

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

8 March 2016

香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立

Dear Sir/Madam,

Comments on the draft Tung Chung Town Centre Area Outline Zoning Plan

No. S/I-TCTC/21

The Hong Kong Bird Watching Society (HKBWS) would like to object to the amendment item A1 of the draft Tung Chung Town Centre Outline Zoning Plan (OZP) No. I-TCTC/20.

The ecological value of Wong Lung Hang

In Section 7.9.2 of the Explanatory Statement of the draft Plan, it stated that “*Wong Lung Hang, an Ecological Important Stream, and its riparian areas with natural and dense vegetation are zoned ‘CA’ (Conservation Area) in recognition of their ecological values*”. The area is encircled by and ecologically connected to the Lantau North (Extension) Country Park. The ecological value of the stream and its surroundings is well-recognized by the Authority.



The flaw of the current OZP amendment

The Wong Lung Hang area was previously unprotected by any statutory plan. Currently, the OZP directly extends to the area without a “Development Permission Area” (DPA) plan beforehand. It is already well-known that areas with OZP but without a DPA do not give the Authority the power to carry out enforcement actions. As such, many natural habitats in rural areas are being trashed or destroyed by land filling or excavation. For example, Pui O in South Lantau is one the last piece of buffalo fields left in Hong Kong but the freshwater wetlands are constantly being filled with construction waste (Figure 1). Even though it is written in the Notes of the South Lantau Coast OZP that any filling of land, excavation of land or diversion of stream requires the permission from the Town Planning Board; yet without a DPA, the Authority cannot carry out enforcement actions.

If the Government recognizes the conservation importance of the Wong Lung Hang area, would a statutory plan without effective enforcement be suitable for the protection of such area? Have we not learnt our lessons in South Lantau (e.g. Pui O) and other suburb/rural areas in Hong Kong? Why are we still following the same path that will give the Authority no power for enforcement and will lead to even more ecological destructions?

Our recommendations

It is clear that an OZP without a DPA is not enough. We consider that the Government and the Town Planning Board (TPB) have the responsibilities to safeguard our countryside and to protect Hong Kong's biodiversity. We therefore urge the TPB to exclude Wong Lung Hang from the draft Tung Chung New Town OZP and make a new DPA for the Tin Sum and Wong Lung Hang area.

A joint letter representing views from 9 Green Groups was submitted on 8 March 2016 (Attachment 1). The HKBWS respectfully requests the TPB would also fully address the concerns stated in the joint letter as well as ours as stated above. Thank you for your kind attention.

Yours faithfully,



Woo Ming Chuan
Conservation Officer
The Hong Kong Bird Watching Society

cc.
The Conservancy Association
Designing Hong Kong
Green Power
Kadoorie Farm and Botanic Garden
WWF – Hong Kong

Figure 1. Dumping of construction wastes/ land filling in the buffalo fields in Pui O reported by a HKBWS's member. It is expected that Wong Lung Hang will receive similar threats.





BY FAX AND BY EMAIL

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

8 March, 2016

Dear Sir/Madams,

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

Support the Promulgation of a Statutory Land Use Plan

1. The undersigned green groups jointly welcome the draft Tung Chung Valley Outline Zoning Plan No. S/I-TVC/1 (TCVOZP) gazetted on 8 January 2016. This OZP will introduce statutory land use control in most part of Tung Chung River Valley and Bay and help protect the rich and diverse ecology against incompatible developments, environmental vandalism and degradation.
2. In order to effectively preserve and manage the biodiversity, natural landscape and hydrology of Tung Chung River, Valley and Coast, green groups call for, as shown in Appendix 1,
 - (a) Cover Tin Sam and Wong Lung Hang areas in new DPAs or Country Park extensions.
 - (b) Establishing a River Nature Park for proactive management of natural riverine and estuarine ecology and landscape, and for flood regulation.
 - (c) Early implementation of environmental protection and conservation landuses proposed in the TCVOZP in prior to other project works in Tung Chung area covering by OZP No. S/I-TCV/1, S/I-TCTC/21 and S/I-TCE/1.
 - (d) Traffic restriction in Tung Chung Valley and Bay, especially for construction trucks and machinery, immediately.

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

3. Tung Chung River is one of the few remaining major streams in Hong Kong with “Excellent” water quality (according to EPD’s monitoring results) and tranquil scenery. The Tung Chung River, which has not been overly affected by channelization, largely retains its natural state throughout from headwater to estuary. The Tung Chung River system is unique in the local context. Its headwaters flow from Hong Kong’s second and third highest peaks, all the way to the shallow Tung Chung Bay without interruptions.
4. The high connectivity and continuity of the river system from the montane area to the estuary make it exceptionally rich in its aquatic and coastal biodiversity, including many rare and endangered species, e.g. Beijiang Thick-lipped Barb (*Acrossocheilus beijiangensis*) 北江光唇魚, Philippine Neon Goby (*Stiphodon atropurpureum*) 紫身枝牙鰕虎魚, Romer's tree frog (*Liuixalus romeri*) 盧氏小樹蛙, Chinese Horseshoe Crab (*Tachypleus tridentatus*) 中國鱟, Seaweed Pipefish (*Syngnathus schlegeli*) 舒氏海龍, Swinhoe’s Egret (*Egretta eulophotes*) 黃嘴白鷺. Diverse types of habitats are also found in the surrounding land area supporting many ecologically important animal and plant species in Hong Kong, including Common Birdwing (*Troides helena*) 裳鳳蝶 and Eurasian Eagle Owl (*Bubo bubo*) 鵞鴞(refer to Appendix 2).
5. Tung Chung River is the second richest in freshwater species of any in Hong Kong, with a total of 23 species recorded, and listed as an Ecologically Important Stream (EIS)(No. 27) by Agricultural, Fishery and Conservation Department (AFCD). The mangroves on the intertidal mudflat at the Tung Chung River estuary is the largest on Lantau which is one of highest plant diversity sites. Tung Chung Valley and coast is also a butterfly hotspot which nurtures 148 species which comprises about 60% of Hong Kong’s total, including two rare and two very rare species.

Green Groups’ Recommended Development Permission Area Plan

6. Green groups’ recommended Development Permission Area (DPA) Plan (version Oct 2015) for a sustainable planning for Tung Chung River, estuary, coastal areas and associated habitats is enclosed (Appendix 1).
7. Regarding the land use of Tung Chung Valley, we suggested in 2012 (Appendix 2):
 - (a) To protect and conserve high quality natural habitats which are of rich biodiversity and ecological value through conservation planning, management and monitoring. In particular, the Tung Chung River, estuary, woodlands and the coast should not be exploited for any development and protected statutorily as “SSSI”, “CA” and “CPA” zones as illustrated in our revised recommended DPA Plan (version Oct 2015) attached to this letter (Appendix 1).
 - (b) To promote compatible community uses and enjoyment of the Tung Chung River Valley and the estuary through environmental education and passive recreation activities.

Ecologically-friendly facilities which encourage the public to access Tung Chung River and the estuary can be considered, for example, eco-trails, a riverside park, a nature education centre, resting places and look-out towers.

(c) To enhance the tourist appeal the river landscape and cultural heritage of the Tung Chung River Valley through improved linkage to existing Country Parks in Lantau. Tung Chung River Valley is located amongst existing tourist spots including Hong Kong International Airport, Ngong Ping Cable Car, Po Lin Monastery and the Tian Tan Buddha Statue.

8. Therefore, Green Groups proposed in our recommended DPA Plan (Appendix 1) an extensive **River Nature Park** to serve above-mentioned land use purposes and flood prevention.

Green Groups' General Response to the Draft TCVOZP

9. Green groups agree with *the general planning intention for the Area* (first part of Section 8.1 of EXPLANATORY STATEMENT, TCVOZP) is “*to conserve the ecologically sensitive areas, to protect the rural and natural character, to maintain the unique landscape character and cultural heritage of the Area*” and “*enforcement actions should be taken against any unauthorized development which would have impacts on the natural and rural character of the Area*”.
10. In response to the PLANNING CONTROL(Section 17 of EXPLANATORY STATEMENT, TCVOZP), green groups are very concerned that the publication of the draft Recommended Outline Development Plan (RODP) of the future new town extension and associated increase in economic activities has allured incompatible and unauthorized land uses in Tung Chung Valley and Bay.
11. Over the past two decades green groups observed a proliferation of incompatible developments and vandalism in Tung Chung Valley. The ecologically degraded land areas increased from 4.8% in 2007 to approximately 13% in 2015 (Appendix 3 and 4). However, enforcement powers and protection were lacking due to the absence of a statutory land-use plan.
12. To address these problems, the Administration should commit, with the publication of TCVOZP for the Tung Chung River Valley and coast,
- (a) to ensure the proposed land uses in the TCVOZP can be implemented,
 - (b) to ensure control over incompatible and/or unauthorized developments,
 - (c) to terminate existing vandalism and to stem potential vandalism in Tung Chung Valley and Coast; and
 - (d) to protect the ecology, hydrology and water quality of Tung Chung River and Bay, a major planning intention of the TCVOZP.

13. Regarding the draft TCVOZP, green groups welcome the zoning of Area 96D, south part of the planning scheme area, as “Conservation Area”(“CA”). However, we insist that 30m on either side of river courses, banks and tributaries of Tung Chung River and Wong Lung Hang, Tung Chung River Estuary and Tung Chung Bay should be zoned as “Site of Special Scientific Interest”(“SSSI”)(Appendix 1)
14. We also welcome the existing *fung shui woods* in the Tung Chung Valley west to Ngau Au and north of Shek Mun Kap zoned as “CA” in the TCVOZP. However, we are disappointed that the remaining *fung shui woods* receive no proper zones against development and ecological vandalism. Therefore, we recommend that the remaining *fung shui woods* should also be zoned as “CA” for protection.
15. We advise that the tributaries of Tung Chung River flowing through Mok Ka, Lam Che and Nim Un should be protected by zoning its stream courses and banks as “SSSI”.

Tin Sam and Wong Lung Hang Remained Unprotected

16. The signatory green groups urge the Government to cover Tin Sam and Wong Lung Hang areas in new DPAs (refer to Appendix 1) which otherwise will remain as enclaves or be without effective land use control.
17. The seagrass beds and nearby mangroves at San Tau (SSSI No.58) are one of only four sites where Dwarf Eel Grass (*Zostera japonica*) 矮大葉藻, and one of only five sites where Oval Halophila (*Halophila ovalis*) 喜鹽草 are recorded in Hong Kong. Both species are rare in Hong Kong and are listed as of Local Concern status in China. San Tau mangroves is of high conservation value due to rich floristic diversity. San Tau, which is nearby Tin Sam, is a butterfly hotspot and Wong Lung Hang is an EIS listed by AFCD. Both areas require the preservation of local habitats.
18. Although the eastern part of Tung Chung Valley and Wong Lung Hang areas are covered in the in Amendment A1 in Tung Chung Town Centre Area OZP No. S/I-TCTC-21 (TCTCOZP), these areas have never been covered by any DPAs, and thus any incompatible developments or environmental vandalisms, such as diversion of Wong Lung Hang EIS, filling of land/pond or excavation of land, cannot be effectively controlled or enforced.
19. Green groups consider Tin Sam, Wong Long Hang and eastern part of Tung Chung Valley are integral parts of the whole Tung Chung River-*cum*-Bay hydrological and ecological system, and should receive stricter and more effective land use control to ensure a comprehensive management of flood regulation, water quality and nature conservation.
20. The Government should proactively protect the ecologically important Wong Lung Hang and Tin Sam areas by adequate, effective and enforceable statutory measures. Such measures should

be consistent with those proposed for Tung Chung River-*cum*-Bay including land use planning and control. Failure to designate a DPA for Wong Lung Hang and Tin Sam areas would materially weaken the ability of the Administration to conduct effective enforcement of the OZP. Since the Administration is fully aware of difficulties of enforcing an OZP which has not been preceded by a DPA, failure to designate a DPA may be considered as maladministration and thereby arouse public and legal controversy.

Tung Chung Valley not Suitable for Residential Development

21. In view of the “Residential (Group C)” (“R(C)”) zone (Section 9.2 of EXPLANATORY STATEMENT, TCVOZP) and the Area 42 and 46 zoned as “Residential(Group A)” (“R(A)”) (Section 7.2.6 and 7.2.7 of EXPLANATORY STATEMENT, TCTCOZP), we call for a reduction in development pressure and wide ranging measures to alleviate development impacts.
22. Much of Tung Chung Valley is allocated for residential development in above-mentioned OZPs. We consider that such planning is incompatible with the physical and ecological setting of Tung Chung Valley and the principles of the Convention on Biological Diversity. Under Article 8 of this Convention, each contracting party shall:
 - Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;
 - Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;
 - Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;
 - Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, *inter alia*, through the development and implementation of plans or other management strategies;
 - Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.
23. We are highly concerned that the residential development (plot ratio 1 near the Tung Chung River estuary and up to 6.4 to the east of the valley) would affect the natural landscape, hydrology and ecology of Tung Chung River, threaten the inhabited wildlife and impact the water quality of Tung Chung River.
24. From the Hong Kong Observatory’s past observation on and prediction of Hong Kong’s future precipitation pattern, the scale and frequency of river floods is expected to increase. Tung Chung River is comparatively short and steep with an overall slope of 1: 4.9, (compared to Lam Tsuen River 1: 14.5, Kam Tin River 1: 14.4, Shing Mun River 1: 17.7, Tuen Mun River 1: 17.9).

The average annual rainfall of its river basin reaches up to 2400 mm, which is one of the highest regions in Hong Kong. Therefore, hydraulic and geotechnical conditions in small and narrow area of Tung Chung River Valley are highly unfavourable for dense and high-rise development.

25. Thus, in the long run, the Government must make early precaution and preventive measures in river land use planning through OZPs for Tung Chung River Valley, to decrease the threat posed by river floods due to climate change:
 - (a) Governments should avoid developing residential and industrial areas in Tung Chung River Valley, which are highly prone to flooding and landslide, to prevent risking the lives of residents and their properties.
 - (b) The government should allocate sufficient “permeable land use” by conserving vegetation and avoid covering large surface areas with concrete in Tung Chung Valley which helps allowing rainwater to infiltrate through the soil and alleviate flooding.
 - (c) Government should strengthen law enforcement on dumping, unauthorized vehicle access and developments on both sides of Tung Chung River or other activities which may affect drainage capacity of the rivers.
26. The large areas of “R(A)”, “R(C)” and “Village Type Development”(“V”) zones in Tung Chung Valley also threaten the water quality, ecosystem and landscape of Tung Chung Valley, River and Bay area and violate the Convention on Biodiversity.
27. We agree “*to concentrate village type development within “V” zone for a more orderly development pattern, efficient use of land and provision of infrastructures and services*” (Section 9.3.1 of EXPLANATORY STATEMENT, TCVOZP).
28. We concur the “*general presumption against development*” for the planning intention in “Green Belt”(“GB”), “CA” and “Coastal Protection Area”(“CPA”) zone.

Threat to Species of Global Conservation Value

29. The “Commercial” (“C”) zone (Section 9.1 of EXPLANATORY STATEMENT, TCVOZP), especially Area 38A in which a public transport terminus and maximum building height of 35m is planned, is incompatible with the mangroves on the western bank of Wong Lung Hang estuary where a breeding population of dragonfly Mangrove Skimmer (*Orthetrum poecilops*) 斑灰蜻 was discovered in 2015 by local green group. Mangrove Skimmer is listed as “Vulnerable” by IUCN and locally rare.
30. We opine that these “C” zones in TCVOZP will threaten Mangrove Skimmer population and we recommend include its habitat in River Park or other proper conservation zoning are needed.

31. The public transport terminus should be relocated in Area 107("GI/C") or Area 39 ("R(A)1") in TCTCOZP to link more efficiently with the planned underground railway station to the west of Yat Tung Estate.

River Nature Park for Flood Control and Conservation as Public Interest

32. Section 18.3 of EXPLANATORY STATEMENT, TCVOZP mentions that "*the Government will resume and clear the private land for..... public developments.....and provide infrastructure.*" Therefore, we urge the Government to seriously consider the resumption of all private land lots in the Tung Chung River Valley to achieve a sustainable plan for public developments in Tung Chung Valley.
33. It is proposed that land is resumed to provide flood prevention, environmental and conservation infrastructure in the entire river valley, and estuary which is managed as a **River Nature Park** (separately or jointly by DSD, AFCD and/or LCSD), to safeguard and control the hydraulic, water quality and ecological properties of the river valley.
34. Designation of Tung Chung River Valley as a River Nature Park can be implemented by the Government as part of public developments in the Tung Chung New Town Extension (TCNTE).
35. Whereas the residential and road zones in the OZP will impose adverse and irreversible impacts on the ecology of Tung Chung River Valley and Bay, the proactive land use management by establishing a River Nature Park will help preserve natural resources for community use and enjoyment, habitat protection and fisheries intended under the RODP of TCNTE study and draft TCVOZP.
36. The resumption of land and the management as River Nature Park will make it possible to better conserve and enhance the ecological value and functions of Tung Chung River Valley. The park will provide a high quality nature experience for residents, improved flood control, and better conservation of the rich habitat of the river valley and estuary.
37. The estimated resumption cost for about 500 private land lots with a total area of 8.5 ha in green groups' proposed River Nature Park (Appendix1) is HK\$370 million.
38. The Government should explore and assess the feasibility and potential impacts of different alternative options for flood prevention such as resuming lands along the riparian zones of Tung Chung River so as to serve as natural floodplain to retain floodwater.

Conservation First Before Development

39. For Section 18 of EXPLANATORY STATEMENT, TCVOZP, we are disappointed that the "*phasing and packaging of works for the Tung Chung New Town Extension to achieve early*

delivery of land to meet the housing needs and ensure timely provision offacilities in tandem with population build-up” do not include the early implementation of environmental protection and conservation landuses proposed in the TCVOZP. We urge the Administration to adopt a “conservation first before development” strategy for the implementation of TCVOZP.

40. Most of Hong Kong’s major natural rivers are channelized and recipients of low quality water including run-off and effluent discharges from storm drain networks. These rivers often emit foul odour and are an urban blight degrading the living quality of Hong Kong, and impact our image as a well-developed and livable world class city. Tung Chung River must not follow the same fate of other channelized rivers of Hong Kong.
41. Once the TCNTE development commences according to the approved OZPs, the amount of construction waste generated according to the Environmental Impact Assessment Report could fill up the whole Tung Chung Valley and estuary. Unless dedicated efforts and proper phasing of works are made to protect the valley and bay, the invaluable river ecosystem and landscape will be irreversibly ruined. And this in turn, would jeopardize the government’s carefully crafted comprehensive plan for the area.
42. The construction, the increase in population and the new economic activities close to these ecologically valuable resources will inevitably lead to destruction unless very strong and specific protection and management measures as proposed in TCVOZP are put in place. Already we have witnessed a proliferation of dumping of massive amounts of debris and construction waste in Tung Chung Valley (Appendix 3 and 4). Increasingly typical ‘brown-field’ uses are covering more areas in the valley, uses which thrive on the growing population and economic activities in north Lantau.
43. Moreover, The Tung Chung River, Estuary and Bay are a great opportunity to implement the “Water-friendly Culture and Activities” policy adopted by the Government in 2015.
44. We invite the Administration to set a good model for “conservation first before development” and to protect this natural river resource, and to consider incorporating the following measures for implementation of TCVOZP:
 - (a) To first create the polders and to establish a River Nature Park covering the river, estuary and areas earmarked for conservation along the river well ahead of commencing the other infrastructure and development projects. By clearly demarcating the conservation areas as a park, and by ensuring management is in place, these areas designated for conservation can be protected from land filling, unauthorized dumping, destruction and other encroachment. At the same time this ensures that flood control and management measures are in place and the natural river courses can be protected from obstruction and diversion.

- (b) The Sustainable Urban Drainage System (SUDS), storm water retention ponds and pump stations must be built before the commencement of any other development projects to avoid polluted water generated by construction works are discharged into the natural river course, deteriorating the water quality and threatening the ecosystem and landscape of Tung Chung River and the estuary.
- (c) In order to protect the ecosystem and natural environment of the valley from air pollution and illegal dumping, large vehicles and construction trucks must be prohibited from entering the section of Tung Chung Road west of Ha Ling Pei. Vehicles that have sufficient reasons for entering need to seek formal approval from relevant authorities.
- (d) No construction and civil engineering works should be allowed in the riverbed, riparian zone and estuary of Tung Chung River. Storm water and sewage water should not be discharged into the river courses and estuary of Tung Chung River.

Prevention of Water Pollution and Habitat Damages

- 45. Green groups concur that “ *any diversion of streams, filling of land/pond or excavation of land, including that to effect a change of use to any of those specified in Column 1 and 2 above or the uses or developments always permitted under the covering NOTES....., shall not be undertaken or continued on or after the date of the first publication in the Gazette of the notice of the draft DPA plan without the permission from the TPB under section 16 of the Town Planning Ordinance*”, which is stipulated in Remarks under “GB”, Remarks (b) under “CA” and “CPA” in TCVOZP.
- 46. However, we opine that this planning measure should also stipulated other zones in TCVOZP, especially those the tributaries of Tung Chung River, whatever natural streams/ rivers, irrigation or stormwater channels, flow through and waterways in mangroves, and including the tributaries flowing through Mok Ka, Lam Che and Nim Un. “*Filling of land/pond or excavation of land*” should be under the same planning control as “*diversion of streams*” and stipulated under Remarks (c) of “V” zones in TCVOZP.
- 47. For Section 17.2 of EXPLANATORY STATEMENT, TCVOZP, we opine that regarding “*uses or building which were in existence immediately before the first publication in the Gazette of the notice of the draft DPA Plan, any material change of such use or any other development*” which may have adverse environment, drainage, traffic, ecology and hydrology of the Area should not be permitted. “*The alteration and/or modification works which may lead to an environmental and ecological improvement to the Area may be considered favourably by the Board.*”
- 48. For Section (2) of NOTES, TCVOZP, in order to avoid water pollution to Tung Chung River and Bay, any use or development that does not conform to Water Pollution Control Ordinance (Cap.358) should be terminated despite being in existence immediately before the first

publication in the Gazette of the notice of the draft DPA Plan No. DPA/I-TCV/1.

49. For section (8)(b), (9)(a)(i) and 9(b) of NOTES, TCVOZP, “refreshment kiosk” should not be permitted on ecologically important areas, within 30 metres on either side of river/stream, which have been mostly zoned as “CA” and “CPA” and agricultural lands because it may generate wastewater and garbage that pollute the water bodies and degrade the habitats.
50. For section (8)(c) and (d), and (9)(a)(ii) of NOTES, TCVOZP, in order to avoid alteration of physical setting and damage to ecology of the natural streams and rivers (including its tributaries flowing through or by agricultural lands), diversion, excavation, shotcreting and paving of beds and banks should not be allowed for “*maintenance or repair ofwatercourse.....*” and “*.....drainage works.....*” without the permission of the relevant government authorities in charge of environmental protection and nature conservation.
51. For section (8)(e) of the NOTES, TCVOZP, the septic tanks of rebuilt New Territories Exemption Houses should not be constructed within 30 metres of either side of watercourse to avoid pollution of river water by the sewage.
52. For Section (11)(a) of the NOTES, TCVOZP, we concur that “*temporary use or development of any land or building*” should not be permitted in areas zoned “CA” and “CPA”.
53. For Section (11)(b) of the NOTES, TCVOZP, we strongly urge that open storage and port back-up landuses must be prohibited in the Planning Scheme Area because these landuses
 - (a) are not compatible with the environmental setting and landscape of Tung Chung River Valley,
 - (b) breaches the planning intention of TCVOZP,
 - (c) will encroach and interrupt the Tung Chung River which is designated as EIS, proposed River Park and SUDS,
 - (d) will disturb and cause permanent and irreversible loss of habitats, such as river beds and banks, freshwater marsh, farmlands, by land filling, dumping of wastes and soil debris,
 - (e) will cause land contamination with toxic substances, air and water pollution,
 - (f) will trigger opening of private vehicular access and additional heavy-vehicle traffic that further disturb and destroy the habitats in Tung Chung River Valley and Bay.
 - (g) are difficult to be reinstates to the origin habitats through planning measures.

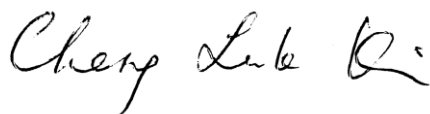
Adverse Impacts of Road Network

54. Green groups would like to stress the adverse impacts of road network (Section 10.1 of EXPLANATORY STATEMENT, TCVOZP) on the environment and ecology of Tung Chung River, Valley and Bay. Road access will promote development, air and noise pollution, and facilitate illegal dumping and landfilling on farmlands and riverbanks.

55. In order to prevent uncontrollable and unenforceable vandalism in Tung Chung Valley and other potential adverse impacts of road access, we urge the Administration to review the proposed road network in the OZP and to impose traffic restriction in Tung Chung West, especially for construction trucks and machinery.
56. We insist that all non-essential roads access to ecologically sensitive areas such as natural coastlines, river banks, *fung shui woods* and other ecologically important sites is eliminated.
57. In the Section 7.1.7 and Figure 2 of EXPLANATORY STATEMENT, TCVOZP, “*two Non-Building Areas (NBA) of 20m and 30m wide are proposed in Area 60 and 71A respectively as breezeway to promote better air ventilation and to enhance visual permeability*” and not shown in the draft TCVOZP, i.e.
- (a) an extension of Yu Tung Road through “R(C)2”(Area 60) to “CPA” on the eastern bank of Tung Chung River,
 - (b) an “NBA” zone connecting “CA” with Road L25 through “R(C)1”(Planning Area No.71A) to the north of Shek Mun Kap,
- However, we worry that these NBAs will become road access that facilitate flytipping and threaten the adjoining “CPA” and “CA”. Moreover, road access will generate air pollution from vehicles that contradicts the design concept of these NBAs.
58. We are highly concerned about the Road L28 connecting existing Shek Mun Kap Road to Mok Ka, which runs across an EIS designated by AFCD.
59. Also, the existing illegal road access across Tung Chung River in Area 84 must be removed because it is not compatible with the planned River Park. Moreover, such illegal structure threatening the water quality and ecology of Tung Chung River should not be accepted and rationalized in the statutory land-use plan.
60. We are also concerned that road access will initiate and ecological vandalism activities in ecologically important areas, e.g. the “CA” zone adjoining Ngau Au, and the “CA” zone between Shek Mun Kap Road and Area 71A.

Thank you very much for your kind attention. We look forward to your favourable decision.

Yours faithfully,



CHENG Luk-ki (Division head, Scientific Research & Conservation, Green Power)

On behalf of

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

Encl.

Appendix 1. Green Groups' recommended DPA Plan (version Oct 2015)

Appendix 2. Joint green groups' recommended DPA Plan for Tung Chung River, estuary, coastal areas and associated habitats (version Jun 2012)

Appendix 3. Map illustrating degraded site complaints and photos by green groups.

Appendix 4. Aerial photos of Tung Chung Valley taken in November 2007 and April 2015.

c.c.

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