

Recommended Advisory Clauses

1. to note the comments of the District Lands Officer/Islands, Lands Department (LandsD) that:
 - (a) should the subject planning application be approved, the project proponent has to apply to her office for a government land allocation for the proposed development prior to the possession of the Site and the commencement of works thereon. Application for the government land allocation will be considered by the LandsD acting in the capacity of landlord at its sole discretion and there is no guarantee that such application will be approved. If such application is approved, it will be subject to such terms and conditions as may be imposed by LandsD.
 - (b) as indicated in paragraph 4 of the Landscape Proposal submitted under the planning application, 31 existing trees within the Site are proposed to be removed and compensated by 53 trees to be planted within the Site for the proposed development. Pursuant to Development Bureau Technical Circular (Works) No. 4/2020 on Tree Preservation, any tree preservation and removal proposals for the proposed development being a Government project shall be submitted to and considered by the Tree Works Vetting Panel of the project department in accordance with the Circular.

2. to note the comments of the Director of Fire Services that:
 - (a) in consideration of the design/nature of the proposal, fire service installations (FSIs) are anticipated to be required. Therefore, the applicant is advised to submit relevant layout plans incorporated with the proposed FSIs to this Department for approval. In addition, the applicant should also be advised as follows:
 - (i) the layout plans should be drawn to scale and depicted with dimensions and the nature of occupancy; and
 - (ii) the location of the proposed FSIs to be installed should be clearly marked on the layout plans.
 - (b) however, the applicant is reminded that if the proposed structures are required to comply with the Buildings Ordinance (Cap. 123), detailed fire

service requirements will be formulated upon receipt of formal submission of general building plans.

3. to note the comment of the Director of Electrical and Mechanical Services that in the interests of public safety and ensuring the continuity of electricity supply, the parties concerned with planning, designing, organizing and supervising any activity near the underground cable or overhead line under the mentioned document should approach the electricity supplier (i.e. CLP Power) for the requisition of cable plans (and overhead line alignment drawings, where applicable) to find out whether there is any underground cable and/or overhead line within and/or in the vicinity of the concerned site. They should also be reminded to observe the Electricity Supply Lines (Protection) Regulation and the “Code of Practice on Working near Electricity Supply Lines” established under the Regulation when carrying out works in the vicinity of the electricity supply lines.
4. to note the comments of the Chief Town Planner/Urban Design and Landscape, Planning Department that:
 - (a) approval of the application does not imply approval of tree works such as pruning, transplanting and felling. Application for any tree works should be submitted to relevant departments for approval.
 - (b) for compliance of site coverage of greenery requirements under PNAP APP-152, submission should be made to Building Department for comments and approval.
5. to note the comment of the Director of Environmental Protection that the proposed development should implement relevant pollution control measures during the works to minimize the potential environmental nuisance. A full set of the “Recommended Pollution Control Clause for Construction Contracts” is available at Environmental Protection Department’s website (https://www.epd.gov.hk/epd/english/environmentinhk/eia_planning/guide_ref/rpc.html).
6. to note the comment of the Executive Secretary (Antiquities and Monuments)², Antiquities and Monuments Office (AMO), Development Bureau that AMO should be informed on the works schedule for follow-up and necessary site inspection.

Urgent Return receipt Expand Group Restricted Prevent Copy

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年05月22日星期五 11:25
收件者: tpbpd/PLAND
主旨: WWF s16_A/SLC/199 20260522
附件: s16_A_SLC_199 20260522 WWF.pdf
類別: csmng, Internet Email

Dear Sir/Madame,

Attached please find our submission regarding the planning application **A/SLC/199**.

Thank you for your attention.

Yours faithfully,
Mr. Tobi Lau
Senior Manager, HK Biodiversity and Conservation Policy
WWF-Hong Kong

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). This email (including any attachments) is intended for the use of the designated recipient(s) only, which may contain confidential, non-public, proprietary information, and/or be protected by the attorney-client or other privilege. Any unauthorized reading, distribution, copying, or other use of this communication is strictly prohibited and may be unlawful. Receipt by anyone other than the intended recipient(s) should not be deemed a waiver of any privilege or protection. If you are not the intended recipient or believe you have received this email in error, please notify the sender immediately and delete this email from your computer system. This email and any attachments are checked for viruses and other malicious software ("malware"). However, the sender does not warrant, represent, or guarantee in any way that this communication is free from malware or potentially damaging defects. The sender disclaims all liability for any errors, omissions, or damages arising out of or in connection with the use or reliance on the information contained in this email.



22 May 2026

Town Planning Board
15/F North Point Government Offices
333 Java Road
North Point
Hong Kong
(Email: tpbpd@pland.gov.hk)

By E-mail ONLY

Dear Chair and Board Members,

**RE: Proposed Education Centre and Associated Excavation and Filling of Land
in "Coastal Protection Area" zone in Shui Hau in South Lantau (A/SLC/199)**

We would like to express views on the captioned.

Proactive control of construction runoff

As the development footprint is located adjacent to a river course connected to Shui Hau Wan and its sandflat which are recognised as critical habitat for the endangered horseshoe crab, providing important breeding and nursery grounds, we recommend the Applicant to adopt specific measures to hydraulically isolate the works areas from the adjacent watercourse and minimise wastewater generated during construction. Best practice measures, including those set out in ProPECC PN1/23, ProPECC PN2/23, and ETWB TC (Works) No. 5/2005, should be implemented. In addition, an emergency response plan is recommended to minimise potential water quality impacts during emergency situations and adverse weather conditions.

Control of wastewater discharge during construction

Given the same concern on the site's close proximity to a river course linked to Shui Hau Wan and its sandflat, the discharge points and boundaries for treated construction wastewater should be conservatively designated. The efficiency of wastewater treatment facilities should be ensured through regular on-site monitoring and random inspections, with immediate maintenance carried out whenever necessary, particularly during the wet season and prior to rainstorms. Discharge points for surface runoff and treated wastewater should not be in flood-prone areas or near the river course.

together possible™

Potential Excessive Light Glare/ Sky Glow during Operation

For safety and security during evening hours, operational lighting at the proposed education centre will inevitably cause some light pollution, particularly glare within the site, surrounding buildings. Such lighting may adversely affect wildlife—especially nocturnal avifauna, including Hong Kong's largest owl, the Eurasian Eagle-Owl (*Bubo bubo*)—by causing attraction, disorientation, or disruption of natural behaviours. While these impacts cannot be completely avoided due to functional requirements, the following measures, including but not limited to, are recommended to minimise disturbance to birds and surrounding habitats:

- Position all light sources within the proposed education center to avoid illuminating nearby terrestrial canopy; directional lighting should be inward-facing and downward-directed;
- Avoid excessive boundary lighting; keep illumination levels and operating duration to the minimum necessary. Where practicable, install automatic dimming or shut-off systems, alarm systems, or infrared-based security lighting;
- Minimise light spill by avoiding bare bulbs and upward-pointing lights; outdoor fixtures should be properly shielded to prevent emission above the horizontal plane.

We would be grateful if our comments and recommendations could be considered by the Town Planning Board.

Kind regards,



Mr. Tobi Lau
Senior Manager, HK Biodiversity and Conservation Policy
WWF Hong Kong

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年05月22日星期五 23:32
收件者: tpbpd/PLAND
副本: JACKY KWOK YUEN WU/CEDD; MAILBOX/AFCD
主旨: KFBG's comments on A/SLC/199
附件: 260522 s16 SLC 199.pdf
類別: Internet Email

Dear Sir/ Madam,

Attached please see our comments regarding A/SLC/199. There is only one pdf file attached to this email. If you cannot see/ download/ open this file, please notify us through email.

Please do not disclose our email address.

Thank You and Best Regards,

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

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

22nd May, 2026.

By email only

Dear Sir/ Madam,

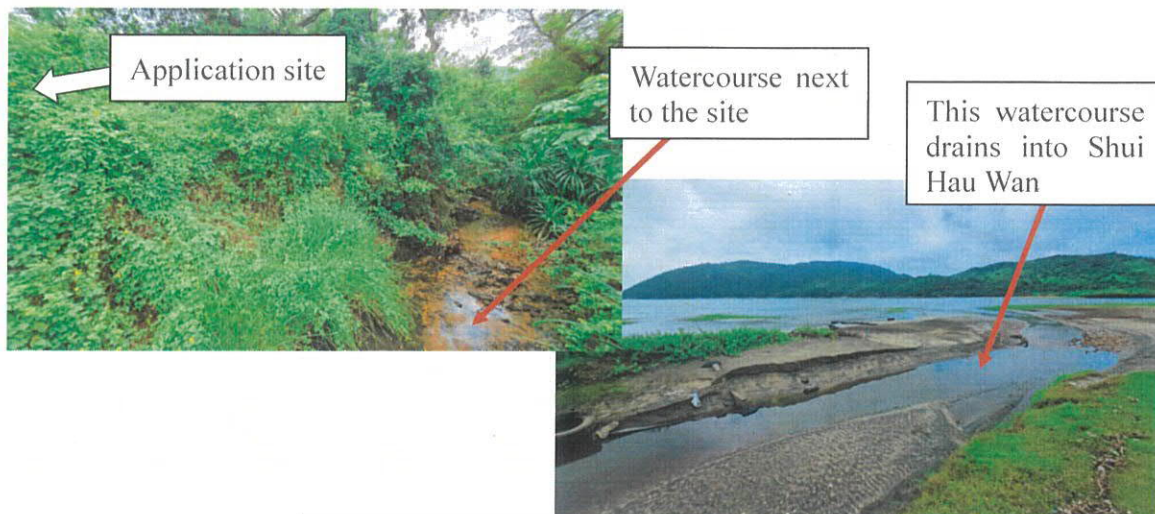
Proposed Education Centre and Associated Excavation and Filling of Land
(A/SLC/199)

1. We refer to the captioned, and would like to raise the following concerns and request the Board's consideration and further investigation.

Interface between the proposed development and the adjacent watercourse

2. We are highly concerned about potential environmental impacts (especially during the construction phase) that may adversely affect the Shui Hau Wan area and the stream system adjacent to the application site.

3. The eastern/ southeastern edge of the application site adjoins a watercourse that drains directly into the highly sensitive Shui Hau Wan (see recent photos taken in May 2026 below). Based on the submitted plans, no structures are proposed along this edge. At present, this riparian area is well-vegetated and appears largely natural (please see below).



4. In light of the above, if no development is intended along this edge, we recommend that a Non-Building Area (NBA)/ No-go area be designated along this boundary to serve as a setback or buffer. This designation should ensure that no construction activities, such as use/handling of cement/ chemicals, stockpiling, storage of materials/ machinery, etc., are permitted within the area, and that no unnecessary facilities/ development are introduced in the future.

5. Furthermore, we recommend that this well-vegetated riparian zone (except those invasive plant species) be retained as far as practicable, as it clearly functions as an active wildlife habitat at present (please refer to the example below). Retention of this zone would not only safeguard the adjacent watercourse from potential impacts during both the construction and operational phases, but would also help preserve existing ecological resources. While we understand that “whip mix” planting is proposed within this area, we recommend that existing natural vegetation can be better utilised and incorporated into the landscape design, with supplementary planting (e.g., the proposed whip mix) used to enhance the current habitat conditions. We urge the Board and the project proponent to consider whether retaining this well-vegetated area, as far as practicable, would better align the proposed education centre with its intended purpose.



6. In addition to establishing a buffer zone, we strongly urge the Board to seek clarification on how sewage/ potential polluted runoff, construction waste and garbage will be properly



managed during the construction phase. This is critical to ensuring that Shui Hau Wan will not be adversely affected, given the close proximity of the site to the adjacent watercourse that drains into it.

Sewage from this facility

7. We would like to ascertain whether a comprehensive Sewage Impact Assessment has been conducted and submitted for this application. Specifically, we request clarification on:

- The handling and disposal of sewage generated from toilets and sand-wash area, including whether all such sewage will be completely transported away from the site.
- Whether the toilets within the centre will be open to the public and, if so, whether the estimated average dry weather flow from daily visitors (10.8 m³/day as stated in the submitted planning statement) is reasonable, and whether the proposed storage tank capacity (i.e., 127 m³) is sufficient;
- Whether there is any risk of accidental or unintended sewage discharge or spillage (in particular from toilet facilities/ storage tank) that could affect Shui Hau Wan;
- Whether the proposed facility will eventually be connected to a communal sewerage system, and if so, the expected timeline and mechanism for such connection.

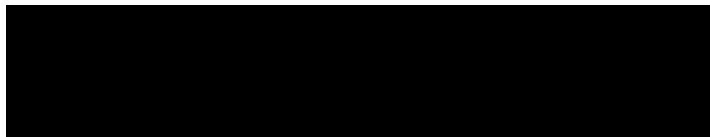
'Minor improvement works'

8. According to information available on the Islands District Council website¹, the project proponent has also proposed certain 'minor improvement works', including the provision of car parking spaces.

9. We request clarification on whether these items are:

- Ancillary or associated facilities supporting the captioned centre; and if so, whether they should be incorporated into this application; or
- Standalone projects requiring separate planning permission and submission of an additional planning application.

¹https://www.districtcouncils.gov.hk/island/doc/2024_2027/en/committee_meetings_doc/CICRC/31517/CICRC_2026_6_TC.pdf



Potential impacts from visitors

10. Recent observations related to ‘eco-tourism’ in Hong Kong have highlighted a number of concerns, and experiences from locations such as Ham Tin², Tai Long Sai Wan³ and Sharp Island⁴ offer valuable lessons. It is therefore timely to consider how these can inform improved management practices going forward.

11. We recommend that the Board take note of these concerns and consider the following: after the proposed centre comes into operation, whether there would be an increase in visitor numbers, as well as associated sewage and waste generation in the Shui Hau Wan area, and whether there would be enforceable regulations to address instances where visitor behaviour (e.g., collection of or disturbance to the globally endangered horseshoe crab in Shui Hau Wan) does not align with education/ conservation objectives. It would be helpful to clarify what role the proposed centre could play in this regard beyond education alone.

Bird protection measures

12. We recommend that the project proponent incorporate bird-friendly design measures to minimise the risk of bird collisions with building façades.

13. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

cc. SSLO – CEDD
AFCD
The Conservancy Association

Hong Kong Bird Watching Society
Green Power
WWF-HK

²<https://www.scmp.com/news/hong-kong/article/3338498/sai-kung-campsite-flooded-trash-after-new-years-eve-celebration>

³ <https://www.stheadline.com/voice-topics/3446016/星島申訴王-隱世天堂變非法難民營-直擊西貢大浪西灣假期多人紮營過夜>

⁴ https://hk.on.cc/hk/bkn/cnt/news/20260503/bkn-20260503175517894-0503_00822_001_cn.html?view=d

[五一長假變生態浩劫 旅客鐵剗生果刀肆虐橋咀 狂挖海螺海膽]

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年05月25日星期一 20:16
收件者: tpbpd/PLAND
主旨: A/SLC/199
附件: Letter re shui hau environmentla centre 2026.05.25 .pdf
類別: Internet Email

Please find attached Living Island Movement' s submission with regard to the planning application A/SLC/199

Kind regards

Louise Preston
Chairman, Living Islands Movement

[REDACTED]

Your Ref: Application Number A/SLC/199

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

22 May 2026

島嶼活力行動

可持續島嶼發展



LIVING ISLANDS
MOVEMENT

SUSTAINABLE ISLAND DEVELOPMENT

Proposed Shui Hau Education Centre and Associated Excavation and Filling of Land

Living Islands Movement (LIM) supports the construction of an Education Centre (the “Centre”) in Shui Hau that promotes conservation of the high ecological values of the nearby sandflat, wetland, woodland and stream and raises awareness of the traditional village culture and customs.

We seek reassurance that during the site formation, construction and operation of the facility, adequate measures will be put in place to protect the ecologically sensitive sandflat and associated natural backshore vegetation, stream, woodland and wetland. We therefore request that a monitoring mechanism for these separate areas is established as a condition of the application.

In particular, measures are required to ensure that visitors to the Centre will be able to experience the areas of ecological interest in an unobtrusive manner.

As a cautionary measure, we draw TPB’s attention to the recent gasoline spill associated with the construction of the sewer treatment plant in San Shek Wan that leaked into the Pui O wetlands.

We welcome the limited number of parking spaces at the Centre as it supports the maintenance of existing vehicle restrictions and strict enforcement of Lantau Closed Road Permits. We would strongly recommend that a safe pedestrian crossing is constructed for the visitor centre. We also support the proposed improvements for the adjacent bus stop and lay-by.

We support the Centre’s aim of collaborative initiatives with villagers, local green groups and NGO’s, and the availability of the Centre for hire by local groups. We also welcome the promotion of activities at the Centre that appeal to local residents as well as to visitors to Lantau, for example bird watching activities.

LIM welcomes the timely launch of this initiative and looks forward to working with South Development and Sustainable Lantau Office to help to ensure its success.

For and on behalf of Living Islands Movement

Louise Preston
Chairman



tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年05月26日星期二 12:27
收件者: tpbpd/PLAND
副本: WILLIAM TSAN KEI LAI/CEDD; KENNETH CHING PIU WONG/CEDD; Ken So; Peter Li
主旨: Comments on Section 16 Application No. A/SLC/199
附件: TPB20260526(SLC199).pdf
類別: Internet Email

Dear Sir/Madam,

Please refer to the attachment for the captioned.

Yours faithfully,
Ng Hei Man (Mr.)
Campaign Manager
The Conservancy Association

[REDACTED]
Registered Name 註冊名稱 : The Conservancy Association 長春社
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

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The Conservancy Association

26th May 2026

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

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Comments on Section 16 Application No. A/SLC/199

The project proponent has offered a briefing session dated 20th May 2026 for the Section 16 Application regarding the proposed education centre in Shui Hau. We welcome any initiatives to genuinely promote nature education and public awareness of nature conservation, and we hope that the proposed education centre would further bring additional resources to ecological management work in Shui Hau. Apart from the comments during the briefing session, The Conservancy Association (CA) would further add some few points as followed:

1. Impact on the adjacent natural stream

As mentioned by some environmental groups during the briefing, there is a natural stream abutting southeast periphery of the application site and connecting to the ecologically-sensitive sandflat at the downstream. To ensure protection of the natural stream, precautionary measures should be proposed such as:

- non-building areas between the application site and the natural stream
- no outfalls to direct any discharge of pollutant from the application site to the natural stream
- no construction activities, including temporary storage of construction materials, adjacent to the natural stream

2. Sewerage arrangement

It is noted that the application site is intended to be reserved for DSD's Shui Hau Sewage Pumping Station (SPS) under the project of Outlying Islands Sewerage Stage 2 South Lantau Sewerage Works. This SPS will be relocated to the immediate northeast of the application site. Even though the implementation programme has not been confirmed in this stage, space and capacity should be reserved for connecting this new SPS.

Besides, viewing the potential increase of visitors due to promotion of eco-tourism or further development of South Lantau eco-recreation corridor, sewage capacity may not be confined to





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participants through the proposed registration system only, but also other visitors elsewhere. According to Section 6.4.1 and 6.4.2 of the Planning Statement, the estimated sewage generation from daily visitors and capacity of the underground tank are 10.8m³/day and 127m³ respectively. In this case, whether the proposed arrangement can handle increasing visitors during weekends and public holidays need further clarification.

3. Bird friendly design

To minimize the disturbance on birds and risk of bird collision, we hope that practices and design standards would be adopted in the new education centre, particularly reducing glass coverage on building façade, avoiding proximity of greenery features from glass façade area, reducing site and building light pollution, etc. These recommendations in design of buildings can be incorporated to facilitate future vetting of general building plan.

4. Disposal of construction and demolition (C&D) waste

In the past few years, we have frequently spotted illegal dumping of C&D waste in South Lantau. If C&D waste is not properly managed in this project, such activities would be more frequent and the environment in South Lantau would be further worsened.

We hope that the project proponent could propose stringent control and monitoring measures on the construction vehicles/dump trucks to prevent any construction waste dumping on ecologically sensitive areas within and adjacent to the project site. For example, construction vehicles/dump trucks could be equipped with GPS devices. Specific transport routes could be designated for construction vehicles/dump trucks to ensure proper waste disposal. Implementation of such measures and associated penalties could be included in the contract terms to effectively control the activities of relevant contractors.

5. Cumulative impact

According to the Community Involvement, Culture and Recreation Committee of Islands District Council, various minor improvement works¹ would be planned adjacent to the proposed education centre, such as pedestrian crossing, a bus lay-by at the Ha Wang Lung bus stop, roadside parking spaces along South Lantau Road and upgrade of existing Shui Hau public toilet. While implementation details, such as scale and time schedule, have yet to be confirmed, it is necessary to evaluate cumulative impact would be resulted during construction phase, and provide measures for mitigation.

6. Comments related to future operation of the centre

Future possible uses and activities

Section 5.3.2 of the Planning Statement has stated that “*The Proposed Centre will organise conservation and culture based activities in collaboration with nearby villagers, non-*

¹ Islands District Council – Document No.6/2026 - Proposed construction of Shui Hau Education Centre
https://www.districtcouncils.gov.hk/island/doc/2024_2027/en/committee_meetings_doc/CICRC/31517/CICRC_2026_6_6_TC.pdf





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governmental organisations, and educational groups. These include exhibitions, seminars, talks, workshops, and guided tours to enhance visitors' awareness of environmental conservation and their understanding of rural culture". As suggested by CA in the briefing session, more details on possible uses and activities of the centre need to be provided to facilitate evaluation of potential environmental impacts and assess any additional hardware and software inputs.

BEAM Plus

To ensure sustainability of the development, we recommend that the project proponent to obtain BEAM Plus (New Buildings) in the project design, say Platinum rating. This would set a good precedent case for similar green buildings in South Lantau.

Engagement with local communities

Continuous engagement with local communities on the expectation of this education centre is still an important issue. Regular meetings or liaison groups, for example, can be arranged to inform the locals on the work progress, handle public enquiries/complaints during construction phase, and consult locals on future operation details of the centre.

Continuous dialogue with environmental groups

CA indeed appreciates the intention of the working team and consultants to arrange face-to-face communication during the public consultation period of the Section 16 Application. Viewing the ecological sensitivity of the area, we look forward to more dialogue and discussion with the teams on exploring potentials of the Shui Hau education centre.

Yours faithfully,
The Conservancy Association

Cc. Civil Engineering and Development Department – South Development and Sustainable Lantau Office



就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 260526-144812-20678

提交限期
Deadline for submission: 26/05/2026

提交日期及時間
Date and time of submission: 26/05/2026 14:48:12

有關的規劃申請編號
The application no. to which the comment relates: A/SLC/199

「提意見人」姓名/名稱
Name of person making this comment: 女士 Ms. Jenny Quinton on behalf of Ark Eden

**意見詳情
Details of the Comment :**

Ark Eden would like to stress that a comprehensive ecological approach is given to the development of an education centre at Shui Hau

Primarily this centre should be renamed to be an Ecological Education Centre so that the intention of this environmental centre is fully understood.

Shui Hau is an ecological treasure trove and Ark Eden would support this project if it can act as a protection measure for this site.

Ark Eden is worried that unless stringent wetland protection measures and monitoring mechanisms along with a capped carrying capacity are put in place then the building of this facility could likely increase human traffic and even mass tourism.

Ark Eden would argue that the centre will significantly increase human traffic and the majority of people visiting the facility would want to go onto the mudflats but then this poses a greater danger to marine ecology and horseshoe crabs.

Ark Eden also believes that more robust legislation should be effected prior to the building of a facility. There is already excessive clam digging in the area and these measures need to be curtailed eg make it illegal without a license before facilities are created to bring more people into the area.

Ark Eden would emphasise that the education facility could provide the necessary ecological education needed to change the clam digging and other marine destructive behaviours

In conclusion, Ark Eden sees this project as a very high risk to a rich ecological area that presently has no legislation to protect it and is already suffering from eco-vandalism.

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年05月26日星期二 15:08
收件者: tpbpd/PLAND
副本: [REDACTED]
主旨: Proposed Education Centre and Associated Excavation and Filling of Land (A/SLC/199)
附件: Letter_TPB_20260526.pdf
類別: Internet Email

Dear Chairperson,

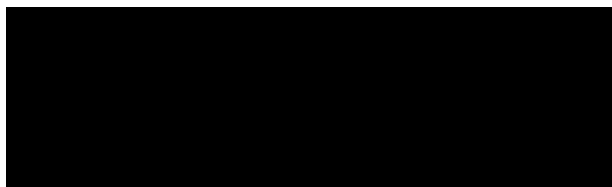
Corresponding to the town planning application for the Proposed Education Centre and Associated Excavation and Filling of Land (A/SLC/199), we would like to address our concerns in different aspects, including stream pollution, vegetation impairment, potential threats on butterfly ecology and etc. Please refer to the letter attached to this email.

If necessary, please feel free to contact me for additional information or clarifications.

Regards,

Matthew Sin

Green Power





By email only

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

26th May 2026

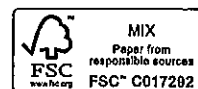
Dear Chairperson,

Proposed Education Centre and Associated Excavation and Filling of Land (A/SLC/199)
on Government Land in D.D. 326L, Shui Hau, Lantau Island

Corresponding to the town planning application for the Proposed Education Centre and Associated Excavation and Filling of Land (refer to the Facility hereafter), we would like to raise the following concerns in different aspects, including stream pollution, vegetation impairment, potential threats on butterfly ecology and etc.

The subject site is very close to a natural stream (i.e. less than 20 meters away from the stream course) leading to Shui Hau Wan which is an important spawning and nursery ground of Horseshoe Crabs. Any intended or accidental spillage of sewerage at the site, no matter in its construction or operation phases, would have irreversible impacts on the stream, Horseshoe Crabs and the ecological-sensitive Shui Hau Mudflat. In view of this, we would like to reiterate our concern on the followings:

- During construction, how does the contractor store and discharge sewage generated?
- Are there any protocols to minimize sewage and construction runoff to be generated?
- Are there any special means to confine sewage in the construction site and avoid spillage of sewage?
- Are there contingency measures to tackle situations if spillage was spotted during construction?





Preservation of water resources for the nearby stream is one of our main concerns. In fact, it is not uncommon for construction workers to extract freshwater from nearby rivers or streams for construction use. To ensure this is not going to happen in the construction of this facility, we would like to know if any measures could be imposed by the applicant or its contractor.

In a meeting with representatives of CEDD and AECOM dated 20 May 2026, we were noted that an underground sewage storage tank would be deployed to manage the black water in the facility. As this is the only means of the facility to get rid of its black water (i.e. at least before Shui Hau is covered by DSD's village sewerage programme), if there was any slippage on the system, disastrous ecological events could be foreseen. We appreciate if the following concerns would be clarified. If situation permits, we would like to urge the applicant to deploy a second black water management system, which aims to complement the existing design with underground sewage storage tank.

- What is the designed capacity of the underground sewage storage tank, in the context of registered visitors and walk-in visitors?
- What is the pumping frequency of the sewage storage tank?
- Are there contingency measures to avoid and tackle overflow of the sewage storage tank, in particular during unexpected high visitor traffic or adverse weather conditions?
- Is it possible to deploy a second black water management system which can complement the underground sewage storage tank?

Currently, the application site is occupied by massive shrubs and individual trees. It is likely that all vegetation within the project area will be removed before and during construction. However, existing riparian habitats near the stream course and backshore habitats must be well-protected and left undisturbed. And all vegetation in the riparian and backshore zones must be preserved. Riparian vegetation always supports a vast amount of biodiversity, including herpetofaunas, fishes, insects and other aquatic invertebrates. Vegetation along the coast near the project site is an integral part of the ecology, surface geology and landscape of the natural coast and intertidal mudflat. Moreover, backshore vegetation can enhance climate resilience of soft seashore against coastal erosion and storm surges, and improve coastal water quality for intertidal habitat by filtering the contaminated surface runoff.

According to Green Power's survey record conducted from 2019 to 2024, a total of 141 butterfly species (54% of number of species recorded in Hong Kong) were recorded Shui Hau, including 3 "Very rare", 13 "Rare" and 46 "Uncommon" species. We opine that the rich biodiversity of butterfly in the proximity of the project site is supported by mosaic of natural, semi-natural, vegetated and watercourse habitats which provide foraging grounds and nectary and larval foodplants. In order to minimize the impacts on butterfly community, their habitats outside the project site should not be disturbed by the project. Vegetation or water bodies should be retained or re-provided with ecologically friendly maintenance to act as buffer. Within the



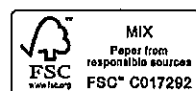


project site, shrublands, wetlands and plantation should be allocated to allow growth of larval foodplants for butterfly species of conservation importance.

Local research revealed that microplastic threatens the survival of juvenile Horseshoe Crabs. We are deeply concerned the waste brought about by the Facility. We would like to consult are there any measures to prevent plastic waste from reaching the mudflat during construction phase and operation phase.

We would appreciate some insight into the concerns we have addressed above. And Green Power is glad to explore this further with the project team.

Yours sincerely,
Sin Kar Wah, Matthew
Green Power



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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年05月26日星期二 22:57
收件者: tpbpd/PLAND
主旨: A/SLC/199 South Development and Sustainable Lantau Office, CEDD CPA
附件: Lantau CPA.pdf; 2024-2025-OIWA-49th-Booklet_v2.pdf
類別: Internet Email

A/SLC/199 South Development and Sustainable Lantau Office, CEDD

Government Land in D.D. 326L, Shui Hau, Lantau

Site area: About 1,110sq.m

Zoning: "Coastal Protection Area"

Applied development: Education Centre / PR.0.4 / 4.35m / 3 Vehicle Parking / **Excavation and Filling of Land**

Dear TPB Members,

STRONGEST OBJECTIONS

*"The Proposed Centre, which is an education centre with the aim **to promote conservation awareness**, leads to an ultimate purpose of **conserving and protecting the natural environment and habitat** of ecological significance in Shui Hau"*

So how does filling in 1,110sq.mts of a strip of "CPA" that has already been substantially degraded fulfil this purpose?

Adjacent to the lots is the 200,000sq.ft that has been cleared of any original vegetation by the "Outlying Islands Women's Federation Tang Fook Hing Memorial Farm". This brownfield touts itself as "a pioneer in green education farms" and was launched in May 2023. It purports to offer planting classes, experiential workshops, team training, biodiversity events, etc.

#離島婦聯 #鄧福興紀念農場 #綠色教育 #露營地 #綠色生活 #種植學習 #體驗工作坊 #團隊培訓 #生物多樣性 #環保活動 #大嶼山 #塘福 #教育農莊 #OIWA #TangFookHingFarm #GreenEducation #CampingSite #GreenLifestyle #PlantingClasses #ExperientialWorkshops #TeamTraining #Biodiversity

I do not record seeing an application for this very large camping site. Members should questions its legitimacy.

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So why would CEDD fill in additional "CPA" to provide more of the same?

Another large bite of the "CPA" was utilized to accommodate the soccer pitch.

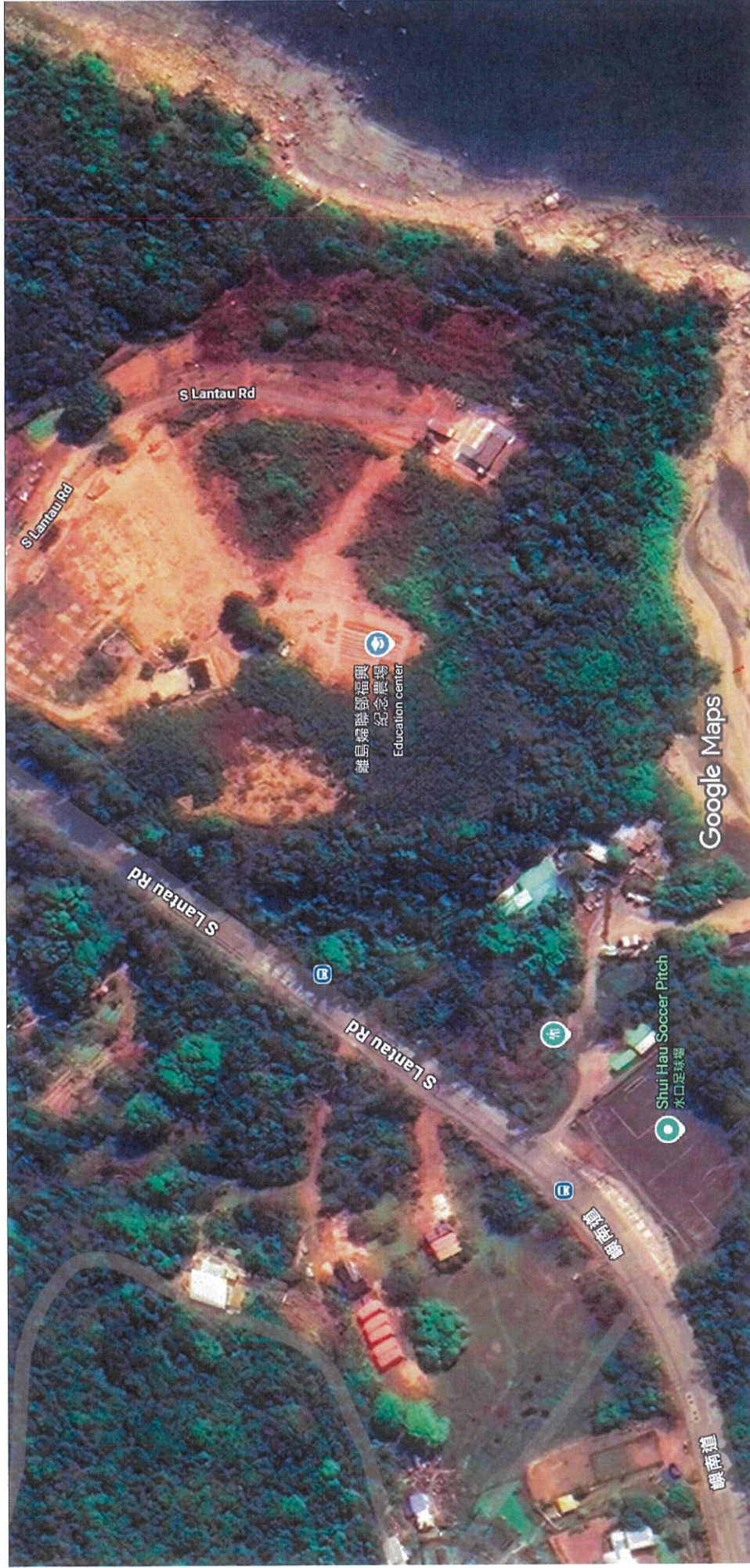
In fact, why is CEDD getting involved in green education at all? Its resources should be spent on urgent issues like slope safety and initiatives to combat the impact of global warming on our coast lines. It should be protecting not exploiting "CPA".

If CEDD must waste its resources for brownie points then it can build the proposed centre on GL land with less sensitive zoning. Sitting in a room or garden can be done anywhere on Lantau.

No data provided with regard to the cost of construction and the annual operations.

It is unacceptable that there be further encroachment on the already very diminished "CPA". The application must be rejected.

Mary Mulvihill



1. CHUNG MUN ROAD



綠在離島 COMMUNITY GREEN STATION

走進自然 - 傳承永續發展

Embrace Nature - Inherit Sustainable Development

離島婦聯透過多元化的自然體驗與教育活動，將永續發展理念深植社區。我們以綠色生態教育離島婦聯鄧福興紀念農場為基地，結合外展活動與生態導賞，讓參加者在親近自然的過程中學習環保知識，實踐綠色生活。

OIWA deeply embeds the concept of sustainable development in the community through diverse nature experience and educational activities. OIWA Tang Fook Hing Green Education Memorial Farm is a base for combining outreach activities with guided ecological tours. Participants could learn about environmental protection and practice green living while getting close to nature.



與老友記一同參觀離島婦聯鄧福興紀念農場。
Visiting the Tang Fook Hing Memorial Farm of the Outlying Islands Women's Association with friends.

綠色教育基地 - 綠色生態教育離島婦聯鄧福興紀念農場 Green Education Base - OIWA Tang Fook Hing Green Education Memorial Farm

位於塘福的綠色生態教育離島婦聯鄧福興紀念農場作為本會其中一個綠色教育農莊，以創新循環模式營運，運用回收樹木、廚餘堆肥與再生泥土打造永續農園。

OIWA Tang Fook Hing Green Education Memorial Farm, located in Tong Fuk, is one of the green education farms of the Association. It operates with an innovative recycling model. Sustainable farms are created using recycled trees, kitchen waste compost, and recycled soil.

農莊提供種植學習班、體驗工作坊及團隊培訓等活動，讓參加者親身參與農耕過程，學習生物多樣性與環保知識。同時，農莊特別為SEN學生與青年創造就業機會，透過農產品加工與銷售，協助他們建立自信與職業技能，實現社會共融。

The farm offers planting workshops, experiential workshops, and team training programs. Participants can get hands-on experience in the farming process and learn about biodiversity and environmental protection. At the same time, the farm creates employment opportunities for SEN students and youth, helping them to build confidence and professional skills and achieve social inclusion through agricultural product processing and sales.



農場的農作物於本地漁業展會農莊年展展出。
The farm's produce was showcased at the local fisheries and food carnival.

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2026年05月26日星期二 23:36
收件者: tpbpd/PLAND
主旨: 對規劃申請編號S/SLC/199的意見
附件: 規劃申請編號S_SLC_199的意見.pdf
類別: Internet Email

致：城規會秘書處
由：守護大嶼聯盟
日：2026.05.26
有關：規劃申請編號 S/SLC/199 的意見



守護大嶼聯盟

SAVE LANTAU ALLIANCE

致：城規會秘書處

有關：規劃申請編號 S/SLC/199 的意見

土木工程拓展署南拓展及可持續大嶼辦事處擬議在距離南大嶼水口沙坪約 50 米。擬建中心總建築面積約 440 平方米，包括 1 座單層建築，設有多用途室、職員辦公室和戶外活動草坪，以及其他附屬設施，如機電房、沖洗區和洗手間等有以下意見。

根據申請書行政綱要內的行政摘要¹，表示有關申請符合海岸保護區的規劃意圖，「通過教育和推廣保育意識來保護水口的自然環境及具生態意義的棲息地。這是政府在大嶼山倡議保育的重要項目。」不過守護大嶼聯盟現時擬議的「教育中心」無論在功能上、人手編制上、法例的保障上、執法的力度上對發揮的保育及維護水口沙坪生態的目的似乎未能發揮作用。

根據土木工程拓展署南拓展及可持續大嶼辦事處 2026 年 1 月提交離島區議會的討論文件²指擬議的水口教育中心可以配合 2024 年施政報告宣布加快建設走廊，並在同年 12 月發佈的《香港旅遊業發展藍圖 2.0》中，該走廊的發展為促進島嶼旅遊的關鍵措施之一。該文件指在 2021 年開展了兩項研究，分別為：「石壁及其鄰近地區的可持續休閒和康樂建議- 勘查研究」及「南大嶼生態康樂走廊下的建議- 勘查研究」。所以項目的重點似乎重於旅遊，而以生態教育包裝的旅遊項目而已。

根據貝澳、水口、大澳及其鄰近地區的生態研究 - 可行性研究³2.2.2 第 3 段：陸地上的有機物流入水口的沿岸水域，為獨特的沙坪提供大量的有機碎屑和營養。為海洋潮間帶群落的食物來源，包括瀕危的「活化石」- 中國蟹（馬蹄蟹物種）。水口沙坪有不同大小的未成年馬蹄蟹，再次證實這片棲息地在孕育這種瀕危物種方面有重要地位。由於潮間帶動物數量豐富，沙坪亦是多種遷徙及／或本地水鳥和猛禽的覓食地，當中包括環頸鴿、蒙古沙鴿、金眶鴿、翻石鴿、游隼和白腹海鵬等具重要保育價值的物種。這片遮蔽型的沙坪很可能是過境遷徙鳥／冬候鳥重要的中途站，當中包括主要在海灣記錄到的灰斑鴿、中杓鴿和翻石鴿。後灘的紅樹林也是鷺鳥和翠鳥等水鳥和涉禽的重要棲息和覓食地。

作為濕地生境的「管理員」，這裡的水牛與貝澳的水牛一樣，在沼澤中覓食，牛背鷺和其他在水牛群附近覓食（此關係稱偏利共棲）的水鳥均能受惠。

綜合該研究，水口先導地區的整體生態價值屬**非常高**。

¹ https://www.tpb.gov.hk/en/plan_application/A_SLC_199/Planning_Statement_1.pdf p5

² https://www.districtcouncils.gov.hk/island/doc/2024_2027/sc/committee_meetings_doc/CICRC/31517/CICRC_2026_6_TC.pdf

³ https://www.cedd.gov.hk/filemanager/tc/content_961/23/CE_62_2017_Executive_Summary_Chi.pdf p5-6

根據該研究，水口面對的主要威脅包括生態敏感的生境受到破壞（特別是於濕地上進行傾倒和填土）、濕地乾涸、過度掘蝕和海上垃圾（特別是在風暴之後）。

根據該研究的保育建議，水口保育措施的三項元素為達致保育目標和生境要求，水口的擬議保育措施由三個元素組成：

- (1) 自然保育-保育措施包括修復和保育現已退化的沼澤和季節性濕草地生境，以滿足選定目標物種的需要、保護水口的河溪、優化毗鄰林地生境的植林，以及保護沿水口沙坪漲潮區生長的紅樹林。
- (2) 管理-建議的管理策略包括在完成修復後實施積極管理和長期監察水口沙坪和濕地生境、移除潮間帶和陸地生境的人侵物種，及在完成修復後對水口的河溪和有可能供水予沼澤的河道進行水質監察。上述的管理策略均需根據第 2.4.2 節所羅列的進一步勘察結果再確認。
- (3) 自然保育以外具額外價值的元素 雖然應優先考慮自然保育，但無需排除其他以可持續方式進行、與生態配合的活動，包括小型的 保育中心、觀鳥設施和生態農耕活動。

根據該研究的行政摘要第 10 頁，建議設立水口的擬議核心保育區
上述擬議的保育措施主要把先導地區分成兩個區：

表 2.3：水口先導地區的擬議保育措施

編號	措施	優先？
自然保育-修復沼澤		
SHCM1	停止現時對生態造成干擾的土地用途，並還原為沼澤	是
SHCM2	長遠修復現有的沼澤和季節性濕草地生境至永久及/或季節性沼澤狀態，並提供多種微生境	是
SHCM3	縮小以往沼澤地區內過大的低地灌木叢面積	是
SHCM4	保育修復後的沼澤，為動植物（尤其是目標物種和分類群）提供生境	是
自然保育-優化林地		
SHCM5	種植原生植物，為蝴蝶提供食用植物和蜜源植物，並維持林地的低干擾水平	
自然保育-保育河溪		
SHCM6	將河溪、林地和紅樹林作為一個整體加以保育	
管理		
SHCM7	實施積極管理、長期監察目標物種/分類群（例如馬蹄蟹）和物種多樣性，以及在沙坪進行保育教育	是
SHCM8	在修復後的濕地生境進行積極管理和長期監察	是
SHCM9	清理海上垃圾	是
SHCM10	控制和移除外來的人侵物種	
SHCM11	設立水質監察站和管制水污染	
具額外價值的元素		
SHCM12	設立小型保育中心以提高保育意識，並協助管理沙坪和管制水污染/廢物	是
SHCM13	在靠近陸地一側與靠近海洋一側之間的位置建造觀鳥設施及行人徑，以作觀鳥和觀賞自然之用	
SHCM14	奉行生態農耕（最好是水稻農耕），並確保沒有過量的肥料和除害劑流入已修復的沼澤	

- 核心保育區一指主要作保育用途的地區，當中包括具較高生態價值的生境、擬實施積極保育管理（例如生境修復和改善）的地區，以及為擬議的保育管理工作提供必要支援設施的地區。建議核心保育區涵蓋整個先導地區範圍，包括生態價值較高的生境，但排除先導地區西北面的小型農地和相關的村屋住宅。此外，有必要設立一個管理先導地區的工作區，以及作康樂和教育用

途的設施，藉以提高公眾的保育意識並推動公眾參與保護海洋和陸地生態及恢復水田耕作。先導地區東北面的政府土地，包括現時鄰近嶼南道及沙坪的足球場，適合作此用途。核心保育區的參考範圍如圖 2.3 所示。

- 其他區域—包括核心保育區以外可以推動與生態相容活動的地區。在水口先導地區內，其他區域包括在先導地區西北部的小型農地和相關的村屋住宅。

雖然有部份的保育措施已推行，但一些核心的保育管理措施仍未落實。例如在水口推行的管理計劃，透過香港觀鳥會的參與推動水口水耕復育項目，但該計劃推行了 3 年，成績有目共睹，共獲村民的支持，可惜現在卻因停止撥款已被逼停止。

在積極管理和長期監察方面，雖然已進行移除入侵紅樹外，其他管理及監察工作仍未見落實，特別是在夏季掘蜆熱潮有增無減，在沒有保育法例的保障下，監察及管理工作根本無法可依，欠缺執法權。設立教育中心，對監察及管理方面無補於事。

守護大嶼聯盟認為在設立教育中心之餘，應加強監察及管理的規範，並賦予相關人士有執管權力，並對在水口沙坪掘蜆活動作出人流管制，令該帶沙坪免受超負荷的情況下受到破壞。

另一方面，聯盟認為擬建中心面向嶼南路的構築物外，應多建樹木，減少海岸保護區被石屎化的觀感。

以上是守護大嶼聯盟對規劃申請編號 S/SLC/199 的意見。

守護大嶼聯盟
召集人謝世傑謹啟
2026.05.26