") technique for ground improvement. A huge quantity of marine sand, of some 100 million cubic metres, is expected to be required for the reclamation works;

(b) construction of the Third Runway, taxiways and apron;

(c) construction of the TRC with 57 parking positions upon 3RS commissioning;

(d) modification/expansion of the existing T2 and construction of associated road network;

(e) provision of a new Automated People Mover ("APM") System and an integrated maintenance depot;

(f) provision of a new high-speed Baggage Handling System serving TRC and T2; and

(g) construction of airport support infrastructure, utilities and facilities.

36. Apart from the scale of the project, factors contributing to the estimated cost include:

(a) about HK$22 billion out of the estimated capital cost of $141.5 billion will be used to employ the various environmentally friendly construction methods (e.g. DCM and horizontal directional drilling ("HDD")) and to implement green features in the design of the 3RS;

(b) complexity of construction taking place with the airport in operation; and

(c) high local construction cost.

37. The Government has engaged two independent Monitoring and Verification consultants to assist in vetting the design details and the associated project cost estimate prepared by an independent quantity surveying consultant commissioned by AAHK, and they generally found that the AAHK's recommendations are reasonable and in order.

38. AAHK has made reference to airport expansion projects undertaken or being planned for in different countries or regions. Based on publicly available information, it is noted that the construction cost of the 3RS project is comparable to those projects of similar scale and complexity in other regions. For example, the proposed 3RS for Heathrow Airport in UK, which would include the construction of a new runway and a new passenger terminal, is estimated to be about GBP 17.6 billion (or HK$214 billion).

(B) Economic Benefits To Be Brought About by the 3RS

39. There were concerns about the economic return of the 3RS vis-à-vis its high construction cost, as well as the fact that its economic contribution is limited to certain industries only; such as tourism and logistics, etc. In this regard, it should be noted that HKIA generates enormous economic value for Hong Kong. In 2012, the airport's direct, indirect and induced contributions to the local economy amounted to HK$94 billion, representing 4.6% of Hong Kong's gross domestic product ("GDP"). The airport also supports Hong Kong's four economic pillars – financial services; trading and logistics; tourism; and producer and professional services – which together accounted for around 58% of the GDP in 2013 and all of them indeed rely heavily on air travels to support their continuous growth and development.

40. AAHK has commissioned a consultancy study on the economic impact of the 3RS as part of the Master Plan 2030. An updated study has been conducted in 2014/15 and the final report will be uploaded on AAHK's website for public reference.

41. Based on the passenger/cargo throughput that can be handled under 3RS, our study concluded that the overall economic benefits of 3RS would be around $1,046 billion[1] (2012 dollars) over the 50-year period from 2012 to 2061, while that of 2RS would be around $591 billion (2012 dollars). Compared with 2RS, the 3RS will bring additional economic benefits of $455 billion (2012 dollars) over the 50-year period, which would represent substantial economic contribution to Hong Kong in the long term.

42. There are also comments about the 3RS completion time frame being out of pace with the rapid economic growth in the PRD as well as the various infrastructural development in the region. In this regard, it is worthy to note that airport development and expansion entails significant investment and should be planned in a prudent manner. The decision of expanding HKIA into the 3RS was thoroughly considered, supported by a whole range of detailed studies and assessments and public consultations. Projections show that HKIA's annual traffic demand is reaching its capacity. It is therefore important for the 3RS to commence as soon as possible for Hong Kong to reap the economic benefits to be brought about by an expanded airport, amidst the various infrastructural developments in the vicinity and also economic development in the PRD.

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[1] The overall economic benefits of 3RS would be the Economic Net Present Value ("ENPV") projected between 2012 and 2061.

(C) Financial Arrangements

43. In considering the financial arrangements, AAHK has adopted the "joint contribution" principle, i.e. users of HKIA, including passengers, airlines and operators at HKIA should contribute to the project cost. With the advice of its financial consultant, AAHK has proposed to fund the 3RS through the following three sources:

(a) optimizing revenue and retaining distributable profits;
(b) introducing a new Airport Construction Fee ("ACF"); and
(c) raising funds from the market to fully bridge the remaining funding gap and the associated debt services charges on its own.

44. It should be noted that since HKIA's opening, AAHK has been financing its facilities expansion projects through making use of internal sources of funds; external sources of funds; and charging airport users. Since the opening of the HKIA, AAHK has invested about $28 billion in its facilities expansion. A further $16 billion will be invested in the coming two years. This is more equitable than by requesting tax payers at large to pay for the construction costs through direct Government funding out of the general revenue.

45. The 3RS project involves substantial capital investment. AAHK has commissioned an independent financial advisor to draw up the above financial proposals. The Government has also appointed its own financial advisor to vet and validate independently the financial analysis and financial arrangement proposal by AAHK's financial advisor. Given AAHK's robust revenue performance in the past and the continued growth in revenue projected for the future years in the light of steadily rising air traffic demand at HKIA, the Government is satisfied that AAHK's financial proposal is overall reasonable and practicable.

46. AAHK is currently refining the proposed level of the ACF in the light of concerns from the Government and the industry. AAHK is also considering different means to maximize borrowings from the market such as bank loans and bonds.

47. In response to criticism that the proposed financial arrangement is an attempt to circumvent the scrutiny of LegCo, AAHK wishes to clarify that it has always kept the LegCo and members of the public abreast of its development plans. In May 2015, LegCo resolved to set up a subcommittee to discuss 3RS related issues. AAHK welcomes the decision and will cooperate fully with the subcommittee as well as the Aviation Development and

Three-Runway System Advisory Committee set up by the Government in August 2015. It will also continue with its public communication and engagement activities to address public concerns. Under the Airport Authority Ordinance, AAHK is required to conduct its business according to prudent commercial principles. It has the statutory power to implement its financial arrangement proposal, including power to retain all profits earned without declaring dividends, to raise funds from the market and to introduce charges for airport users.

IV. Environmental Impacts of the 3RS

48. EIA is a key component in the development of the 3RS project. Understandably, there are a number of concerns about different aspects of environmental impacts and the associated mitigation measures, ranging from those on marine ecology, the Chinese White Dolphins ("CWDs") and fisheries; Sha Chau Egretry; to those on noise and air qualities.

(A) Comprehensiveness of the EIA and the Proposed Mitigation Measures

49. Some of the representations commented that the EIA of the 3RS project is incomprehensive and lacks sustainable mitigation measures. AAHK cannot agree to this allegation. The EIA is a major part of the 3RS project. It includes a series of studies assessing the potential environmental impact of the project across 12 key aspects. The studies were undertaken by a strong EIA Study Team, comprising an experienced EIA lead consultant, a review consultant and a number of reputable experts, both local and overseas. Through the statutory EIA process, AAHK has strictly followed the requirements in the Study Brief set out by the Environmental Protection Department ("EPD") and ensured that all potential environmental impacts are properly avoided, minimized or compensated. With the extensive mitigation measures, the EIA Report concluded that all potential impacts could be mitigated to an acceptable level. AAHK is committed to mitigating the environmental impacts identified from the 3RS project through the implementation of more than 250 measures.

50. Following the granting of the Environmental Permit ("EP") to AAHK by the Director of Environmental Protection ("DEP") on 7 November 2014, AAHK has been proactively taking forward its plan to fulfill the commitments made in the EIA Report and to comply with the respective requirements stipulated in the EP granted under the EIA Ordinance. Details of the mitigation measures proposed in respect of the different aspects of environmental impacts are set out in the paragraphs below.

(B) Conservation of Marine Ecology and CWDs

51. A number of the representations expressed concerns about possible adverse impacts on the marine ecology as well as the loss of habitat for the CWDs and the impacts on them. These concerns and the mitigation measures proposed are addressed in detail below.

(i) Issues Identified and Studied in the EIA

52. In the course of conducting the EIA, thorough assessments were conducted on the potential impacts of the proposed development on the marine ecology, including the CWDs. During the CWD impact assessment, a very thorough literature review had been conducted which was supplemented with a 12 - 14 month CWD field survey, utilizing three types of survey method. A robust and up-to-date data set was therefore used as the basis for the EIA assessments.

53. Assessments of the existing marine traffic pattern and volumes, and projections of future marine traffic in North Lantau and further afield were conducted to facilitate the assessment of impacts on CWDs due to marine traffic and from changes in marine traffic, in compliance with the EIA Study Brief.

54. The swimming speeds, reorientation rates and linear movement of CWDs in the presence of high-speed ferries ("HSFs") were assessed in the EIA Report. Acoustic disturbance and risk of CWD injury/mortality from vessel movements including HSFs were also assessed.

55. The EIA Report identified that different factors may have different degree of impacts on the CWDs, with vessel speed and vessel noise being the key factors affecting CWDs. The amount of traffic volume is also important but the EIA findings considered such impact to be less significant. These findings have been taken fully into account in the formulation of a wide range of mitigation measures aimed at mitigating the identified impact to acceptable levels.

56. Cumulative impacts on CWDs of both the 3RS project and other concurrent projects[2] have also been assessed in the EIA Report and appropriate

[2] The "concurrent projects" that have been considered in the EIA include : Container Terminal 10 Development at Southwest Tsing Yi, Hong Kong Boundary Crossing Facilities ("HKBCF"), Hong Kong Link Road ("HKLR") and Tuen Mun-Chek Lap Kok Link ("TM-CLKL"), Lantau Logistics Park, Leisure and Entertainment Node at Sunny Bay, New Contaminated Mud Disposal Facility at HKIA East/East Sha Chau, Kwai Tsing Container Basin Dredging and Tung Chung New Town

mitigation measures have been developed to mitigate residual cumulative impacts on CWDs to an acceptable level.

(ii) Proposed Mitigation and Enhancement Measures

57 The approved EIA Report has proposed a multi-pronged approach of mitigation measures to ensure that the identified impacts on the CWDs expected from the 3RS project are minimized and mitigated to an acceptable level, during both the construction and operations phases.

58. One of the most significant mitigation measures is a proposed marine park of approximately 2,400 hectares which will provide an area of nearly 4 times that of the reclamation area. The proposed marine park will connect the Hong Kong International Airport Approach Areas ("HKIAAA")[3] with the existing Sha Chau and Lung Kwu Chau Marine Park ("SCLKCMP") to its north and with the committed marine park in the Brothers Islands to the east (to be designated under the Hong Kong–Zhuhai–Macao Bridge Hong Kong Boundary Crossing Facilities project), forming a huge continuous stretch of marine protected area of about 5,200 hectares. The synergy thus gained would contribute significantly to the long-term conservation of CWDs, and provide a protected habitat for other marine ecology. Effectiveness of the proposed new marine park establishment has been assessed during the EIA study and this, together with the other CWD mitigation measures, are considered to be adequate for effectively mitigating the predicted impacts on the CWDs arising from the 3RS project to an acceptable level. AAHK will advance the preparatory work for the designation of the marine park as recommended in the EIA report, including conducting a study on the details of the designation. We will consult relevant stakeholders on the designation of the marine park and further enhancement measures, such as deploying artificial reefs, releasing fish fry, etc. may be incorporated as appropriate.

59. AAHK will also establish an independent Marine Ecology Enhancement Fund ("MEEF"). The MEEF will support the implementation of the Marine Ecology Conversation Plan ("MECP") with scientific research and studies of CWDs in Hong Kong and Pearl River Estuary waters. The outcome of the studies will help develop a holistic and long-term conservation framework for CWDs. A management committee will also be set up to manage the MEEF, with members from different stakeholders including relevant

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Extension.

[3] Hong Kong International Airport Approach Area ("HKIAAA") is an area established in the vicinity of the airport island to safeguard the operation of aircraft and radio navigational aids whereby entrance of vessels into the area is restricted.

academics, green groups and dolphin experts, to facilitate effective implementation of the MECP.

60. To achieve the aim of "Conservation alongside Development", the following measures will be put in place during the construction of the project:

(a) route diversion for SkyPier HSF operating to/ from Zhuhai and Macau, moving their route from between the airport and the SCLKCMP to the north of the SCLKCMP. The diverted routes incorporates a 15-knot speed controlled zone where the diverted HSFs cross high CWD abundance grid squares;
(b) capping the SkyPier HSF movements at an annual daily average of 99 (or 36,135 movements during one whole year of 365 days) prior to designation of the proposed marine park;
(c) management of construction vessels traffic including speed control, designated routes and skipper trainings;
(d) adoption of advanced designs and specific construction methods (such as non-dredge methods during land formation, DCM over existing contaminated mud pits, HDD for submarine pipeline diversion and acoustic decoupling for noisy equipment on barges) that minimize potential environmental impacts; and
(e) avoidance of bored piling during peak calving season for CWDs.

(C) Mitigation and Enhancement Measures for Fisheries Impacts

61. There were concerns about the loss of habitat and the irreversible impact on fisheries resources.

62. In the course of completing the EIA, thorough assessments were undertaken on potential impacts from the proposed 3RS development on fisheries activities and resources. The EIA recommended ways of ensuring impacts are minimized and mitigated to an acceptable level. The proposed establishment of the new marine park would generally compensate for the permanent loss of fisheries habitats and resources and is also anticipated to support and enhance the fishing industry and fisheries resources.

63. The proposed establishment of the marine park, apart from providing a protected habitat for the CWDs, will also be able to compensate for the loss of fisheries habitats (and resources) / fishing ground by improving the ecological connectivity between the existing SCLKCMP, the planned marine park in the Brothers Islands, the Pearl River Estuary Chinese White Dolphin National Nature Reserve and the existing / future HKIAAA.

64. In addition, in complying with the suite of controls and restrictions according to the Marine Parks Ordinance and the Marine Parks and Marine Reserves Regulation, including the control of fishing activities, speed restriction to 10 knots or below and control of other anthropogenic disturbance, the recovery of fisheries resources in the northern Lantau waters and adjacent areas would be further enhanced.

65. As an enhancement measure, AAHK will establish an independent Fisheries Enhancement Fund ("FEF") and develop a detailed Fisheries Management Plan ("FMP") in collaboration with fishermen for supporting the fishing industry and enhancing fisheries resources in the western Hong Kong waters, especially the Lantau waters. A management committee will be set up, with members from fishermen and relevant stakeholders, to oversee the FEF for effective implementation of the FMP.

(D) Sha Chau Egretry

66. There were concerns about the adverse impact on the Sha Chau Egretry. In this regard, the potential impacts associated with the aviation fuel pipeline diversion construction works at Sheung Sha Chau (in close proximity to the Sha Chau Egretry) were assessed in the EIA Report as moderate.

67. Several mitigation measures were proposed in the EIA to mitigate the potential impacts on the Sha Chau Egretry to an acceptable level. For example, the daylighting location shall be distant from the Sha Chau Egretry boundary with direct encroachment on the egretry avoided; construction works shall not be carried out during ardeids' breeding season (i.e. between April and July); night-time construction works and felling of trees shall be prohibited.

68. As the construction works in the vicinity of the Sha Chau Egretry will be scheduled outside the ardeids' breeding season, the potential indirect disturbance (e.g. noise and dust) to the breeding ardeids is expected to be minimal. A pre-construction survey of the egretry will be undertaken before commencement of the HDD works to allow the proposed daylighting location to be determined based on the most up-to-date information on the egretry boundary. With the aforementioned measures in place, it is anticipated that potential impacts on the Sha Chau Egretry would be mitigated to an acceptable level.

(E) Noise Impacts

69. Concerns about possible adverse impacts from aircraft noise were expressed in some of the representations. Over the years, advancement in

aircraft engine technology has significantly reduced aircraft noise and airlines will continue to replace older aircraft with newer and quieter models. Throughout the statutory 3RS EIA process, AAHK has conducted assessments using the state-of-the-art Integrated Noise Model of the U.S. Federal Aviation Administration to determine the airport noise exposure in accordance with the guidelines set out in the EIAO Technical Memorandum and EIA Study Brief. The assessment covers the entire Hong Kong with particular emphasis on those areas under and near the flight tracks, and in the vicinity of HKIA. A number of aircraft noise mitigation measures have been identified to ensure that no adverse residual aircraft noise impact will be associated with the operation of the 3RS project. In this regard, it should be noted that when the 3RS comes into operation, the south runway will generally remain on standby at night between 2300 and 0659. This would significantly reduce the noise impact on North Lantau, which is not permissible under the existing 2RS. As the distance between Tung Chung and the nearest operating runway under 3RS will double to more than 3 km, the noise impact on Tung Chung and North Lantau will be significantly improved. The number of affected village houses/ licensed structures in Sha Lo Wan will be significantly reduced from the present 170 to around 20 when the 3RS comes into operation.

70. The above measure, complemented by two existing measures, will be able to reduce the noise impacts further. Firstly, the preferential runway use programme will continued to be implemented when wind conditions allow such that more flights would fly over the sea to the west of the airport instead of over the urban areas to the east at night time. Departures will be required to take the southbound route via West Lamma Channel during east flow at night time to avoid flights flying over populated areas at night.

71. In addition, CAD has imposed further restrictions on aircraft which are marginally compliant with the Chapter 3 noise levels[4] to land and take off in Hong Kong. The CAD has also introduced an arrival flight path (Track 6) over-water via West Lamma Channel which can be used during night-time as an alternative route by aircraft with appropriate navigation equipment to avoid flying over densely populated areas.

(F) Air Quality Impacts

72. There were concerns about the worsening of air pollution in Tung Chung, especially possible increase in the level of Nitrogen Oxides ("NOx"), with the implementation of the 3RS. In this regard, it should be noted that

[4] "Chapter 3 Standards of Noise" means the standards of noise specified in Volume I, Part II, Chapter 3 of Annex 16 to the Convention on International Civil Aviation ("the Chicago Convention").

AAHK is committed to reducing emissions and has developed and implemented a series of measures to achieve this. For example, we have banned all aircraft at frontal stands from using high-emission auxiliary power units for lighting and air conditioning since end of 2014. We have also required all airside saloon vehicles to be electric by end-2017.

73. A detailed quantitative air quality assessment under the statutory EIA Study has been undertaken by AAHK's consultant who has taken into account all relevant factors, including the new emissions reduction measures to be adopted at HKIA, as well as the Hong Kong SAR and the Mainland Governments' planned emission reduction initiatives which were included in the emissions reduction targets set for major air pollutants in the Pearl River Delta region for 2020.

74. AAHK has gone one step further in the air quality assessment whereby a "conservative approach" has been adopted. For example, in assessing emissions of NOx originating from the Pearl River Delta Economic Zone ("PRDEZ") for 2020, while the emission reduction target ranges from 20% - 40%, AAHK had only factored in the lower end of the range at 20% during the assessment. Moreover, the assessment did not include any subsequent emission reduction expected after 2020 to be implemented by the Governments of the Guangdong Province and Hong Kong SAR.

75. Even with a conservative approach, the assessment findings concluded that the air quality for all air sensitive receivers, including Tung Chung, will comply with the Air Quality Objectives under the 3RS operations. It should be noted as a matter of fact that airport emissions have minor impact on the cumulative air quality of Tung Chung. For example, nitrogen dioxide (NO_2), which is the major air pollutant from aircraft, accounts for only about 6-7% of Tung Chung's average annual cumulative air quality impact.

V. Traffic Considerations

(A) Traffic Impact Assessment ("TIA")

76. A number of comments asked for details of the TIA, specifically on whether the capacity of the roads, AEL and all other means of transportation are capable of meeting the predicted traffic demand arising from the expanding airport capacity.

77. During the EIA stage, AAHK has, based on the requirements of various Government departments, completed a detailed TIA report which has covered a detailed analysis of the impacts due to future road traffic. The

traffic assessment has fully taken into account the traffic flow arising from 3RS, future airport business centre and other existing and planned developments in Lantau, and has assessed the traffic impact in detail. The forecast results showed that all major roads will operate within the practical capacity in years 2026 and 2031 under these scenarios.

78. The AEL is one of the ground transportation services providing essential connection to the HKIA. The design capacity of AEL is sufficient and coordination has been undertaken with MTR to support the HKIA expansion into a 3RS operation. AAHK will liaise with MTR and other public transport operators to ensure that their services would continuously be enhanced to accommodate the additional patronage arising from the 3RS project.

(B) Marine Traffic Impact Assessment

79. Some representations requested information on details of the Marine Traffic Impact Assessment ("MTIA") Study regarding whether the proposed reclamation would reduce the width of Urmston Road and the impact on the safety of ferry passengers using this channel of waters.

80. Between 2011 and 2015, AAHK had undertaken MTIA studies to assess thoroughly the likely marine traffic risk to be brought about by the proposed 3RS Project so as to ensure that the risk is manageable.

81. The MTIA studies were conducted by a specialist marine consultant using (i) a quantitative analysis of marine traffic risk using extensively validated dynamic marine traffic models; and (ii) qualitative results derived from the simulated future marine environment (during the construction of the 3RS and after its completion) captured during the navigation simulation workshops conducted at Marine Department's Full Mission Ship Simulator[5]. This approach and methodology have been widely adopted internationally and locally in various MTIA studies for infrastructure projects.

82. The following key issues had been taken into account and assessed in the MTIA studies: -

(a) the anticipated marine traffic activities up to year 2030;
(b) construction activities of the 3RS Project;
(c) the geometry of future water spaces including (i) the latest 3RS land formation footprint; (ii) the proposed HKIAAA to be

[5] The Full Mission Ship Simulator is a 3D graphic database management software to create and edit specific ship types and exercise areas to simulate different navigational conditions such as unfavourable weather, sea, tidal and traffic conditions etc

developed for the 3RS; and (iii) the layout of the marine park proposed in the EIA;

(d) route diversion and speed restriction of SkyPier HSFs plying between SkyPier and Macau/Zhuhai;

(e) the works area of the 3RS Project;

(f) the results of quantitative analysis of marine traffic risk using extensively validated dynamic marine traffic models; and

(g) qualitative results derived from the simulated future marine environment (during the construction of the 3RS project and after its completion) captured during the navigation simulation workshops conducted at Marine Department's ("MD's"). Full Mission Ship Simulator.

83. Findings of the MTIA studies at various design / planning stages were presented to the stakeholders of the marine industries in the Marine Industry Consultation Workshops held in July 2012 and June 2014. These stakeholders include members from Local Vessels Advisory Committee, Pilotage Advisory Committee, Port Operations Committee and High Speed Craft Consultative Committee.

84. Findings of the MTIA affirmed that maritime safety will not be compromised by the expansion of HKIA into a 3RS with the implementation of the recommended marine traffic mitigation and enhancement measures. Specifically:

(a) the marine traffic risk in the future navigable waterspace as a result of 3RS project (both during construction and operation) remains within acceptable levels with respect to the Hong Kong Societal Risk criteria[6]; and

(b) the navigation simulation workshops concluded that the simulated waterspace is viable and safe for navigation.

85. Some comments asked for information of the hydrodynamic study, specifically on whether the reduced width of Urmston Road, as a result of the reclamation works of the 3RS project, may create higher waves that limit certain types of vessels to travel in the channel.

86. Hydrodynamic changes, if any, caused by the reclamation to the operations of Urmston Road and key marine facilities e.g. Tuen Mun Immigration Anchorage, Designated Bunkering Area and Sham Shui Kok

[6] Societal risk expresses the risks to the whole population living, working or travelling near a hazardous operation. The Societal Risk Guideline is specified in Annex 4 of the EIA Ordinance – Technical Memorandum.

Anchorages etc. were also assessed in the 3RS MTIA studies. It is concluded that the construction of the proposed reclamation arising from 3RS Project has no significant impact on the wave climate and current regime within the Urmston Road and adjacent waters.

87. In accordance with the EP conditions, AAHK will implement measures for the management of construction and associated vessels, and implement a Marine Travel Routes and Management Plan for HSFs of SkyPier. To address the concern about possible oil spillage at sea, a Spill Response Plan will also be developed in conjunction with relevant government departments for necessary implementation.

88. The proposed 3RS HKIAAA and the proposed 3RS marine works area will have adequate and safe clearance, and will not encroach upon the main deep water channel of Urmston Road where majority of vessels are transiting at the Urmston Road with at least 10m water depth. The 3RS Project therefore will not result in reducing the width of navigable waterspace at Urmstom Road.

89. In sum, with the implementation of the recommended marine traffic mitigation and enhancement measures, the 3RS project would not pose any insurmountable navigational risk and would not adversely affect the future marine traffic activities in the vicinity of Urmston Road.

VI. Employment Opportunities To Be Brought About By the 3RS

90. There are concerns that the 3RS project may not benefit the local labour as there is manpower shortage for the aviation and construction industries and so the need for additional manpower for the 3RS would only be achieved through importation of labour.

91. In response to concerns about employment opportunities, AAHK would like to highlight that HKIA generates enormous economic value for Hong Kong, the benefits of which will be enjoyed by the Hong Kong community, including workers and employers. See details in paragraphs 39 and 41 above.

92. In terms of employment opportunities, HKIA provides directly more than 65,000 jobs at present. It is anticipated that the 3RS would create direct employment of around 123,000 jobs as well as indirect and induced employment of 165,000 jobs. During construction phase, it is anticipated that around 139,000 jobs, in terms of direct, indirect and induced man-years[7], will be

[7] A "man-year" is defined as one person employed full-time for one year.

created. It should be noted that the jobs would not be required all at once at the commissioning of the 3RS. As construction of 3RS would take some eight years and that employment opportunities would be phased in gradually, there is therefore plenty of time for the relevant industries to work with different educational institutes to train and nurture the necessary manpower required.

93. AAHK will follow the basic principle of the Government labour policy that local workers must be given priority in filling job vacancies. Importation of labour will only be considered if there is a genuine shortage of labour supply in the local construction market and any such scheme must be fully in compliance with the government's policy in this regard.

VII. Public Consultations

94. Concerns have been expressed about the lack of adequate consultation and public support for the 3RS.

95. AAHK could not agree to these allegations. AAHK has always attached great importance to stakeholder communication and public engagement regarding the 3RS project. On the basis of the two options developed in the MP2030 (i.e. option one of maintaining the existing 2RS but with terminal and apron facilities expanded; and option two of expanding HKIA into a 3RS), the report of which was made available to the public, AAHK conducted a three-month public consultation exercise ("PCE") on MP2030 between 3 June and 2 September 2011 to seek public views on the future development of HKIA. A total of 194 briefings, including three public forums, on MP2030 had been arranged during the three-month consultation period, covering a wide range of stakeholders (e.g. LegCo members, District Councillors, general public, business communities, professional institutes, media, workers' union and trade associations, youth groups, resident groups, green groups etc). Apart from briefings, AAHK also made available the MP2030 related information through channels such as roving exhibitions, the MP2030 website, YouTube, Announcement of Public Interest, short videos, news paper supplements etc.

96. To ensure a fair and impartial process in the compilation of public opinion, AAHK appointed the Social Science Research Centre ("SSRC") of the University of Hong Kong to independently compile, analyse and report on the views collected during the three-month PCE. The two proposed development options were presented in questionnaires for respondents to indicate their overall preference as well as their preferred option after considering each of the following eight considerations – Hong Kong's air connectivity, service quality, competitiveness, economic growth, creation of jobs, convenience for travel, environmental impact and construction cost.

97. Of the 24,242 questionnaires received, there was a clear preference for the three-runway option. 73% of the respondents preferred the three-runway option overall, while 11.1% preferred the two-runway option overall. In addition, SSRC analysed some 15,200 entries of qualitative feedback collected through a total of ten different channels.

98. On the basis of the MP2030 and the majority support during the PCE, the Executive Council ("ExCo") approved in-principle, AAHK's recommendation to adopt the option of expanding into a 3RS as the future development option for HKIA for planning purpose; and for AAHK to proceed with the planning related to the development of the 3RS, which included specifically the statutory EIA, the associated design details, and the financial arrangements.

99. The above stakeholder communication and engagement exercises provided invaluable advice and views for the planning work after ExCo's in-principle approval in March 2012, especially that for the EIA.

100. AAHK proceeded with the statutory EIA between August 2012 and November 2014[8]. In the course of the EIA Study, AAHK implemented an extensive communication and engagement plan to engage relevant stakeholder groups and solicit general support for the 3RS project, with special emphasis on the possible environmental impact of the 3RS and the proposed mitigation measures. We had reached out to promote the 3RS project and conducted regular 3RS briefings as well as airport visits for a broad range of stakeholder groups, including universities, secondary schools, political parties, district councils, resident groups, professional bodies, industry and business organizations, business partners, the media, green groups, academia, think tanks, opinion leaders, fishermen groups, community organizations of affected villages, and the general public. About 700 engagement activities were organized during the period. Besides, AAHK organised two public forums in August 2013 and June 2014 to update the general public on the findings of the EIA and 3RS development.

101. In addition, dedicated engagement platforms were formed:

(a) Four Technical Briefing Groups ("TBGs") comprising 28 members from industry and academia with technical expertise in noise, air quality, marine ecology (including CWDs) and fisheries. Three

[8] The Environmental Protection Department issued the EIA Study Brief for the 3RS in August 2012 while AAHK submitted the EIA Report to EPD in April 2014. The Environmental Permit for the 3RS was issued on 7 November 2014.

rounds of meetings from September 2012 to December 2013 were held.

(b) Five Community Liaison Groups ("CLGs") comprising District Councillors and community leaders from the airport's neighbouring districts: Islands, Kwai Tsing, Shatin, Tsuen Wan and Tuen Mun. CLGs serve as advisory platforms for community leaders to exchange views on issues related to airport's development which are of particular concern to the neighbouring communities. Four rounds of meetings were held from September 2012 to August 2014.

(c) A Professional Liaison Group ("PLG") comprising members from the relevant professional/ experts will be set up to facilitate communications on all environmental issues related to the 3RS project. The first meeting of the Professional Liaison Group is scheduled for September/October 2015.

102. AAHK's stakeholder communication and engagement efforts remained vigilant after ExCo's affirmation of the need for the 3RS in March 2015. AAHK will continue to reach out to gain support for the 3RS and address concerns in the most professional manners. Amongst others, AAHK will brief and update the LegCo subcommittee to be established on 3RS related issues and also the Aviation Development and Three-Runway System Advisory Committee set up in August 2015 on matters related to the 3RS project.

VIII. Other Planning Issues

103. AAHK noted that some of the representations expressed concerns about an amendment to the Notes of the Plan to include a people mover depot whereby some of the representations were concerned about the potential hazards of the depot to the vicinity. There are also concerns about the control of the land use of the future reclaimed land in the airport island.

104. The land uses, as proposed, reflect the land use needs arising from the 3RS project. They are to provide flexibility to support the development of airport operational and support facilities, and have long been adopted to meet the constantly-changing functional and development needs of HKIA. Take depot as an example, it should be noted that as part of the 3RS project, a new APM system of approximately 2.6km long, connecting T2 with the new passenger concourse, will be built. In order to accommodate the operation and maintenance facilities for the new APM system, a depot will be required. The proposed depot will also accommodate the existing APM system maintenance

facilities. The depot is not only an essential part of the APM system, but its need should also be considered holistically in the wider context of the airport operation. The APM system, including the depot, will be meticulously coordinated with the requirements of airport expansion and operation for the purpose of developing a fully integrated land use planning, with due regard to the airport's functional needs as well as public safety. The design of the different APM infrastructures will be carried out by experienced consultants in compliance with relevant statutory requirements, including the relevant environmental requirements.

IX. Conclusion

105. To conclude, AAHK has set out and reiterated the need for the 3RS and therefore supports the amendments to the draft Chek Lap Kok OZP No. S/I-CLK/13. This paper has responded, in broad categories, to the areas of concern and misunderstanding expressed in the representations.

Airport Authority Hong Kong
September 2015

寄件者: SD Advocates [redacted]
寄件日期: 04日09月2015年星期五 15:19
收件者: tpbpd@pland.gov.hk
主旨: 持續智庫就《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》的申述提出的意見
附件: 持續智庫_赤鱲角分區大綱草圖_150904.pdf

敬啟者:

附件為持續智庫就《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》的申述提出的意見，以供參考。如有垂詢，歡迎與本智庫聯絡 (電話：[redacted]或電郵：[redacted])，謝謝！

祝工作愉快！

Regards,

SD Advocates
Email: [redacted]
Website: [redacted]
Tel: 2508 3699

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持續
智庫 SD Advocates
SD Advocates is a think tank under SDA Institute Limited, a non-profit organization

致：城市規劃委員會秘書
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持續智庫就《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》的申述提出意見
2015 年 9 月

香港國際機場一直是全球最繁忙客運機場之一，也是世界上最繁忙的貨運樞紐。無論在航班密度及航點方面均佔有優勢，其優越的全球連接網絡，方便旅客往來香港與世界各地。不過，隨著全球及本港航空交通需求節節上升，現有的雙跑道系統將於明年飽和，較原先估計的早了數年；加上珠三角及鄰近亞洲機場的擴建，香港作為航空樞紐的地位正受到威脅。

機場管理局自 2008 年起計劃擴建香港國際機場成為三跑道系統，其後數年更就此計劃進行相關研究與諮詢，行政會議更於今年 3 月 17 日正式批准擴建香港國際機場成為三跑道系統，並肯定其必要性。是次圖則修訂正是配合機場三跑系統的發展。

持續智庫支持香港國際機場興建三跑道系統，並同意申述編號 TPB/R/S/I-CLK/13-1、2 及 4 的意見，認為三跑道系統能增強香港作為國際及地區性航空樞紐的地位，保持競爭力及經濟增長，以應對區內其他機場的競爭。

根據世界經濟論壇分析，香港的最大優勢之一是完善的基礎建設；論壇的《全球競爭力報告》指出，香港的基建和運輸網絡全球第一，促使整體競爭力排名高企。由此可見，如果香港的基建和運輸網絡喪失優勢，必定影響香港的競爭力。

現時無論亞洲的機場，如廣州、深圳、珠海、上海、北京、新加坡樟宜、首爾仁川、台北桃園、曼谷蘇凡納布等機場；抑或全國最繁忙的國際機場，如倫敦希斯路機場、德國法蘭克福機場、美國洛杉磯機場、中東杜拜機場等，均看準不斷增長的航空客貨運量，紛紛動工擴建，甚至增建新機場以應付未來的需求。若然香港再繼續磋跎，不盡快興建「三跑」，我們很快就會被邊緣化。屆時航空樞紐地位不保，不但不能保持空運高度通達性和靈活性的優勢，更會直接威脅香港最大的支柱產業 — 貿易及物流業。貿易和物流佔本地生產總值約四分之一，也提供超過全港兩成的就業機會。當中航空貨運量雖然只佔全港出入口總量的 1.3%，但貨值卻佔總值約 40%。可見空運對本港經濟的重要。若然不能保持航空業上的優勢，我們作為亞洲以至世界一線城市的地位也就難保了。

Unit A, 9/F., Two Chinachem Plaza, 68 Connaught Road Central, Hong Kong T: [redacted] F: [redacted]

城規會就《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》收到的申述中，大部分均從三跑道系統的需要、經濟效益、融資方案、空域問題、對環境的影響、缺乏公眾諮詢等理由反對興建「三跑」，不過這些意見並非全部在城市規劃的考慮範圍。

根據《城市規劃條例》，城規會的職責是負責檢視土地用途是否符合社會需要，以「促進社區的衞生、安全、便利及一般福利」為目的來制訂規劃圖則。市民不應把政治、融資、經濟等因素牽涉在城市規劃上。持續智庫期望城規會根據《城市規劃委員會規劃指引》落實有關草圖的修訂。

對於申述編號 TPB/R/S/I-CLK/13-387、389 及 390 指現時不適宜修改分區計劃大綱圖，直至法庭就有關三跑道系統的司法覆核有判決為止，本智庫並不同意。修改分區計劃大綱圖須根據法定程序進行，若整個過程順利，也需要最少九個月時間，然後才把收納了有關修訂的草圖，連同有關的申述、意見和進一步申述，一併提交行政長官會同行政會議核准。當中若遇上其他問題，所需時間更長。對於應付迅速增長的航空客貨運量需求，香港的發展已較其他機場慢，若擴建三跑道系統的計劃一再拖延，只會令競爭者乘虛而入，迎頭趕上，到時後悔已經太遲。況且工程越遲展開，所需費用亦相應增加，對社會毫無好處。

至於有申述指修訂項目中的土地用途地帶對准許土地用途及/或發展密度的限制過份寬鬆，持續智庫相信城規會定必好好把關，在考慮各種因素後，作出最適當的決定。

城規會將來就此修訂草圖舉行聆訊時，持續智庫希望能派代表出席，並在會議上陳詞，以表述持續智庫的意見。

持續智庫

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

參考編號
Reference Number: 150908-120903-49737

提交限期
Deadline for submission: 08/09/2015

提交日期及時間
Date and time of submission: 08/09/2015 12:09:03

提出此份意見的人士 (下稱「提意見人」)
Person Making This Comment (known as "Commenter") hereafter: 大嶼山發展聯盟

與意見相關的草圖
Draft plan to which the comment relates: S/I-CLK/13

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-CLK/13-1 TPB/R/S/I-CLK/13-2 TPB/R/S/I-CLK/13-4	聯盟支持有關申述。三跑系統投入運作後，客貨運量大幅提升的同時，連接機場與市區的海陸的交通流亦會相應增升，有關發展將提供契機，改善大嶼山對外及島內的交通聯繫，構建暢順通達的運輸網絡，興旺大嶼山整體發展。而且三條跑道系統帶動的人流，正好配合大嶼山未來在旅遊和商業的持續發展，可接待更多商務及優閒旅客，起協助市區分流作用，若能為此類入境客流提供更便捷的機場與區內聯繫，必能創造多贏優勢。聯盟同時期望機管局在發展三跑的同時，落實其就環境保育的建議，確保大嶼山在可持續發展的大前題下前行。而項目的財務可行性需要仔細研究。
TPB/R/S/I-CLK/13-3	我們支持有關申述。計劃工程龐大，落成後客貨運量將大大提升，從興建至投入運作，對人力資源有大量需求，創造就業機會。三跑建成後的經濟效益，亦有利為區內居民提供就業機會及平台，促進原區就業和區內經濟發展。聯盟同時期望機管局在發展三跑的同時，落實其就環境保育的建議，確保大嶼山在可持續發展的大前題下前行。而項目的財務可行性需要仔細研究。

寄件者: Ivan Chan (CCD) [redacted]
寄件日期: 08日09月2015年星期二 11:54
收件者: tpbpd@pland.gov.hk
副本: Jodi Kwok
主旨: Comments on Representation Relating to Draft Plan (Plan No. S/I-CLK/13) - from Hong Kong Airport Services Limited
附件: HAS submission to TPB_8Sep2015.pdf

Dear Sir/Madam,

Please see submission for the captioned as attached. Details of the Commenter are as below:

Name of Commenter: Hong Kong Airport Services Limited

Contact Person: Jodi Kwok

Telephone No: [redacted]

Postal Address: 4/F, Dragonair House, 11 Tung Fai Road, Hong Kong International Airport, Lantau, Hong Kong

Fax No: [redacted]

Email Address: [redacted]

Thanks!

Best regards,

Ivan Chan
(On behalf of Hong Kong Airport Services Limited)

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HAS

Hong Kong Airport Services Ltd
Submission to The Town Planning Board
On Representation Relating to Plan No. S/I-CLK/13

Hong Kong Airport Services Ltd (HAS), a key ground handling service operator at Hong Kong International Airport (HKIA), gives its support to the amendment items to the draft Chek Lap Kok Outline Zoning Plan (OZP), as they are relevant to the Three-runway System (3RS) of Hong Kong International Airport (HKIA). We believe the third runway is vital for the sustainable future of the aviation industry in Hong Kong.

HAS has been operating at HKIA since 1998 and currently accounts for a 44% and 20% market share respectively in the ramp handling and passenger handling businesses at HKIA. We provide services to a total of 24 airlines at HKIA, including the three major local carriers, Cathay Pacific Airways, Hong Kong Dragon Airlines and Air Hong Kong. We handled close to 60,000 flights during the first half of 2015. Out of the 3,205-strong HAS workforce, 612 are manual workers and 2,425 are skilled operatives.

Since the opening of the airport on Chek Lap Kok Island, we have seen rapid, and continuous, growth in air movements. Our customers have continued to add flights in response to the growing demand for both passenger travel and cargo movements. We look forward to a strong and sustained growth in flight movements at HKIA in the long run.

This increase in air traffic has inevitably added extra pressure in the already-busy apron and passenger terminal areas at the airport. The availability of check-in counters, boarding gates, aircraft parking bays and airport staff facilities is becoming increasingly limited and we are frequently experiencing congestion. If such issues are not addressed in a timely manner, there could be a significant impact on ramp safety, airlines' on-time-performance, efficiency and service levels. We need a long-term, sustainable and cost-efficient approach to increasing capacity at HKIA, with minimum disruption to operations.

The current HKIA expansion plan, including the Midfield Development Project, will add more parking bays and bring some relief to the congestion problems. However, HAS believes that the introduction of a three-runway system is the only long-term solution for meeting growing air traffic demand, maintaining the competitiveness of HKIA and Hong Kong as a whole, further developing HKIA as a leading aviation and logistics hub, and providing efficient and consistently high-quality services to passengers and other airport customers. The 3RS project will also create significant job opportunities for both manual labour and service-industry professionals, at the same time enabling existing employees at HKIA to advance their careers over the longer term.

As one of the key airport operators at HKIA, we also support Airport Authority Hong Kong's environmental initiatives. We welcome any commercially and operationally viable measures to improve the airport environment, including the replacement of the airside saloon vehicle fleet with electric vehicles by the end of 2017 and the introduction of more electric vehicles and electric ground support equipment at HKIA.

A third runway at HKIA needs to be built for the interest of Hong Kong. HAS would therefore reiterate its support to the change of the draft Chek Lap Kok Outline Zoning Plan as indicated in Plan No. S/I-CLK/13.

September 2015

TPB/R/S/I-CLK/13-C18

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

參考編號
Reference Number: 150908-175142-30572

提交限期
Deadline for submission: 08/09/2015

提交日期及時間
Date and time of submission: 08/09/2015 17:51:42

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. 賴子文

與意見相關的草圖
Draft plan to which the comment relates: S/I-CLK/13

意見詳情
Details of the Comments:

申述編號 **Representation No:**	意見詳情 **Details of Comments:**
	致：城市規劃委員會主席暨全體委員： 本人支持香港盡快落實興建香港國際機場第三條跑道，理據如下： 機場即將飽和 香港國際機場的客運量持續按年察新， 2014年，客運量達6,340萬人次，貨運量達438萬公噸，飛機起降量達390,955架次，航空交通量實際增長比機場《2030規劃大綱》的預期快，現時機場每日平均處理約1,100班航班升降。按現時情況顯示，將會在三年達到飽和。以上數據顯示航空交通需求持續增加，現有機場的設施已不足以應付未來增長，擴建機場第三跑道系統急不容緩。 提升本港的競爭力及配合國家發展方針 隨著珠江三角洲的經濟及航空的不斷發展 ，香港以往的優勢將進一步被削減。目前，深圳和廣洲正在高速發展中 ，廣州白雲國際機場規劃發展五條跑道，第三條跑道已在2014年10月啓用。值得注意是，廣州政府規劃在機場附近建設空港經濟區，規模約佔全市6%土地面積（約為439平方公里）深圳機場的發展規模相對較小。深圳T3航站樓亦已在2013年底啓用。深圳對第三條跑道和T4航站樓的規劃，理論上可滿足2040年前的航空需求。目前，深圳正探討在東部地區興建第二個機場的可行性，以滿足通用航空之用。鄰近地區都正在富前瞻性的高速發展，香港國際機場向來在大珠三角地區擔當著區域樞紐的戰略角色，發揮國際連接門戶作用，實在責無旁貸的需要作出應對措施。香港要穩坐中國最重要國際航空樞紐及國際最具效率的地位，必須要興建第三跑道，增加客貨運的吞吐量，迎接未

來需要及吸引國際一流航運公司使用本港國際機場。
再者，香港國際機場是國際和地區的航空樞紐，深圳機場則擁有強大的內場航空網絡，如深港機場合作，彼此配合，優勢互補，必能促進兩地和珠三角等地進一步的經濟和社會發展。

平衡發展與保育
自2014年8月以來，環諮會就三跑道系統環評報告舉行了多次會議，並建議有條件通過就擴建香港國際機場成為三跑道系統的環境影響評估報告。而環境保護署署長在2014年11月7日批准建議擴建香港國際機場成為三跑道系統的環境影響評估報告，並發出環境許可證。本人認為：擴建三跑道系統環境影響評估報告已提出相應的緩解措施，以避免、減少、緩解及補償潛在環境的影響，對興建第三跑道計劃可能造成的環境影響盡力減低。本人認同，透過有效的緩解措施及嚴格的監測工作，發展與保育是可以平衡。

三跑道系統工程盡早展開
機場對香港的持續發展及經濟增長擔當重要角色，支持四大支柱產業（金融服務、貿易及物流、旅遊，以及工商業支援及專業服務）機場是香港一項重要的資產，因此繼續提升機場的處理容量，以維持香港的競爭力及航空樞紐地位，刻不容緩。其次，加強配套設施，有利提升旅遊業發展：同時，機管局正研究北商業區整體發展計劃的相關規劃，配合大嶼山未來發展，有助提升大嶼山作為世界地標性旅遊點的吸引力。再者，三跑道計劃在未來大嶼山發展重要性不單促進旅遊業，而且會為本港尤其是鄰近社區，即大嶼山及新界西提供大量就業機會。由現在6 萬多職位增加至12萬5仟。而引申至其他行業的就業人數將會更大，當赤鱲角至屯門連接路建成後，新界西的居民在鄰近就業的機會大大提升，對改變新界西人口結構組合，將會有更大促進和幫助。

赤鱲角分區計劃大綱草圖編號S/I-CLK/13

妥善融資安排
機管局將採取『共同承擔，用者自付』的融資安排 。第三條跑道的工程費最新估算為1415億元，由於機管局財政狀況穩健，長期信貨評估達到 AAA級，因此完全具備自行融資的條件。建議中，機管局會運用內部資金向市場舉債及用者自付原則興建，由航空公司及旅客共同承擔。此項建議，非常附合經濟效益；資源亦會得到最佳的運用。

結論
本人支持興建機場第三條跑道，認為發展與環境保護之間若能取得平衡，定能促進持續發展，以目前科技的先進及機管局對擴建三跑道系統的謹慎研究，相信機管局有能力將工程對生態的影響盡可能減至最低。為了提高本港的競爭力、及配合國際空運的持續發展，香港有必要興建第三跑道。這是香港人的機場，我們要抓緊機遇，提升運行的承載力，希望各方盡快凝聚共識，讓三跑道系統工程得以順利展開。

離島區議會議員 ：賴子文
日 期：二零一五年九月八日

	賴子文區議員辦事處 地址：長洲北社街18號地下 電話：[redacted]

就草圖的申述提出意見
Comment on Representation Relating to Draft Plan TPB/R/S/I-CLK/13-C19

參考編號
Reference Number: 150908-224456-23580

提交限期
Deadline for submission: 08/09/2015

提交日期及時間
Date and time of submission: 08/09/2015 22:44:56

提出此份意見的人士(下稱「提意見人」)
Person Making This Comment (known as "Commenter") hereafter: 香港離島區各界協會

與意見相關的草圖
Draft plan to which the comment relates: S/I-CLK/13

意見詳情
Details of the Comments:

申述編號 **Representation No:**	意見詳情 **Details of Comments:**
	致：城市規劃委員會主席暨全體委員： 本會支持香港盡快落實興建香港國際機場第三條跑道，理據如下： 機場即將飽和 香港地理位置優越，從香港國際機場出發，可於五小時內飛抵全球半數人口聚居的地方。憑此，再配合香港國際機場廣濶的航空網絡，奠定了香港的國際商業心心的地位。香港國際機場的客運量持續按年察新， 2014年，客運量達6,330萬人次，貨運量達438萬公噸，飛機起降量達390,955架次。航空交通量實際增長比機場《2030規劃大綱》的預期快，現時機場每日平均處理約1,100班航班升降。按現時情況顯示，將會在三年達到飽和。雖然機管局為應付香港國際機場中期的航空交通增長已投放超過120億港元去興建新設施以提升服務，包括發展中場範圍、擴建西停機坪、及提升1號客運大樓運力，但要應付與日俱增的航空客貨量，長遠而言，機場有必要擴展第三跑道系統。若第三跑道系統完成後，屆時可應付預期中增加的3000萬人次客運量。 提升本港的競爭力及配合國家發展方針 隨著珠江三角洲的經濟及航空的不斷發展 ，香港以往的優勢將進一步被削減。目前，深圳和廣洲正在高速發展中 ，廣州白雲國際機場規劃發展五條跑道，第三條跑道已在2014年10月啓用。值得注意是，廣州政府規劃在機場附近建設空港經濟區，規模約佔全市6%土地面積（約為439平方公里）深圳機場的發展規模相對較小。深圳T3航站樓亦已在2013年底啓用。深圳對第三條跑道和T4航站樓的規

	劃，理論上可滿足2040年前的航空需求。目前，深圳正探討在東部地區興建第二個機場的可行性，以滿足通用航空之用。鄰近地區都正在富前瞻性的高速發展，香港國際機場向來在大珠三角地區擔當著區域樞紐的戰略角色，發揮國際連接門戶作用，實在責無旁貸的需要作出應對措施。香港要穩坐中國最重要國際航空樞紐及國際最具效率的地位，必須要興建第三跑道，增加客貨運的吞吐量，迎接未來需要及吸引國際一流航運公司使用本港國際機場。 再者，香港國際機場是國際和地區的航空樞紐，深圳機場則擁有強大的內場航空網絡，如深港機場合作，彼此配合，優勢互補，必能促進兩地和珠三角等地進一步的經濟和社會發展。 平衡發展與保育 自2014年8月以來，環諮會就三跑道系統環評報告舉行了多次會議，並建議有條件通過就擴建香港國際機場成為三跑道系統的環境影響評估報告。而環境保護署署長在2014年11月7日批准建議擴建香港國際機場成為三跑道系統的環境影響評估報告，並發出環境許可證。本會認為：擴建三跑道系統環境影響評估報告已提出相應的緩解措施，以避免、減少、緩解及補償潛在環境的影響，對興建第三跑道計劃可能造成的環境影響盡力減低。本會認同，透過有效的緩解措施及嚴格的監測工作，例如免挖式填海、替定使用電動車、禁止飛機在廊前停機位使用輔助動力裝置等等，發展與保育是可以平衡的。
赤鱲角分區計劃大綱草圖編號S/I-CLK/13	三跑道系統工程盡早展開 機場對香港的持續發展及經濟增長擔當重要角色，支持四大支柱產業（金融服務、貿易及物流、旅遊，以及工商業支援及專業服務）機場是香港一項重要的資產，因此繼續提升機場的處理容量，以維持香港的競爭力及航空樞紐地位，刻不容緩。其次，加強配套設施，有利提升旅遊業發展：同時，機管局正研究北商業區整體發展計劃的相關規劃，配合大嶼山未來發展，有助提升大嶼山作為世界地標性旅遊點的吸引力。再者，三跑道計劃在未來大嶼山發展重要性不單促進旅遊業，而且會為本港尤其是鄰近社區，即大嶼山及新界西提供大量就業機會。由現在6萬多職位增加至12萬3仟。而引申至其他行業的就業人數將會更大，當赤鱲角至屯門連接路建成後，新界西的居民在鄰近就業的機會大大提升，對改變新界西人口結構組合，將會有更大促進和幫助。 妥善融資安排 機管局將採取『共同承擔，用者自付』的融資安排。第三條跑道的工程費最新估算為1415億元，由於機管局財政狀況穩健，長期信貸評估達到AAA級，因此完全具備自行融資的條件。建議中，機管局會運用內部資金向市場舉債及用者自付原則興建，由航空公司及旅客共同承擔。此項建議，非常附合經濟效益，資源亦會得到最佳的運用。機管局的現有方案亦已由政府和專家審核，工程造價合理。至於公眾關心的工程超資事宜，如出現超資情況，機管局亦會一力承擔，此項決定實在釋除了公眾的疑慮。

單Y型三跑道設計使運作更具彈性
第三跑道的設計可供任何飛機作升降用途。基本上，現時雙跑道的設計是一條用於起飛，另一條用於降落。但第三跑道建成後，則大大提高了跑道使用的效率。機管局可以案情況轉變第三跑道的用途，提高本港可承擔的客貨運量。
此外，單Y型的跑道設計，預留了空間給日後有需要時進行額外的機場擴建，提升每年可處理之客運量達 5000萬人次。

結論
本會支持興建機場第三條跑道，認為發展與環境保護之間若能取得平衡，定能促進持續發展，以目前科技的先進及機管局對擴建三跑道系統的謹慎研究，相信機管局有能力將工程對生態的影響盡可能減至最低。為了提高本港的競爭力、及配合國際空運的持續發展，香港有必要興建第三跑道。希望興建第三跑道能順利被通過，工程每延遲一年動工，估計工程費用可能會增加70億港元。我們要抓緊機遇，提升運行的承載力，希望各方盡快凝聚共識，讓三跑道系統工程得以順利展開。

香港離島區各界協會
日 期：二零一五年九月八日

香港離島區各界協會
地址：香港上環永和街23-29號俊和商業中心12樓A室
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TPB/R/S/I-CLK/13-C21

寄件者: Alexandra Poon [redacted]
寄件日期: 07日09月2015年星期一 14:25
收件者: tpbpd@pland.gov.hk
主旨: 城市規劃委員會-擴建香港國際機場成為三跑道系統_香港工業總會意見書
附件: Message from FHKI-NP15 (188 KB)

Dear Sir/Madam,

Pls find the view of the Federation of Hong Kong Industries regarding the airport's planned expansion into a three-runway system.
We sincerely hope that the Town Planning Board will take our views into consideration.

The hard copy of the letter will be sent to your office by mail.

Yours faithfully,
Alexandra Poon
Director, Policy, Research & Communications
Federation of Hong Kong Industries
Tel: [redacted]

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香港工業總會
FHKI Federation of Hong Kong Industries

香港工業總會
Federation of Hong Kong Industries
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城市規劃委員會
香港北角渣華道 333 號
北角政府合署 15 樓

敬啓者：

擴建香港國際機場成為三跑道系統

就香港國際機場擴建成為三跑道系統，香港工業總會（工總）對此的意見如下。

1. 總則

1.1 香港國際機場是世界上最繁忙的貨運樞紐，在2014年，香港國際機場的總客運量達6,330萬人次，總航空貨運量共438萬公噸。是全球人流最多的客運機場之一。香港國際機場連接全球約180個航點，超過100家航空公司在機場營運，香港在機場服務是佔世界前列，服務水平深受國際稱譽，拓展航空業務享有一定優勢。

1.2 香港航空交通量增長與本地生產總值增長息息相關，而本港經濟四大支柱行業即金融、貿易及物流、旅遊和專業和工商業支援服務，均依賴香港國際機場的高效運作而得以持續發展。在2013年，這四大支柱產業佔本地生產總值57.8%。

1.3 工總認為，當局必須盡快落實三跑道系統計劃，以應付直至2030年甚或其後的長遠航空交通需求，推動香港經濟進一步發展。

1.4 我們理解興建第三條跑道無可避免對環境生態構成某些影響。機管局將採取一系列環保緩解措施，我們有信心不少環保問題是可以妥善處理，公眾人士、環保團體和持份者也有機會監察這些緩解措施有否確實執行。

1.5 政府正與機管局一起研究香港機場島北商業區的發展。第三條跑道計劃，與興建相關的配套基礎建設、公用設施及設備，以及與大嶼山整體未來發展的協調效應，對機場島北商業區發展，以至充分發揮大嶼山的發展潛力，將舉足輕重。

2. 拖延或放棄興建第三條跑道的後果

2.1 根據機管局 2015 年最新研究，2014 年飛機起降量實際增長比預測快 4 年。機管局預測，香港機場現有雙跑道系統將在 2016 年至 2017 年之間達到實際最高容量。到 2030 年，每年的客運量需求將達約 1.023 億人次，貨運量需求達 890 萬公噸，而飛機升降量需求則達 607 000 架次，遠超現有雙跑道系統的容量，發展第三條跑道有迫切需要。

2.2 隨着亞太地區迅速發展，區內國家紛紛致力提升航空運輸能力。香港和鄰近城市（例如上海、廣州、深圳、新加坡、首爾等）的機場的競爭日益劇烈， 而這些機場已經決定/計劃或甚至正進行大規模的擴建計劃。若香港國際機場放棄三跑道系統的主要擴建計劃， 香港最終會在航空業務，以及其他相關業務落後於區內主要競爭對手。

2.3 工總憂慮若香港機場不擴建成為三跑道系統，航空網絡會因而萎縮，無法增加直飛航點及航班密度，亦不能容納新的航空公司（如低成本航空公司）。航空服務其中一個特質是航班的先行者優勢，當一條航線由香港來出發，業界和旅客也習慣了這個安排，其他航線的擴展會比較困難。若果香港機場的容量不足，承載力滿足不了業界的需求；業界一轉往其他機場之後，這些航班便會一去不返。

2.4 根據空運客貨量的預測，亞太區未來二十年需求增長高於全球水平。香港機場若不及時提高容量，就會平白錯失當中的機遇。若干年後，即使香港機場能擴大跑道容量，亦未必能夠回復領先的地位。這個會對香港構成很大的負面影響。香港的國際船運中心地位近年驟降是一個要引以為鑑的例子。

3. 第三條跑道能帶來龐大經濟利益

香港機場現有雙跑道系統的處理容量快將飽和，工總相信，興建第三條跑道，可提升香港航空業的客運和貨運容量，鞏固香港國際航空樞紐的地位，可帶來的經濟利益包括：

3.1 廣東省正大力實施創新驅動發展戰略，利用國家在省內配置的創新資源，構建科技創新形勢。廣東未來經濟發展將著重於提升能力對接產業轉型升級，尤其是高端電子資訊產業、互聯網技術、環保產業等。香港機場擴充跑道容量，正好配合珠三角

因產業結構調整而對空運日益增加的需求。

3.2 香港機場是環球供應鏈的主要構成部分，在珠三角經營的一些企業均樂意使用香港機場作付貨渠道，認為其運作可靠、效率極高。

3.3 若香港擴建成為三跑道系統，增加了機場的承載力，也可以讓多一些航空公司來港，來港的航班將可增加，旅客出外便更為便捷，而航空公司之間的競爭也可令票價下降，服務提升，旅客自然受惠。

3.4 根據機管局2015年最新研究，三跑道系統下機場對香港2030年本地生產總值的直接、間接及連帶貢獻價值將為1,840億港元，約相當於屆時本地生產總值預測數字的5%。到2030年，香港國際機場直接產生的職位將有123,000個，而間接及連帶職位將增至 約165,000個。

4. 對環境的影響

4.1 機管局在擴建三跑道系統的環境影響評估報告提出超過250項緩解措施。環境諮詢委員會去年9月在有條件下通過環評報告，環保署則於去年11月批准有關的環評報告，並發出環境許可證。這正好顯示有關的項目合乎準則。

4.2 工總深信，機管局會致力推行環評報告內的所有緩解措施，減少、緩解及補償工程可能對環境造成的影響，而政府、環保團體和市民亦會密切監察機管局在這方面的工作。

5. 總結

5.1 現時，當局的目標是在 2016 年動工，利用 8 年完成第三條跑道計劃。是項工程涉及填海拓地(需時 4 年)，以及在營運中的機場旁邊進行工程，工程艱巨。然而，當局可能要處理與工程相關的多個司法覆核，勞工短缺也可能影響工程進度，稍有差池，便會出現延誤，將令工程費用增加(據機管局估計，每延誤一年動工，工程費用增加 70 億元)。因此，工總促請政府應爭取在最短時間內動工興建新跑道。

5.2 工總強調，機場並非只是一項運輸物流基建設施，而是城市發展和經濟增長的重要動力。更加重要是香港有必要推展三跑道系統計劃，以維持香港作為世界及地區航空樞紐的競爭力，並

配合香港長遠的經濟和發展需要。再者，在國家推展一帶一路發展策略的背景下，香港處於「一路」之上，有必要進一步提升其作為航空樞紐的地位，以能在機遇來臨時把握得到。因此，對擴建香港國際機場成為三跑道系統，我們認為必須盡速落實，刻不容緩。

香港工業總會主席
鄭文聰謹啟
2015 年 9 月 8 日

香港民用航空事業職工總會

THE STAFFS & WORKERS UNION OF HONG KONG CIVIL AIRLINES

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TPB/R/S/I-CLK/13-C35

城市規劃委員會：

圖則編號 S/I-CLK/13 的申述

香港民用航空事業職工總會就圖則編號 S/I-CLK/13 向　貴委員會作出申述。

本會支持赤鱲角分區計劃大綱草圖的修訂項目，即機場的三跑系統建設。我們認為它有利香港航空業的擴展，對眾多機場打工仔的職業前景，以及經濟的多元化均有積極影響，為經濟和社會發展的火車頭效應。

民航工會支持興建三跑的重要原因,是此舉可確保香港作為國際航空交通樞紐，對鄰近地區保持競爭優勢，維持香港未來交通物流業的生存空間。綜觀現時鄰近地區的航空業發展，以及貨櫃運輸業衰落的前車之鑑，可以說，若果香港機場再不發展，勢必不進則退，整個交通物流業失去了競爭優勢，被鄰近地區超越而邊緣化，因而興建三跑已是迫在眉睫。

至於環保問題的爭論，我們認為環保署較早前已通過三跑工程計劃的環評報告，這些都是經過不少相關專業人士的審議，而同時我們亦見到香港機場管理局及有關政府部門提出了不少改善建議和措施；而機場的使用效益，包括空域的使用問題，國家民航總局和深圳方面，已經表示可和香港商討解決方法。我們認為世上沒有任何計劃可以事先做到完美無缺，然而才付諸實行，現實世界不存在這種發展模式。關鍵是若果發展的大方向正確，那麼我們就應把握機會，在發展中解決矛盾，而非因噎廢食，固步自封，事後卻追悔莫及。因而工會認為現在是時候結束爭議，落實興建三跑。

然而，民航工會認為當前機場發展的討論，都只聚焦硬件，忽略軟件，尤其是人力資源規劃的問題，需要社會各界正視，如何確保機場人力充沛是今後機場發展的成敗關鍵，有關當局必需正視。

民航工會認為目前機場的 6 萬多工作職位中，保守估計缺人手達 1 成。造成人手

（本會是香港工會聯合會屬會　We are affiliated to the Hong Kong Federation of Trade Unions）

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荒的原因很多，但工資低、工時長、工作多、車資貴、搭車難皆是工友的共同感受。特別是往返機場的交通配套不佳常為人詬病，工會曾就此敦促政府改善，最近巴士公司加設了四條通宵巴士路線，我們對表示歡迎，但認為仍有改善空間。

工會特別關注機場人手荒這兩年間持續惡化，而日後三跑落成之後，估計需要勞工 14 萬。試問若不在人力發展規劃上早謀定策，如何能應對？工會擔心若再放任問題惡化不管，使工友對三跑未見其利先見其害，支持三跑的主流民意必將逆轉，屆時再良好的初衷也只能落空，這是誰都不願見到的。

工會認為，既然政府已通過落實興建三跑，現在是時候針對上述問題作出具體回應。當務之急，我們要求政府和機管局提出切實的人力發展規劃方案，以釋工友疑慮，使社會各界安心。工會建議該方案必須針對人手荒的成因，對症下藥提出解決辦法，其措施必須要包括以下各項：

1. 設立常設的機場發展諮詢架構。讓一眾工友、工會和各機場持份者，有平台定期發表意見；在發展規劃中，要重視以人為本，從源頭著手改善現時的工作環境、工作流程和職業安全的各項問題，減少潛在危險；

2. 推動本地人員的機場就業計劃。政府要優化現時的海運及空運人材培訓，並由現在開始籌劃，推動本地青年由教育到就業的一條龍人材培訓計劃，積極有序地進行有關航空服務業、物流業、維修業的培訓，為航空業的發展打下堅實的根基；

3. 利用房屋政策傾斜鼓勵更多人到機場就業。政府可參考以前啓德機場搬遷時，東涌公屋優先分配予機場工作人仕的計劃，推動機場的工作人員，可優先獲分配到東涌或鄰近機場地區的公屋，一來可鼓勵就業，二來也可減低工友的交通開支和時間。

總括而言，本會支持圖則編號 S/I-CLK/13 的修訂項目及內容。如有查詢，請聯絡本會秘書處，電話：[redacted]

THE STAFFS ★ WORKERS UNION OF HONG KONG CIVIL AVIATION
香港民用航空事業職工總會

香港民用航空事業職工總會
2015 年 9 月 7 日

（本會是香港工會聯合會屬會 We are affiliated to the Hong Kong Federation of Trade Unions）

寄件者: HKPASEA Secretariat [redacted]
寄件日期: 07日09月2015年星期一 11:04
收件者: Chan Paul 陳茂波 hkpasea
副本: tpbpd@pland.gov.hk
主旨: HKPASEA:香港專業及資深行政人員協會《赤鱲角分區計劃大綱草圖編號S/I-CLK/13》之意見書
附件: L-R-Development-Bureau_Draft Chek Lap Kok Outline Zoning Plan No. S.I-CLK.13.pdf; HKPASEA_105_Comments_on_Draft Chek Lap Kok Outline Zoning Plan No. S.I-CLK.13.pdf

發展局局長
陳茂波先生, MH, JP 鈞鑒：

《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》之意見書

香港專業及資深行政人員協會支持香港國際機場擴建成為三跑道系統，贊同城市規劃委員會對《赤鱲角分區計劃大綱核准圖編號 S/I-CLK/12》作出的修訂項目，加入有關用作興建香港國際機場新的第三條跑道的擬議填海區的土地用途建議，並支持修訂後之《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》。本會就此提出一些意見。

現謹附上有關意見書，以供 閣下參閱。

敬頌
鈞祺！

香港專業及資深行政人員協會
會長 盧偉國 敬上

二零一五年九月七日
附：意見書

0009

HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION

香港專業及資深行政人員協會

發展局局長
陳茂波先生, MH, JP 鈞鑒：

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敬頌
鈞祺！

香港專業及資深行政人員協會

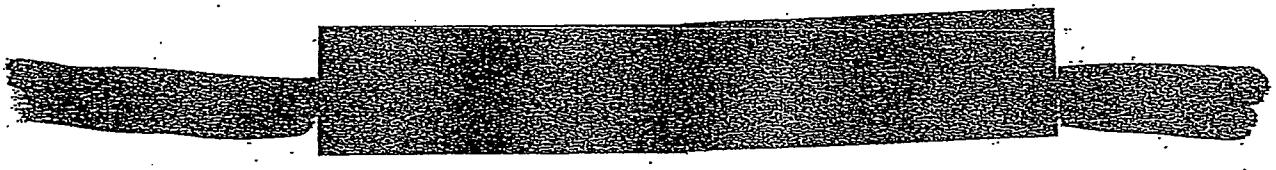
會長 盧偉國 敬上

二零一五年九月七日
附：意見書

HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION
香港專業及資深行政人員協會

《赤鱲角分區計劃大綱草圖編號S/I-CLK/13》之意見書

2015年9月



HONG KONG PROFESSIONALS AND SENIOR EXECUTIVES ASSOCIATION

香港專業及資深行政人員協會

2015/2016 年度

理事會成員名單

更新於 2015 年 8 月 27 日

會　　長：	盧偉國議員, SBS, MH, JP	
創會會長：	容永祺先生, SBS, MH, JP	*理事會當然成員
前任會長：	胡曉明工程師, BBS, JP	*理事會當然成員
	謝偉銓測量師, BBS	*理事會當然成員
常務副會長：	李惠光工程師, JP	
副　會　長：	伍翠瑤博士	吳長勝先生
	李鏡波先生	陳紹雄工程師, JP
	羅范椒芬議員, GBS, JP	黃友嘉博士, BBS, JP
	周伯展醫生, JP	林義揚先生
	劉勵超先生, SBS	陳鎮仁先生, SBS, JP
	黃天祥工程師, BBS, JP	鄔滿海測量師, GBS
	區永熙先生, SBS, JP	梁廣灝工程師, SBS, OBE, JP
	黃錦輝教授, MH	
財　務　長：	陳記煊先生	
秘　書　長：	梁家棟博士測量師	
副秘書長：	廖凌康測量師	
理　　事：	史泰祖醫生, JP	吳德龍先生
	鍾志平博士, BBS, JP	楊位醒先生, MH
	范耀鈞教授, BBS, JP	李樂詩博士, MH
	華慧娜女士	楊素珊女士
	左龍佩蘭教授	施家殷先生
	林力山博士測量師	施榮懷先生, BBS, JP
	余秀珠女士, BBS, MH, JP	葛珮帆議員, JP
	洪為民博士, JP	彭一邦博士工程師
	楊章桂芝女士	廖長江大律師, SBS, JP
	劉展灝博士, SBS, MH, JP	羅志聰先生
	王桂壎律師, BBS, JP	胡劍江先生
	容海恩大律師	張華強博士
	梁世民醫生, JP	劉冠業先生

註：依職位資歷及筆劃排序

香港專業及資深行政人員協會
《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》之意見書
2015 年 9 月

香港專業及資深行政人員協會支持香港國際機場擴建成為三跑道系統，贊同城市規劃委員會對《赤鱲角分區計劃大綱核准圖編號 S/I-CLK/12》作出的修訂項目，加入有關用作興建香港國際機場新的第三條跑道的擬議填海區的土地用途建議，並支持修訂後之《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》。

本會認同香港機場管理局就擴建三跑道系統上，已盡可能在經濟發展與海洋生態保育間取得平衡，在施工期間及營運階段更建議採取多達 250 項措施，已達到盡量避免、減少及補償對整體環境影響的目的。

在施工方面，本會支持在已覆蓋的污泥坑範圍採用深層水泥拌合法，拓地擴建三跑道系統，避免因填海釋出污染物，讓附近生態環境免受影響。本會亦支持限制工程船隻速度與航線、限制海天客運碼頭快船船速等緩解措施，相信透過減少交通流量、避免船隻排放污染水域等措施，加上建設新海岸公園，能有效減少工程對中華白海豚等海洋生物的滋擾。

對於上述海岸公園之建設，本會認為機管局只要透過深入研究擬設新海岸公園水域的生態環境，及早劃定新海岸公園實際需要的面積，只把極具生態保育價值的水域納入新海岸公園範圍，便可避免影響漁民作業及未來交通網絡的發展。並可分階段展開海岸公園的建設工作，為受擴建三跑道系統工程影響之中華白海豚等海洋生物，提供其他適合的棲身及覓食的地方。本會相信在機管局推動多項措施、建設新海岸公園，配合政府加強教育公眾保護中華白海豚、繼續監察保育的進展、永久停用工程項目附近的污泥坑，有助進一步確保附近的海洋生態環境不受干擾，讓海洋生物可繼續繁衍。

本會亦支持機管局就擴建三跑道系統推行環境監察及審核計劃，只要透過主動匯報緩解措施的落實情況，以及相關環境監察數據，包括空氣質素、噪音水平、水質等數據及分析，可提高相關工程及機管局推動環保工作的透明度，讓擴建三跑道系統能順利推動。

此外，本會亦贊同機管局在三跑道系統營運時擬推出的措施，例如安排南跑道於夜間處於備用狀態、調整飛機航道避免夜間飛越人口稠密的地區等，相信三跑道系統日後將有助提升香港國際機場的環保水平，尤其確保空氣質素、噪音影響等環境影響達到可接受水平，帶來更大的環保效益。

航空交通需求量迅速增加，香港國際機場現有基建設施即將飽和，擴建機場成為三跑道系統已刻不容緩。本會支持《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》，期望儘快落實擴建三跑道系統，鞏固香港的國際及區域航空樞紐地位，實現數以億元的經濟收益、創造數十萬個就業機會，繼續支持其他行業的蓬勃發展，以推動香港經濟及社會持續發展。

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

參考編號
Reference Number: 150907-104709-06946

提交限期
Deadline for submission: 08/09/2015

提交日期及時間
Date and time of submission: 07/09/2015 10:47:09

提出此份意見的人士 (下稱「提意見人」)
Person Making This Comment (known as "Commenter") hereafter: 香港專業及資深行政人員協會

與意見相關的草圖
Draft plan to which the comment relates: S/I-CLK/13

意見詳情
Details of the Comments:

申述編號 Representation No:	意見詳情 Details of Comments:
Ref: Draft Chek Lap K	香港專業及資深行政人員協會 《赤鱲角分區計劃大綱草圖編號S/I-CLK/13》之意見書 2015年9月 香港專業及資深行政人員協會支持香港國際機場擴建成為三跑道系統，贊同城市規劃委員會對《赤鱲角分區計劃大綱核准圖編號S/I-CLK/12》作出的修訂項目，加入有關用作興建香港國際機場新的第三條跑道的擬議填海區的土地用途建議，並支持修訂後之《赤鱲角分區計劃大綱草圖編號S/I-CLK/13》。 本會認同香港機場管理局就擴建三跑道系統上，已盡可能在經濟發展與海洋生態保育間取得平衡，在施工期間及營運階段更建議採取多達250項措施，已達到盡量避免、減少及補償對整體環境影響的目的。 在施工方面，本會支持在已覆蓋的污泥坑範圍採用深層水泥拌合法，拓地擴建三跑道系統，避免因填海釋出污染物，讓附近生態環境免受影響。本會亦支持限制工程船隻速度與航線、限制海天客運碼頭快船船速等緩解措施，相信透過減少交通流量、避免船隻排放污染水域等措施，加上建設新海岸公園，能有效減少工程對中華白海豚等海洋生物的滋擾。 對於上述海岸公園之建設，本會認為機管局只要透過深入研究擬設新海岸公園水域的生態環境，及早劃定新海岸公園實際需要的面積，只把極具生態保育價值的水域納入新海岸公園範圍，便可

ok Outline Zoning Plan No. S/I-CLK/13	避免影響漁民作業及未來交通網絡的發展。並可分階段展開海岸公園的建設工作，為受擴建三跑道系統工程影響之中華白海豚等海洋生物，提供其他適合的棲身及覓食的地方。本會相信在機管局推動多項措施、建設新海岸公園，配合政府加強教育公眾保護中華白海豚、繼續監察保育的進展、永久停用工程項目附近的污泥坑，有助進一步確保附近的海洋生態環境不受干擾，讓海洋生物可繼續繁衍。 本會亦支持機管局就擴建三跑道系統推行環境監察及審核計劃，只要透過主動匯報緩解措施的落實情況，以及相關環境監察數據，包括空氣質素、噪音水平、水質等數據及分析，可提高相關工程及機管局推動環保工作的透明度，讓擴建三跑道系統能順利推動。 此外，本會亦贊同機管局在三跑道系統營運時擬推出的措施，例如安排南跑道於夜間處於備用狀態、調整飛機航道避免夜間飛越人口稠密的地區等，相信三跑道系統日後將有助提升香港國際機場的環保水平，尤其確保空氣質素、噪音影響等環境影響達到可接受水平，帶來更大的環保效益。 航空交通需求量迅速增加，香港國際機場現有基建設施即將飽和，擴建機場成為三跑道系統已刻不容緩。本會支持《赤鱲角分區計劃大綱草圖編號S/I-CLK/13》，期望儘快落實擴建三跑道系統，鞏固香港的國際及區域航空樞紐地位，實現數以億元的經濟收益、創造數十萬個就業機會，繼續支持其他行業的蓬勃發展，以推動香港經濟及社會持續發展。

香港北角渣華道 333 號
北角政府合署 17 樓
城市規劃委員會秘書處

傳真號碼：2877 0245 或 2522 8426
電郵地址：tpbpd@pland.gov.hk

城市規劃委員會秘書：

有關：赤鱲角分區計劃大綱草圖編號 S/I-CLK/13

本人根據《城市規劃條例》第 6A(1)條，就上述事項提交對申述的意見，支持赤鱲角分區計劃大綱草圖編號 S/I-CLK/13。

2014 年香港國際機場的客運量達 6 330 萬人次，貨運量共 438 萬公噸，飛機起降量 391 000 架次。現時共有超過 100 家航空公司在香港提供航空服務，往來全球約 180 個航點，當中 47 個位於內地。香港國際機場對持香港的亞洲國際都會地位有着舉足輕重的貢獻。機場亦支持本港四大經濟支柱產業：金融服務、貿易及物流、旅遊，以及工商業支援及專業服務。

根據 International Air Transport Association (國際航空運輸協會，簡稱 IATA) Consulting 最新交通需求量基準情況預測顯示，2030 年香港的航空交通需求為年客運量 9,700 萬人次，年貨運量 890 萬公噸，年飛機起降量 602,000 架次。但 2014 年的飛機起降量顯示，實際增長比預測快四年。根據最近預測，現有的雙跑道系統可能於 2016 年或 2017 年達到實際最高容量，即飛機起降量每小時 68 架次或每年 42 萬架次，討論發展三跑道系統有迫切需要，以免削弱香港整體競爭力。

機管局委託 Enright, Scott & Associates (ESA) 進行三跑道系統的經濟影響預測研究，根據 2015 年的最新評估，估計 2030 年機場對香港本地生產總值的直接、間接及連帶貢獻價值將 1,840 億港元 (按 2012 年價格計算)，相當於香港 2030 年本地生產總值預測數字約 5% (2012 年為 4.6%)。機場管理局的三跑道系統計劃，將可為香港帶來 4,550 億港元的額外經濟貢獻，創造 123 000 個直接職位，有助維持香港的競爭力。香港的航空樞紐地位亦為貿易及物流、金融服務、專業服務及旅遊業提供重要支持，這些產業合共佔本地生產總值超過 50%。

香港國際機場三跑道系統計劃刻不容緩，工程必須盡早展開。

姓名：龐美觀
聯絡電話 [redacted]
電郵 [redacted]

2015 年 9 月 4 日

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

參考編號 **Reference Number:**	150905-210304-19839
提交限期 **Deadline for submission:**	08/09/2015
提交日期及時間 **Date and time of submission:**	05/09/2015 21:03:04
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. Henry Sung
與意見相關的草圖 **Draft plan to which the comment relates:**	S/I-CLK/13

意見詳情
Details of the Comments:

申述編號 **Representation No:**	意見詳情 **Details of Comments:**
S/I-CLK/13	Airport Authority's planned expansion of our airport into a three-runway system will provide an additional HK$455 billion to our economy, create 13,000 direct jobs, and help our city to stay competitive. Hong Kong's aviation hub status supports our city's trading & logistics industry, financial services, professional services and tourism, which together accounting for over 50% of Hong Kong's GDP. I support the expansion of our airport into a three-runway system."

TPB/R/S/I-CLK/13-C83

致：城市規劃委員會

發展和保育往往要取得平衡，如果我們只談保育，不顧發展，社會經濟將陷入困境。

機場三跑道已經做好環境保護配套，降低對環境污染的成本。我們沒有理由不支持。

三跑道的興建可以帶來 14 萬的就業職位，我們的社會，特別是東涌、大嶼山以至全港居民都受惠於職位的增加。

所以我支持三跑道。

姓名：林德根

日期：20.9.2015

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- 7 SEP 2015
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香港北角渣華道 333 號
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城市規劃委員會秘書：

有關：赤鱲角分區計劃大綱草圖編號 S/I-CLK/13

本人根據《城市規劃條例》第 6A(1)條，就上述事項提交對申述的意見，支持赤鱲角分區計劃大綱草圖編號 S/I-CLK/13。

根據旅遊事務署資料顯示，2014 年來自世界各地的訪港旅客達 6080 萬人次，較 2013 年上升 12%。旅遊業是香港四大支柱產業之一，佔本地生產總值百分之五，直接為二十七萬人提供就業機會。世界經濟論壇最新發表的《旅遊業競爭力報告》，香港的排名較之前升了兩位。在今次的報告，香港排名第十三位，特別在基礎建設、港口方面，香港的競爭力比較高。

整體而言，香港在旅遊方面仍然有很高的吸引力，需繼續發展香港不同的旅遊基建，令旅客有更豐富的旅遊經驗。機場管理局的三跑道系統計劃，可帶來重大的經濟及就業貢獻，並有助維持香港的競爭力，維持香港的航空樞紐地位。

港人近年外遊不斷增加，如果機場可以發展為三跑道系統，可令香港連接更多海外城市，提升港人外遊興趣和增加旅遊點選擇，也可為香港增加源源不絕的新客源，令本港旅遊業以至相關的行業得以持續發展。機場擴建為三跑道系統後，由於客量、連接城市增加，加上航空公司會致力擴展業務，提升競爭，可令機票價格下調，刺激本港旅客外遊和海外遊客來港，加上港珠澳大橋落成在即，可望吸引更多珠三角旅客來港或經港外遊，令旅遊業增加客源。

旅遊業認為香港機場擴建有逼切需要，支持香港國際機場擴建為三跑道系統。

姓名：文龔慧玲
聯絡電話 [redacted]
電郵 [redacted]

2015 年 9 月 4 日

致：城市規劃委員會

香港近年基建停滯不前，很多是由於司法覆核導致。

如果我們再不趕上、造好硬件配套，早晚會失去所有競爭力。

深圳、廣州也在擴建新跑道，我們如果選擇翹手以待，未來香港空運業不再蓬勃，因為都被深圳、廣州等鄰近地區的機場搶走客戶。

所以，為了保持競爭力，我支持三跑道的興建。

姓名：周儀霖

日期：4-9-2015

RECEIVED
- 7 SEP 2015
Town Planning Board

tpbpd

TPB/R/S/I-CLK/13-C128

寄件者: Chiu Ying Lam [redacted]
寄件日期: 06日09月2015年星期日 14:39
收件者: tpbpd@pland.gov.hk; Chiu Ying Lam
主旨: 赤鱲角分區計劃大綱草圖S/I-CLK/13 - 就申訴提出意見
附件: 20150906_林超英_申述_CLK_OZP-comment_on_rep.pdf

發送：城市規劃委員會

發自：香港中文大學地理與資源管理學系客座教授林超英

2015 年 8 月 18 日城市規劃委員會的憲報通告，公布了公眾對赤鱲角分區計劃大綱草圖 S/I-CLK/13 的申訴，以及邀請公眾對該等申訴提出意見。謹根據城規條例 6A (1)提出意見，內容見附件。

謹請回郵確認收到本件。

林超英

0005

發送：城市規劃委員會

發自：香港中文大學地理與資源管理學系客座教授林超英

事由：赤鱲角分區計劃大綱草圖 S/I-CLK/13 - 就申訴提出意見

日期：2015 年 9 月 6 日

2015 年 8 月 18 日城市規劃委員會的憲報通告，公布了公眾對赤鱲角分區計劃大綱草圖 S/I-CLK/13 的申訴，以及邀請公眾對該等申訴提出意見。謹根據城規條例 6A（1)提出以下的意見。

申訴編號 TPB/R/S/I-CLK/13-1 至 4

1. 此四項申訴支持草圖北面填海所得土地用作「機場」用途，論述基礎是該處興建第三條跑道（"三跑"）會提升赤鱲角機場的競爭力；而這個說法又建基於機場管理局所謂「三跑系統可以大幅提升機場的飛機升降量」的假設。必須指出：航空專家（包括兩位前民航處處長、內地航空專家及機管局聘請的顧問 NATS*）早已指出空域飽和令三跑建了也沒用，今年（2015 年）年初廣州白雲機場第三條跑道開始運作後，每天只能增加十個航班是非常實質的證明，赤鱲角機場和深圳機場飛機升降有直接的矛盾來自簡單的幾何空間局限，在不關閉深圳機場的前提下，沒有任何人為措施能夠解決（見附件一），實質超出了內地及特區政府的解難能力。城規會委員必須認真理解第三條跑道不能發揮機管局聲稱的功能的原因，包括 TPB/R/S/I-CLK/1-392 對機管局所作預測的嚴重質疑。基於以上現實，TPB/R/S/I-CLK/13-1 to 4 支持草圖者的意見是建基於錯誤和不成立的理據的，城規會不應理會。

（*見 2007 年提交的《空域及跑道容量研究第一期終期報告》）

2. 草圖支持者意見認為雙跑道系統接近飽和，三跑可滿足中至長期的航運需求，有助維持競爭力，不過提升目前赤鱲角機場飛機升降數目的方法不只一個，資深民航專家如兩位前民航處處長和民間團體人人監機會先後提出了毋需三跑的替代方案，但是機管局一直拒絕公開討論，也從來沒有和不能證明三跑是最符合環境、社會及經濟效益的提升競爭力方案，因此城規會不可能知道草圖中有關三跑部份的土地規劃是否達到香港規劃基本目標「促進社區的衞生、安全、便利及一般福利」*的最優方案。由於草圖支持者的意見假設了三跑是唯一方案，而這是源於對事件的錯誤認識（主要受機管局的片面宣傳誤導），與事實不符，城規會不應理會他們的支持意見和不應通過填海建三跑的大綱圖修訂。

（*香港法律第 131 章城市規劃條例「詳題」，是城規會運作的指導原則。）

申訴編號 TPB/R/S/I-CLK/13-5 至 12220

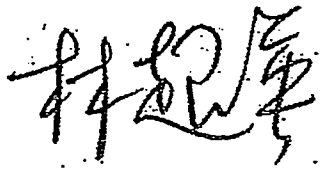
3. 一萬二千多份反對意見書中，牽涉的範圍非常廣泛，包括三跑興建期間及興建後對全港各區居民及社區造成的種種負面影響、久缺全盤運輸配套規劃、對生態的嚴重影響、以及衍生出航空、航海及陸地運輸的安全問題（尤其見 TPB/R/S/I-CLK/13-400）等等，千頭萬緒而不見全局，未見其利已先見其害，城規會應認真處理所有反對意見書提出的理據，否則

三跑建成後不能達至預測的效益卻造成早已預見的破壞，則城規會和相關政府部門恐怕都要負上無可逃避的責任，不過對香港整體利益來說，更不幸的是不少破壞將是無可彌補的。

結論

4. 三跑牽涉填海 650 公頃，面積約為界限街以南九龍半島（不計西九新填海區及舊啟德機場）的三分之二，佔用香港寶貴空間不少，茲事體大，處理必須慎之又慎。舉一個極端的例，同樣面積的土地，足夠興建一個「新九龍」，讓百萬計的香港人安居樂業，有了這個比較，希望城規會委員們感應到這次大綱圖修訂的大局觀和對全港市民的重要性，絕不宜單純地看成「機場發展」議題而匆匆通過。

5. 在履行法律要求「促進社區的衞生、安全、便利及一般福利」的前提下，注意到四份支持修訂圖的意見書是基於不成立的理據和錯誤的認識，考慮到三跑未被證明是提高赤鱲角機場（及香港航空業）競爭力、最符合香港總體利益的方案，以及理解到同樣面積土地的重大社會意義，城規會此刻應該否決赤鱲角分區計劃大綱草圖 S/I-CLK/13 內提出的修訂。



—— 林超英

香港中文大學地理與資源管理學系客座教授

附件一：見下頁

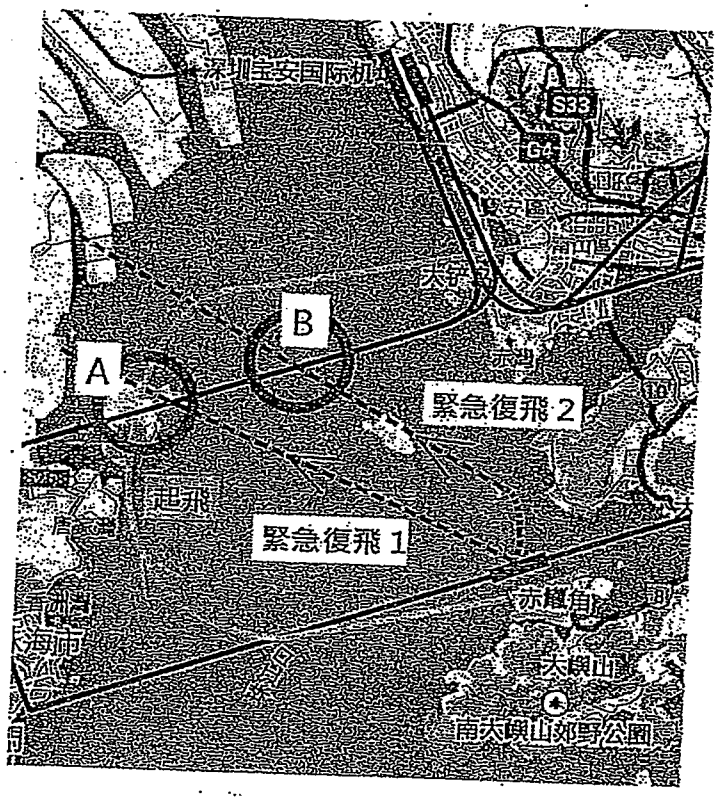
附件一

2015年1月23日網誌《草雲居》文章

死亡遊戲 – 第三條跑道與深圳機場的空中衝突　　林超英

香港機場管理局大力鼓吹興建第三條跑道（下稱「三跑」），但是由始至終向香港公眾甚至政府高層隱瞞了一件關鍵事實：三跑使用的北飛航道會把飛機送去與進出深圳機場的飛機碰撞的危險位置。

機管局醞釀在我們看不到的地方製造一場死亡遊戲，讓我把事實展現在大家眼前。



鳴謝：機場發展關注網絡

上圖藍色線是進出深圳機場的航道，黃色線是專家顧問規劃從赤鱲角機場向西起飛的飛機北轉進入內地的航道，兩條線在淇澳島上空重疊（圖中的圓圈A），在這個位置兩條航道的飛機高度剛好都是4,900英呎左右（1,500米），可以算碰個正着，當然我們可以祈禱飛機不同時間飛過而避過撞機慘劇，但是這個死亡遊戲我們願意玩嗎？又或者我們可以強迫深圳機場一起玩嗎？

藍色的深圳機場航道早已存在，按國際航空慣例，航道、航線等先到先得，香港沒有特權要求人家讓路，為了航空安全，後果是三跑道系統這條北飛航道不能實現，即是說，三跑沒有向西起飛的功能。

再看兩條紅色虛線，圖中標記為「緊急復飛1」和「緊急復飛2」，前者是從東面來的飛機在三跑下降出現問題時緊急加油重新起飛所用的路線，在圓圈A與深圳航道重疊，後者是從西面下降碰到同樣情況時所用的路線，在圓圈B與深圳航道重疊。

在兩個重疊處雙方飛機的高度差距不足 1,000 英呎（300 米），也是一場死亡遊戲，根據航空安全要求是不容許發生的，即是說，飛機不能在第三條跑道下降，不論來自東面或西面。

如果我們不玩死亡遊戲（相信大家沒有異議），第三條跑道只剩下向東起飛的功能，於是花一千多億港元興建的三跑最多只有完整跑道功能的四分之一。我們講「最多」四分之一，是因為飛機向東起飛的話，三跑不能獨立運作，而必須看另外兩條跑道有否飛機起飛，因為舉竟民航機安全第一，不可以像戰鬥機進行花式表演般三架一齊起飛，以免發生危險。說到這裏，大概大家明白為甚麼三跑連四分之一條跑道也不如。

全港市民要問自己：可以笨到容許機管局花香港人以千億計的金錢去建四分一條跑道？

機管局有責任立即向香港全體市民和政府講清楚：它是否在為香港人製造死亡遊戲？它知道有圓圈 A 和 B 的撞機死亡陷阱嗎？

機管局必須把問題公開解釋，不要硬是叫我們相信三跑建好後，問題會自我消失！

鄭重鳴謝：前民航署署長林光宇先生首先揭示這個關鍵問題，見 2014 年 11 月 19 日信報文章《香港機場的「第三條出路」》

tpbpd

寄件者:
寄件日期:
收件者:
副本:
主旨:
附件:

Paul Zimmerman [redacted]
08日09月2015年星期二 23:46
tpbpd@pland.gov.hk
Miffy Ng
FW: Comment on Representations In Respect of Draft Chek Lap Kok Outline Zoning Plan
20150908 DHK OZP Chek Lap Kok S I-CLK 13 Comment on representation.doc

TPB/R/S/I-CLK/13-C130

From: Miffy Ng
Sent: Tuesday, September 08, 2015 6:38 PM
Subject: Comment on Representations In Respect of Draft Chek Lap Kok Outline Zoning Plan

Thanks,
Miffy

0058

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Hong Kong, 9 September 2015

Mr. Thomas Chow Tat Ming
Chairman of the Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Email: tpbpd@pland.gov.hk

Re: Comment on Representations In Respect of Draft Chek Lap Kok Outline Zoning Plan No.S/I-CLK/13

Dear Chairman and Members,

The following comments are made under Section 6A (1) of the Town Planning Ordinance (TPO) in respect of the representations. Kindly consider our following concerns:

Comment on Representations No. TPB/R/S/I-CLK/13-1 to 4

We do not support representations 1-4.

1. The representations claim that the 3R System (3RS) is needed for Hong Kong to sustain its competitiveness and growth. It is assumed that the 3RS would achieve the target capacity as claimed by Airport Authority Hong Kong (AAHK). It must be pointed out that there is serious doubt that the 3RS would be able to achieve its target capacity as explained in Representation No. TPB/R/S/I-CLK/5-385, 390-398 and others. The air traffic demand forecast is based on Master Plan 2030, which was published in 2007. The expected economic and local population growth is in doubt. Moreover, most of the representations submitted to Town Planning Board show concern over air space, as the surrounding terrain and air space management will limit air traffic. This is a key factor determining whether the 3RS could achieve its target capacity, Town Planning Board should not ignore and allow the rezoning when the air space issue has not been resolved.

2. The representations also claim that the runway capacity is constrained and that the 3RS is required to meet Hong Kong's medium to long-term demand and maintain competitiveness of HKIA against other airports in the region. However, there are other alternatives which can increase the capacity of the airport. The AAHK has failed to explain to the general public the feasibility of alternative strategies in terms of environmental, social as well as economic impact. The process of selecting the 3RS as AAHK's most favourable scheme and the criteria with which the alternatives were assessed have not been disclosed to the public. In other words the selection process has not been conducted in a transparent manner. It is thus impossible to judge why the 3RS is the most feasible option to address the problem of capacity constraint and worth the allocation of a large area of reclaimed land including 650 hectares.

3. Representation No. TPB/R/S/I-CLK/13-3 opines that the expanded airport combined with Tung Chung New Town Extension Development would emerge as a new tourism hub for PRD region with retail and commercial facilities. However, this premise is wrong. The prime purpose of the HKIA, as stipulated in the Airport Authority Ordinance, shall be to maintain Hong Kong's status as a centre of international and regional aviation, and to provide, operate, develop and maintain an airport at and in the vicinity of Chek Lap Kok for civil aviation.

Unit 7, 5/F, Eastern Harbour Centre,28 Hoi Chak Street, Quarry Bay,
Tel: +852 3104 2765 Fax:+852 2187 2305

4. Representation No. TPB/R/S/I-CLK/13-3 considers that the EIA is thorough and well-balanced and that the proposed marine park will ensure the prosperity of marine life, and it suggests that after completion of infrastructure projects Chinese White Dolphin has been observed to repopulate the region soon after completion of related works. The EIA is now subject a judicial review and is awaiting the ruling of the court. The proposed marine park is not a mitigation measure under the EIA, and unrelated to the airport construction. Moreover, as there is no commitment on excluding marine traffic and on safeguarding corridors for marine life. The effectiveness of marine parks in mitigating the impact of 3RS construction and loss of habitat is highly doubtful.

5. Representation No. TPB/R/S/I-CLK/13-4 suggested that separate airport for cargo may be considered after completion of the 3RS. According to HKTDC research, over 50% of the Hong Kong's airfreight is carried in the holds of passenger aircraft rather than pure freighters.[1] This suggestion is unreasonable, as the flexibility and effectiveness of a separated airport for cargo is lower compared with airport contained aircraft and freighters.

Comment on Representations No. TPB/R/S/I-CLK/13-5 to 12,200

1. Many of the remaining 12,200 representations who object to the 3RS for a range of reasons highlight the noise disturbance and air pollution to communities near the airport and along the different flight paths. The proposed noise contours and proposed mitigation measures ignore the likely increase in noise events for a large section of Hong Kong's population. Tung Chung has suffered from air pollution severely; we believe that the proposed development would intensify the bad situation. The Board is responsible for safeguarding the health and well-being of Hong Kong people should give due consideration to these representations before reserving land for an increase in airport operations. The AAHK should reconsider mitigation and compensation measures before the project proceeds further.

2. Most of the representations urged for an overall public consultation regarding the traffic, ecological, reclamation works and financial management. We support a comprehensive and long-term public consultation on the proposed third runway development.

3. The safety issues highlighted by among others Representation No. TPB/R/S/I-CLK/13-400 should be dealt with thoroughly and all relevant studies mentioned should be undertaken and considered by the Board.

In view of the above, it will be premature to proceed with the proposed amendments and Draft Plan. The Board should consider amendments under section 6B (8) of TPO and delete the amendments to the Draft Chek Lap Kok Outline Zoning Plan No.S/I-CLK/13.

Here we submit our concerns for your consideration.

Designing Hong Kong Limited
September 2015

[1] http://hong-kong-economy-research.hktdc.com/business-news/article/Hong-Kong-Industry-Profiles/Air-Transport-Industry-in-Hong-Kong/hkip/en/1/1X000000/1X0018JT.htm

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赤鱲角分區計劃大綱草圖S/I-CLK/13 - 就申訴提出意見
07/09/2015 21:46

[redacted] to: tpbpd@pland.gov.hk

TPB/R/S/I-CLK/13-C132

2015年8月18日城市規劃委員會的憲報通告，公布了公眾對赤鱲角分區計劃大綱草圖S/I-CLK/13的申訴，以及邀請公眾對該等申訴提出意見。謹根據城規條例6A（1)提出以下的意見。

申訴編號 TPB/R/S/I-CLK/13-1 至 4

1. 此四項申訴支持草圖北面填海所得土地用作「機場」用途，論述基礎是該處興建第三條跑道（"三跑"）會提升赤鱲角機場的競爭力，而這個說法又建基於機場管理局所謂「三跑系統可以大幅提升機場的飛機升降量」的假設。必須指出：航空專家（包括兩位前民航處處長、內地航空專家及機管局聘請的顧問NATS*）早已指出空域飽和令三跑建了也沒用，今年（2015年）年初廣州白雲機場第三條跑道開始運作後，每天只能增加十個航班是非常實質的證明，赤鱲角機場和深圳機場飛機升降有直接的矛盾來自簡單的幾何空間局限，在不關閉深圳機場的前提下，沒有任何人為措施能夠解決，實質超出了內地及特區政府的解難能力。城規會委員必須認真理解第三條跑道不能發揮機管局聲稱的功能的原因，包括TPB/R/S/I-CLK/1-392對機管局所作預測的嚴重質疑。基於以上現實，TPB/R/S/I-CLK/13-1 to 4支持草圖者的意見是建基於錯誤和不成立的理據的，城規會不應理會。
（*見2007年提交的《空域及跑道容量研究第一期終期報告》）

2. 草圖支持者意見認為雙跑道系統接近飽和，三跑可滿足中至長期的航運需求，有助維持競爭力，不過提升目前赤鱲角機場飛機升降數目的方法不只一個，資深民航專家如兩位前民航處處長和民間團體人人監機會先後提出了毋需三跑的替代方案，但是機管局一直拒絕公開討論，也從來沒有和不能證明三跑是最符合環境、社會及經濟效益的提升競爭力方案，因此城規會不可能知道草圖中有關三跑部份的土地規劃是否達到香港規劃基本目標「促進社區的衞生、安全、便利及一般福利」*的最優方案。由於草圖支持者的意見假設了三跑是唯一方案，而這是源於對事件的錯誤認識（主要受機管局的片面宣傳誤導），與事實不符，城規會不應理會他們的支持意見和不應通過填海建三跑的大綱圖修訂。
（*香港法律第131章城市規劃條例「詳題」，是城規會運作的指導原則。）

申訴編號 TPB/R/S/I-CLK/13-5 至 12220

3. 一萬二千多份反對意見書中，牽涉的範圍非常廣泛，包括三跑興建期間及興建後對全港各區居民及社區造成的種種負面影響、欠缺全盤運輸配套規劃、對生態的嚴重影響、以及衍生出航空、航海及陸地運輸的安全問題（尤其見TPB/R/S/I-CLK/13-400）等等，千頭萬緒而不見全局，未見其利已先見其害，城規會應認真處理所有反對意見書提出的理據，否則三跑建成後不能達至預測的效益卻造成早已預見的破壞，則城規會和相關政府部門恐怕都要負上無可逃避的責任，不過對香港整體利益來說，更不幸的是不少破壞將是無可彌補的。

結論

4. 三跑牽涉填海650公頃，面積約為界限街以南九龍半島（不計西九新填海區及舊啟德機場）的三分之二，佔用香港寶貴空間不，茲事體大，處理必須慎之又慎。舉一個極端的例，同樣面積的土地，足夠興建一個「新九龍」，讓百萬計的香港人安居樂業，有了這個比較，希望城規會委員們感應到這次大綱圖修訂的大局觀和對全港市民的重要性，絕不宜單純地看成「機場發展」議題而匆匆通過。

5. 在履行法律要求「促進社區的衞生、安全、便利及一般福利」的前提下，注意到四份支持修訂圖的意見書是基於不成立的理據和錯誤的認識，考慮到三跑未被證明是提高赤鱲角機場（及香港航空業）競爭力、最符合香港總體利益的方案，以及理解到同樣面積土地的重大社會意義，城規會此刻應該否決赤鱲角分區計劃大綱草圖S/I-CLK/13內提出的修訂。

寄件者: Lam Shu Wing [redacted]
寄件日期: 07日09月2015年星期一 21:33
收件者: tpbpd@pland.gov.hk
主旨: 反對興建機場第三條跑道

TPB/R/S/I-CLK/13-C190

本人林樹榮反對興建機場第三條跑道，不同意修訂赤鱲角分區計劃大綱圖（圖則編號 S/I-CLK/13），並支持申述意見 TPB/R/S/I-CLK/13-5 至 TPB/R/S/I-CLK/13-12220 就第三條跑道提出的憂慮，重申理由如下：

【海洋是大眾資產　不容私有化】
海洋是公共擁有，在海洋上進行填海等不可逆轉的發展更是要小心和保守。就此填海為機場興建第三條跑道為例，第三跑工程卻未經透明公開及獨立的全面公眾諮詢，政府其實不應就這未得公眾認受的工程進行法定填海程序。現在當局按《前濱及海床條例》刊憲，當中已有「工程將會進行」的前設，是本末倒置，不符政府程序公義及合理期望。

【空域問題未解決，　三跑得物無所用】
第三條跑道不是香港單方面可以落實，需要澳門及深圳機場作配合。現時珠三角多個機場太近，樽頸並非的跑道，而是空域及航道。港深空域矛盾難解決，政府一直拒絕公開與三地空域協議　，卻欺騙市民打算「邊興建商討」，非常不負責任　。

【1415 億造價太昂貴】
三跑乃香港主權移交後後最貴工程，而現時方案中只有半個客運大樓，　工程隨時大幅超支。　政府建議的三種融資計劃　，包括免機管局未來十年股息　，令庫房減少 500　億收入，以及向市民收取$180 機場建設費，都是出自市民口袋，理應用作有利民生的社會政策如教育和福利等。

【應先增加雙跑道容量及改善機場效率】
現時雙跑道容量其實未用盡，應先從以下方向提升機場容量　，這些方法成本極低，不需巨額工程費　，包括：減少中國二三線城市航班，　放眼國際；　使用載客量較大的飛機　，珍惜跑道空間；　興建中場客運大樓及登機橋，改善旅客體驗，　提升機場效率。

【破壞海洋生態，　摧毀中華白海豚生境】
本來於填海一帶域生活及覓食，或需經過該的洋物　，將永久損 失超過 650 公頃棲息地 棲息地　，進一步危及中華白海豚 中華白海豚 的生存；機管局提出七年後 建海岸公園乃「先破壞、後補償」，於事無補，因為海豚已因工程影響離開或死亡。

【加劇噪音問題及空氣污染】
飛機發出的噪音對航道沿途居民影響嚴重，滋擾日常生活多年來未見有效解決方法，興建第三條跑道將會加劇有關問題　；航空業乃高污染行業，　三跑興建後將大大增加臭氧及氮化物等空氣污染物濃度，　整體市民健康受損。

0228

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反對機場第三條跑道工程及規劃 (S/I-CLK/13)
07/09/2015 17:18

[redacted] to: tpbpd@pland.gov.hk

TPB/R/S/I-CLK/13-C328

致　城市規劃委員會

機場第三條跑道一旦建成　馬灣居民勢必受害
反對機場第三條跑道工程及規劃 (S/I-CLK/13)

馬灣長期以來深受飛機噪音所害，居民無不叫苦連天，生活日常分分秒秒被困擾。儘管過去向民航處及機管局極力投訴，要求改善問題，可恨是當局持大欺小，除了官腔回應，所謂改善措施從沒有實際效果，承諾皆為空言，至今每日在珀麗灣及馬灣村頭上，仍然是飛機聲隆隆作響。

至近年機管局為推銷第三條跑道，主動向馬灣居民宣傳工程完成後，飛機可以向北直飛，飛越馬灣的飛機將會減少，噪音問題就得到長遠解決。但是，有前民航處長就公開表示，要做到飛機向北直飛，中港跨境空域問題需先得到解決，而此事的可能性極微。後有環保團體發表研究及專業機師於報章撰文，揭發如果香港空域受大陸空牆限制的問題持續，屆時珀麗灣上空將有比現在更多的飛機飛過，噪音只會有增無減！按團體的專業估計，馬灣北面及珀麗灣全屋苑都很可能在NEF 25噪音影響的範圍內，問題極之嚴重，但機管局對此半聲不響，在工程環評報告內亦全無提及，有意蒙馬灣居民在鼓裡，實在欺人太甚！

當然，機場第三條跑道的問題不只馬灣居民受影響。工程大規模填海對海洋生態的破壞、香港要為興建機場而要支付的金錢及社會成本、所謂經濟回報是如何計算、大型基建一旦超支又如何解決等，當局均一直沒有公佈資料及誠實回應。香港市民不能認同這種自以為是，不顧民情的規劃方式。

有關機場環評報告及行政會議決定正被司法覆核挑戰中，在政府及機管局未清楚交代以上環境、噪音、生態、經濟問題及官司有結果之前，本人強烈反對機場第三條跑道工程，要求城規會聽從民意，反對機場相關的整份S/I-CLK/13赤鱲角分區計劃大綱圖。

Chan Sung Hong

二零一五年九月八日

0272

A member enquired about the existing quota of the general out-patient department of the hospital, the time for raising the quota and whether the extra quota would be allocated to patients of chronic diseases or reserved for those with telephone appointment or in the form of daily quota.

The representative of the NLTH responded as follows:

(a) The 5 000 additional annual quota would be reserved for patients of episodic diseases, excluding that for chronic disease patients. Each year 40 000 or 50 000 patients consulted the general out-patient department of the hospital. Improvement would be made gradually.

(b) Patients highly suspected of carrying MERS would be transferred direct to PMH's Infectious Disease Centre. NLTH was fully equipped to handle suspected MERS cases and conduct tests for MERS at the early stage. Patients tested positive would be transferred to PMH immediately.

III. Amendments to the Approved Chek Lap Kok Outline Zoning Plan No. S/I-CLK/12

A representative of the Planning Department (PlanD) gave a briefing with the aid of PowerPoint presentation.

A member said that the Airport Authority Hong Kong (AA) bypassed the Legislative Council (LegCo) and presented the three-runway system (3RS) project to Town Planning Board (TPB) for consultation and he expressed regret at the adoption of the approach. The supervisory role of LegCo was undermined, and the legal issue of airspace management and technicalities concerning flight direction remained unresolved. Since the environmental permit had been issued, there was little TPB could do. He did not agree to the amendments to the Outline Zoning Plan (OZP).

Another member shared his view. The financial arrangement plan was an attempt to bypass LegCo and that was unusual. Recent incidents showed that the Government took forward projects regardless of public opinions would have disastrous consequences. She hoped the Chief Executive and his team would pay heed to public views and the affected people's concerns sincerely. She also hoped that the PlanD and AA would address the concerns of members and the public over the 3RS project, especially its financial arrangement, and that the LegCo would be allowed to exercise its powers.

A member said that there should be no delay to implement the 3RS project and was afraid the third runway could not come into operation in 2023 as scheduled given that four judicial reviews were underway. In the previous year, the Civil Aviation Department (CAD) and AA had explained that the problem facing the two-runway system was inadequate ground space for landing and taking off of aircrafts, not airspace management. The Islands District Council (IDC) had sufficient discussion regarding the 3RS project. Under 3RS, the new north runway would be in use during night-time to reduce the noise impacts on Tung Chung residents. He hoped AA would continue to follow up on the financial arrangement and other issues of 3RS and increase its transparency. The LegCo had set up a Subcommittee and he hoped the government departments would respect the LegCo and District Councils and keep members informed of the progress.

The Vice-chairlady advised that IDC members had said time and again that 3RS would generate enormous economic benefits by enhancing Hong Kong's competitiveness and creating more job opportunities. She supported the early implementation of the project. AA had held over 200 public forums and she believed AA would ensure that 3RS would meet the requirements of the environmental impact assessment (EIA). The use and management of airspace in Pearl River Delta (PRD) region had no conflict with 3RS, and the Central Government had all along given its full support. Under the operation of the new north runway, the flight paths would be far away from densely populated districts in new towns and Lautau West. The amendments to the OZP would stimulate the development of economy and judicial reviews would cause delay to the project and lead to higher construction cost. Hong Kong would be in danger of being marginalised if the project was held back. She supported the amendments to the OZP and encouraged the residents to voice their views during the consultation period.

A member said that AA and the relevant government departments had explained the 3RS many times to allay members' concerns. He cited the Hong Kong-Zhuhai-Macao Bridge (HZMB) as an example to illustrate that a delay of the 3RS project would cause cost overruns and hinder the overall development of Hong Kong. He supported the amendments to the OZP.

A member was a legal consultant of New World Development Company Limited and he declared interests. He said that 3RS was of paramount importance to Hong Kong's development, and he hoped that even though the public had divided views over the financial arrangement plan, they should not obstruct the entire project. He supported the amendments to the OZP and hoped the 3RS project could be implemented smoothly.

A representative of the PlanD was pleased that a majority of members supported the amendments. The EIA report had been approved, and the amendments were made basing on the findings of the technical assessment and in accordance with the policy of the Executive Council. The department noted the concerns of the community and LegCo about the financial arrangement.

A representative of AA responded as follows:

(a) The 3RS project was of paramount importance to Hong Kong. AA agreed to be under the supervision of LegCo. Apart from the LegCo's endorsement of the formation of a Subcommittee in May 2015, the Governement would set up an advisory committee to collect public opinions on the 3RS project. AA would co-operate with the Subcommittee and advisory committee.

(b) The financial arrangement of AA was based on a joint contribution and user-pay principle. AA would fund the project through three channels: (1) bank loans; (2) the airport's operational surplus; and (3) fees and charges imposed on airport users. AA believed that as around 70% of airport passengers were non-Hong Kong residents, the user-pay principle made good sense. In response to the Government's enquiry whether it would adjust downwards the airport construction fee for departing passengers, AA would discuss with the independent financial consultant and submit its proposal in due course.

A representative of THB said that the Airport Expansion Project Coordination Office of the Bureau would gather and coordinate the views of various parties for discussion by the Subcommittee and thus there was no such thing as to bypass the LegCo's scrutiny. Given the scale, cost and complexity of the 3RS project, the Bureau would monitor the work of AA to ensure that the project would be delivered in a timely manner and public interests were protected.

Chairman enquired whether members agreed to amend the OZP.

A member said that the consultation on the amendments would conclude on 8 July of the year and members could submit their views to TPB during the consultation period. She queried whether members had to give their stance at the meeting. She had reservations about the amendments and hoped that AA and relevant government departments would provide more information.

When asked, 19 members gave support for the amendments and two expressed reservations.

~~IV. Question on development of Lantau Island leading to imbalance in transport ancillary~~ facilities

A representative of the Transport Department responded as follows:

(a) The department would formulate detailed plans with relevant bureaux and government departments to pursue the conservation intent and rationalise the traffic facilities and public transport on Lantau Island to tie in with the timetable of development projects.

(b) When Ngong Ping 360 closed for maintenance on May 1, the Labour Day holiday, the demand for bus and ferry services increased. A survey by the Department showed that the demand for bus service had doubled that day, and New Lantao Bus Company Ltd (Lantao Bus) increased the service of routes 3M, 11 and 23 three or four times.

(c) The Department was informed prior to service suspension and had requested Lantao Bus in advance to increase bus service.

The representative of the Transport Department said that the New World First Ferry Services (First Ferry) had increased the service between Central and Mui Wo to meet the demand. Generally speaking, the demand was sufficiently coped with. During the period from May 17 to 31, the ferries running along the Central - Mui Wo route were less than 80% full even at peak times.

A representative of First Ferry said that extra fast ferries were deployed on the Labour Day Holiday with four more sailings between Central and Mui Wo on morning peak and two more on evening peak.

A representative of Lantao Bus said the number of bus passengers on May 1 was several times more than other holidays. Extra buses had been deployed to handle the crowd and the operation was generally smooth.

A member said that South Lautau Road was seriously damaged due to wear and tear. He was dissatisfied that over 10 improvement works were outstanding because no excavation permit was issued. Illegal roadside parking on South Lautau ~~was rampant and on the day of Dragon Boat Festival, over 200 vehicles were found~~

~~(b) 關於中東呼吸綜合症，如果在機場內發現高度懷疑個案，衞生署職員會直接把病人轉送至瑪嘉烈醫院的傳染病控制中心。他不排除有遊客因為初期病徵不明顯，其後發病時才前往醫院求診。事實上，早前北大嶼山醫院曾接收一宗懷疑個案，其測試結果為陰性。北大嶼山醫院有足夠的設施和專業人員，初步處理懷疑個案，並會盡快進行檢測以確定病人是否感染中東呼吸綜合症。如檢測結果為陽性，院方會盡快把患者轉送至瑪嘉烈醫院接受治療。~~

~~(黃漢權議員在是項議題討論期間離開會場。)~~

~~(莊義雄醫生在是項議題討論完畢後離開會場。)~~

IV. 《赤鱲角分區計劃大綱核准圖編號 S/I-CLK/12》的修訂
(文件 IDC 55/2015 號)

26. 主席歡迎出席講解文件的嘉賓：規劃署西貢及離島規劃專員規劃專員鍾文傑先生、高級城市規劃師(離島)蕭爾年先生、運輸及房屋局助理秘書長(機場擴建統籌辦)朱展強先生、民航處高級評估主任吳毅賢先生，以及應邀出席的嘉賓：香港機場管理局策略規劃及發展總經理閻宇明女士和工程副總經理陳浩榮先生。

27. 蕭爾年先生利用電腦投影片介紹文件內容。

28. 余俊翔議員表示，機場管理局("機管局")繞過立法會，將三跑道系統計劃提交城市規劃委員會("城規會")進行諮詢，實屬偷步行為，對於機管局的做法，他表示遺憾。公眾對發展三跑道系統仍存有很多疑問，例如在財務融資安排方面，立法會的監察角色被剝奪，無從過問融資安排；而空域管理的法律問題以及飛機向北飛行等技術問題，亦尚未解決。他認為機管局在進行任何諮詢前，應先回應市民的關注，以釋除疑慮，但該局並沒有這樣做。由於計劃已獲批環境許可證，城規會的角色非常有限。對於機管局的做法，他再次表示遺憾，因此，他不支持《赤鱲角分區計劃大綱核准圖編號 S/I-CLK/12》("大綱圖")的修訂。

29. 容詠嫦議員贊同余俊翔議員的意見。她認為，機管局就三跑道系統計劃的融資安排，是試圖繞過立法會，做法非常不尋常。從近日的事件可見，如果政府罔顧民意，刻意推動某些項目，最終只會造

成非常慘痛的結局。行政長官曾表示，政府在未來會致力推動經濟及改善民生。她希望在推動任何事情之前，行政長官及其團隊要真心誠意聆聽居民及受影響市民的心聲，否則會令人失望。她希望規劃署及機管局解答議員及市民對三跑道系統計劃的關注及疑慮，特別是融資安排，並容許立法會行使其權力。她會適時就有關事宜向城規會反映意見。

30. 鄧家彪議員表示，推展三跑道系統計劃刻不容緩，但現時有四宗司法覆核正在進行，他擔心第三條跑道能否如期於 2023 年啟用。在過去一年，離島區議員曾多次就三跑道系統計劃作出提問，民航處及機管局亦詳細說明現時機場雙跑道系統所面對的技術問題，是沒有足夠地面空間提升飛機的升降量，而非空域管理問題。他認爲，離島區議會已就三跑道系統計劃進行充分討論，並認同機管局及民航處需要加強與市民的溝通。據他了解，在三跑道系統運作下，新的北跑道在深夜時段使用，相信有助減低晚間飛機嘈音對東涌居民的影響。至於三跑道系統計劃的融資及其他問題，他希望機管局繼續跟進及提高透明度。他補充，立法會已成立小組委員會，希望各部門尊重立法會及區議會，並適時向相關區議會報告計劃的進展。

31. 周轉香副主席表示，離島區議員曾多次表示，發展三跑道系統能提升香港的競爭力及創造就業，有重大的經濟價值，並支持盡快落實有關計劃。在諮詢過程中，機管局已進行二百多場公眾論壇，收集市民的意見。她相信機管局會確保三跑道系統符合環境影響評估的要求。至於珠三角地區的空域使用及管理問題，與興建三跑道系統並無矛盾，應由特區政府與中央商討，而中央一直非常支持香港的基建工程。她促請機管局與相關部門在規劃及興建三跑道系統的過程中，密切溝通及商議。此外，根據機管局所提供的資料，在新北跑道運作下，飛機升降會遠離新市鎮及大嶼山西面的民居。因此，村民關注在飛機噪音預測(NEF25)等量線 25 區域的建築物限制會否作出修訂。她認為修訂大綱圖或可帶動地區的發展。她擔心司法覆核會拖延該計劃的推展，令工程費用上升，增加市民的負擔。如遲遲未能落實計劃，將會導致本港的競爭力降低而令香港被邊緣化。因此，從離島區發展的角度而言，她支持大綱圖的修訂，並會鼓勵居民在諮詢期間踴躍發表意見。

32. 老廣成議員表示，機管局及各政府部門曾多次在離島區議會會議上，解釋三跑道系統方案，並回應議員的憂慮。他認為三跑道系統計劃對香港未來整體經濟發展影響深遠，相信大部分市民都會支持。他以港珠澳大橋為例，表示司法覆核拖延興建三跑道系統，將會

令工程超支，並會拖慢香港整體發展。他表示，興建三跑道系統刻不容緩，希望機管局及各政府部門向市民解釋該計劃，以釋疑慮及盡快落實該計劃。他支持修訂大綱圖。

33. 周浩鼎議員申報，他任職新世界發展有限公司的法律顧問。他曾多次在會議上表示，雖然公眾對機管局的融資方案有異議，但三跑道系統計劃對香港整體發展十分重要，除可創造 14 萬個職位外，亦對香港未來能否維持其航空樞紐的地位有所影響，如現時不落實興建三跑道系統，鄰近地區勢必與香港競爭，他擔心香港將難以維持航空樞紐的地位。因此，他認為即使公眾對興建三跑道系統的融資方案及操作細節有異議，亦不應拉倒整個計劃。他支持大綱圖的修訂，並希望三跑道系統計劃能順利推展，為市民帶來更多就業機會。

34. 鍾文傑先生感謝大部分議員支持修訂。環境保護署署長已批准三跑道系統的環境影響評估報告，是次大綱圖的修訂主要是根據有關項目的技術評估結果及配合行政會議的政策。規劃署亦備悉公眾及立法會對融資安排的關注。

35. 閻宇明女士回應如下：

(a) 三跑道系統計劃對香港的發展非常重要，機管局樂意接受立法會監察。立法會在 2015 年 5 月通過成立小組委員會，監察三跑道系統計劃的推行，機管局對此表示歡迎。此外，政府亦將成立諮詢委員會，以聽取社會人士對三跑道系統計劃的意見，機管局會全力配合。

(b) 機管局向政府提交的融資方案有兩大原則－共同承擔及用者自付。局方主要透過三個途徑集資，無需政府撥款。第一，是通過借貸；第二是保留機管局的盈利，注資三跑道系統計劃；第三是用者自付，即向機場使用者徵費。機管局認為，機場使用者有三成是本地人士，七成是海外旅客，因此按用者自付原則收費較為合理。政府亦提出請機管局考慮機場建設費是否有下調空間。為此，機管局正與獨立的財政顧問商討，稍後便會向政府提交建議。

36. 朱展強先生表示，立法會將會成立小組委員會，監察推展三跑道系統計劃的工作，運輸及房屋局("運房局")轄下的機場擴建工程統籌辦公室會負責收集和協調各方的意見及資料，以供該小組委員會討論，所以不存在繞過立法會的問題。鑑於三跑道系統計劃的規模、

成本和複雜性，局方明白公眾殷切期望由政府監察落實推展計劃，而運房局會監察機管局推展三跑道系統計劃的事宜，確保計劃順利推展及符合公眾利益。

37. 主席詢問議員是否同意修訂大綱圖。

38. 容詠嫦議員表示，有關修訂的諮詢期至本年 7 月 8 日為止，議員可在諮詢期內向城規會提交意見。她質疑區議會是否需要在是次會議上表態。她對大綱圖的修訂有所保留，希望機管局及相關政府部門提供更詳盡的資料，以便她有足夠資料表達意見。

39. 主席詢問議員的意見後，有 19 位議員表示支持修訂，2 位則有所保留。

(余漢坤議員在是項議題討論期間進入會場。)
(蕭爾年先生、朱展強先生、吳毅賢先生、閻宇明女士及陳浩榮先生在是項議題討論完畢後離開會場。)

V. 有關發展大嶼山將令交通配套失衡的提問
(文件 IDC 56/2015 號)

40. 主席歡迎出席回應的嘉賓：發展局助理秘書長(土地供應)葉鴻平先生；運輸署總運輸主任(新界西南)阮康誠先生及高級運輸主任(渡輪策劃)阮榮昌先生；規劃署西貢及離島規劃專員鍾文傑先生；新世界渡輪有限公司企業傳訊經理周淑敏女士；以及大嶼山巴士公司行政經理黃華先生。

41. 黃福根議員介紹提問內容。

42. 阮康誠先生回應如下：

(a) 運輸署及相關政策局和部門(例如土木工程拓展署)會密切留意，根據大嶼山保育的發展意向及個別項目的發展進度，適時作出詳細規劃，調整大嶼山的交通設施及公共運輸，以配合個別發展項目的時間表。

(b) 本年 5 月 1 日勞動節假期，適逢昂坪 360 進行維修，因此前往大嶼山旅遊的人士對巴士及渡輪服務的需求增加。根據運輸署的調查，5 月 1 日大嶼山巴士的需求較平日增加

《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》
申述的理據／申述人的建議的摘要及
規劃署的回應

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
表示支持的申述		
A(R1 至 R4)	見城市規劃委員會文件(下稱「文件」)第 4.2 段。	(1) 申述的理據 備悉。 (2) 申述人的建議 見文件第 6.25 段。
表示反對的申述		
發展三跑道系統的需要／現有雙跑道系統的效率和容量		
B6 至 B13、B15 及 B16 R390、R3343、R3648、R3649、R3652、R3653、R3721、R3760、R3761、R3797、R3803、R3805、R3980、R3981、R4027、R12020、	見文件第 4.3(a)至(d)段。	(1) 發展三跑道系統的需要 見文件第 6.7 至 6.12 段。 關於港深港高鐵（下稱「高鐵」）和香港國際機場（下稱「機場」）提供的短途航班之間的競爭的關注，須注意的是，可能面臨高鐵競爭的區域性內地航線[2]，其客運量只佔機場二零一四年的總客運量約 4%。高鐵應不會對機場構成重大的負面影響。相反，高鐵或可連達主要城市周邊的那些未必設有機場和國際航班服務的二三線地點，將有助擴大機場的載客範圍。再者，發展高速鐵路亦可提升旅遊意欲，擴大鐵路和航空運輸的整體

[1] 申述組別的索引見**附錄**。

[2] 包括汕頭、長沙、南寧、廈門、武漢、南京、南昌及福州等目的地。

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
R12072 及 R12151		市場規模。 (2) 現有雙跑道系統的效率和容量 見文件第 6.13 及 6.14 段。對申述人就雙跑道系統容量所提出的個別關注，回應如下： *a. 與區域內鄰近的機場合作* 國際航空業受嚴格規管，而且必須遵守各地政府有關當局之間簽訂的雙邊《民用航空運輸協定》(下稱「雙邊民航協定」)。這些協定屬國際條約，為雙邊民航夥伴之間的定期航班服務訂立框架。特區政府獲中央人民政府(下稱「中央政府」)根據《基本法》授權，可因應本港航空業和本地航空公司需要，與民航夥伴磋商航空交通權。中央政府則與其本身的雙邊夥伴簽訂雙邊民航協定，訂明有關的各個協議航班目的地。一般而言，雙邊民航協定一律以雙邊夥伴平等交換航空交通權為基礎。某一空管管轄區所得的權利，只可由該管轄區的指定航空公司行使。假如認為個別機場或政府機關可隨意把航機分流往其他機場(按定義是在香港的空管管轄區以外)，是妄顧現實而且絕不可行。

組別編號 [1] 申述編號	申述的理據／建議	規劃署的回應
		至於往返香港的定期航班服務，是由航空公司(而非政府或機場)因應市場情況，在符合雙邊民航協定框架的情況下，決定所提供的航空運輸服務量(包括目的地和班次)。假如有航空公司被迫終止香港和內地之間某些特定航點或短程航點的航班服務，定會有損相關航空公司的財政收益。而且，航班目的地的選擇減少，旅客需要轉乘非直航航班或轉往鄰近機場，會為他們帶來不便，損害機場作為國際及區域航空樞紐的地位。 根據「Strategic Access」在二零一一年進行的研究顯示，在十二個有兩個或以上機場的城市中，即使其大部分機場均在同一空管管轄區內，亦沒有一個有意義的合作例子。因為如果旅客要到另一機場轉機，連同來回兩個機場的交通接駁時間，轉機所需的時間便會較長；相比在同一個機場轉機所需預留的時間(以香港國際機場為例，目前少至 50 分鐘)，根本無法競爭。 此外，與珠三角地區的機場合作並不能取代擴建機場成為三跑道系統。大珠三角地區的五個機場正因應市場需求

組別編號 [1] 申述編號	申述的理據／建議	規劃署的回應
		進行擴建計劃。不過根據「IATA Consulting」的資料顯示，即使計及該五個機場客運量的預期增幅，它們於二零三零年的總供應量仍未能滿足預測的 8 200 萬人次客運需求量。 總括而言，香港不能依賴鄰近機場來解決本身機場的容量問題。 *b. 削除大嶼山東北部的山峯* 削去大嶼山東北部的高山峯頂的建議，既不切實際，亦不可行。按一九九二年《新機場總綱計劃》(下稱「《總綱計劃》」)建議，削除大嶼山東北部的大陰頂和花瓶頂，可減少對飛機引擎失去動力時的爬升限制，但在獨立混合起降模式運作下，並不能增加航機升降量，令機場雙跑道系統容量進一步提升。據民航處表示，假如雙跑道系統以獨立混合起降模式運作，同時又要符合國際民航組織的安全標準／規定，則大嶼山大部分高山峯頂便須削平。那麼，大嶼山重要的基建設施及地標，例如昂坪纜車、天壇大佛和寶蓮禪寺等，都得遷移。 *c. 減少飛往非熱門地點的航班*

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
		數目 在雙邊民航協定的框架下，航空公司(並非機場或政府)可因應市場需求和經營能力，決定所提供的定期航班服務的目的地、航線及班次。擁有四通八達的航線網絡，對維持機場作為國際及區域航空樞紐的地位，有關鍵的作用。取消網絡內任何航線，對機場的整體交通量，尤其是轉機／過境交通量(佔機場處理量相當大的比重)，會有深遠的影響。此外，旅客的選擇亦會因此而減少，並會損及本港整體經濟利益。 *d. 採用廣體飛機* 香港國際機場已是全球最有效率的機場之一[3]，採用廣體飛機的比率更是第二高(達62.1%)。再者，在機場升降的機種組合是市場需求使然，並由航空公司決定，不論機場營運者還是各地政府，都不應作出強制規定，而且不必要的干預亦會損害機場和航空公司的營運效率。

[3] 機場效率以工作量單位量度。一個工作量單位相等於一名旅客或100公斤貨物。根據國際機場協會二零一四年《全球機場交通量報告》，在香港國際機場升降的每架航機的平均工作量單位達267個，是全球最有效率的機場。

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
		e. 提供更多／改善地勤支援設施 為了在中短期內提升機場的地面處理能力，機管局正全力推展中場範圍發展計劃，增設20個停機位，期望每年額外處理1 000萬人次的旅客。當機場的中場範圍發展完成後，在雙跑道系統下，現有機場範圍內可供進一步擴建的空間將會有限。此外，由於機場容量的瓶頸是跑道的飛機起降容量，故此擴建中場範圍並不會提升機場的整體處理能力。因此，爲了應付長遠的航空交通需求，實有必要把機場擴建成爲三跑道系統。
環境及生態的問題		
B1至B4、 B7至B17 R5、R48、 R385至 R391、 R510、 R3343、 R3350、 R3354、 R3648、 R3649、 R3653、 R3721、 R3722、	見文件第4.3(e)至(i)段。	見文件第6.15及6.16段。對申述人所提出的個別環境／生態關注，回應如下： (1) <u>對中華白海豚的生活環境、自然環境、海洋生態和漁業資源的影響</u> 環保署署長和漁農自然護理署署長(下稱「漁護署署長」)表示，三跑道系統的環評報告已處理與三跑道系統工程計劃相關的擬議填海工程對海洋生態和漁業的影響，包括對中華白海豚的生活環

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
R3778、 R3781、 R3788、 R3792、 R3796、 R3799、 R3803 至 R3805、 R3978、 R12020、 R12067 至 R12069、 R12073、 R12081、 R12083、 R12085 及 R12205		境(生境)的影響，並提出了具體的的緩解措施，以符合三跑道系統的環評研究概要及根據環評條例發出的技術備忘錄(下稱「環評條例技術備忘錄」)的要求。根據三跑道系統的環評報告，機場擴建部分的覆蓋範圍已盡量縮小。另外，環評報告亦建議闢設海岸公園作為補償措施，為海洋生態提供一個受保護的生境。 (2) <u>闢設擬議海岸公園的成效及被指為「先破壞，後補償」的做法</u> a. 環保署署長及漁護署署長表示，環評報告建議闢設面積約 2 400 公頃的海岸公園(比擬議填海面積大近四倍)。擬議的海岸公園是一項主要的緩解措施，日後將會連接機場航道進場範圍[4]。該公園北接沙洲和龍鼓洲海岸公園，東接已承諾闢設的大小磨刀海岸公園，組成一個面積約 5 200 公頃的龐大而連綿不斷的海洋保護區。由此而所帶來的協同效應，長遠對保育中華白海豚的生活環境會有莫大幫助。此外，闢設海岸公園後，會規定所有在該公園範圍內航行的船隻，其速度不得超逾 10 節，以盡量減低海上交通對擬議海岸公

[4] 機場航道進場範圍是在機場島一帶劃出的一個範圍，作用是保障航空安全。在該範圍內航行的船隻的速度受到管制，以確保航空訊號傳送時不受船隻干擾，以及飛機航道暢通無阻。

組別編號 [1] 申述編號	申述的理據／建議	規劃署的回應
		園的干擾。 b. 為補償因進行與三跑道系統工程計劃相關的擬議土地平整工程而失去的生境，環評報告列出三跑道系統工程計劃在施工和運作階段所需採取的緩解措施，依次為避免影響、抑減影響及作出彌償。環保署署長及漁護署署長表示曾研究提前劃設該擬議海岸公園的可能性，但環評報告的結論是，在三跑道系統工程正在進行時劃定擬設的新海岸公園範圍並不切實可行。 (3) <u>噪音及空氣污染</u> a. 環保署署長表示，環評報告有交代飛機噪音及其他如空氣質素等環境問題的評估，以符合環評條例技術備忘錄及研究概要訂明的相關要求。環評報告提出了適當的消減噪音措施，建議加入三跑道系統的設計中，以及在日後三跑道系統運作時實施。根據三跑道系統環評報告，飛機噪音評估範圍涵蓋全港，而評估範圍內那些被環評條例技術備忘錄界定為易受噪音影響的地方，包括馬灣、沙田、深井、沙螺灣和礦頭，都進行了噪音評估。環保署署長表示，環評

組別編號 [1] 申述編號	申述的理據／建議	規劃署的回應
		報告的結論是，實施擬議的消減噪音措施後，應不會有剩餘的飛機噪音影響。至於空氣質素評估的結論是，當三跑道系統運作時，所有易受空氣質素影響的地方(包括東涌)，其空氣質素皆符合空氣質素指標。 b. 有指三跑道系統工程計劃會使碳排放量和其他污染物增加，加劇溫室效應。關於這點，環保署署長確認環評條例並無規定要進行溫室氣體評估。儘管如此，機管局亦就三跑道系統計劃相關的溫室氣體排放進行全面研究。研究結論是因三跑道系統運作從航機與非航機航空活動帶來的額外溫室氣體排放量，估計為 3,600 萬公噸二氧化碳當量；而以淨現值計算，在 50 年間產生的額外溫室氣體排放量總碳成本，估計約 70 億港元。有關的研究報告摘要已上載至香港國際機場三跑道系統專題網站，以供查閱。有關的碳成本估算遠低於三跑道系統計劃可帶來超過 4,500 億港元的額外經濟效益。此外，航空相關的溫室氣體排放主要由飛機的活動所引致，機管局可直接管轄的溫室氣體排放量只佔極少部分。然而，機管局承諾會採取積極行動減少

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
		在其直接管轄下的温室氣體排放量，包括繼續與機管局的業務夥伴聯手監察及減少碳排放。 (4) 對沙洲鷺鳥林和沙螺灣的負面影響 環保署署長表示，環評報告提出了緩解措施，以紓減對沙洲鷺鳥林可能造成的影響。該報告的結論是，有關措施可有效紓減對沙洲鷺鳥林可能造成的影響。環保署署長確定這方面已符合環評研究概要及環評條例技術備忘錄的相關規定。關於沙螺灣沙灘海沙流失的問題，前臨時機場管理局於一九九二年獲批許可證，可從龍鼓水道、磨刀洲、東沙洲和西蒲台挖取海沙，用以進行當時赤鱲角新機場的填海工程。該許可證涵蓋的範圍並不包括沙螺灣。機管局表示，沒有資料顯示沙螺灣海沙流失與機場的運作有關。 (5) 建議的紓減環境影響措施的成效 環保署署長和漁護署署長表示，環評報告已評估三跑道系統及同期進行的其他工程計劃[5]的累積影響，包括對中華白海豚的影響，並提出了適當的緩解措施，紓減剩餘的累積影響，以符合環

[5] 環評報告曾考慮的「同期進行的工程計劃」包括：青衣西南部十號貨櫃碼頭發展計劃、香港口岸、香港接線及屯門至赤鱲角連接路、大嶼山物流園、欣澳的消閒及娛樂樞紐、機場東面／東沙洲的新污泥卸置設施、葵青貨櫃港灣挖泥工程及東涌新市鎮擴展工程。

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
		評條例的規定。所有建議的措施，例如採用免挖泥的深層水泥拌合法，皆證明有效。 (6) 關於環評條例程序中披露的資訊不足 環保署署長表示，進行環評的程序有法規訂明，透明度高，過程中所有主要步驟均在環評條例中清楚訂明，而項目倡議者所提供的全部文件(包括工程項目簡介和環評報告)亦已根據環評條例的規定，讓公眾查閱和提出意見。
交通問題		
B5及B6 R387、 R390、 R391、 R400、 R3354、 R3648、 R12020、 R12077、 R12078、 R12083及 R12085	見文件第4.3(j)至(l)段。	見文件第6.17至6.19段。
對土地用途及發展的管制不足／成效不彰		
B5 R391、 R398、 R12020、	見文件第4.3(m)及(n)段。	見文件第6.20及6.21段。

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
R12084及 R12085		
違反程序公義		
B5至B7及 B17	見文件第4.3(o)及(p)段。	見文件第6.22段。
R47、 R387、R389至R391、 R398、 R399、 R3201、 R3653、 R3769、 R3775、 R4019、 R4020、 R12069、 R12076、 R12082及 R12085		
不恰當的公眾諮詢工作		
B5至B7及 B14	見文件第4.3(q)段。	見文件第6.23段。

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
R47、 R389、 R391、 R398、 R3653、 R3722、 R3769、 R3775、 R4019、 R4020、 R12076、 R12082 及 R12085		
其他問題——空域問題尚未解決		
B1 及 B3 至 B17 R48、 R385、 R390、 R400、 R1477、 R3340、 R3343、 R3350、 R3354、 R3721、 R3760、 R3761、 R3769、 R3775、 R3973 至 R3975、 R3977、	見文件第 4.3(r)至(t)段。	見文件第 6.24(a)段，詳細的回應如下： ● 鑑於珠三角地區的航空交通日益頻繁，國家民航局、香港特區民航處及澳門民航局三方於二零零四年組成了「珠江三角洲地區空中交通管理規劃與實施專題工作組」(下稱「三方工作組」)，制訂措施改善珠三角地區的空域結構和航空交通管理安排，以優化空域的使用和加強安全。三方工作組於二零零七年定出《珠三角空管方案》[6]，清楚訂明在短、中及長期要達到和付諸實施的優化目標和措施，以優化珠三角地區空域的使用，配合區內民航業的持續發展。在落實《珠三角空管方案》的過程中，民航處會確保有關安排符合《基本法》的有關條文，以及國際民航組織的有關規定。

[6] 《珠三角空管方案》中經協定的原則是統一規劃、統一標準及統一程序。

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
R3980、 R3981、 R12068、 R12069、 R12076、 R12077、 R12081 及 R12085		● 在三方工作組的共同努力下，《珠三角空管方案》中多項航空交通管理優化措施均得以落實，其中包括加開珠三角外圍航道、增設空管移交點和調整珠海空域結構等，使珠三角地區的航班運作和航空交通管理效率都有所提升。 ● 對於有申述人指出有關「空牆」限制的問題，其實是其對毗連空域的航空交通管理安排有所誤解之故。申述人所指的其實是空管管轄區之間的「空管移交點」[7]。此安排是依照一般的民航安排，目的是把在毗連空域航行的飛機分隔開，防止飛機相阻，確保所有飛機安全航行。其他航空交通量高的機場也有此安排，實與跑道容量無關。跑道容量乃取決於接續使用跑道的飛機彼此起降相隔的時間和空間距離，以及機場附近一帶的地形。
其他問題——成本效益及財政可行性		
B3 及 B7 至 B16	見文件第 4.3(u)至(w)段。	見文件第 6.24(b)段。詳細的回應如下： (1) <u>融資安排</u> 機管局估計三跑道系統工程計劃的造價約為 1,415 億港元（按付款當日價格計算）。機管局作為三跑道系統工程計劃的倡議者，為這項計劃擬定了融資安排。根據有關安排，機管局會透過運用內部資金、向外借貸及向用者收費(包括調整對航空公司的機場收費及向離
R47、R48、 R54、 R385、 R510、 R3340、 R3343、 R3350、 R3648 至 R3650、 R3652、		

[7] 這裏是指香港與內地航空交通管制單位之間的安排，訂明往來香港與內地的飛機須於某一位置和最低高度(15 700呎)，才可在兩地的交通管制單位之間移交。

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
R3653、 R3722、 R3778、 R3780、 R3782、 R3784、 R3785、 R3788、 R3792、 R3794、 R3795、 R3797、 R3800、 R3803、 R3804、 R3806、 R3976、 R3978、 R3979、 R3981、 R12014、 R12067、 R12068、 R12081、 R12082 及 R12085		境的本地和海外旅客徵收機場建設費)進行融資。在此安排下，政府無須注資或為貸款提供擔保。由於機管局建議的融資安排並不涉及稅收或公共開支，所以《基本法》第七十三條的規定並不適用。無論如何，機管局會盡力管理工程計劃的實施，並把成本控制在協定的預算內，並設法按照計劃提高收入。若工程出現超支，政府將期望機管局採用一切可行及合理方法，盡量增加借貸。由於機管局的收入一向穩健，加上機場的未來航空交通需求穩步增長亦預計會令機管局的收入在未來繼續增長，政府認為機管局自行為這項工程計劃融資的建議整體上合理和切實可行。 (2) <u>內部回報率</u> 三跑道系統工程計劃的內部回報率與機管局預計未來的收入有直接關係。三跑道系統計劃作為單一項獨立工程，其內部回報率並未量度三跑道系統計劃對香港所帶來的整體利益。機管局已因應政府及公眾的意見，重新檢視其擬議的機場建設費的收費水平及融資安排建議。根據機管局最新的融資安排及收費建議，三跑道系統工程計劃的內部回報率約為8%。 (3) <u>經濟收益</u> 香港國際機場為香港帶來龐大的

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
		經濟價值。2012 年，機場所帶來的直接、間接及連帶經濟貢獻達到 940 億港元，佔本地生產總值 4.6%。機場亦支持本港四大經濟支柱產業－金融服務、貿易、及物流、旅遊、以及工商業支援及專業服務－這些產業合共佔 2013 年本地生產總值 58%。 作為《2030 規劃大綱》的一部分，機管局已委託顧問研究三跑道系統的經濟影響。一份最新的研究已在 2014/15 年進行，市民可在機管局網頁參閱其最終報告。 根據機管局對 2012 至 2061 年的 50 年間的預測，與目前雙跑道系統比較，三跑道系統額外帶來的經濟利益為 4,550 億元（按 2012 年價格計算），長遠來說，對香港經濟有極大的貢獻。 在就業機會方面，預計三跑道系統並會帶來約 123 000 個直接職位及 165 000 個間接或連帶職位，遠高於雙跑道系統帶來的 89 000 個直接職位及 119 000 個間接或連帶職位。 (4) <u>社會成本</u> 至於要求當局提供有關三跑道系統工程計劃的社會成本資料，有關人士應注意，社會回報成本是

組別編號 [1] 申述編號	申述的理據／建議	規劃署的回應
		透過計算成本和效益，評估一項工程計劃對社會、經濟及環境的影響的方法，當中涉及量化持份者對有關計劃的主觀判斷／觀感。機管局認為，由於沒有劃一的評估標準，大部分已發展國家如美國、英國、加拿大、德國及澳洲，也沒有法例規定須進行這方面的評估。 (5) 人手短缺 a. 機場現有的 65 000 名員工中，有 12%擔任體力勞動或低技術的職位。如發展三跑道系統，施工期間會創造 139 000 人工作年(包括直接、間接及連帶職位)。而到了二零三零年三跑道系統全面運作後，亦會創造 123 000 個直接職位及 165 000 個間接／連帶職位。 b. 關於人力資源的問題，據運房局表示，機管局正根據三跑道系統發展計劃的進程及相關的施工時間表，檢討預計所需的建築工人數目，以確保能適時提供人手，應付日後三跑道系統施工時的需求。另外，政府認同要加強和擴充機場服務，除了要提供設施外，提供人手也同樣重要。機場和航空相關的行業都需要大量人手，包括飛

組別編號[1] 申述編號	申述的理據／建議	規劃署的回應
		機工程師、機艙服務員、飛機維修員、航空交通控制員、行李處理大堂工作人員、餐飲及機場服務員。有見及此，政府非常重視航空業人員的培訓，並提出了多項措施支援航空業人員的培訓和發展，包括在二零一四年成立 1 億港元的「海運及空運人才培訓基金」，以及建議設立民航訓練學院。
其他問題——向受影響的村民作出補償		
B2	見文件第 4.3(x)段。	見文件第 6.21(c)及(d)段。
其他反對的申述(沒有特殊理由/建議)		
R3779、R12066 及 R12088 至 R12092	反對草圖／反對三跑道系統工程計劃	備悉。

附件 **IV** 的附錄－各組申述的索引

組別	申述編號
A	R1 至 R4
B1	R6 至 R15、R3969 至 R3972、R12150
B2	R16 至 R46
B3	R49 至 R53
B4	R54 至 R384、R12152

組別	申述編號
B5	R392 至 R397
B6	R399、R401 至 R509、R3770、R12070、R12071、R12074、R12075、R12080、R12086、R12087
B7	R511、R1067 至 R1476、R3315 至 R3319、R3331 至 R3339、R3341、R3342、R3344 至 R3348、R3351 至 R3353、R3355 至 R3359、R12176
B8	R512、R3349、R3789 至 R3791、R3798、R12014 至 R12019、R12079
B9	R513、R1478 至 R2538、R3783、R3786、R3787、R3793、R4029 至 R4474、R12153、R12154、R12177、R12180、R12192、R12193、R12195、R12196、R12199、R12200、R12206、R12207、R12209 至 R12213、R12218
B10	R514、R515、R11964 至 R12013
B11	R4475 至 R11963
B12	R516 至 R543、R2539 至 R2542、R3285、R3286、R3360 至 R3366、R3776、R3807、R3808、R3918 至 R3968、R12190
B13	R2567 至 R2631、R2639 至 R2868、R3425 至 R3495、R3523 至 R3549、R3555 至 R3568、R3651、R3660 至 R3693、R3759、R3763、R3777、R3882 至 R3917、R3996 至 R4000、R4013 至 R4018、R12140 至 R12145、R12158 至 R12161、R12178 至 R12179、R12216
B14	R3015 至 R3284、R3371 至 R3424、R3723 至 R3750、R3771 至 R3773、R3816 至 R3881、R3982 至 R3995、R4021 至 R4026、R12094 至 R12107、R12155 至 R12157、R12188、R12189、R12191、R12204、R12208、R12214、R12217
B15	R544 至 R1066、R2632 至 R2638、R2869 至 R3014、R3287 至 R3314、R3320 至 R3330、R3496 至 R3522、R3550 至 R3554、R3569 至 R3647、R3694 至 R3720、R3751 至 R3758、R3764 至 R3768、R3774、R3801、R3802、

組別	申述編號
	R4001 至 R4012、R4028、R12108 至 R12139、R12146 至 R12149、R12162 至 R12175、R12181 至 R12187 、 R12197 、 R12198 、 R12201 至 R12203、R12215、R12219、R12220
B16	R2543 至 R2566、R3367 至 R3370、R3654 至 R3659、R3762、R3809 至 R3815、R12093
B17	R12021 至 R12065、R12194

《赤鱲角分區計劃大綱草圖編號 S/I-CLK/13》

意見的摘要及規劃署的回應

意見編號 (R/S/I-CLK/13-)	相關的申述	意見的摘要	規劃署的回應
C1	• 對 R1 至 R12220 作出回應	(a) 見城市規劃委員會(下稱「城規會」)文件第 10056 號(下稱「文件」)第 5.2 段。	備悉。
C2	• 支持 R1、R2 及 R4 • 反對 R387、R389 及 R390	(a) 現有的雙跑道系統的容量即將飽和，因此有迫切需要發展三跑道系統。擴建機場是唯一可以應付香港中長期航空服務需求的辦法。 (b) 三跑道系統會成為香港經濟的推動力，有助維持機場的競爭力及增長，鞏固香港作為國際航空樞紐的地位。 (c) 發展三跑道系統可釋放大嶼山龐大的潛力和發揮協同作用，有助建立一個新旅遊樞紐。 (d) 未能落實三跑道系統，對工作安全、航空公司的表現和服務效率，以至香港航空業整體發	備悉。
C3	• 支持 R1 至 R4		
C4 至 C5	• 支持 R1		
C6 至 C123	• 不是與任何個別申述有關		

附件 V

意見編號 **(R/S/I-CLK/13-)**	相關的申述	意見的摘要	規劃署的回應
		展都有負面影響。 (e) 機管局如能運用最新的科技，並有效地落實所建議的緩解措施，以及進行緊密的監察，應可以令環境所受到的影響減至最少。 (f) 一些提意見人同意機管局現時提出的「共同承擔」融資方案**(只是 C7、C17 及 C18)**。	
C124 至 C127	• 不是與任何個別申述有關	(a) 支持發展機場三跑道系統，但沒有提出具體理由。	備悉。
C128 至 C160、C221 至 C223	• 反對 R1 至 R4 • 支持 R5 至 R12220(**只是 C128 至 C146 及 C149 至 C156**)	(a) **R1** 至 **R4** 表示支持的論點並無充分理據，只是基於不合理的假設及機管局有欠詳盡的資料(如航空交通影響評估)，根本不能成立，因此城規會不應理會。 (b) **R3** 表示支持的意見指擬設的海岸公園會保護海洋生物，是基於對環評報告的誤解，該報告	(a) 見文件第 6.7 至 6.12 段。 (b) 見文件第 6.15 至 6.16 段及**附件 IV** 關於「環境及生態問題」的回應(1)及(2)。 (c) 見文件第 6.7 至 6.24(d)段及**附件 IV** 對「表示反對的申述」的回應。

意見編號 **(R/S/I-CLK/13-)**	相關的申述	意見的摘要	規劃署的回應
		其實已被環境專家質疑。 (c) 城規會應認真考慮 **R392** 就三跑道系統的成本效益及設計容量所提出的質疑，亦應詳細考慮 R5 至 R12220 所指三跑道系統帶來的廣泛負面影響，特別是 **R400** 提出的安全問題。 (d) 選取三跑道系統方案的過程欠缺透明度，令人質疑這未必是解決跑道容量限制問題的最可行方案(**只是 C147 及 C148、C157 至 C160、C221 至 C223**)。	(d) 見文件第 6.7 至 6.14 段及**附件 IV** 關於「興建三跑道系統的需要／現有雙跑道系統的效率和容量」的回應(2)。
C161	• 反對 R1 至 R4 • 就 R3 及 R400 提出意見	(a) 表示支持的申述(**R1 至 R4**)不能成立，因為根據 **R392** 及其他表示反對的申述提出的理據，令人質疑三跑道系統是否可以達到機管局聲稱的設計容量。 (b) **R3** 的論點是基於對擴建機場的目的之錯誤假設，以為興建機場三跑道系統，再加上進行東	(a) 見文件第 6.7 至 6.24(d)段及**附件 IV** 對「表示反對的申述」的回應。 (b) 文件第 6.7 至 6.12 段已闡述興建三跑道系統的需要。進行三跑道系統工程計劃的好處之一，是可以在珠三角地區建立旅遊樞紐。
C162	• 就 R3 及 R392 提出意見		
C163 至 C181、C183、C184 及	• 就 R3、R392 及		

意見編號 **(R/S/I-CLK/13-)**	相關的申述	意見的摘要	規劃署的回應
C188	R400 提出意見	涌新市鎮擴展計劃，是為了在珠三角地區建立新旅遊樞紐，但其實《機場管理局條例》訂明，發展機場的首要目的是維持香港作為國際及區域航空中心的地位。 (c) 城規會亦應詳盡考慮 R5 至 R12220 所指三跑道系統帶來的廣泛負面影響，特別是 **R400** 提出的安全問題**(只是 C161、C163 至 C181、C183、C184 及 C188)**。	(c) 見文件第 6.7 至 6.24(d)段及**附件 IV** 對「表示反對的申述」的回應。
C185	• 就 R3 提出意見	(a) **R3** 的論點是基於對擴建機場的目的之錯誤假設，以為興建機場三跑道系統，再加上進行東涌新市鎮擴展計劃，是為了在珠三角地區建立新旅遊樞紐，但其實《機場管理局條例》訂明，發展機場的主要目的是維持香港作為國際及區域航空中心的地位。 (b) 當局未有提供足夠資料／技術評估數據，證明三跑道系統是	(a) 文件第 6.7 至 6.12 段已闡述興建三跑道系統的需要。進行三跑道系統發展計劃的好處之一，是可以在珠三角地區建立旅遊樞紐。 (b) 見文件第 6.7 至 6.14 段及**附件 IV** 關於「興建三跑道系統的需要／雙跑道系統的效率和容量」的回應(2)。 (c) 見文件的**附件 IV** 關於「環境及生
C186、C187 及 R189	• 就 R3 及 R400 提出意見		

意見編號 **(R/S/I-CLK/13-)**	相關的申述	意見的摘要	規劃署的回應
		擴建機場的最可行方案。選取三跑道系統方案的過程欠缺透明度。 (c) 當局應針對三跑道系統發展計劃對區內環境／居民所造成的各種滋擾和污染，作出適當的回應，並提出合適的緩解措施**(只是 C185)**。 (d) 城規會亦應詳細考慮 R5 至 R12220 所指三跑道系統帶來的廣泛不良影響，特別是 **R400** 提出的安全問題**(只是 C186、C187 及 R189)**。	態的問題」的回應。 (d) 見文件第 6.7 至 6.24(d)段及**附件 IV** 對「表示反對的申述」的回應。
C190 至 C219 及 C224 至 C227	• 支持 R5 至 R12220	(a) 三跑道系統工程計劃欠缺公開透明的公眾諮詢程序。在公眾未有共識的情況下進行有關填海工程及修訂分區計劃大綱圖的法定程序，做法有違程序公義。 (b) 倘空域問題不能解決，三跑道系統所發揮的效用成疑。	(a) 見文件第 6.22 及 6.23 段。 (b) 見文件第 6.24(a)段及**附件 IV** 關於「其他問題—空域問題尚未解決」的回應。 (c) 見文件第 6.24(b)段及**附件 IV** 關於「其他問題—成本效益及財政
C230 至 C346	• 不是與任何個別申述有關		

意見編號 (R/S/I-CLK/13-)	相關的申述	意見的摘要	規劃署的回應
		(c) 建築費用高昂，可能有超支風險。發展三跑道系統的開支可用於其他有利於市民的政策方面。 (d) 當局未有全面探討提升雙跑道系統運作效率的各個方案是否可行。 (e) 興建三跑道系統涉及大規模填海工程，會摧毀中華白海豚生活的海洋環境。此外，在三跑道系統落成後才闢設海岸公園的建議，等同「先破壞，後補償」，是不可接受的。 (f) 機場運作時產生噪音，亦污染空氣，對區內居民造成不可接受的影響。	可行性」的回應。 (d) 見文件的**附件 IV** 關於「興建三跑道系統的需要／現有雙跑道系統的效率和容量」的回應(2)。 (e) 見文件第 6.15 及 6.16 段及**附件 IV** 關於「環境及生態的問題」的回應(1)及(2)。 (f) 見文件第 6.15 及 6.16 段及**附件 IV** 關於「環境及生態的問題」的回應(3)。
C220	• 反對 R1 至 R4 • 支持 R47 至 R12220	(a) 若空域問題未能解決，三跑道系統所發揮的效用成疑。 (b) 三跑道系統的環評報告及環境許可證正面對法律挑戰，政府	(a) 見文件第 6.24(a)段及**附件 IV** 關於「對其他問題—空域問題尚未解決」的回應。 (b) 見文件第 6.22 段。

意見編號 (R/S/I-CLK/13-)	相關的申述	意見的摘要	規劃署的回應
		不應進行有關的法定程序。	
C228	• 支持 R386、R389 及 R397	(a) 其中一項主要的緩解措施，即建議在大嶼山西南面及索罟群島闢設海岸公園，由於區內人士反對，根本不能落實。 (b) 北大嶼山對出水域有數項建築工程計劃陸續進行，所造成的累積影響，會令海洋生境惡化，對中華白海豚造成負面影響。	(a) 見文件第 6.15 及 6.16 段及**附件 IV** 關於「環境及生態的問題」的回應(3)。 (b) 見文件第 6.15 及 6.16 段及**附件 IV** 關於「環境及生態的問題」的回應(3)。
C229	• 就 R399 至 R508 提出意見	(a) 反對三跑道系統。 (b) 當局未有公開三跑道系統的交通影響評估的詳細資料，亦沒有就三跑道系統進行海上交通影響評估和水文影響評估。 (c) 當局未有按國際民用航空組織的規定提供三跑道系統的航空交通影響評估及其他相關評估資料。	(a) 備悉。見下文的回應。 (b) 見文件第 6.17 及 6.18 段。 (c) 見文件第 6.19 段。

申述個案編號
REPRESENTATIONS No.
R1-R699, R701-R1699, R1701-R1951, R1953-R2658, R2660-R2699, R2701-R3033, R3035-R4044, R4046-R4118, R4120-R4262 & R4264-R12220

N

沙洲及龍鼓灣海岸公園
SHA CHAU AND LUNG KWU CHAU MARINE PARK

大磡灯
TAI MO TO (WEST BROTHER)

機場
AIRPORT

機場相關設施用地
AIRPORT SERVICE AREA

OU

A

B

Northern Runway

北跑道

South Airfield Road

Terminal Concourse

客運大樓

香港國際機場
HONG KONG INTERNATIONAL AIRPORT

Southern Runway

南跑道

North Runway Road

South Runway Road

海上救援站
SEA RESCUE STATION

自動旅客捷運系統隧道（暫定路線）
AUTOMATED PEOPLE MOVER TUNNEL (TENTATIVE ALIGNMENT)

通風大樓
VENTILATION BUILDING

口岸
BOUNDARY CROSSING FACILITIES

屯門至赤鱲角連接路
TUEN MUN – CHEK LAP KOK LINK

衛星管制樓
SATELLITE CONTROL BUILDING

AMENITY AREA

HIGHWAYS MAINTENANCE AREA

SCENIC HILL

水藍天岸
LeBleu Deux

映灣園
Caribbean Coast

藍天海岸
Coastal Skyline

北大嶼山公路
NORTH LANTAU HIGHWAY

東堤灣畔
Tung Chung Crescent

東涌
TUNG CHUNG

田心
TIN SAM

沙螺灣
SHA LO WAN

東涌灣
TUNG CHUNG BAY

逸東邨
Yat Tung Estate

欖石灣
SAN SHEK WAN

圖例 LEGEND

	申述地點 REPRESENTATION SITE
Ⓐ	分區計劃大綱圖內的修訂項目 AMENDMENT ITEM OF OUTLINE ZONING PLAN
R1 - R4	支持分區計劃大綱草圖 SUPPORT THE DRAFT OUTLINE ZONING PLAN
#R5 - R12220	反對分區計劃大綱草圖 OPPOSE THE DRAFT OUTLINE ZONING PLAN

#申述人表示並沒有就草圖提交申述
REPRESENTERS HAVE INDICATED THAT THEY DID NOT MAKE ANY SUBMISSION IN RESPECT OF THE DRAFT OZP
R700, R1700, R1952, R2659, R2700, R3034, R4045, R4119 & R4263

相關意見C1 - C346（參閱附件V）
RELATED COMMENTS C1 - C346 (REFER TO ANNEX V)

本摘要圖於2015年11月23日擬備，
所根據的資料為於2015年5月8日
展示的分區計劃大綱草圖編號S/I-CLK/13
EXTRACT PLAN PREPARED ON 23.11.2015
BASED ON DRAFT OUTLINE ZONING PLAN No.
S/I-CLK/13 EXHIBITED ON 8.5.2015

位置圖 LOCATION PLAN

就赤鱲角分區計劃大綱草圖編號 S/I-CLK/13 提出的申述個案編號 R1-R12220 號
以及意見個案編號 C1-C346 作出考慮

CONSIDERATION OF REPRESENTATIONS No. R1 - R12220 AND COMMENTS No. C1 - C346
DRAFT CHEK LAP KOK OUTLINE ZONING PLAN No. S/I-CLK/13

SCALE 1 : 30 000 比例尺

米 METRES 300 0 300 600 900 1 200 1 500 1 800 2 100 2 400 2 700 3 000 米 METRES

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-CLK/13-1 to 12220

圖 PLAN
H - 1

申述個案編號
REPRESENTATIONS No.
R1-R699, R701-R1699, R1701-R1951, R1953-R2658,
R2660-R2699, R2701-R3033, R3035-R4044,
R4046-R4118, R4120-R4262 & R4264-R12220

N

沙洲及龍鼓洲海岸公園
SHA CHAU AND LUNG KWU CHAU
MARINE PARK

亞洲國際博覽館
AsiaWorld-Expo

香港國際機場
客運大樓
Passenger Terminal
Hong Kong
International Airport

香港國際機場
Hong Kong
International Airport

觀景山
SCENIC HILL

水藍天岸
LeBleu Deux

映灣園
Caribbean
Coast

藍天海岸
Coastal Skyline

北大嶼山公路
NORTH LANTAU HIGHWAY

東堤灣畔
Tung Chung
Crescent

田心
TIN SAM

沙螺灣
SHA LO WAN

東涌灣
TUNG CHUNG BAY

東涌
TUNG CHUNG

逸東邨
Yat Tung Estate

磡石灣
SAN SHEK WAN

圖例 LEGEND

	申述地點 REPRESENTATION SITE
Ⓐ	分區計劃大綱圖內的修訂項目 AMENDMENT ITEM OF OUTLINE ZONING PLAN
R1 - R4	支持分區計劃大綱草圖 SUPPORT THE DRAFT OUTLINE ZONING PLAN
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#申述人表示並沒有就草圖提交申述
REPRESENTERS HAVE INDICATED THAT THEY DID NOT MAKE ANY SUBMISSION IN RESPECT OF THE DRAFT OZP
R700, R1700, R1952, R2659, R2700, R3034, R4045, R4119 & R4263

相關意見C1 - C346（參閱附件V）
RELATED COMMENTS C1 - C346 (REFER TO ANNEX V)

本摘要圖於2015年11月24日擬備，所根據的資料為地政總署於2014年12月16日拍得的航攝照片編號CW110982和CW110983r
EXTRACT PLAN PREPARED ON 24.11.2015 BASED ON AERIAL PHOTOS No.CW110982 AND CW110983r TAKEN ON 16.12.2014 BY LANDS DEPARTMENT

航攝照片 AERIAL PHOTO

就赤鱲角分區計劃大綱草圖編號 S/I-CLK/13 提出的申述個案編號 R1-R12220 號
以及意見個案編號 C1-C346 作出考慮

CONSIDERATION OF REPRESENTATIONS No. R1 - R12220 AND COMMENTS No. C1 - C346
DRAFT CHEK LAP KOK OUTLINE ZONING PLAN No. S/I-CLK/13

規劃署
PLANNING DEPARTMENT

參考編號
REFERENCE No.
R/S/I-CLK/13-1 to 12220

圖 PLAN
H - 2