

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-130958-45410

Submission Number:
TPB/R/S/STT/1-S786

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1401

提交日期及時間
Date and time of submission: 07/05/2024 13:09:58

「申述人」全名
Full Name of "Representer": 女士 Ms. 孫敏瓊

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
新田科技城 S/STT/1	反對 Oppose	<p>新田科技城發展佔用150公頃「濕地保育區」和97公頃「濕地緩衝區」。發展不僅會導致90公頃濕地損失，損害濕地連結性及完整性，由於發展容許興建中至高密度樓宇，恐進一步令毗鄰的國際重要濕地的生境質素下降，導致整體生態功能喪失。新田科技城明顯違反城市規劃委員會規劃指引12 C所列明的「防患於未然」及「不會有濕地淨減少」原則。</p> <p>受影響魚塘濕地所錄得的雀鳥物種數量達205種，其中有117種為具保育級別物種。新田科技城填塘發展將危及19種全球瀕危及近危物種，例如青頭潛鴨、黃胸鵝、黑臉琵鷺、紅頭潛鴨、白眼潛鴨和尖尾濱鵝；33種國家一級或二級重點保護野生動物，例如白肩鵝、烏鵲和禿鷲。填平新田濕地將令眾多面臨滅絕物種失去其重要棲息地。</p> <p>新田科技城發展緊貼「米埔內后海灣拉姆薩爾濕地」，相距或不足30米。發展須填平150公頃「濕地保育區」作創科發展，發展不但會對拉姆薩爾濕地造成嚴重干擾，更會直接切斷她與東邊濕地的連接，損害國際重要濕地的濕地完整性和生態特徵。這與《濕地公約》將「避免濕地受到不利影響</p>

」列為首要要求，和《生物多樣性公約》所提倡的濕地保護，背道而馳。

2023年8月國務院公佈的《河套深港科技創新合作區深圳園區發展規劃》，明確指出「河套深港科技創新合作區」香港園區具體面積為87公頃，面積與落馬洲河套區的「港深科技園」吻合。反之，具指導意義的《粵港澳大灣區發展規劃綱要》，就明確提出「加強濕地保護修復，全面保護區域內國際和國家重要濕地，開展濱海濕地跨境聯合保護」。局方似乎選擇性解讀國策，忽略新田科技城填平濕地與國家濕地保護策略相沖的事實。局方認真看待《十四五規劃》及《粵港澳大灣區發展規劃綱要》的生態環境保育條文，並應依照國家主席習近平「綠水青山就是金山銀山」的理念，懸崖勒馬收回發展計劃，不要與「推動生態文明建設」背道而馳。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

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Urgent Return receipt Expand Group Restricted Prevent Copy

From: man sze ng [REDACTED]
Sent: 2024-05-08 星期三 00:07:21
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 新田科技城草圖. 意見書/申訴

Submission Number:
TPB/R/S/STT/1-S811

Representation Number:
TPB/R/S/STT/1-R1402

致城規會：

本人就《新田科技城分區計劃大綱草圖》(《新田科技城草圖》) 提出申訴，希望能重新修訂或中止計劃方案。

其中計劃將「濕地保育區」及「濕地緩衝區」內的「其他指定用途(創新及科技)」地帶，重新劃為原來的地帶，即「自然保育區」、「其他指定用途(綜合發展包括濕地改善區)」及「其他指定用途(綜合發展包括濕地修復區)」，或其他與濕地保育相關的用途地帶，以確保任何發展不會違反「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。同時須列明「不會有濕地淨減少」可指面積和功能這兩方面的減少。

其二，重新修訂《新田科技城草圖》將后海灣第二及第三大的鷺鳥林，及其覓食地劃作保育用途地帶；將鷺鳥來往鳥巢及其覓食地的飛行區，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾。

三，重新修訂《新田科技城草圖》將落馬洲地鐵站一帶至落馬洲管制站北面部分的已平整土地，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾，以保障米埔、馬草壟及塱原的生態連結。

四、重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

Ng Man Sze
香港市民
[REDACTED]

Urgent Return receipt Expand Group Restricted Prevent Copy

Submission Number:
TPB/R/S/STT/1-S846

From: yuki chan [REDACTED]
Sent: 2024-05-07 星期二 21:33:42
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 致城規會

Representation Number:
TPB/R/S/STT/1-R1403

申述人: Chan Shuk Ling

申述人的身份證 [REDACTED]

我要求城規會：

- 重新修訂新田科技城草圖，將「其他指定用途（創新及科技）」地帶重新劃為原本的地帶，即「自然保育區」、「其他指定用途（綜合發展及濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以遵循「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。
- 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。
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Urgent Return receipt Expand Group Restricted Prevent Copy

From: ly wong [REDACTED]
Sent: 2024-05-07 星期二 23:38:38
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 重新修訂新田科技城草圖

Submission Number:
TPB/R/S/STT/1-S898

Representation Number:
TPB/R/S/STT/1-R1404

致城規會:

發展說起來很動聽，好像不做便是香港的大損失，人工化一個天然環境其實一點也不難，但對於候鳥來說沒有了后海灣的中途補給站，後果是沒法補償的！我希望政府必定要擱置新田的發展，相信中央政府也不會希望香港失去重要的保育地點！

我要求城規會：

- 重新修訂新田科技城草圖，將「其他指定用途（創新及科技）」地帶重新劃為原本的地帶，即「自然保育區」、「其他指定用途（綜合發展及濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以遵循「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。
- 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

申述人全名：

_Wong Lai Yin

申述人的身份證 / :

[REDACTED]

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-164244-86962

Submission Number:
TPB/R/S/STT/1-S942

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1405

提交日期及時間
Date and time of submission: 07/05/2024 16:42:44

「申述人」全名
Full Name of "Representer": 先生 Mr. Cheng Chit Lung Stewart

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
S/STT/1	反對 Oppose	<p>1、環評報告的馬虎與不完善：</p> <p>科技城的環評報告被指存有多處違反一般環評的法定要求的問題。報告中技術評估和數據錯漏的情況被揭示，同時也對濕地保育區造成了損害。這顯示政府和顧問公司在進行環評時存在草率和不嚴謹的情況，這無疑將對環境和生態系統造成嚴重損害。</p> <p>根傳媒報導，環評報告存在至少29項嚴重的技術評估和數據錯誤或遺漏。其中包括違反環評「避免」原則、生態基線及評估資料不足、嚴重低估對保育類雀鳥、繁殖雀鳥和雀鳥飛行路線的影響、嚴重低估對歐亞水獺的影響，以及未提供充分資料來證明生態補償的有效性等問題。此外，報告還將「生態優化措施」錯誤地當作緩解措施。</p> <p>這些錯誤和遺漏的問題使得環評報告的質量不達標，無法被接受；既違反了法定要求，也無法提供準確評估和預測對環境和生態系統的影響的依據。在進一步推進科技城發展之前，應該對環評報告進行修正並確保其符合相關的法律法規和科學標準。</p> <p>2、濕地保育的重要性</p>

新田科技城計劃涉及150公頃的「濕地保育區」和97公頃的「緩衝區」。濕地是生態系統中重要的環境資源，能夠提供水資源調節、生物多樣性保護和碳吸存等功能，該處亦瀕臨后海灣的米埔隴鷺鳥林。興建科技城很可能導致濕地的破壞和生態系統的碎片化，對生態環境造成負面影響。在過去半個世紀中，新田一帶的養魚戶一直以傳統的塘魚養殖方式經營。在近十多年的時間裡，他們亦積極參與生境管理和保育工作，不僅保留了傳統的塘魚養殖方式，還為水鳥提供了覓食和棲息的空間，為維護后海灣魚塘濕地的生態價值作出貢獻。無奈地，是次發展將對該地30個養魚戶產生直接影響。

3、可持續發展的考慮

科技城的興建可能對香港的可持續發展帶來挑戰。佔地300公頃的科技城，將極可能破壞現有的生態環境和生物多樣性。同時，科技城的興建也需要大量的基建和資源，勢必對土地和水資源的使用帶來壓力。此外，規劃方案並未遵循避免、減少和補償原則，也沒有優先考慮減少對生態環境的負面影響。這與中國政府的生態文明建設、高質量發展以及保護優先的國策不符，也背離了《十四五規劃》提到的整治修復濱海濕地的目標。而國務院公佈的《河套深港科技創新合作區深圳園區發展規劃》，指出了香港園區的具體面積為87公頃，與落馬洲河套區的港深科技園不謀而合，似乎發展河套用地已經足夠。再者《粵港澳大灣區發展規劃綱要》明確提出加強濕地保護修復，全面保護區域內的國際和國家重要濕地，並進行跨境聯合保護。對於今次科技城規劃上以填平濕地為主軸的舉措，無疑與國家濕地保護策略相衝突。

4、公眾參與和透明度的不足

在新田科技城計劃中，公眾參與和透明度屢被質疑。當局在發表相關文件時，公眾的關注度被其他事件所分散，可能導致公眾對計劃的了解不足。此外，環評報告的不完善也顯示了政府在計劃中缺乏透明度和公眾參與的重視。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

就圖則作出申述**Representation Relating to Plan**

參考編號

Reference Number:

240507-165721-92409

Submission Number:

TPB/R/S/STT/1-S943

提交限期

Deadline for submission:

08/05/2024

Representation Number:

TPB/R/S/STT/1-R1406

提交日期及時間

Date and time of submission:

07/05/2024 16:57:21

「申述人」全名

Full Name of "Representer":

女士 Ms. Cheung Wan Fun

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Filling the wetland / fish ponds for other specified uses for Sah Tin Technopole	反對 Oppose	You are destroying the precious wetlands which belong to the birds and wildlife. This is the world's heritage and should not be destroyed in the name of technology and maximisation of monetary profits.
Fragmentation of existing wetland and natural habitation sites of birds and wildlife	反對 Oppose	This will lead to drop in population of birds and wildlife which is not acceptable.
Amendment items on Plan S/STT/1	反對 Oppose	Do not destroy nature and beautiful countryside of Hong Kong.

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

Return to nature. Do not change nature and the existing wetlands.

就圖則作出申述

Representation Relating to Plan

參考編號
Reference Number: 240507-190120-35192

Submission Number:
TPB/R/S/STT/1-S945

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1407

提交日期及時間
Date and time of submission: 07/05/2024 19:01:20

「申述人」全名
Full Name of "Representer": 先生 Mr. LAM KIN HANG

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
Schedule of Uses (Column 1) of "Other Specified Uses" annotated "Innovation and Technology"	反對 Oppose	Cannot have Commercial Uses such as "Eating Place", "Hotel" and "Office" under Column 1 of "Other Specified Uses" annotated "Innovation and Technology" In planning terms, the development space for accommodating innovation and technology uses (including research and development, production activities and data centre are categorised as "Industrial Use" (i.e. Group III of Broad Use Terms under Definition of Terms). Owing to fire safety and environmental concerns, other non-industrial uses will not be permitted to co-exist or at least will have to be completely separated from the industrial portion to ensure compatibility of the uses within the same planning area or the building. Acting under the common basic planning principles, land uses that have "direct provision of customer services or goods" (e.g. eating place / hotel / office) should not be permitted as of right together with other industrial uses (including non-polluting industrial uses with no offensive trades) under Column 1 of the Schedule of Uses.
Schedule of Uses (Columns 1 & 2) of "Other Specified Uses" annotated	反對 Oppose	Not acceptable to have uses that are "Residential" in nature under Columns 1 and 2 of "Other Specified Uses" annotated "Innovation and Technology" To take the above Point 1 further, please confirm if it is the new norm for the Hong Kong's planning system to allow "residential" uses to "co-exist" with new "industrial" uses under the same Schedule of Uses of a land-use zoning. A statutory planning control document (i.e. OZP) to allow "Flat (Staff Quarters only)" for talent accommodation units, as well

ed “Innovation and Technology”		<p>as to allow “Flat” under Column 2 simply violates the normal practice and ignores the possible “industrial / residential” interface issues.</p> <p>From the Explanatory Statement, it states that “provision of talent accommodation should duly observe the possible constraints posed by the nearby less environmental friendly manufacturing processes, if any. Centralised air-conditioning system with chilled water supplied by DCS is assumed to be adopted by the talent accommodation units”. These are the mitigation measures to protect sensitive uses from environmental nuisances if the situation unwillingly occurs. However, you (as the Planning Authority) are doing a statutory planning control document from a blank slate. It is inherently unlawful by putting a subject matter as “always permissible” or “may be permitted on application” if the happening of this subject matter is not legitimate at the first place.</p>
Notes of “Other Specified Uses” annotated “Innovation and Technology”	反對 Oppose	<p>Cannot have no statutory planning control on PR, GFA and Development Mix for “Other Specified Uses” annotated “Innovation and Technology” zone</p> <p>It is not acceptable to have no statutory PR, GFA and Development Mix control under the Notes of the OZP. Although the Explanatory Statement claims that land grant conditions and departmental Outline Development Plan (ODP) will be prepared to set out development restrictions and the planning requirements for each planning areas of the “OU(I&T)” zone, they are all administrative means. To put it bluntly, the Notes is tactically formulated to allow “flexible” land disposal without going through town planning procedures in future.</p>

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

1. Move all Column 1 uses with direct provision of customer services or goods (i.e. eating place, hotel, office and etc.) to Column 2;
2. Move “Flat (Staff Quarters only)” from Column 1 to Column 2;
3. Delete “Flat (not elsewhere specified)” from Column 2. If anybody wants to proceed with residential development(s), he / she should submit a rezoning application; and
4. Sub-divide “Other Specified Uses” annotated “Innovation and Technology” into different sub-zones. For each sub-zone, clearly define the max. PR / GFA under the Notes of the OZP. Also, similar to the Guidelines set for “G/IC” zone (i.e. TPG PG-No. 16), please clearly stipulate the max. GFA of other non-I&T uses in all planning areas and individual land parcels under the OZP as “not more than 50% of the max. permissible GFA” so as to respect the primary planning intention (if you really want to do I&T, unless you are not).

“Flexibility” and “Efficiency” do not come above all other matters. A proper planning control should still have a role of play when it is needed.

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-195919-59288

Submission Number:
TPB/R/S/STT/1-S946

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1408

提交日期及時間
Date and time of submission: 07/05/2024 19:59:19

「申述人」全名
Full Name of "Representer": 女士 Ms. HA WING SEE

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
不同意圖則規劃所選的範圍和位置.	反對 Oppose	<p>我相信城市發展是需要, 經濟影響民生, 但同時環境保育也同樣重要, 整個世界都在講氣候變化, 環保, 而香港雖小, 卻有世界級自然景觀, 國際級的商業城市規模, 生物多樣性, 國際濕地, 這些都是我們一直自豪. 后海灣這個地方是一處很美的地方, 平靜滿有水鄉的情懷, 同時也是雀鳥的天堂, 每到秋冬一群群的雀鳥飛越, 逗留, 準備下一個路程, 這個地方被稱為香港的後花園.</p> <p>這片土地在商人/地主眼中可能是一塊搵錢的黃金地, 而雀鳥也視它為黃金之地, 讓牠們可以繼續延續下代. 當城市不斷增長, 雀鳥生物都被迫要遷移, 減少或死亡. 好像黑臉琵鷺很多年前數目不斷減少, 直至疫情時數目開始增加, 可能人的活動減少了, 生物才有空間生存. 如果按照規劃這片土地被分割了差不多三分二的地方, 只剩下少量漁塘, 那這些雀鳥將何去何從? 或許會就那些漁塘已經夠牠們用, 但香港的石屎森林已經夠多, 這樣的濕地已愈來愈少. 其實濕地對氣候也起了恆溫作用. 尤其我們這個雀鳥天堂更是石屎森林的氣候調節劑. 如果城市發展起來, 人多車多, 污染多, 那僅餘的漁塘會否被污染, 寧靜的環境不再寧靜啦? 可能有人說在規劃上做多些配合, 減少騷擾, 但人工化的建設始終不及天然的好, 想想以前的雀鳥在樹上築巢, 現在被迫在屋簷</p>

下, 建築物的縫隙處築巢, 動物走上馬路, 在垃圾堆找食物, 這些情況是誰讓牠們改變? 生物為了生存只有人類的生活圈中尋找可安身的地方。

有些事做了之後就不能逆轉, 自然生態有它的循環, 當一種生物減少, 另一個生物也會因而減少, 最終損害是人類。大陸這十年來都不斷努力保育, 減低對環境氣候的影響。為何香港在倒退? 我們常說要振興經濟, 深度遊, 尋找更多可持續發展的地方。香港除了高樓大廈還剩下什麼? 還有什麼資源? 澳門懂得活化舊建築物, 成為旅遊景點, 香港的古蹟舊樓很多都因為起樓而拆卸, 存留的也沒認真保育活化。我們經常說要環保, 保育, 但在整個規劃上都只是頭痛醫頭, 腳痛醫痛。這個后海灣正是香港獨有的景點, 也是世界公認的濕地保育區, 若我們不保護僅有的資源, 我們的後代也看不見這麼美麗的畫面。城市容易建造, 滋養一個多樣化濕地不容易。興建多一個沙田衛星城市, 多一個灣仔區, 或多一個科技城, 可能帶來短暫經濟效益, 但十年廿年後又說土地不夠用, 又要開發更多的土地, 那時我們可以直接跨過條河就可到對岸。香港真的沒有其他土地嗎? 真的要犧牲這片上天賜給我們的禮物?

我覺得城市建設需與生態環境要平衡, 環保組織有他們的考量, 應該多同他們一齊商討達到一個平衡方案。就算我不是一個環保成員或不懂什麼城市規劃建築, 見你們的規劃圖都有很大疑問, 為何會這樣分割這塊濕地, 好似將唔要的地留來作濕地, 看似保留不少漁塘, 但原來雙通的格局困住濕地, 看起來像個橫向水氹, 候鳥過冬有牠們的路線, 如果條路線起了建築物, 牠們就沒了落腳的地方, 牠們是可以飛去別的地方, 但同時也改變牠們的習性, 影響生存的機會。我不太贊同這個劃分, 如果可以, 應該研究下計劃對整個生態環境影響, 以及候鳥的習性, 飛行路線, 不要只著眼在建設新的事物才能帶來經濟效益, 可能最原始的環境反而帶來生機。若能多與環保團體溝通, 商討一個合適方案, 免得多了個衛星城市, 卻失去國際濕地的美譽。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-213316-84157

Submission Number:
TPB/R/S/STT/1-S948

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1409

提交日期及時間
Date and time of submission: 07/05/2024 21:33:16

「申述人」全名
Full Name of "Representer": 女士 Ms. Lau Ching Yan

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
S/STT/1 新田科技城發展	反對 Oppose	- 區內的發展計劃欠缺保育元素，破壞重要濕地，未能確保三寶樹濕地保育公園能有效補償生態損失 - 沒有跟從過往以面積淨零損失作濕地補償的標準 - 環境評估倉卒且不全面，對農地生態價值的評估錯漏百出，亦未有就此作修訂，低估區內生態價值 - 有其他更適合的選址作科技城發展

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-213437-34382

Submission Number:
TPB/R/S/STT/1-S949

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1410

提交日期及時間
Date and time of submission: 07/05/2024 21:34:37

「申述人」全名
Full Name of "Representer": 先生 Mr. WONG, Chun Man

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
S/STT/1 新田科技城發展	反對 Oppose	該區內的發展計劃缺乏保育元素，導致重要濕地遭受破壞，同時未能確保三寶樹濕地保育公園有效地彌補生態損失。環境評估工作匆忙進行，未能全面評估農地的生態價值，且存在著許多錯誤和遺漏，缺乏相應的修正措施。此外，該計劃也未按照以往以面積淨零損失為標準進行濕地補償，忽略了過去的經驗教訓。因此，有必要重新考慮和調整該發展計劃，以確保環境保育與生態平衡的可持續發展。

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-214457-78720

Submission Number:
TPB/R/S/STT/1-S950

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1411

提交日期及時間
Date and time of submission: 07/05/2024 21:44:57

「申述人」全名
Full Name of "Representer": 女士 Ms. LI PUI SZE

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
鄰近新田公路石湖圍的一幅7公頃，原本建議劃作「農業」用途的土地，在新田科技城的最新發展中完全消失	反對 Oppose	農地具高生態價值，應保護區內農地，而消失的農地是無法逆轉的
雀鳥飛行路線只預留300米闊的飛行走廊，日後仍容許發展，沒有就填塘範圍內的雀鳥飛行路線，解釋現時發展佈局	反對 Oppose	此圖則無法解決對雀鳥及歐亞水獺的影響，而把米埔隴鷺鳥林及飛行走廊劃作休憩地帶，公眾或恆常護養工程或會干擾鷺鳥繁殖及飛行
大規模填平新田一帶的魚塘濕地	反對 Oppose	第七章關於「推進生態文明建設」中，提到要「加強濕地保護修復，全面保護區域內國際和國家重要濕地，開展濱海濕地跨境聯合保護」，新田一帶的魚塘濕地，正正是大灣區國際級的重要濕地，大規模填平不符《規劃綱要》的要求。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

應優先保護農地及魚塘濕地，並重新嚴謹地評估對雀鳥及歐亞水獺的影響。

5951 - S1000

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-214802-14904

Submission Number:
TPB/R/S/STT/1-S951

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1412

提交日期及時間
Date and time of submission: 07/05/2024 21:48:02

「申述人」全名
Full Name of "Representer": 女士 Ms. Leung Wai Ching

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
新田科技城草圖	反對 Oppose	要求重新修訂《新田科技城草圖》，將后海灣第二及第三大的鷺鳥林，及其覓食地劃作保育用途地帶；將鷺鳥來往鳥巢及其覓食地的飛行區，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾。
新田科技城草圖	反對 Oppose	要求重新修訂《新田科技城草圖》，將落馬洲地鐵站一帶至落馬洲管制站北面部分的已平整土地，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾，以保障米埔、馬草壟及塱原的生態連結。
新田科技城草圖	反對 Oppose	要求重新修訂《新田科技城草圖》，重新找合資格公司做環境評估，生態基線及評估資料不足；嚴重低估對保育類雀鳥、繁殖雀鳥、雀鳥飛行路線的影響；嚴重低估對歐亞水獺的影響；無充分資料證明生態補償有效；誤將「生態優化措施」當作緩解措施等。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

要求重新修訂《新田科技城草圖》，請重新找合資格公司做環境評估，新田是極具生態價值的濕地，發展應考慮保育有價值的東西。

就圖則作出申述**Representation Relating to Plan**

參考編號

Reference Number:

240507-215346-20654

Submission Number:

TPB/R/S/STT/1-S952

提交限期

Deadline for submission:

08/05/2024

Representation Number:

TPB/R/S/STT/1-R1413

提交日期及時間

Date and time of submission:

07/05/2024 21:53:46

「申述人」全名

Full Name of "Representer":

女士 Ms. Leung Ka Lok Clare

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
取消151公頃土地‘濕地保育區’及97公頃土地‘濕地緩衝區’用作興建‘創科園區’	反對 Oppose	香港地少人多本不是宜居城市，要提升人材吸引力和增加國際層面競爭力，自然環境如濕地反而比創科園區更有長遠價值。發展創科園區應量力而為，在香港現有商業區進行更加可行！

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-223536-62142

Submission Number:
TPB/R/S/STT/1-S953

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1414

提交日期及時間
Date and time of submission: 07/05/2024 22:35:36

「申述人」全名
Full Name of "Representer": 女士 Ms. fung siu yin

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
《新田科技城分區計劃大綱草圖》（《新田科技城草圖》），將「濕地保育區」及「濕地緩衝區」內的「其他指定用途（創新及科技）」地帶，	反對 Oppose	重新修訂《新田科技城分區計劃大綱草圖》（《新田科技城草圖》），將「濕地保育區」及「濕地緩衝區」內的「其他指定用途（創新及科技）」地帶，重新劃為原來的地帶，即「自然保育區」、「其他指定用途（綜合發展包括濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以確保任何發展不會違反「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。同時須列明「不會有濕地淨減少」可指面積和功能這兩方面的減少。
新田科技城發展佔用150公頃「濕地保育區」和97公頃「濕地緩衝區」。	反對 Oppose	發展不僅會導致90公頃濕地損失，損害濕地連結性及完整性，由於發展容許興建中至高密度樓宇，恐進一步令毗鄰的國際重要濕地的生境質素下降，導致整體生態功能喪失。新田科技城明顯違反城市規劃委員會規劃指引12C所列明的「防患於未然」及「不會有濕地淨減少」原則。
新田科技城填塘後的土地並非只用作創科商業用地，除了超過12,000新增工作人口，更預計會有6400單位的住宅、酒店、康樂等用途。	反對 Oppose	受影響魚塘濕地所錄得的雀鳥物種數量達205種，其中有117種為具保育級別物種。新田科技城填塘發展將危及19種全球瀕危及近危物種，例如青頭潛鴨、黃胸鵝、黑臉琵鷺、紅頭潛鴨、白眼潛鴨和尖尾濱鵝；33種國家一級或二級重點保護野生動物，例如白肩鵝、烏鵲和禿鷲。填平新田濕地將令眾多面臨滅絕物種失去其重要棲息地。

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

一 重新修訂《新田科技城分區計劃大綱草圖》（《新田科技城草圖》），將「濕地保育區」及「濕地緩衝區」內的「其他指定用途（創新及科技）」地帶，重新劃為原來的地帶，即「自然保育區」、「其他指定用途（綜合發展包括濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以確保任何

發展不會違反「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。同時須列明「不會有濕地淨減少」可指面積和功能這兩方面的減少。

二 | 重新修訂《新田科技城草圖》，將后海灣第二及第三大的鷺鳥林，及其覓食地劃作保育用途地帶；將鷺鳥來往鳥巢及其覓食地的飛行區，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾。

三 | 重新修訂《新田科技城草圖》，將落馬洲地鐵站一帶至落馬洲管制站北面部分的已平整土地，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾，以保障米埔、馬草壟及塋原的生態連結。

四 | 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目A1及B項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

就圖則作出申述**Representation Relating to Plan**

參考編號

Reference Number:

240507-225457-07288

Submission Number:

TPB/R/S/STT/1-S955

提交限期

Deadline for submission:

08/05/2024

Representation Number:

TPB/R/S/STT/1-R1415

提交日期及時間

Date and time of submission:

07/05/2024 22:54:57

「申述人」全名

Full Name of "Representer":

女士 Ms. YEUNG LOK TO

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
"Other Specified Uses" annotated "Innovation and Technology"	反對 Oppose	There are weak justifications for the enormous size of the I&T land here to foster I&T development, given there are already three Innoparks in Hong Kong with vacant sites. There will be another 300 ha of land planned for similar development in Shenzhen. Hong Kong will only struggle to compete against Shenzhen. The highrise cluster with maximum BHs of 200mPD is incompatible and unnecessary for the development. It will create an eyesore and potential disturbance to the birds and other wildlife.
A loss of 89 ha of wetland	反對 Oppose	The proposed plan violates the Ramsar Convention, an intergovernmental treaty that urges international cooperation for the conservation and wise use of wetlands and their resources. This would destroy internationally important wetlands as development takes priority over conservation. Globally endangered species will be threatened due to the loss of their important foraging and roosting habitats.

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

To review the size of the OU(I&T) and reduce the loss of wetlands as far as possible to remain the landscape for the conservation, recreation and traditional local fishery.

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-230059-92364

Submission Number:
TPB/R/S/STT/1-S956

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1416

提交日期及時間
Date and time of submission: 07/05/2024 23:00:59

「申述人」全名
Full Name of "Representer": 先生 Mr. Lau Hoi Lung

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
整個新田環評報告	反對 Oppose	環評報告粗疏得史無前例，請別浪費納稅人的金錢去打官司吧，交稅不應是垃圾徵費！

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

整體反對！

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-231339-87939

Submission Number:
TPB/R/S/STT/1-S957

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1417

提交日期及時間
Date and time of submission: 07/05/2024 23:13:39

「申述人」全名
Full Name of "Representer": 先生 Mr. Poon Sing Chau

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
不符《粵港澳大灣區發展規劃綱要》	反對 Oppose	第七章關於「推進生態文明建設」中，提到要「加強濕地保護修復，全面保護區域內國際和國家重要濕地，開展濱海濕地跨境聯合保護」，新田一帶的魚塘濕地，正正是大灣區國際級的重要濕地，大規模填平不符《規劃綱要》的要求。
不符「防患未然」、「不會有濕地淨減少」原則	反對 Oppose	新田科技城的規劃圖則指計劃將「實現相關濕地的生態功能及承載力不會出現淨減少」，然而這種說法與以往「防患未然」、「不會有濕地淨減少」的原則，似乎有差異。
無法解決對雀鳥及歐亞水獺的影響	反對 Oppose	- 雀鳥飛行路線只預留300米闊的飛行走廊，日後仍容許發展，沒有就填塘範圍內的雀鳥飛行路線，解釋現時發展佈局。 - 把米埔隴鷺鳥林及飛行走廊劃作休憩地帶，擔心公眾或恆常護養工程干擾鷺鳥繁殖及飛行。 - 為歐亞水獺提供的生態走廊，部分將有河道活化工程，擔心會為歐亞水獺的帶來人為干擾。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

建議城規會必須嚴謹把關，把新田科技城的規劃圖則作大幅度修改!
- 應參照1997年完成的《后海灣地區魚塘生態價值研究》，認定新田的魚塘為后海灣地區濕地生態系統不可或缺的一部分；
- 應遵守「防患未然」、「不會有濕地淨減少」等；將區內所有濕地、魚塘、鷺鳥林等劃為保育相關用途等。

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-232200-09590

Submission Number:
TPB/R/S/STT/1-S958

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1418

提交日期及時間
Date and time of submission: 07/05/2024 23:22:00

「申述人」全名
Full Name of "Representer": 先生 Mr. Chow Tak Wai

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
發展新田科技城	反對 Oppose	無必要地在現有的「濕地保育區」及「濕地緩衝區」上，重新規劃發展為科技城，這些地帶仍作養殖用途的魚塘或已荒廢的魚塘，有重要的生態價值，強行發展成人才公寓、商業、酒店、工業等用途，而且發展高度達130米的建築物，一定會影響現有的生態動物，包括青頭潛鴨、黃胸鵝、黑臉琵鷺、紅頭潛鴨、白眼潛鴨和尖尾濱鵝等。即使發展有作濕地補償，但已經破壞了原有的濕地功能，以及令到原有生境被碎片化，影響濕地系統的完整性，勢必危害繁殖鷺鳥族群，造成不可逆轉的破壞。

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240507-235614-26894

Submission Number:
TPB/R/S/STT/1-S960

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1419

提交日期及時間
Date and time of submission: 07/05/2024 23:56:14

「申述人」全名
Full Name of "Representer": 先生 Mr. Choi Hang Yat

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
S/STT/1	反對 Oppose	反對環評報告，程序不公義，沒有理會對不同持份者的不可逆轉的破壞及損失

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

請為香港及世界未來負責，停止破壞生態，大量囤積的政府荒廢土地可選，已經可以做到同樣功能。

就圖則作出申述

Representation Relating to Plan

參考編號

Reference Number:

240508-004618-79259

Submission Number:

TPB/R/S/STT/1-S962

提交限期

Deadline for submission:

08/05/2024

提交日期及時間

Date and time of submission:

08/05/2024 00:46:18

Representation Number:

TPB/R/S/STT/1-R1420

「申述人」全名

Full Name of "Representer":

先生 Mr. CHENG Tak Yiu Eureka

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Unjustified Building Height(s) and Development Intensity of "OU(I&T) Uses"	反對 Oppose	Quite a lot of the proposed zones designated "Other Specified Uses" annotated "Innovation and Technology" have permissible building heights of over 100mPD extending upto even 170 mPD (around 40 storeys) which also forms the only control on the Plan as regards development intensity. The proposed height to such extent does not seem justified to be a necessity but may lead to floodgate of high-rise developments damaging the appropriate spatial form and pattern required by a successful and functional O&T development. There is no clear justification for such high height and at the same time on the adequacy of transport and infrastructure facilities to support such intensity created;
Potential Serious Mis-match in Labour Demand & Supply due to 70:30 Public to Private Housing Ratio	反對 Oppose	It is stated in the Explanatory Statement (Item 7 - Housing Mix) that the overall Public to Private Housing ratio in terms of number of flats is about 70:30. This seems illogical and a big mis-match for a prosperous Technopole District. On one hand, most of the prospective highly educated skilled talents would not be qualified as public housing residents, those newly incurred public housing talents however will further scramble the already tight transport infrastructure network in the NWN T, including the West Rail Tuen Ma Line, for commuting to work in the old urban areas.
Inadequate Mass Transit Infrastructure to Support Tech	反對 Oppose	It is stated in Item 17.1 (Implementation) that the tentative commissioning date of the Proposed Northern Link Main Line and San Tin Station be around 2024, i.e. 10 years from today. The Proposed Northern Link Spur Line is even only shown as "indicative" on the Transport Network Plan attached. The acute transportation problem will likely affect during the development of the Lok Ma Chau LOOP development with

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h a big bottle-neck on Lok Ma Chau Road and the poor access to Mas
s Transit Network as currently planned. The situation will further aggr
avate if mass transit infrastructure continues to far lag behind the dem
and. The attractiveness of those new I&T uses proposed will obviousl
y diminish as a result.

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

As illustrated in Item 17.3 (under Implementation), it is understood that the 5.7 million sqm of I
&T uses are yet justifiable as the ITIB Study is still on-going. It is highly recommended that ITI
B should expedite in completing the said Study asap and publish the detailed findings for public
information. Without which, the above three subject matters concerned cannot be addressed and
accordingly the San Tin Technopole OZP would be considered premature.

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-022130-60811

Submission Number:
TPB/R/S/STT/1-S963

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1421

提交日期及時間
Date and time of submission: 08/05/2024 02:21:30

「申述人」全名
Full Name of "Representer": 女士 Ms. TAM KIT YUNG

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
<p>改劃近250公頃「濕地保育區」及「濕地緩衝區」內的濕地保育相關地帶為創科發展用途；並同時修訂《米埔及錦繡花園分區計劃大綱核准圖》，以改劃餘下約338公頃的「濕地保育區」為三寶樹濕地保育公園，以「補償」濕地損失。</p> <p>此舉實屬毫不符合</p>	反對 Oppose	<p>新田公路以北一帶原為濕地緩衝區界線，現今因「發展新田科技城」而主動剔除早於「城規會規劃指引編號12C」中標明的近250公頃「濕地保育區」及「濕地緩衝區」。3月刊憲的草圖根本違背12C要求，未通過修訂12C就刊出新田科技城的改劃新草圖根本違反原則，更完完全全無視12C中的『防患未然』和『濕地零淨損失』的原則。12C中更明確寫出「近年來，擬在後海灣地區進行的發展計劃數目日增，而這些擬議發展大多涉及填塘或其他工程，對後海灣地區的濕地生態系統可能會造成不良影響。為免後海灣地區的魚塘和區內其他濕地生境蒙受影響，以致情況無法挽回，城規會藉擬備法定圖則，為後海灣地區制訂發展指引」。米埔內後海灣拉姆薩爾濕地，是國際公約《拉姆薩爾公約》的其中之一。過去之所以能免受大規模破壞，建基於政府當初建立的保育制度及12C中的主張，但新田科技城計劃將必然摧毀這片國際級濕地，並造成不可逆轉的破壞。濕地的價值，很多專業團體也提及過，對生物多樣性的重要價值、對身處「東亞—澳大利西亞遷飛區」的飛行路線的雀鳥的必要性、對人類社會防洪防水浸的重要功能、對香港的國際地位的代表性等等。但濕地的重點是保育需要有一體性，不能將其分割、拆散，破碎的濕地，面積縮細後，價值必定會大幅下降，能提供的生態價值及舒緩水患的功能將會大幅下降。亦是當初12C主張的存在意義，即是要--完整地--保育濕地才算得上有效的保護。</p>

理性、科學、違反環境生態保育、與國家發展理念背道而馳。

同上	反對 Oppose	本人從新聞中得知本港發展創科的需求，如商會、科技界於請願時提及「因為發展創科不能缺少土地配套，很多不同科技領域，包括人工智能、半導體、生命科技、數據中心等等，都需要土地配合才能發展。所以科創業界希望環諮會能夠通過新田科技城的環評報告，擔心工程一旦被拖延，恐怕會對香港造成極大影響。」但發展創科所需的土地，並不須與這片國際級濕地相爭。
同上	反對 Oppose	<p>既然於「城規會規劃指引編號12C」早早規劃好香港北部的「濕地保育區」及「濕地緩衝區」，可見濕地的價值和該保護的範圍早已被辨認及以法規積極地保護著。世界之大，各國家、城市、社會同樣積極地應對氣候變化，努力探討保育環境及生物多樣性的方法。因為活到現在，我們終於明白「可持續發展」是基於一個可持續的環境，才可達致一個可持續的社會，最後才能可持續地發展經濟、民生等。</p> <p>因為維護環境及生物多樣性必然地是達至可持續發展的首要，最重要的基石。既然我們一早便能認清香港自然環境的國際級地位及珍貴而無可取替的價值，並落力制定法規積極保育。現在怎能夠開倒車，走回頭路，將努力守護的國際級濕地用自己雙手摧毀？根本豪不合常理吧。請新田科技城重新選址，無須為創科犧牲香港可持續環境中的最重要一塊—香港北部的濕地。</p>

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

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就圖則作出申述

Representation Relating to Plan

參考編號

Reference Number:

240508-024029-65032

Submission Number:

TPB/R/S/STT/1-S964

提交限期

Deadline for submission:

08/05/2024

Representation Number:

TPB/R/S/STT/1-R1422

提交日期及時間

Date and time of submission:

08/05/2024 02:40:29

「申述人」全名

Full Name of "Representer":

女士 Ms. Li Wing

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
San Tin Technopole Plan	反對 Oppose	<p>Strongly opposed to the San Tin Technopole plan.</p> <p>This is obviously not only a huge contradiction to the Country's direction to wetland, wildlife and environmental protection, but also an indirect murder to many endangered wildlife species, including those listed in the IUCN Red List of Threatened Species as well as our National Protected Animals.</p> <p>I have been a volunteer of the annual world Black-faced Spoonbills survey for more than 15 years. Observations include: the warmer and warmer temperature year after year, the denser tall buildings at the edge of Shenzhen, the fewer number of Black-faced Spoonbills visiting Hong Kong, and the higher and higher human disturbance made to the natural habitats which nourish huge number of wildlife, including endemics and migratory birds.</p> <p>Damage made to the natural habitats is irreversible. Natural area needed to be protected is not only that area itself. Nearby areas needed to be protected too as a buffer zone. This was exactly what the Chinese idiom 唇亡齒寒 means. The same idiom also applies to the relationship between human beings (or human society) and nature.</p>

Please stop the San Tin Technopole Plan and reexamine what Hong Kong, both government and the people, really needs to treasure and protect.

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-032435-89140

Submission Number:
TPB/R/S/STT/1-S965

提交限期
Deadline for submission: 08/05/2024

提交日期及時間
Date and time of submission: 08/05/2024 03:24:35

Representation Number:
TPB/R/S/STT/1-R1423

「申述人」全名
Full Name of "Representer": 先生 Mr. AU KWOK KUEN

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
All	反對 Oppose	<p>本人就新田科技城的規劃圖則（編號S/STT/1）提出反對。新田魚塘濕地的位置毗鄰米埔拉姆薩爾濕地，是「東亞-澳大利西亞遷飛區」中必不可少の中途補給站，新田科技城計劃要填平近90公頃魚塘濕地，涉247公頃濕地保育區及緩衝區，面積相等於13個維園，若事成將是近30年香港最大的濕地破壞，嚴重威脅這片大灣區獨有的濕地。</p> <p>按視察及資料搜集所得，該圖則仍未解決以下問題：</p> <ol style="list-style-type: none"> 1. 不符世界各地提倡「加強濕地保護修復」，新田一帶的魚塘濕地，正正是重要濕地，大規模填平不符國際要求和共識！ 2. 新田科技城的規劃圖則指計劃將「實現相關濕地的生態功能及承載力不會出現淨減少」，然而這種說法與以往「防患未然」、「不會有濕地淨減少」的原則，似乎有差異。 3. 建議的「創科地帶」無保育元素「創科地帶」內的規劃意向純粹以發展為先；第一欄有大量用途屬「經常准許用途」，即日後無須由城規會把關。而且部份是地產項目，與科技無關。 4. 無法解決對雀鳥及歐亞水獺的影響雀鳥飛行路線只預留300米闊的飛行走

廊，日後仍容許發展，沒有就填塘範圍內的雀鳥飛行路線，及無解釋現時發展佈局，把米埔隴鷺鳥林及飛行走廊劃作休憩地帶，擔心公眾或恆常護養工程干擾鷺鳥繁殖及飛行

5. 為歐亞水獺所提供的生態走廊，部分將有河道活化工程，擔心會為歐亞水獺的帶來人為干擾

6. 無盡力保護區內農地鄰近新田公路石湖圍的一幅7公頃，原本建議劃作「農業」用途的土地，在新田科技城的最新發展中完全消失

7. 無設法促進城鄉共融如位於落馬洲的下灣村將受發展影響，村內的非物質文化遺產「土地誕」或成絕響

8. 現時規劃科技用地重疊，元朗工業區，元朗南、蓮塘口岸附近，以致像地產項目的科學園及數碼港。

基於上述理由，反對這次大規模規劃的申請。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-063851-05370

Submission Number:
TPB/R/S/STT/1-S966

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1424

提交日期及時間
Date and time of submission: 08/05/2024 06:38:51

「申述人」全名
Full Name of "Representer": 先生 Mr. Yip Tsz Lam

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
新田發展區域不合理填平魚塘濕地	反對 Oppose	<p>新田魚塘濕地是整片后海灣濕地不可或缺的一環，與毗鄰的國際重要濕地「米埔內后海灣拉姆薩爾濕地」及「廣東深圳福田紅樹林國際重要濕地」、南生圍、蠔殼圍等新界魚塘生態緊密相連。連片開闊的生境，構成大灣區僅存最完整的沿海濕地系統，每年支撐着超過五萬隻水鳥度冬。</p> <p>政府去年5月突然宣佈加大新田科技城發展規模，發展面積激增六成，須填平近90公頃魚塘濕地，入侵175公頃國際鳥盟認可的「內后海灣及深圳河集水區」重要野鳥及生物多樣性棲地（Important Bird and Biodiversity Area, IBA）。新田是后海灣（又稱深圳灣）濕地東西兩邊的重要連接，開發這片濕地，形同對大灣區沿海濕地系統施行「腰斬刑」，有違與國家和國際奠定的濕地保護方針。</p> <p>惟政府卻未正視開發濕地的潛在危機，反而以「快刀斬亂麻」的方式，強行上馬新田科技城，甚至連環評報告尚未正式通過，史無前例地同時啟動收地刊憲程序，及展開最後一個公眾參與的法定程序。</p> <p>2024年3月8日，政府公布新的《新田</p>

科技城分區計劃大綱草圖》（《新田科技城草圖》），以改劃近250公頃「濕地保育區」及「濕地緩衝區」內的濕地保育相關地帶為創科發展用途；並同時修訂《米埔及錦繡花園分區計劃大綱核准圖》，以改劃餘下約338公頃的「濕地保育區」為三寶樹濕地保育公園，以「補償」濕地損失。建議修訂後的分區大綱圖剔走部分濕地保育要求及規劃原則，似乎試圖藉納入新田科技城發展，削弱圖則的保育意向，恐令未來的發展與毗連敏感的濕地環境嚴重不協調。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-081029-27041

Submission Number:
TPB/R/S/STT/1-S967

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1425

提交日期及時間
Date and time of submission: 08/05/2024 08:10:29

「申述人」全名
Full Name of "Representer": 先生 Mr. WONG CHI CHUN

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
S/STT/1	反對 Oppose	<p>新田嘅生態價值，即使被環評報告低估，其他環團如香港觀鳥會等，已證明這片毗連國際重要濕地的保育地區，或是重要鳥區(IBA)嘅一部分，我在這次申訴中不再著眼新田的重要生態價值。</p> <p>新田位於深圳河旁，魚塘濕地明顯是一個重要的水浸緩衝區，在這裡填平濕地，發展任何人為建築，將會帶來嚴重的風險，財物經濟事小，市民生命無價。</p> <p>現時新田大部分魚塘仍然為香港提供新鮮淡水魚，而魚塘以及相連的村落仍是當地居民生活地方，發展科技城把傳統漁村消滅，將村民趕絕，讓香港獨特的傳統文化碎化以至消失。</p> <p>香港現時已有數碼港、科學園，再多一個科技城是有這個必要嗎？即使有需要，為甚麼不在更佳的位置，即已平整土地的河套區或者在其他非拉姆薩爾濕地內的棕地，將已破壞的濕地復育是世界潮流，香港竟然把完好無缺的濕地填平，實在是對保育自然大趨勢的諷刺。</p> <p>最後，我反對將現時不論荒廢魚塘、運作中魚塘或是補償性濕地改劃成發展區，任何濕地規劃或發展都要堅守濕地零損失原則！</p>

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-085115-78762

Submission Number:
TPB/R/S/STT/1-S968

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1426

提交日期及時間
Date and time of submission: 08/05/2024 08:51:15

「申述人」全名
Full Name of "Representer": 先生 Mr. LI MAN YEUNG CHRISTOPHER WILSON

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
將新田發展成成新田科技城	反對 Oppose	嚴重破壞香港的生態系統。

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

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就圖則作出申述**Representation Relating to Plan**

參考編號
Reference Number: 240508-091525-37081

Submission Number:
TPB/R/S/STT/1-S969

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1427

提交日期及時間
Date and time of submission: 08/05/2024 09:15:25

「申述人」全名
Full Name of "Representer": 女士 Ms. Wong Fung Ki

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
新田科技城草圖	反對 Oppose	香港的自然生態多樣性是香港獨有而又寶貴的資產，希望政府不是連僅有的都破壞掉，邨反之，要好好維護推廣才對！
《米埔及錦繡花園分區計劃大綱核准圖》	反對 Oppose	香港的自然生態多樣性是香港獨有而又寶貴的資產，希望政府不是連僅有的都破壞掉，邨反之，要好好維護推廣才對！
《米埔及錦繡花園分區計劃大綱核准圖》	反對 Oppose	香港的自然生態多樣性是香港獨有而又寶貴的資產，希望政府不是連僅有的都破壞掉，邨反之，要好好維護推廣才對！

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

香港的自然生態多樣性是香港獨有而又寶貴的資產，希望政府不是連僅有的都破壞掉，邨反之，要好好維護推廣才對！

Urgent Return receipt Expand Group Restricted Prevent Copy

From: [REDACTED]
Sent: 2024-05-08 星期三 09:17:16
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 提交就新田科技城分區計劃大綱草圖及米埔及錦繡花園分區計劃大綱核准圖的書面申述

Submission Number:
TPB/R/S/STT/1-S1036

申述人全名（與身份證明文件一致）：Wong Fung Ki

申述人的身份證／護照號碼首四個字母數字（如 A123）：[REDACTED]

香港的自然生態多樣性是香港獨有而又寶貴的資產，希望政府不是連僅有的都破壞掉，反之，要好好維護推廣才對！

我要求城規會：

- 重新修訂新田科技城草圖，將「其他指定用途（創新及科技）」地帶重新劃為原本的地帶，即「自然保育區」、「其他指定用途（綜合發展及濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以遵循「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。
- 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

原因如下：

- **【不符合新田法定圖則的規劃原意】**根據原本的新田分區計劃大綱核准圖編號 S/YL-ST/8，150 公頃「濕地保育區」和 97 公頃「濕地緩衝區」的土地，主要被劃作濕地保育相關的用途地帶，例如「自然保育區」、「其他指定用途（綜合發展包括濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」。該規劃意向主要是「保存和加強現有魚塘

或濕地的生態價值和功能」，以達到「不會有濕地淨減少」的原則。新田科技城涉填平大量魚塘，與上述法定規劃意向不符。

- **【不符合后海灣濕地規劃原則】**發展入侵 150 公頃「濕地保育區」和 97 公頃「濕地緩衝區」，不僅導致 90 公頃濕地損失，損害濕地連結性及完整性，發展更容許興建中至高密度樓宇，恐令毗鄰的國際重要濕地的生境質素下降，導致整體生態功能喪失。這違反城市規劃委員會規劃指引 12C 所列明的『防患於未然』原則及『濕地零淨損失』。
- **【最新圖則剔除原有濕地規劃原則】**以往所有位於后海灣內的法定圖則，均會因應「濕地保育區」和「濕地緩衝區」而制定不同用途地帶的濕地保育要求。但根據最新的新田科技城分區圖，「濕地保育區」的大部分土地被劃為「其他指定用途（創新及科技）」地帶，其規劃意向改為「容納各式各樣的創新及科技用途」，當中經常准許的用途更達 44 種，包括人才公寓、商業、酒店、工業用途等，發展高度達 130 米。「濕地緩衝區」亦有土地被劃作「其他指定用途（混合用途）」地帶，容許高達 200 米的建築發展。最新規劃不但沒有列明濕地保育要求，更沒有採納任何濕地保育的規劃原則，恐令發展與毗連環境嚴重不協調。
- **【濕地喪失和生境破碎化】**新田科技城將導致至少 90 公頃的濕地面積減少，令大灣區的沿海濕地總量大減。新田科技城位於整個后海灣（又稱深圳灣）濕地系統的核心，發展將切斷后海灣東西兩側的生態連接，導致濕地生境破碎化，損害后海灣（又稱深圳灣）濕地系統的完整性。
- **【濕地系統質素退化】**新田科技城填塘後不只有創科商業用地，帶來超過 12,000 工作人口，更預計會有 6,400 單位作的住宅、酒店、康樂等用途。發展引入的人口和基建，將為毗連的「米埔內后海灣拉姆薩爾濕地」及「濕地保育區」帶來不可挽回的負面生態影響，例如人類活動干擾、光污染、噪音等等。
- **【危害全球面臨絕種危機及國家級保護物種】**受影響魚塘濕地所錄得的雀鳥物種數量達 205 種，其中有 117 種為具保育級別物種。新田科技城填塘發展將危及 19 種全球瀕危及近危物種，例如青頭潛鴨、黃胸鵝、黑臉琵鷺、紅頭潛鴨、白眼潛鴨和尖尾濱鵝；33 種國家一級或二級重點保護野生動物，例如白肩鵝、烏鵲和禿鷲。填平新田濕地將令眾多面臨滅絕物種失去其重要棲息地。
- **【危害繁殖鷺鳥族群】**新田科技城將直接影響全后海灣第二大的米埔隴鷺鳥林和第三大的米埔鷺鳥林，是超過 230 對鷺鳥的繁殖重陣，佔全港池鷺和小白鷺繁殖族群的三分之一。第一，新田科技城將永久移除部分用作繁殖的樹木；第二，繁殖鷺鳥將因大面積填塘而失去賴以為生的覓食地；第三，高達 105 米的創科發展將直接切斷繁殖鷺鳥來往鷺鳥林和覓食地的飛行廊區。發展一旦令鷺鳥無法在此繁殖後代，將直接威脅近二百對繁殖鷺鳥，相等於近 15% 的繁殖族群。

- **【環評錯漏百出不達標】**新田科技城圖則是基於「不合格」的環評報告，不能接受。新田環評報告有至少 29 項嚴重的技術評估和數據錯誤或遺漏，包括：違反環評「避免」原則；生態基線及評估資料不足；嚴重低估對保育類雀鳥、繁殖雀鳥、雀鳥飛行路線的影響；嚴重低估對歐亞水獺的影響；無充分資料證明生態補償有效；誤將生態優化措施當作緩解措施等。
- **【破壞傳統魚塘 直接影響傳統塘魚養殖】**新田科技城將直接影響超過 30 個已正式登記的養魚戶，發展忽視傳統塘魚養殖對經濟、社會和環境永續的貢獻。新田一帶的養魚戶過去半世紀一直養殖塘魚，甚至近十多年甚至積極參與生境管理及保育工作，在保留傳統塘魚養殖運作的同時，為水鳥提供覓食及棲息的空間，維持后海灣灣魚塘濕地的生態價值。
- **【違反國際公約】**新田科技城發展緊貼「米埔內后海灣拉姆薩爾濕地」，相距或不足 30 米。發展須填平 150 公頃「濕地保育區」作創科發展，發展不但會對拉姆薩爾濕地造成嚴重干擾，更會直接切斷她與東邊濕地的連接，損害國際重要濕地的濕地完整性和生態特徵。這與《濕地公約》將「避免濕地受到不利影響」列為首要要求，和《生物多樣性公約》所提倡的濕地保護，背道而馳。
- **【未先避免濕地損失 違反國家政策】**新田科技城未有遵循「避免、減少與補償」的原則進行規劃，未有優先考慮能夠避免負面生態影響或將破壞減到最少的方案，反而直接採納會造成大型濕地損失的方案，與「生態文明建設、高質量發展」和「保護優先」的國策，和十四五規劃提到的「整治修復濱海濕地 2 萬公頃」，背道而馳。
- **【疑曲解國家政策 合理化填塘方案】**2023 年 8 月國務院公佈的《河套深港科技創新合作區深圳園區發展規劃》，明確指出「河套深港科技創新合作區」香港園區具體面積為 87 公頃，面積與落馬洲河套區的「港深科技園」吻合。新田科技城的填塘方案並非出自國家的主意。反之，具指導意義的《粵港澳大灣區發展規劃綱要》，就明確提出「加強濕地保護修復，全面保護區域內國際和國家重要濕地，開展濱海濕地跨境聯合保護」。局方選擇性解讀國策，借國家之名，忽略填平濱海濕地與國家濕地保護策略相沖的事實。

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-092942-55574

Submission Number:
TPB/R/S/STT/1-S970

提交限期
Deadline for submission: 08/05/2024

提交日期及時間
Date and time of submission: 08/05/2024 09:29:42

Representation Number:
TPB/R/S/STT/1-R1428

「申述人」全名
Full Name of "Representer": 女士 Ms. Shan Lui

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
整個項目	反對 Oppose	新田魚塘係重要嘅保育濕地，不應該用來發展，魚塘冇咗會令很多生態消失，不能重來

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

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就圖則作出申述**Representation Relating to Plan**

參考編號

Reference Number:

240508-112453-37464

Submission Number:

TPB/R/S/STT/1-S971

提交限期

Deadline for submission:

08/05/2024

Representation Number:

TPB/R/S/STT/1-R1429

提交日期及時間

Date and time of submission:

08/05/2024 11:24:53

「申述人」全名

Full Name of "Representer":

先生 Mr. Wong Lun Cheong

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Rezoning of fishponds (Conservation Area) to OU (Innovation and Tech)	反對 Oppose	<p>(1) The ecological value of fishponds is well recognized in the fishpond study in this part of Deep Bay in 1997.</p> <p>(2) There is no data to support the ecological value of these fishponds are so low that it could be rezoned to other uses. In fact, the subject area is within the feeding range of the Mai Po Lung colony (1-2km). The public reasonably expect that these fishponds are still ecologically important and should not be down-zoned for development of unclear intention</p> <p>(3) Abandoned fishponds are just a type of land use. These fishponds can be easily operated back to active ones. In addition, there is an ongoing study by the HK Bird Watching society that the ecological value of abandoned ponds can be enhanced through simple vegetation control. More ducks visited after vegetation clearance and pond bund modification</p> <p>(4) There is no explanation that why San Tin Technopole must be formed in the internationally important wetlands of Deep Bay. The goal and objective of this technopole is also unclear to the public. As we have already a number of similar uses in HK, eg Science Park and Cyberport. The project proponent should provide more information about the existing uses of these so-called hi-tech parks, the objective, aim and detailed layout plan in order to justify this rezoning.</p>

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

就圖則作出申述**Representation Relating to Plan**

參考編號
Reference Number: 240508-120548-56894

Submission Number:
TPB/R/S/STT/1-5972

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1430

提交日期及時間
Date and time of submission: 08/05/2024 12:05:48

「申述人」全名
Full Name of "Representer": 女士 Ms. Wong Ka Yee

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
Expansion of san ting development	反對 Oppose	San ting has a lot of fish pond that is important habitats for Hong Kong biodiversity, more conservation should be made to protect our biodiversity.
The EIA report	反對 Oppose	The EIA report is not accurate and miss out a lot of species, misidentified species. A new and accurate EIA should be made to have an accurate estimation on impact on the Hong Kong biodiversity.

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

- Reduce the area of expansion
- redo the EIA
- set up wetland buffer and conservation zone
- protect important wetland for eurasian otter
- reduce the number of building to build
- limit building heights

就圖則作出申述**Representation Relating to Plan**

參考編號

Reference Number:

240508-131747-53294

Submission Number:

TPB/R/S/STT/1-S973

提交限期

Deadline for submission:

08/05/2024

Representation Number:

TPB/R/S/STT/1-R1431

提交日期及時間

Date and time of submission:

08/05/2024 13:17:47

「申述人」全名

Full Name of "Representer":

女士 Ms. Hui Shuk Kwan

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
新田科技城 S/STT/1	反對 Oppose	<p>1. 新田科技城計劃要填平近90公頃魚塘濕地，涉247公頃濕地保育區及緩衝區，亦有不同水鳥，包括植度瀕危的黑臉琵鷺於冬天留港時使用此濕地。計劃將進一步減少候鳥於香港的重要棲息地，危及全球瀕危鳥類的族群存亡。</p> <p>2. 新田科技城的規劃圖則指計劃將「實現相關濕地的生態功能及承載力不會出現淨減少」，似乎不是「不會有濕地淨減少」的原則。</p> <p>3. 新田的濕地是歐亞水獺的棲息地，歐亞水獺在港的棲息地已經很少了，這大規模發展是否會趕絕這種罕見的生物？而且計劃所提供的生態走廊部分亦有河道活化工程，十分擔心會影響歐亞水獺生存。（不要說牠們會因為發展而會移動去其他地方生活，事實上牠們的棲息地就只有米埔及新田及落馬洲一帶，而除了米埔，其他地方都已有計劃發展，牠們可以走到哪裡？</p>

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-132330-61357

Submission Number:
TPB/R/S/STT/1-S974

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1432

提交日期及時間
Date and time of submission: 08/05/2024 13:23:30

「申述人」全名
Full Name of "Representer": 女士 Ms. NG YEUK NAM

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
1	反對 Oppose	生態及潛在經濟效益

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

對現有濕地採取不干涉、不發展的取態

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-142628-63168

Submission Number:
TPB/R/S/STT/1-S975

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1433

提交日期及時間
Date and time of submission: 08/05/2024 14:26:28

「申述人」全名
Full Name of "Representer": 女士 Ms. Cheung Vince

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
《新田科技城分區計劃大綱草圖》	反對 Oppose	根據原本的新田分區計劃大綱核准圖編號S/YL-ST/8，鑑於后海灣地區魚塘生態價值研究（魚塘研究），不論是仍作養殖用途的魚塘或已荒廢的魚塘，均是濕地生態系統不可或缺的部分。因此新田的法定整體規劃意向是「保存魚塘的生態價值」，具科學調基礎。《新田科技城草圖》的說明書竟然對上述魚塘研究，隻字不提，卻取而代之，以一份不科學、不全面的環評報告為依據，強行將大面積魚塘濕地改劃作發展用途，無視良好的濕地規劃意向。
《新田科技城草圖》	反對 Oppose	【最新用途地帶缺乏濕地保育規劃意向】以往所有位於后海灣內的法定圖則，均會因應「濕地保育區」和「濕地緩衝區」而制定不同用途地帶的濕地保育要求。但根據最新的《新田科技城草圖》，「濕地保育區」的大部分土地被劃為「其他指定用途（創新及科技）」地帶，其規劃意向改為「容納各式各樣的創新及科技用途」，當中經常准許的用途更達44種，包括人才公寓、商業、酒店、工業用途等，發展高度達130米。「濕地緩衝區」亦有土地被劃作「其他指定用途（混合用途）」地帶，容許高達200米的建築發展。最新規劃不但沒有列明濕地保育要求，更沒有採納任何濕地保育的規劃原則，恐令發展與毗連環境嚴

重不協調。

【「自然保育區」地帶的「不會有濕地面積減少」被刪】根據原本的新田分區計劃大綱核准圖編號S/YL-ST/8的說明書，就「自然保育區」的任何用途改變，當局會採納「不會有濕地淨減少」的原則來處理。該說明書清楚列明「不會有濕地淨減少」可指「面積和功能這兩方面的減少」。但《新田科技城草圖》的說明書卻將此句子從「自然保育區」地帶中剔除，只提及「不會有功能減少」，缺乏對維護濕地面積的要求。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

一| 重新修訂《新田科技城分區計劃大綱草圖》（《新田科技城草圖》），將「濕地保育區」及「濕地緩衝區」內的「其他指定用途（創新及科技）」地帶，重新劃為原來的地帶，即「自然保育區」、「其他指定用途（綜合發展包括濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以確保任何發展不會違反「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。同時須列明「不會有濕地淨減少」可指面積和功能這兩方面的減少。

二| 重新修訂《新田科技城草圖》，將后海灣第二及第三大的鷺鳥林，及其覓食地劃作保育用途地帶；將鷺鳥來往鳥巢及其覓食地的飛行區，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾。

三| 重新修訂《新田科技城草圖》，將落馬洲地鐵站一帶至落馬洲管制站北面部分的已平整土地，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾，以保障米埔、馬草壟及塱原的生態連結。

四| 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目A1及B項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

Urgent Return receipt Expand Group Restricted Prevent Copy

Submission Number:
TPB/R/S/STT/1-S982

From: [REDACTED]
Sent: 2024-05-08 星期三 12:29:10
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 提交就新田科技城分區計劃大綱草圖的書面申述

Representation Number:
TPB/R/S/STT/1-R1434

致城規會（電郵：tpbpd@pland.gov.hk）：

就新的新田科技城分區計劃大綱草圖刊憲及修訂兩份分區計劃大綱，我要求城規會：

- 重新計劃以保障不危害全球面臨絕種危機及國家級保護物種。受影響魚塘濕地所錄得的雀鳥物種數量達 205 種，其中有 117 種為具保育級別物種。新田科技城填塘發展將危及 19 種全球瀕危及近危物種，例如青頭潛鴨、黃胸鵝、黑臉琵鷺、紅頭潛鴨、白眼潛鴨和尖尾濱鵝；33 種國家一級或二級重點保護野生動物，例如白肩鵝、烏鵲和禿鷲。填平新田濕地將令眾多面臨滅絕物種失去其重要棲息地。
- 重新修訂新田科技城草圖，以符合濕地保育的原則。
將「其他指定用途（創新及科技）」地帶重新劃為原本的地帶，即「自然保育區」、「其他指定用途（綜合發展及濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以遵循「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。
- 修改修訂項目 A1 及 B 項有關「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途，包括將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」的原則列為規劃意向；將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。
- 新田科技城將導致至少 90 公頃的濕地面積減少，令大灣區的沿海濕地總量大減。新田科技城位於整個后海灣（又稱深圳灣）濕地系統的核心，發展將切斷后海灣東西兩側的生態連接，導致濕地生境破碎化，損害后海灣（又稱深圳灣）濕地系統的完整性。

申述人全名：LAM KIT MAN IRENE

申述人的身份證首四個字母數字：[REDACTED]

Urgent Return receipt Expand Group Restricted Prevent Copy

From: [REDACTED]
Sent: 2024-05-08 星期三 03:09:12
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 提交就新田科技城分區計劃大綱草圖及米埔及錦繡花園分區計劃大綱核准圖的書面申述

Submission Number:
TPB/R/S/STT/1-S1021

致城規會：

申述人：LAM wai ki yvonne

Representation Number:
TPB/R/S/STT/1-R1435

申述人的身份證首四個字母數字： [REDACTED]

之前我們國家推出的《粵港澳大灣區發展規劃綱要》，已明確提出「加強濕地保護修復，全面保護區域內國際和國家重要濕地，開展濱海濕地跨境聯合保護」。新田位處米埔與塱原之間，是連接兩區濕地的重要地段，令整片濕地生境能供養現時起碼 200 多種鳥類，包括瀕危的黑臉琵鷺，是國際鳥盟定明的重要鳥類走廊地段。將新田原本好好的漁塘濕地，填塘變成起樓（不管是甚麼用途），定必使生境碎片化，繼而影響鳥類棲息，尤其是候鳥數量，間接影響國家近年努力營造的「生態文明」國際形象！

國家近十年已在習近平主席提倡「青山綠水就是金山銀山」路上，做好生態保育就是經濟發展的硬道理。香港已有數碼港和科技園，新田要起科技城，也不必如此大面積的土地，善用當中的村落與棕地來起樓，同步保留原本已在並且有優質的生態區域，減省「興建」新生態公園的開支，又能成為科技城本身的賣點 -- 天然濕地提供優質環境，絕對是近年財政緊絀的香港政府更佳的選擇。

因此，我要求城規會：

重新修訂新田科技城草圖，將「其他指定用途（創新及科技）」地帶重新劃為原本的地帶，即「自然保育區」、「其他指定用途（綜合發展及濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以遵循「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。

重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

謝謝！

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當人與自然的關係得以修復,
就是地球以及人類社會繼續生存之道.

https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail 乾淨無病毒。 [www.avast.com](https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail) https://www.avast.com/sig-email?utm_medium=email&utm_source=link&utm_campaign=sig-email&utm_content=webmail

Urgent Return receipt Expand Group Restricted Prevent Copy

From:

Sent:

To:

Subject:

2024-05-08 星期三 18:00:10

tpbpd/PLAND <tpbpd@pland.gov.hk>

新田科技城分區計劃

Submission Number:
TPB/R/S/STT/1-S1081

我全面反對新田科技城分區計劃：

1. 完全不需要,科技園是極劣的先例。
2. 沒有諮詢民意。
3. 環境評估報告欠缺透明度。

鍾立光

Representation Number:
TPB/R/S/STT/1-R1436

Urgent Return receipt Expand Group Restricted Prevent Copy

From: WAI CHUN LO [REDACTED]
Sent: 2024-05-08 星期三 16:28:50
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 表達對新田科技成分區計劃草圖的意見

Submission Number:
TPB/R/S/STT/1-S1113

本人要求

Representation Number:
TPB/R/S/STT/1-R1437

1. 重新修訂《新田科技城分區計劃大綱草圖》(《新田科技城草圖》)，將「濕地保育區」及「濕地緩衝區」內的「其他指定用途(創新及科技)」地帶，重新劃為原來的地帶，即「自然保育區」、「其他指定用途(綜合發展包括濕地改善區)」及「其他指定用途(綜合發展包括濕地修復區)」，或其他與濕地保育相關的用途地帶，以確保任何發展不會違反「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。同時須列明「不會有濕地淨減少」可指面積和功能這兩方面的減少。
2. 重新修訂《新田科技城草圖》，將后海灣第二及第三大的鷺鳥林，及其覓食地劃作保育用途地帶；將鷺鳥來往鳥巢及其覓食地的飛行區，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾。
3. 重新修訂《新田科技城草圖》，將落馬洲地鐵站一帶至落馬洲管制站北面部分的已平整土地，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾，以保障米埔、馬草壟及塱原的生態連結。
4. 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

姓名：羅慧珍



Urgent Return receipt Expand Group Restricted Prevent Copy

From: WAI CHUN LO [REDACTED]
Sent: 2024-05-08 星期三 16:27:24
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: Fwd: 表達對新田科技城修改圖則的意見

從我的 iPhone 傳送

以下為轉寄郵件：

寄件人: WAI CHUN LO [REDACTED]
日期: 2024 年 5 月 8 日 上午 7:54:12 [GMT+8]
收件人: tpbpd@pland.gov.hk
標題: 表達對新田科技城修改圖則的意見

本人要求

1. 重新修訂《新田科技城分區計劃大綱草圖》(《新田科技城草圖》)，將「濕地保育區」及「濕地緩衝區」內的「其他指定用途(創新及科技)」地帶，重新劃為原來的地帶，即「自然保育區」、「其他指定用途(綜合發展包括濕地改善區)」及「其他指定用途(綜合發展包括濕地修復區)」，或其他與濕地保育相關的用途地帶，以確保任何發展不會違反「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。同時須列明「不會有濕地淨減少」可指面積和功能這兩方面的減少。

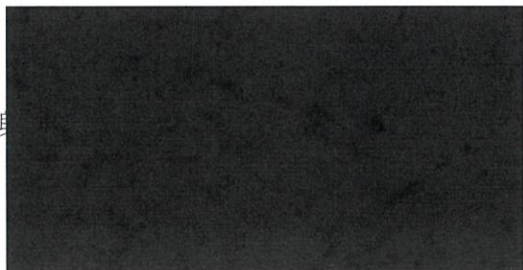
2. 重新修訂《新田科技城草圖》，將后海灣第二及第三大的鷺鳥林，及其覓食地劃作保育用途地帶；將鷺鳥來往鳥巢及其覓食地的飛行區，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾。

3. 重新修訂《新田科技城草圖》，將落馬洲地鐵站一帶至落馬洲管制站北面部分的已平整土地，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾，以保障米埔、馬草壟及塱原的生態連結。

4. 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

Urgent Return receipt Expand Group Restricted Prevent Copy

姓名：羅慧珍



Urgent Return receipt Expand Group Restricted Prevent Copy

tpbpd/PLAND

寄件者: Tiffany Tong
寄件日期: 2024年05月08日星期三 23:03
收件者: tpbpd/PLAND
主旨: 提交就《新田科技城分區計劃大綱草圖編號S/STT/1》及《米埔及錦繡花園分區計劃大綱草圖編號S/YL-MP/7》的書面申述

類別: Internet Email

Submission Number:
TPB/R/S/STT/1-S1219

Representation Number:
TPB/R/S/STT/1-R1438

唐靖雅

敬啟者：

新田科技城圖則不但影響魚塘濕地範圍內多達 205 種雀鳥物種數量，更影響鄰近濕地環境、以致其他物種，例如國家二級重點保護野生動物、全球近危物種的歐亞水獺。生態環境的破壞更會影響整個生態，對人類生活的影響密不可分，盼城規會多接納環保團體以及專業人士之意見，以免造成不可逆轉的破壞。而且，新田科技城在興建過程及落成後使用將對附近居民造成光污染、噪音污染等，建築所帶來之影響更是深遠。

大自然是珍貴天然資源，眼見工程可能對動植物帶來不必要且嚴重的破壞，若然政府未有盡力在發展用地時在經濟效益、環境保護及生態保育作出平衡，我深信使用者、廣大市民對工程帶來的破壞以及政府施政感到十分痛心和失望。故此，懇請政府聽取環保團體及研究人員的專業意見，作出以下調整：

1. 重新修訂新田科技城草圖，將「其他指定用途（創新及科技）」地帶重新劃為原本的地帶，即「自然保育區」、「其他指定用途（綜合發展及濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以遵循「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。
2. 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。

盼政府會在施政時落實民意，以盡治港之責。

此致
城市規劃委員會組
二零二四年五月八日

Urgent Return receipt Expand Group Restricted Prevent Copy

From: [REDACTED]
Sent: 2024-05-08 星期三 22:49:23
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: Comments on the San Tin Technopole OZP No. S/STT/1

Submission Number:
TPB/R/S/STT/1-S1320

Representation Number:
TPB/R/S/STT/1-R1439

Dear Sir/Madam,

I tried to make my submission online using your form on the Town Planning Board website, but every time I press the submit button it will land on an error page.

找不到網頁 找不到網頁 Page Not Found - Google Chrome

pub32.tpb.gov.hk/pems/Newfilepresentation.html



中華人民共和國香港特別行政區政府
The Government of the Hong Kong Special Administrative Region
of the People's Republic of China

對不起，我們找不到你要的網頁。
对不起，我们找不到你要的网页。

Sorry, the page you requested cannot be found.

請嘗試：

- 檢查並重新輸入網址。
- 於「香港政府一站通」(<https://www.gov.hk>) 尋找所需的政府資訊及網上服務。

请尝试：

- 检查并重新输入网址。
- 于「香港政府一站通」(<https://www.gov.hk>) 寻找所需的政府资讯及网上服务。

You could:

- check and retype the URL.
- visit GovHK at <https://www.gov.hk> for the government information and services you need.

In case my submission cannot be received via the website, I submit my comments again through email. If there are any duplicates, keeping any one of the versions is fine. Below are by comments:

Oppose San Tin Technopole OZP

The San Tin Technopole OZP is heavily based on the development's Environmental Impact Assessment (EIA) report. As stated in the San Tin Technopole EIA, "a working group will be formed between CEDD (as San Tin Technopole's works agent) and AFCD (as SPS WCP's sponsoring department) to coordinate the progress of pond filling and SPS WCP implementation." **No budget** of the mitigation work was found in the EIA and the project proponent (i.e. CEDD) is not the department for securing the funding for the mitigation work (i.e. rely on AFCD). **No detailed wetland management plan** for the mitigation work was found in the EIA report. **How can we (as well as the project proponent) be sure** there will be enough budget and planning to secure the overly optimistic and greatly overestimated ecological capacity that was said to be created as promised in the poorly prepared and written EIA report? This is not about "trusting the project proponent", but about "how strong is the scientific evidence" which this EIA report lacks. The environmental NGOs have made their points very clear on these issues.

Oppose "Other Specified Uses (Innovation and Technology)" zones

The Town Planning Board Guideline No. 12C has over 30 years of history, with "precautionary approach" and "no-net-loss in wetland" as the main principles of the guideline. It was established and strengthened based on strong scientific evidence. The Study on the Ecological Value of Fish Ponds in the Deep Bay Area (Fish Pond

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Study) completed by the government in 1997 included: at least 12-month ecological baseline study for the whole fishpond area, comprehensive literature review for about 10-year waterbird data, disturbance study and also both seasonal and spatial analysis. **Yet, a poorly prepared and written EIA report for a wetland filling development (i.e. San Tin Technopole) with ecological baseline study covering part of the San Tin wetland area and only using 1-year waterbird data can overthrow the key recommendations and planning principles developed from a comprehensive study for wetland conservation.** Unbelievable. I am disappointed that the current San Tin Technopole OZP gave up the good quality research study and replace it with a poor-quality report instead.

Therefore, the "Other Specified Uses (Innovation and Technology)" zones within the "Wetland Conservation Area" ("WCA") and "Wetland Buffer Area" ("WBA") should be rezoned back to their original zonings, which are "Conservation Area", "Other Specified Uses (Comprehensive Development and Wetland Enhancement Area)," "Other Specified Uses (Comprehensive Development to include Wetland Restoration Area)" or other zonings effective for wetland conservation.

Oppose the planning intention and objectives of the San Tin Technopole OZP

The conservation elements originally in the planning intention of the San Tin OZP were removed and we cannot be sure how the development within the "Other Specified Uses (Innovation and Technology) (OU(I&T))" zone of the San Tin Technopole OZP can be compatible with the surrounding wetland environment as no preliminary planning of the I&T development is stated in the EIA report.

Therefore, conservation principles of "precautionary approach" and "no-net-loss in wetland" should be included in the planning intention of the San Tin Technopole OZP.

Other comments

Will corporates be interested to develop on this piece of wetland-filled area and compromise with their responsibilities under ESG/CSR/TNFD/Ecological Civilisation? I doubt.

According to the Town Planning Board (TPB) website, TPB is "a statutory body established under section 2 of the Town Planning Ordinance (the Ordinance) with a view to promoting the health, safety, convenience and general welfare of the community through the systematic preparation of plans for the layout of such areas of Hong Kong as the Chief Executive may direct, as well as the types of buildings suitable for erection therein."

An encroachment of wetland conservation area and wetland filling development plan of the San Tin Technopole, together with a poorly prepared and written Environmental Impact Assessment report, **clearly does not justify** the San Tin OZP is in line with the mission of the TPB as stipulated under the Town Planning Ordinance.

I urge the TPB to make decision according to the aim of the Town Planning Ordinance and for the "health, safety, convenience and general welfare" of Hong Kong citizens as well as the wildlife that relies on the various habitats within the territory.

Thank you very much for your kind attention. I hope my comments are well-received and the Town Planning Board will carefully consider my points made above.

Best Regards,
Woo Ming Chuan (Ms.)
(HKID: [REDACTED])

Urgent Return receipt Expand Group Restricted Prevent Copy

From: [REDACTED]
Sent: 2024-05-08 星期三 22:48:34
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 反對新田科技城分區計劃大綱草圖編號 S/STT/1 事宜
Attachment: 反對新田科技城分區計劃大綱草圖編號 S_STT_1 事宜 docx.pdf

致：城市規劃委員會
由：謝世傑
日：2024.05.08
有關：反對新田科技城分區計劃大綱草圖編號S/STT/1/事宜

Submission Number:
TPB/R/S/STT/1-S1321

Representation Number:
TPB/R/S/STT/1-R1440

致：城市規劃委員會

有關：反對新田科技城分區計劃大綱草圖編號 S/STT/1 事宜

本人謝世傑〔身份証編號：[REDACTED]〕反對 S/STT/1 新田科技城分區計劃大綱草圖，理由如下：

1. 以備蓋全 被重就輕

S/STT/1 的新田科技城分區計劃大綱草圖(下稱 S/STT/1)是包括《新田中期發展審批地區圖編號 IDPA/YL-ST/1》、《牛潭尾中期發展審批地區圖編號 IDPA/YL-NTM/1》、《牛潭尾發展審批地區草圖編號 DPA/YL-NTM/1》和《牛潭尾分區計劃大綱草圖編號 S/YL-NTM/4》先前涵蓋的部分地方，但在該圖註釋說明第 5 點的規劃區描述，只描述有關草圖覆蓋的範圍，並沒有如 S/YL-ST/8 的大綱圖註釋說明第 5 點對規劃區在生態及文化方面的詳細描述，例如 S/YL-ST/8 的說明第 5.3：「該區在新界西北的北部，與新田公路連接的新深路把該區分為兩半。該區半數地方為魚塘，而位於西北部的小片魚塘，列入拉姆薩爾公約所確認的具國際意義的濕地範圍。該區的魚塘是后海灣地區濕地生態系統的一部分，極具保育價值」、5.5：「該區有多條具歷史價值的鄉村，亦有一些已評級的古蹟.....這些歷史鄉村及建築物具有保存價值.....」

根據政府在 1997 年進行的「后海灣地區魚塘生態價值研究」，確立在**拉姆薩爾濕地以外的所有魚塘都是有相關生態價值**，即使是荒廢了的魚塘都有其功效，由於長期遠離發展的威脅，成為東亞—澳大利西亞遷飛區上的主要度冬地點。然而 S/STT/1 完全淡化規劃區的生態價值及國際認可的雀鳥遷飛區主要度冬地點的重要性，**避重就輕地迴避城規會過去就保育該帶地區生態價值的規劃意向及 12c 的規劃指引**。

根據 S/YL-ST/8 的註釋說明第 7.1 點：「於 1997 年完成『后海灣地區魚塘生態價值研究』(下稱『魚塘研究』)，確認后海灣地區的魚塘系統具有國際及區域的生態功用，尤以對鷺鳥為然。該研究認定新田的魚塘區為后海灣地區濕地生態系統一個不可或缺的部分，極具生態價值。魚塘研究以科學調查及分析為基礎，擬定了『防患未然』及『不會有濕地淨減少』的原則，以提供機會保育／加強該區的天然資源及令環境已受破壞的地區得以修復。」

根據 S/YL-ST/8 的註釋說明有關整 9 規劃意向第 8.1 點：「鑑於魚塘研究的結果及建議，當局為該區定下的規劃意向，是保存魚塘的生態價值，因為魚塘是后海灣地區濕地生態系統一個不可或缺的部分。后海灣地區現有大片相連的魚塘，不論是否仍作養殖用途或已荒廢，都必須保存。此外，亦應防止魚塘流失及生境變得零碎分散，以及紓緩不適當的土地用途及人為干擾所造成的負面影響。」8.2 點：「為實現保育目標，當局採納了『防患未然』的方法及『不會有濕地淨減少』的原則。除了為保存或加強該區的生態價值而必須進行的發展，或者絕對基於公眾利益而必須進行的基礎設施項目外，魚塘區內不准進行新發展。」8.3 點：「至於離魚塘較遠的地方，當局定下的規劃意向，是保護濕地的生態完整，並防止對魚塘生態價值帶來負面干擾影響的發展。涉及新露天貯物或貨櫃後勤用途的申請，一般不會獲得批准。只有鄰近落馬洲跨界通道的地點而不涉及填塘工程的申請，才會獲從寬考慮。」

根據 S/YL-ST/8 的註釋的「說明」，當局採納了「防患未然」的方法及「不會有濕地淨減少」的原則是有嚴謹的科學研究基礎、該帶的魚塘(無論是活躍與荒廢)已被認可為國際及地區具生態功用、是后海灣濕地生態系統不可或缺的部分、甚至遠離魚塘的地方，也必須防止對魚塘生態價帶來負面干擾的發展。

然而 S/STT/1 的規劃草圖對該帶地區的生態價值、規劃意向及發展的限制隻字不提，甚至將接壤擬設的三寶樹濕地保育公園，原規劃的面積佔 520 公頃，在未完成生態研究前，就建議填平 90 公頃漁塘、削減了 220 公頃濕地，更將三寶樹濕地保育公園「降格」為濕地補償區。新田科技城的發展欠缺客觀科學的理據，環境影響評估缺乏全面的研究，亦沒有認真的緩解措施以達致 S/YL-ST/8 的規劃原意及發展限制，令人感到為求發展，妄顧科學、歷史、國際保育生態的責任及法治基礎。

2. 違反《十四五規劃綱要》及《粵港澳大灣區發展規劃綱要》

S/STT/1 的說明的策略性規劃環境第 6.1 點強調：「《中華人民共和國國民經濟和社會發展第十四個五年規劃和 2035 年遠景目標綱要》(下稱十四五規劃綱要)在 2021 年 3 月的全國人民代表大會通過，支持香港加強、設立和發展成為國際新科技中心等。……政府其後在 2023 年 10 月公布的《北部都會區行動綱領 2023》把新田科技城的定位是整個北部都會區產業發展的重心及創科發展集群的樞紐，與深圳科創園區產生協同效應。……」

不過，十四五規劃綱要的第十一篇 37-39 章亦提出《推動綠色發展 促進人與自然和諧共生》的政策綱領¹，提升生態系統質量和穩定性、持續改善環境質量及加快發展方式綠色轉型。在提升生態系統質量和穩定性方面，包括 1) 完善生態安全屏障體系、2) 構建自然保護地體系、3) 健全生態保護補償機制。

根據香港於 2017 年 7 月 1 日簽署的《深化粵港澳合作 推進大灣區建設框架協議》的合作原則之一是「生態優先，綠色發展」：著眼於城市群可持續發展，強化環境保護和生態修復，推動形成綠色低碳的生產生活方式和城市建設運營模式，有效提升城市群品質²。而在推動綠色發展的重點合作方面，包括：培育戰略性新興產業集群，建設產業合作發展平台，構建高端引領、協同發展、特色突出、**綠色低碳的開放型、創新型產業體系**；共建健康灣區，**完善生態建設和環境保護合作機制，建設綠色低碳灣區**；充分發揮港澳地區獨特優勢，深化與「一帶一路」沿線國家在基礎設施互聯互通、經貿、金融、**生態環保及人文交流領域的合作**...等

根據 2019 年 2 月 18 日公布的《粵港澳大灣區發展規劃綱要》³第二節的機遇挑戰就指出：區域發展空間面臨瓶頸制約，資源能源約束趨緊，**生態環境壓力日益增大**，人口紅利逐步減退。在第二章總體要求第二節基本原則之一：「**綠色發展，保護生態**。大力推進生態文明建設，樹立綠色發展理念，堅持節約資源和保護環境的基本國策，**實行最嚴格的生態環境保護制度**，堅持最嚴格的耕地保護制度和最嚴格的節約用地制度，推動形成綠色低碳的生產生活方式和城市建設運營模式，為居民提供良好生態環境，促進大灣區可持續發展。」第七章推進生態文明建設的第一節打這生態防護豎障提出「**加強粵港澳生態環境保護合作，共同改善生態環境系統。加強濕地保護修復，全面保護區域內國際和國家重要濕地，開展濱海濕地跨境聯合保護。**」

因此，根據《十四五規劃綱要》及《粵港澳大灣區發展規劃綱要》，香港在配合成為國際科技中心的同時，亦應兼顧《推動綠色發展 促進人與自然和諧共生》的政策方向。可惜政府在欠缺科學的基礎及客觀用地需要的分析，就大刀闊斧地將這片國際及區域

¹ http://big5.www.gov.cn/gate/big5/www.gov.cn/xinwen/2021-03/13/content_5592681.htm

² https://www.bayarea.gov.hk/filemanager/tc/share/pdf/Framework_Agreement.pdf

³ https://www.bayarea.gov.hk/filemanager/tc/share/pdf/Outline_Development_Plan.pdf

認可具生態價值的生態系統切割，並無推動綠色發展之餘，更進一步破壞人與自然和諧共生的生境。

3. 暗渡陳倉 偷換概念

根據規劃指引編號 12C (二零一四年五月修訂本) 的引言指出「由一九九五年起，當局已根據《關於特別是作為水禽棲息地的國際重要濕地公約》(下稱「拉姆薩爾公約」)，把米埔沼澤區、后海灣內灣和四周的魚塘列為「具國際意義的濕地」(下稱「拉姆薩爾濕地」)。這項安排確認了后海灣地區具有重要的生態價值，是成千上萬候鳥一處濕地生境和補給站。根據《拉姆薩爾公約》，倘締約方其後撤銷或縮小一幅「具國際意義的濕地」，應盡量就濕地資源的損失作出賠償，並為此增闢自然護理區。為了方便公眾就各類用途和發展提出申請，城規會亦公布了一套規劃指引，包括：1) 以「防患未然」的方法保育魚塘的生態價值；及 2) 「不會有濕地淨減少」的原則。而濕地「不會有淨減少」可以指「面積」和「功能」這兩方面的減少。而 S/YL-ST/8 的註釋的「說明」，當局採納了「防患未然」的方法及「不會有濕地淨減少」規劃指引。

然而在 S/STT/1 的說明第 10 點「規劃主題及城市設計與園境設計大綱」的規劃主題 10.1.4 就提出「同時，三寶樹濕地保育公園亦可緩解新田科技城中新田／落馬洲地區的發展所導致的生態及漁業資源影響，以達致濕地的生態功能及承載力不會出現淨減少。」10.1.6 點提出「根據有關研究的環評報告，在三寶樹濕地保育公園擬用作落實生態及漁業優化措施的 328 公頃土地中，政府會透過積極的保護管理和現代化水產養殖，以提升 288 公頃濕地的生態功能和承載力及 40 公頃魚塘的漁業資源，從而補償新田科技城中新田／落馬洲地區內的發展對濕地生境及漁業造成的損失，亦實現相關濕地的生態功能及承載力不會出現淨減少。」

S/STT/1 所提出的三寶樹濕地保育公園概念及環評提出的生態優化措施，只是提出生態功能及承載力不會出現淨減少，而非指「面積」和「功能」這兩方面的減少；其次，環評提出的緩解措施非常粗疏，欠缺科學依據，所謂優化後的措施是否真正能避免該片濕地的生態功能及承載力不會出現淨減少的功能存疑，加上規劃區域的房屋、工業、交通、人口的發展對該帶環境所構成的壓力，這些緩解措施往往是空口講白講。過去多個發展項目提出的緩解措施，例如三跑／港珠澳大橋對中華白海豚及珊瑚的影響所提出的緩解措施根本無助於生態的復原，然而一旦落實了發展，這些行動將會構成不可逆轉的破壞。

當局訂定 12C 的規劃指引的態度非常嚴謹，例如在濕地保育區的土地用途及發展指引就說明：「魚塘是后海灣地區濕地生態系統不可或缺的部分。濕地保育區的規劃意向，是保育魚塘的生態價值。這個地區涵蓋后海灣地區現有並仍用作養殖或已荒廢的相連魚塘，而這些魚塘全部都須予保育。除了為保存這個地區的生態價值而必須進行的發展，或者絕對基於公眾利益而必須進行的基礎設施項目外，濕地保育區內將不准進行新發展。任何這類發展必須呈交生態影響評估報告，以證明該發展不會令濕地所發揮的功能出現淨減少的情況，也不會帶來負面的干擾影響。」S/STT/1 的發展範圍，包括原有的濕地保育區及濕地緩衝區，在保育方面有嚴謹的要求，而在發展方面有嚴格的限制，而 S/STT/1 的規劃既非「為保存這個地區的生態價值而必須進行的發展」，亦非「絕對基於公眾利益而必須進行的基礎設施項目」(包括科技城規模與選址的合理性)，當局自打嘴巴，自毀長城，破壞這片「具國際意義的濕地」。

4. 保育級別降格

在 S/YL-ST/8 的大綱圖，被規劃為自然保育區有對相嚴格的規管，除了採納不會有「濕地淨減少」的原則處理外，在備註(b)項：.....如未取得城市規劃委員會根據(城市規劃

條例)第 16 條批給的許可，不得進行或繼續進行任何填土／填塘或挖土工程，包括為改作上文第一欄和第二欄所列的任何用途，或註釋)說明頁所經常准許的用途或發展而進行或繼續進行。但在 S/STT/1 自然保育區進行任何填土／填塘或挖土工程，由政府統籌或落實的公共工程，以及保養、修葺或翻建工程可獲豁免申請。而今次 S/STT/1 的大綱草圖更進一步說明任何保育承諾，即使是「具國際意義的濕地」，有嚴謹的規劃指引，包括「防患未然」的方法及「濕地淨減少」的原則，只要政府的發展需要下，這些原則不會受到尊重。

S/YL-ST/8 的大綱圖的土地用途，有多片土地以「其他指定用途」及說明是綜合發展及濕地改善區，與綜合發展包括濕地復修區。濕地改善區的規劃意向是「保存和加強現有孫塘或濕地的生態價值和功能。」而經常准許用途包括：農業用途(只限魚塘養殖)、自然保護區及濕地生境；而濕地復修區的規劃意向是「鼓勵把毗連現有魚塘而環境已受破壞的濕地復修」，經常准許的用途包括農業用途、燒烤地點、郊野學習/教埭/遊客中心、自然教育徑、農地住用構築物、野營地點、宗教機構(只限宗祠)、鄉事委員會會所/鄉公所。同時分別座落在濕地保育區及濕地緩衝區，總面積涉及 213.58 公頃(約佔大綱圖 1/3 面積)，若提出改劃申請，有詳細說明及嚴格的要求。

反觀 S/STT/1 的其他指定用途包括混合用途、創新及科技、物流、貯物和工場、文化和社區用途及配套用途和設施、潔淨能源站，都涉及住宅、工業、物流、貯物和工場之類的发展，並沒有在濕地保育上提出任何的限制及改劃申請的要求，總面積涉及 313.24 公頃(佔 1/3 大綱草圖的面積)。可見涉及發展及破壞的面積超過原有濕地改善區及濕地復修區的 100 公頃。

在自然保育區的規劃限制放寬及濕地改善區及復修區大幅減少的情況下，這片「具國際意義的濕地」的生態保育級別大大降格。

5. 消失的鷺鳥林

S/STT/1 的大綱草圖一方面強調在該區範圍內和該區附近一帶蘊含具重要生態價值的資源，包括米埔隴和米埔村附近的兩個鷺鳥林、多個夜間棲息地，以及三寶村的濕地(9.1.5)；但在說明書的 10.1.8 只提及未來接近鷺鳥林和夜間棲息地的發展項目會遵守建議的生態緩解措施。該區的北面和西面劃定了非建築用地，以作為生態緩衝區，保護雀鳥飛行廊道／路線。此外，建議採用梯級式建築物高度，遞降至該區以北的三寶樹濕地保育公園，以盡量減少對生態易受影響地區的影響。在生態值得關注的地區，建築物高度限制亦會較低。另外亦會加入野生動物走廊，方便非飛行性的哺乳類動物活動。並在 12.4.3 提出「在第 19C 及 20 區提供休憩用地，旨在保留雀鳥的飛行路線和米埔隴村的鷺鳥林。就此用地進行設計和落實工作時須小心謹慎，並遵照有關研究的環評報告所建議的生態緩解／改善措施。」根據 12.4.1，休憩用地的規劃意向主要「是提供戶外公共空間作各種動態及／或靜態康樂用途，以配合當地居民、在該區工作的人士和其他市民的需要。」在土地用途的指引，完全欠缺保育的措施，甚至可能會出現鷺鳥林對休憩地點做成滋擾的爭議(大埔露鳥林就曾因有市民投訴令康樂及文化事務署新界東樹木組於大埔墟鷺鳥林進行修樹冠工程⁴)。有關措施對保育鷺鳥林完全沒有幫助。

⁴ <https://www.info.gov.hk/gia/general/201712/01/P2017120100317.htm>

本人要求：

1. 反對新田科技城分區計劃大綱草圖編號 S/STT/1 的規劃建議；
2. 保留原有的濕地保育區及濕地緩衝區的規劃，將其他其他指定用途的混合用途、創新及科技、物流、貯物和工場、文化和社區用途及配套用途和設施、潔淨能源站，都涉及住宅、工業、物流、貯物和工場之類的發展，維持原有的「其他指定用途」及說明是綜合發展及濕地改善區，與綜合發展包括濕地復修區；
3. 審議的過程，嚴謹執行 12C 的規劃指引，包括「防患未然」的方法及「濕地淨減少」(包括面積和功能)的原則，以維護這片「具國際意義濕地」的生態價值；
4. 在自然保育區刪除「自然保育區進行任何填土／填塘或挖土工程，由政府統籌或落實的公共工程，以及保養、修葺或翻建工程除外」的豁免條款；
5. 文件提出的生態補償措施欠缺科學的基礎及效果成疑，不應接受作為這片「具國際意義濕地」的補償措施；
6. 尊重《深化粵港澳合作 推進大灣區建設框架協議》的合作原則之一是「生態優先，綠色發展」及《粵港澳大灣區發展規劃綱要》在第二章總體要求第二節基本原則之一：「綠色發展，保護生態」的規劃綱要

意見提交者：謝世傑

簽署：謝世傑

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tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2024年05月08日星期三 23:09
收件者: tpbpd/PLAND
主旨: Comment on Plan No. S/STT/1
附件: Objection to SST1.pdf
類別: Internet Email

Submission Number:
TPB/R/S/STT/1-S1322

Representation Number:
TPB/R/S/STT/1-R1441

Objection to Plan No. S/STT/1

WONG Kenneth Ka-wai [REDACTED]

Introduction

San Tin / Lok Ma Chau Development Node (No. EIA 302-2023) is first proposed in (ARUP) 2021. In May 2023, the proposal was revised and announced with an increase in development area from 340ha to 627ha (Development Bureau, 2023). The Environmental Impact Assessment report was available for public review since February 2024, result based on surveys that were conducted in between November 2021 and October 2022 (AECOM, 2024) as required by the EIA Technical Memorandum(TM).

Numerous aspects of the development project are of public concern, namely the abnormal and substantial change in size of proposing development area, survey effort on ecological impact and related mitigation measures, and some principal problems of the EIA ordinance and related procedures.

Ecological Survey Methodology and Findings about *Lutra lutra*

In the EIA TM (Tse, 2023), the applicant is required to carry out yearlong investigation that covers both wet and dry season, for the sake of documenting existing flora and fauna that may have or have not recorded in literatures, and hence to conserve important and endangered species and habitats (Lau C.F., 2021). The instruction seems inclusive yet vague to describe specific requirements for each ecological survey to be valid.

Accuracy of the preliminary study and EIA ecological study for this Project is of concern. *Lutra lutra* was not mentioned in the project profile (ARUP, 2021). In the EIA report published in (2024), no *L. lutra* was recorded during study period. The applicant did show their concern, however, only refer to Eurasian otters' presence in historical data. GN No. 10/2010 (Environmental Protection Department, 2010) briefly described the methods that surveying respective fauna should use. The guidance note can easily be followed, however not necessarily specified for species, in this case, the Eurasian otters (Chan, 2024).

20 camera traps (CT) were planted inside the 627ha impact area. Only CT 2, CT 10 and CT 11 are located at where associated with limited disturbance, infrastructure and human activity, in other words, only these 3 CT have higher chance of capturing an otter (AECOM, 2024). WWF (Chan, 2024) considers only 6 of the cameras are located within areas of habitat loss which only CT 19 is within the fishponds to be filled. Not to mention the likeliness of capturing otter occurrence with small number of camera traps in the 627ha development area is not quite practical, some camera traps are even clustered (i.e. CT1, CT6, CT7, CT8 and CT9 on the North; CT 5 and CT 18 on the East; CT 3, CT16 and CT17 on the South East). Effectiveness in reflecting population of Eurasian otters as well as other terrestrial fauns by these cameras set up (Chan, 2024), and hence the ability to estimate the impact towards these critters, may be biased and inaccurate. The applicant claimed the mentioned CT survey was done in collaboration with WWF and KFBG, however, only 5%

coverage of the entire assessment area. Information in the report maybe misleading (Chan, 2024).

Since no otter was captured with the mentioned effort during survey period, it was considered “no significant ecological impact” towards this IUCN classified near threatened species(AECOM, 2024; Loy et al., 2022). This would be misleading (Chan, 2024). The EIA report did refer to McMillan et al. (2023), which identified the 7 individual otters near abandoned fishponds around the development proposal area. Furthermore, small number of identified otter population should not be interpreted as “only small population may be affected and hence no significant ecological impact to the species and the population”; in contrast, it is a potential cause to local extinction due to substantial destruction of fishpond habitats (Loy et al., 2022; Chan, 2024). Eurasian otter is also known as susceptible to vegetation removal from sides of waterbody, draining of wetlands, and reduce fish availability from wetland or ponds. Further destruction or any temporary occupation of habitat would cause reduction in carrying capacity and potentially lead to local extinction (Loy et al., 2022).

Attention to Eurasian Otter from local community was limited until recent years, so as research effort for conserving this species (Chan, 2024). More information shall release while this EIA report being reviewed and judged for approval, the 36 months validity of EIA report may not be suitable for protecting this species, the critical habitat, and reveal the complete status of otters (The Conservancy Association, 2023).

Eurasian otters are nocturnal species and sensitive to disturbance (North Ireland Environmental Agency, 2011), which general survey effort or camera trap method shall not be sufficient to obtain accurate population data for this species (Chan, 2024). Considering the camera trap survey done by the applicant was not specified to reveal population data of Eurasian otters, as well active search for otter sprint and Local Ecological Knowledge was not described in any part of the EIA or EM&A methodology (Chan, 2024), accuracy of the research performed is of serious concern. Extra research effort should be made dealing with rare species, for example, the cover board survey carried out for Bogadek’s Burrowing Lizard as the consultancy for AEIAR-163/2012 aware of this rarely documented endangered species (Chan, 2024; Hong Kong Bird Watching Society, 2023).

Mitigations for otters: Corridors

There are a few sets of wildlife corridor proposed. As demonstrated in the EIA report figure 10.10A (AECOM, 2024) the new wildlife corridor meant to be a compensation for the removal of the old one but may not be necessarily mitigating any ecological function for the otters (Chan, 2024). Existing wildlife corridor was one of the conditions of the Environmental Permit listed for Sheung Shui to Lok Ma Chau Spur Line Project. Unfortunately, as per DEP request in Condition 3.35, the wildlife corridor was not one of the listed items that required monitoring and report (Department of Environmental Protection, 2002). There is no proof that the 200mm and 300mm diameter wildlife corridors was used by any wildlife after all these years, except a domestic cat being captured by Camera Trap CT9 in the EIA report for this Project (AECOM, 2024).

Available information of the corridor design is limited. Only location, size in width and length, and fencing is described. Whether there will be monitoring and maintenance in future is not mentioned. To improvement from existing corridors, adding fencing alone may not be enough. Noise reduction walls may help reducing acoustic disturbance to the environment and increasing usage of these corridors and hence better carrying out the purpose of mitigation (Sołowczuk, 2020), as Eurasian otters are nocturnal and sensitive to human activities (Loy et al., 2022) while maintenance of the MTR company mainly happens in nighttime. Without further information of how certain wildlife corridor will be built and managed, despite the applicant claimed the corridors demonstrated in Figure 10.10A are dedicated for otters, it is not convinced that the corridors can mitigate ecological function loss to the otters and other terrestrial animals due to this Project (Chan, 2024), including habitat and prey loss.

Few is known about the mitigation wetland: SPS WCP

Mitigation area for the project is not designated on site, but outside and adjoining the entire development area the Sam Po Shue Wetland Conservation Park (SPS WCP). The proponent suggested it to be a reasonable compensation by improving “environmental capacity” (Development Bureau, 2023), implying habitat loss within the development area can be compensated by enhancing habitat of elsewhere to increase carrying capacity for all species occupying the area.

Yet there is no management, financial or development information of the proposal SPS WCP to judge how it can support the comprehensive ecological function. WWF (Chan, 2024), as one of the major stakeholders, was not one of the parties engaged for management and cooperation discussion, even though the development boundary is as close as about 1KM from the Inner Deep Bay Ramsar Site boundary(Chan, 2024).

The SPS WCP along with other proposing wetland parks in the Northern district was only being promoted and public engaged in February 2024. It was mentioned about the 10ha of facility construction, and the “Container Aquaculture System” that being promoted by AFCD and EPD. Should this be the mitigation part of the project proposal, but it is not located within the project area neither was it studied for its 500meter impact assessment area(AECOM, 2024). This EIA report be responsible to find out its impact for the 10ha infrastructures during construction and operation, as well as the aquaculture systems(Chan, 2024; Hong Kong Bird Watching Society, 2023), unless the DEP is trying to approve it as another independent designated project from this STLCM DN.

“The assumed increase in functional value of 45%” in the proposed enhancement area, is another statement of public’s concern (Chan, 2024; Hong Kong Bird Watching Society, 2023; Hong Kong Institute of Architects, 2024). The applicant referred to Fung Lok Wai (FLW) project to estimate ecological value increased in the proposed area after enhancement. By project nature, size of infrastructure and extend of habitat loss are different to be comparable(Hong Kong Institute of Architects, 2024). Moreover, mitigation results for Fung Lok Wai project were only estimated, instead of results from statistical data analysis as it is not yet operating in reality (Chan, 2024; Hong Kong Bird Watching Society, 2023). Estimation of the result of mitigation measures should be based on factual data of comparable projects for accurate justification(Hong Kong Institute of Architects, 2024; Chan, 2024).

For recommendation, Habitat Creation and Management Plan (HCMP) maybe a better tool for overseeing ecological mitigations of a town size development plan throughout the process, which as well applied in the FLW EIA and related approval condition. A HCMP describes in detail how mitigations measures shall be implemented for compensating ecological value loss in a development and what achievements shall be expected from that (Chan, 2024). Not a new method being utilized in Hong Kong, HCMP is one of the tools that MTR used for decades to plan, implement and monitor ecological functions under their supervision (MTR, 2023). With the HCMP we can further discuss the better way possible in balancing development and protection. Similarly, the UK recently published a Habitat Management and Monitoring Plan which outlines detail how a land shall be managed and monitored to create and enhance habitat, on a Biodiversity Net Gain (BNG) basis, for at least 30 years (Natural England, 2024). While the developer and consultant referred to FLW EIA report in estimating function value increase in the enhancement land, they should have as well taken reference to the better environmental protection tools that was used in the same project.

However, with limited details provided, the development proposed to begin by the end of this 2024 (AECOM, 2024). It seems the DEP is allowing incomplete project proposals and EIA reports that neglect parts of uncertainty.

Should this EIA Report be rejected or withdrawn?

Pattern in recent EP and EIA approval may have suggested some implications. Withdrawal of EIA Study Brief was uncommon until 2012, and even rare afterwards (Environmental Protection Department, 2024). The only rejected EIA report and therefore related EP applications happened in 2000. In the aspect of political manner, it is convincing that the DEP tend not to reject and prefer withdrawal of project applications by the applicant in recent 12-20 years.

The DEP takes advice from the Advisory Committee of Environment and should independently consider if all alternatives were considered, and the impact was avoided the best possible. For this Project, the applicant did not restart the application process by request nor by will in order to take up the responsibility for the substantial area difference between the project profiles 2 years ago and today. Procedural justice is of concern (Chan, 2024).

Doubt in procedural justification

In the original proposal, no fishpond or wetland were included. The newly announced development added over hundred hectares of fishpond (Legislation Council, 2023). This different proposal was only treated as an update of the previous proposal instead of a new project profile (Hong Kong Bird Watching Society, 2023), but should the previous project profile be considered invalid (Chan, 2024)? Not any indication explaining if the EIA was conducted based on the previous 300ha or the new 600ha proposal, either one, the mitigation park located outside site with construction mentioned was not included in the assessment for the environmental impact (Hong Kong Institute of Architects, 2024). Plenty exceptions are allowed in one project.

In the EIAO Cap 499 Section 5 (6), any person can comment on the project profile within 14 days of its being advertised, yet not applicable in this case. The right of people to know and to comment on the impact towards loss of hundred hectares of fishpond habitat, as should have meant to be the purpose of the EIAO (Chan, 2024; Hong Kong Bird Watching Society, 2023), is being override.

Is EIAO up-to-date for protecting the environment? Better Biodiversity Net Gain (BNG) than No Net Loss (NNL)?

Strategic Environmental Assessment (SEA) is another rather suitable planning tools for developments like STLMC DN (Mayer & Wu, 2019). SEA is not a new tool even for Hong Kong. EPD compared it with EIA and listed the functions and crucial benefit of the SEA, however, it was only a suggestion for the government to formulate policies, plans and programs (Environmental Protection Department, 2004). While EU has adopted mandatory SEA before development of a project in 2001, and China has taken similar act in 2002, Hong Kong still not including or considering SEA to be included in the EIAO or any related ordinance (Mayer & Wu, 2019).

As there is only update in guidance notes, instead of EIAO itself, there is doubt even if the STLMC DN EIA report obeyed with and completed under all requirements of the ordinance, does it necessarily valid to protect the wetland habitats at least to meet NNL principle (Mayer & Wu, 2019)?

Designated project listed under Schedule 2 or 3 might not have covered every possible case, and neither both schedules clearly identify projects exclusively from one another. Why would fishponds in Deep Bay, that has prolonged history of ecological value till present, excluded from fish culture zone that concerns Schedule 2 which developments of these area would require to obtain an EP (Mayer & Wu, 2019)? All of these questions remain mystery.

There are discussions in doubt of the No Net Loss (NNL) principle. EIOA (Environmental Protection Department, 1998) embraces the NNL principle, a theory that may regulate the developers to offset adverse impact that can be seen as soon as the development begins, however does not guarantee ecological value as long as the infrastructures remain. Without a decades long management plan for ecological function, along with extreme climates increasing in recent years, short term NNL planning promises nothing more than perhaps a moment of offset for the destruction (Damiens et al., 2021). Research estimates only 1/3 of the English written reports of NNL approach projects could achieve as planned. Evidence based mitigation measure and monitoring should have been the baseline for environmental protection (zu Ermgassen et al., 2019).

To achieve Biological Net Gain, understanding the full picture of ecological process is needed, unlike NNL that only compares ecological value of one habitat to another (Bull & Brownlie, 2017). For instance, if removal of a 1% of dry, nutrient value low and fire susceptible grassland that can trade for significant power generation, instead of recovering that piece of grassland, same amount of effort given to enhance same size of wetlands and ponds may generate more ecological value as of the richness in bird and insect species the Hong Kong possess of as well as the flyway importance to numerous migratory birds. Ecology should not have to compromise with development.

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寄件者: [REDACTED]
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收件者: tpbpd/PLAND
主旨: Fw: 提交就新田科技城核准圖的書面申述
附件: Objection to SST1.pdf
類別: Internet Email

致城規會（電郵：tpbpd@pland.gov.hk）：
WONG, Kenneth Ka-wai
[REDACTED]

I request the TPB to reject entire EIA report and planning proposal of S/SST/1, reasons are as followed:

Ecological Survey Methodology and Findings about *Lutra lutra*

In the EIA TM (Tse, 2023), the applicant is required to carry out yearlong investigation that covers both wet and dry season, for the sake of documenting existing flora and fauna that may have or have not recorded in literatures, and hence to conserve important and endangered species and habitats (Lau C.F., 2021). The instruction seems inclusive yet vague to describe specific requirements for each ecological survey to be valid.

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Eurasian otters are nocturnal species and sensitive to disturbance (North Ireland Environmental Agency, 2011), which general survey effort or camera trap method shall not be sufficient to obtain accurate population data for this species (Chan, 2024). Considering the camera trap survey done by the applicant was not specified to reveal population data of Eurasian otters, as well active search for otter sprint and Local Ecological Knowledge was not described in any part of the EIA or EM&A methodology (Chan, 2024), accuracy of the research performed is of serious concern. Extra research effort should be made dealing with rare species, for example, the cover board survey carried out for Bogadek’s Burrowing Lizard as the consultancy for AEIAR-163/2012 aware of this rarely documented endangered species (Chan, 2024; Hong Kong Bird Watching Society, 2023).

Mitigations for otters: Corridors

There are a few sets of wildlife corridor proposed. As demonstrated in the EIA report figure 10.10A (AECOM, 2024) the new wildlife corridor meant to be a compensation for the removal of the old one but may not be necessarily mitigating any ecological function for the otters (Chan, 2024). Existing wildlife corridor was one of the conditions of the Environmental Permit listed for Sheung Shui to Lok Ma Chau Spur Line Project. Unfortunately, as per DEP request in Condition 3.35, the wildlife corridor was not one of the listed items that required monitoring and report (Department of Environmental Protection, 2002). There is no proof that the 200mm and 300mm diameter wildlife corridors was used by any wildlife after all these years, except a domestic cat being captured by Camera Trap CT9 in the EIA report for this Project (AECOM, 2024).

Available information of the corridor design is limited. Only location, size in width and length, and fencing is described. Whether there will be monitoring and maintenance in future is not mentioned. To improvement from existing corridors, adding fencing alone may not be enough. Noise reduction walls may help reducing acoustic disturbance to the environment and increasing usage of these corridors and hence better carrying out the purpose of mitigation (Sołowczuk, 2020), as Eurasian otters are nocturnal and sensitive to human activities (Loy et al., 2022) while maintenance of the MTR company mainly happens in nighttime. Without further information of how certain wildlife corridor will be built and managed, despite the applicant claimed the corridors demonstrated in Figure 10.10A are dedicated for otters, it is not convinced

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that the corridors can mitigate ecological function loss to the otters and other terrestrial animals due to this Project (Chan, 2024), including habitat and prey loss.

Few is known about the mitigation wetland: SPS WCP

Mitigation area for the project is not designated on site, but outside and adjoining the entire development area the Sam Po Shue Wetland Conservation Park (SPS WCP). The proponent suggested it to be a reasonable compensation by improving “environmental capacity” (Development Bureau, 2023), implying habitat loss within the development area can be compensated by enhancing habitat of elsewhere to increase carrying capacity for all species occupying the area.

Yet there is no management, financial or development information of the proposal SPS WCP to judge how it can support the comprehensive ecological function. WWF (Chan, 2024), as one of the major stakeholders, was not one of the parties engaged for management and cooperation discussion, even though the development boundary is as close as about 1KM from the Inner Deep Bay Ramsar Site boundary(Chan, 2024).

The SPS WCP along with other proposing wetland parks in the Northern district was only being promoted and public engaged in February 2024. It was mentioned about the 10ha of facility construction, and the “Container Aquaculture System” that being promoted by AFCD and EPD. Should this be the mitigation part of the project proposal, but it is not located within the project area neither was it studied for its 500meter impact assessment area(AECOM, 2024). This EIA report be responsible to find out its impact for the 10ha infrastructures during construction and operation, as well as the aquaculture systems(Chan, 2024; Hong Kong Bird Watching Society, 2023), unless the DEP is trying to approve it as another independent designated project from this STLCM DN.

“The assumed increase in functional value of 45%” in the proposed enhancement area, is another statement of public’s concern (Chan, 2024; Hong Kong Bird Watching Society, 2023; Hong Kong Institute of Architects, 2024). The applicant referred to Fung Lok Wai (FLW) project to estimate ecological value increased in the proposed area after enhancement. By project nature, size of infrastructure and extend of habitat loss are different to be comparable(Hong Kong Institute of Architects, 2024). Moreover, mitigation results for Fung Lok Wai project were only estimated, instead of results from statistical data analysis as it is not yet operating in reality (Chan, 2024; Hong Kong Bird Watching Society, 2023). Estimation of the result of mitigation measures should be based on factual data of comparable projects for accurate justification(Hong Kong Institute of Architects, 2024; Chan, 2024).

For recommendation, Habitat Creation and Management Plan (HCMP) maybe a better tool for overseeing ecological mitigations of a town size development plan throughout the process, which as well applied in the FLW EIA and related approval condition. A HCMP describes in detail how mitigations measures shall be implemented for compensating ecological value loss in a development and what achievements shall be expected from that (Chan, 2024). Not a new method being utilized in Hong Kong, HCMP is one of the tools that MTR used for decades to plan, implement and monitor ecological functions under their supervision (MTR, 2023). With the HCMP we can further discuss the better way possible in balancing development and protection. Similarly, the UK recently published a Habitat Management and Monitoring Plan which outlines detail how a land shall be managed and monitored to create and enhance habitat, on a Biodiversity Net Gain (BNG) basis, for at least 30 years (Natural England, 2024). While the developer and consultant referred to FLW EIA report in estimating function value increase in the enhancement land, they should have as well taken reference to the better environmental protection tools that was used in the same project.

However, with limited details provided, the development proposed to begin by the end of this 2024 (AECOM, 2024). It seems the DEP is allowing incomplete project proposals and EIA reports that neglect parts of uncertainty.

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Should this EIA Report be rejected or withdrawn?

Pattern in recent EP and EIA approval may have suggested some implications. Withdrawal of EIA Study Brief was uncommon until 2012, and even rare afterwards (Environmental Protection Department, 2024). The only rejected EIA report and therefore related EP applications happened in 2000. In the aspect of political manner, it is convincing that the DEP tend not to reject and prefer withdrawal of project applications by the applicant in recent 12-20 years.

The DEP takes advice from the Advisory Committee of Environment and should independently consider if all alternatives were considered, and the impact was avoided the best possible. For this Project, the applicant did not restart the application process by request nor by will in order to take up the responsibility for the substantial area difference between the project profiles 2 years ago and today. Procedural justice is of concern (Chan, 2024).

Doubt in procedural justification

In the original proposal, no fishpond or wetland were included. The newly announced development added over hundred hectares of fishpond (Legislation Council, 2023). This different proposal was only treated as an update of the previous proposal instead of a new project profile (Hong Kong Bird Watching Society, 2023), but should the previous project profile be considered invalid (Chan, 2024)? Not any indication explaining if the EIA was conducted based on the previous 300ha or the new 600ha proposal, either one, the mitigation park located outside site with construction mentioned was not included in the assessment for the environmental impact (Hong Kong Institute of Architects, 2024). Plenty exceptions are allowed in one project.

In the EIAO Cap 499 Section 5 (6), any person can comment on the project profile within 14 days of its being advertised, yet not applicable in this case. The right of people to know and to comment on the impact towards loss of hundred hectares of fishpond habitat, as should have meant to be the purpose of the EIAO (Chan, 2024; Hong Kong Bird Watching Society, 2023), is being override.

Is EIAO up-to-date for protecting the environment? Better Biodiversity Net Gain (BNG) than No Net Loss (NNL)?

Strategic Environmental Assessment (SEA) is another rather suitable planning tools for developments like STLMC DN (Mayer & Wu, 2019). SEA is not a new tool even for Hong Kong. EPD compared it with EIA and listed the functions and crucial benefit of the SEA, however, it was only a suggestion for the government to formulate policies, plans and programs (Environmental Protection Department, 2004). While EU has adopted mandatory SEA before development of a project in 2001, and China has taken similar act in 2002, Hong Kong still not including or considering SEA to be included in the EIAO or any related ordinance (Mayer & Wu, 2019).

As there is only update in guidance notes, instead of EIAO itself, there is doubt even if the STLMC DN EIA report obeyed with and completed under all requirements of the ordinance, does it necessarily valid to protect the wetland habitats at least to meet NNL principle (Mayer & Wu, 2019)?

Designated project listed under Schedule 2 or 3 might not have covered every possible case, and neither both schedules clearly identify projects exclusively from one another. Why would fishponds in Deep Bay, that has prolonged history of ecological value till present, excluded from fish culture zone that concerns Schedule 2 which developments of these area would require to obtain an EP (Mayer & Wu, 2019)? All of these questions remain mystery.

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There are discussions in doubt of the No Net Loss (NNL) principle. EIOA (Environmental Protection Department, 1998) embraces the NNL principle, a theory that may regulate the developers to offset adverse impact that can be seen as soon as the development begins, however does not guarantee ecological value as long as the infrastructures remain. Without a decades long management plan for ecological function, along with extreme climates increasing in recent years, short term NNL planning promises nothing more than perhaps a moment of offset for the destruction (Damiens et al., 2021). Research estimates only 1/3 of the English written reports of NNL approach projects could achieve as planned. Evidence based mitigation measure and monitoring should have been the baseline for environmental protection (zu Ermgassen et al., 2019).

To achieve Biological Net Gain, understanding the full picture of ecological process is needed, unlike NNL that only compares ecological value of one habitat to another (Bull & Brownlie, 2017). For instance, if removal of a 1% of dry, nutrient value low and fire susceptible grassland that can trade for significant power generation, instead of recovering that piece of grassland, same amount of effort given to enhance same size of wetlands and ponds may generate more ecological value as of the richness in bird and insect species the Hong Kong possess of as well as the flyway importance to numerous migratory birds. Ecology should not have to compromise with development.

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Objection to Plan No. S/STT/1

WONG Kenneth Ka-wai [REDACTED]

Introduction

San Tin / Lok Ma Chau Development Node (No. EIA 302-2023) is first proposed in (ARUP) 2021. In May 2023, the proposal was revised and announced with an increase in development area from 340ha to 627ha (Development Bureau, 2023). The Environmental Impact Assessment report was available for public review since February 2024, result based on surveys that were conducted in between November 2021 and October 2022 (AECOM, 2024) as required by the EIA Technical Memorandum(TM).

Numerous aspects of the development project are of public concern, namely the abnormal and substantial change in size of proposing development area, survey effort on ecological impact and related mitigation measures, and some principal problems of the EIA ordinance and related procedures.

Ecological Survey Methodology and Findings about *Lutra lutra*

In the EIA TM (Tse, 2023), the applicant is required to carry out yearlong investigation that covers both wet and dry season, for the sake of documenting existing flora and fauna that may have or have not recorded in literatures, and hence to conserve important and endangered species and habitats (Lau C.F., 2021). The instruction seems inclusive yet vague to describe specific requirements for each ecological survey to be valid.

Accuracy of the preliminary study and EIA ecological study for this Project is of concern. *Lutra lutra* was not mentioned in the project profile (ARUP, 2021). In the EIA report published in (2024), no *L. lutra* was recorded during study period. The applicant did show their concern, however, only refer to Eurasian otters' presence in historical data. GN No. 10/2010 (Environmental Protection Department, 2010) briefly described the methods that surveying respective fauna should use. The guidance note can easily be followed, however not necessarily specified for species, in this case, the Eurasian otters (Chan, 2024).

20 camera traps (CT) were planted inside the 627ha impact area. Only CT 2, CT 10 and CT 11 are located at where associated with limited disturbance, infrastructure and human activity, in other words, only these 3 CT have higher chance of capturing an otter (AECOM, 2024). WWF (Chan, 2024) considers only 6 of the cameras are located within areas of habitat loss which only CT 19 is within the fishponds to be filled. Not to mention the likeliness of capturing otter occurrence with small number of camera traps in the 627ha development area is not quite practical, some camera traps are even clustered (i.e. CT1, CT6, CT7, CT8 and CT9 on the North; CT 5 and CT 18 on the East; CT 3, CT16 and CT17 on the South East). Effectiveness in reflecting population of Eurasian otters as well as other terrestrial fauns by these cameras set up (Chan, 2024), and hence the ability to estimate the impact towards these critters, may be biased and inaccurate. The applicant claimed the mentioned CT survey was done in collaboration with WWF and KFBG, however, only 5%

coverage of the entire assessment area. Information in the report maybe misleading (Chan, 2024).

Since no otter was captured with the mentioned effort during survey period, it was considered “no significant ecological impact” towards this IUCN classified near threatened species(AECOM, 2024; Loy et al., 2022). This would be misleading (Chan, 2024). The EIA report did refer to McMillan et al. (2023), which identified the 7 individual otters near abandoned fishponds around the development proposal area. Furthermore, small number of identified otter population should not be interpreted as “only small population may be affected and hence no significant ecological impact to the species and the population”; in contrast, it is a potential cause to local extinction due to substantial destruction of fishpond habitats (Loy et al., 2022; Chan, 2024). Eurasian otter is also known as susceptible to vegetation removal from sides of waterbody, draining of wetlands, and reduce fish availability from wetland or ponds. Further destruction or any temporary occupation of habitat would cause reduction in carrying capacity and potentially lead to local extinction (Loy et al., 2022).

Attention to Eurasian Otter from local community was limited until recent years, so as research effort for conserving this species (Chan, 2024). More information shall release while this EIA report being reviewed and judged for approval, the 36 months validity of EIA report may not be suitable for protecting this species, the critical habitat, and reveal the complete status of otters (The Conservancy Association, 2023).

Eurasian otters are nocturnal species and sensitive to disturbance (North Ireland Environmental Agency, 2011), which general survey effort or camera trap method shall not be sufficient to obtain accurate population data for this species (Chan, 2024). Considering the camera trap survey done by the applicant was not specified to reveal population data of Eurasian otters, as well active search for otter sprint and Local Ecological Knowledge was not described in any part of the EIA or EM&A methodology (Chan, 2024), accuracy of the research performed is of serious concern. Extra research effort should be made dealing with rare species, for example, the cover board survey carried out for Bogadek’s Burrowing Lizard as the consultancy for AEIAR-163/2012 aware of this rarely documented endangered species (Chan, 2024; Hong Kong Bird Watching Society, 2023).

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There are a few sets of wildlife corridor proposed. As demonstrated in the EIA report figure 10.10A (AECOM, 2024) the new wildlife corridor meant to be a compensation for the removal of the old one but may not be necessarily mitigating any ecological function for the otters (Chan, 2024). Existing wildlife corridor was one of the conditions of the Environmental Permit listed for Sheung Shui to Lok Ma Chau Spur Line Project. Unfortunately, as per DEP request in Condition 3.35, the wildlife corridor was not one of the listed items that required monitoring and report (Department of Environmental Protection, 2002). There is no proof that the 200mm and 300mm diameter wildlife corridors was used by any wildlife after all these years, except a domestic cat being captured by Camera Trap CT9 in the EIA report for this Project (AECOM, 2024).

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Few is known about the mitigation wetland: SPS WCP

Mitigation area for the project is not designated on site, but outside and adjoining the entire development area the Sam Po Shue Wetland Conservation Park (SPS WCP). The proponent suggested it to be a reasonable compensation by improving “environmental capacity” (Development Bureau, 2023), implying habitat loss within the development area can be compensated by enhancing habitat of elsewhere to increase carrying capacity for all species occupying the area.

Yet there is no management, financial or development information of the proposal SPS WCP to judge how it can support the comprehensive ecological function. WWF (Chan, 2024), as one of the major stakeholders, was not one of the parties engaged for management and cooperation discussion, even though the development boundary is as close as about 1KM from the Inner Deep Bay Ramsar Site boundary(Chan, 2024).

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Urgent Return receipt Expand Group Restricted Prevent Copy

From: [REDACTED]
Sent: 2024-05-08 星期三 21:26:25
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: DRAFT SAN TIN TECHNOPOLE OUTLINE ZONING PLAN NO. S/STT/1

Submission Number:
TPB/R/S/STT/1-S1335

Representation Number:
TPB/R/S/STT/1-R1442

DRAFT SAN TIN TECHNOPOLE OUTLINE ZONING PLAN NO. S/STT/1

Dear TPB Members,

The STT OZP covers an area of about 1,004 ha comprising a major portion of the approved San Tin OZP (ST OZP) No. S/YL-ST/8 (about 610 ha); the northern part of the approved NTM OZP No. S/YL-NTM/12 (about 374 ha); and a few pieces of land near Siu Hum Tsuen, Shek Wu Wai San Tsuen, San Tin Barracks and Tam Mei Barracks (about 20 ha in total) previously not covered by any statutory plan.

And this sums up the information provided as a basis for what should be an in-depth public consultation.

The data provided to the public consists of:

1 X ONE PAGE PLAN

NOTES AND EXPLANATORY STATEMENT THAT LISTS THE VARIOUS LAND USES AND WHAT IS PERMITTED AND THE OBLIGATORY VAGUE WAFFLE ABOUT ANOTHER DREAM SCHEME THAT IS AT BEST ASPIRATIONAL WITH THE UBIQUITOUS PASTEL SHADED OUTLINES.

THE 23 PAGE PAPER THAT ENDS WITH

16. Attachments

Appendix A Draft San Tin Technopole OZP No. S/STT/C

Appendix B Notes of the Draft San Tin Technopole OZP No. S/STT/C

Appendix C Explanatory Statement of the Draft San Tin Technopole OZP No. S/STT/C

Appendix D Town Planning Board Paper No. 10906 and minutes of TPB Meeting on 16.6.2023

Appendix E Consolidated Report and Summary Report of the Revised RODP

Appendix F Provision of Major Government, Institution or Community Facilities and Open Space

Plan 1 Revised Recommended Outline Development Plan of the San Tin Technopole

Plan 2 Proposed Amendments to the Planning Scheme Areas related to the San Tin Technopole

Plan 3 Aerial Photo

Plans 4a to 4d Site Photos

Plans 5a to 5e Renderings

Plan 6 Comparison of Wetland Conservation Area/Wetland Buffer Area

BUT NO LINKS PROVIDED TO THESE ATTACHMENTS INCLUDING THOSE OF PARTICULAR INTEREST LIKE THE AERIAL PHOTOS, PROVISION OF GIC - MOST IMPORTANT **AS ONLY A MERE 1.5% OF THE ENTIRE DISTRICT (15HA)** WILL BE DEVOTED TO COMMUNITY USES. MOST OF THE COMMUNITY FACILITIES, ACCORDING TO THE PAPER, ARE TO BE STUFFED INTO THE PODIUMS OF PUBLIC HOUSING DEVELOPMENTS INDICATING THAT ON THE SCALE OF PRIORITIES, GIC FACILITIES ARE WAY DOWN AT THE BOTTOM OF THE LIST.

MOREOVER WHERE IS THE LINK TO EIA AND A REPORT ON NOT ONLY THE IMPACT ON HONG KONG BUT A COMPREHENSIVE REPORT ON THE ENVIRONMENTAL IMPACT ON THE ENTIRE PEARL RIVER / GBA AREA? AFTER ALL GLOBAL WARMING WILL REQUIRE A UNITED FRONT AND A COHESIVE OUTLINE OF THE IMPACT THIS PLAN WILL HAVE ON THE ENVIRONMENT OF SOUTHERN CHINA, NOT JUST THIS LITTLE CORNER.

SO IN ESSENCE A FAKE CONSULTATION WITH MAJOR ISSUES BRUSHED UNDER THE CARPET.

STRONGEST OBJECTS TO THE PLAN THAT WILL HAVE DISASTEROUS CONSEQUENCES AND INFLICT IRRIVERSIBLE DAMAGE NOT ONLY THE LOCAL COMMUNITY BUT THE ENTIRE REGION.

Green groups like the Conservancy Association, the Bird Watching Society, Greenpeace and others have analysed the plans and their findings are alarming.

Hopefully members have carefully studied their observations and recommendations and will respect their expertise.

Recent reports on the impact of climate change indicate that 'no man is an island'. Every territory will be subjected to natural disaster in one shape or another. It is the duty of our government to ring fence the territory as far as possible. This plan is contrary to the advice of the top experts in climate change and must be rejected.

Mary Mulvihill



Urgent Return receipt Expand Group Restricted Prevent Copy

tpbpd/PLAND

寄件者: [REDACTED]
寄件日期: 2024年05月08日星期三 23:19
收件者: tpbpd/PLAND
主旨: 有關<新田科技城分區計劃大綱草圖>意見
類別: Internet Email

Submission Number:
TPB/R/S/STT/1-S1342

Representation Number:
TPB/R/S/STT/1-R1443

本人要求重新修訂《新田科技城分區計劃大綱草圖》（《新田科技城草圖》），將「濕地保育區」及「濕地緩衝區」內的「其他指定用途（創新及科技）」地帶，重新劃為原來的地帶，即「自然保育區」、「其他指定用途（綜合發展包括濕地改善區）」及「其他指定用途（綜合發展包括濕地修復區）」，或其他與濕地保育相關的用途地帶，以確保任何發展不會違反「防患於未然」和「不會有濕地淨減少」的濕地規劃原則。同時須列明「不會有濕地淨減少」可指面積和功能這兩方面的減少。

二 | 重新修訂《新田科技城草圖》，將后海灣第二及第三大的鷺鳥林，及其覓食地劃作保育用途地帶；將鷺鳥來往鳥巢及其覓食地的飛行區，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾。

三 | 重新修訂《新田科技城草圖》，將落馬洲地鐵站一帶至落馬洲管制站北面部分的已平整土地，劃作具嚴格高度及用途限制的用途地帶，確保任何發展不得高於現時的低密度發展高度，亦不會對毗鄰敏感生態造成不良干擾，以保障米埔、馬草壟及塋原的生態連結。

四 | 重新修訂《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目 A1 及 B 項，包括修改「其他指定用途」註明「濕地保育公園」地帶的規劃意向和第一欄經常准許的用途。第一，將「保護濕地生態系統完整」、「防患於未然」和「不會有濕地淨減少」等重要濕地保育原則列為規劃意向；第二，將「農地住用構築物」轉至第二欄，以確保所有可能對濕地造成負面影響的發展和基礎設施，均受到城規會把關。理由如下：

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1. 生態環境為一體，此發展計劃的環評報告卻把範圍任意切割為 7 個部分評估其生態價值。這種不符現實的研究方法大大低估了此地區的生態價值，未能充分反映此地的生物多樣性及高用量的功能性。
2. 此外，該環評報告亦只以 4 種魚食性雀鳥（黑臉琵鷺、大白鷺、蒼鷺及普通鸕鶿）作為指標計算此地的濕地價值，無視其他食性鳥類及具不同生境的物種（小鸕鶿、黃胸鵝、歐亞水獺等）在此地區的出現。這反映該環評報告未有全面反映地區的生態價值。
3. 相反，在新年紀錄過的物種極為豐富，共 205 種鳥類（全港紀錄得的鳥種為 572 種），其中 117 種為具保育級別的鳥類，當中 33 種國家級鳥類及 19 種全球受威脅/近危鳥類，如極度瀕危的青頭潛鴨及黃胸鵝、瀕危的黑臉琵鷺、國家一級保護的紫水雞等。
4. 而且亦沒有對少數香港有歐亞水獺出現紀錄的新田作出相應研究。
5. 濕地除了為不同物種提供理想的生境外，還有蓄水緩洪及穩定微氣候的功能。
5. 發展對生態的影響是難以逆轉的。《中國生物多樣性保護》白皮書內提到，生物多樣性保護已提升到國家戰略級地位，在社會發展時須堅持保育優先。再者，《粵港澳大灣區發展規劃綱要》內亦提出須全面保護區域內國際和國家重要濕地。香港作為中國不可缺少的一部分，應該全面貫徹國家的方針，一同為維持國家生態作出共同努力。

市民

WONG OI KWAN

就圖則作出申述**Representation Relating to Plan**

參考編號

Reference Number:

240508-154508-98364

Submission Number:

TPB/R/S/STT/1-51402

提交限期

Deadline for submission:

08/05/2024

Representation Number:

TPB/R/S/STT/1-R1444

提交日期及時間

Date and time of submission:

08/05/2024 15:45:08

「申述人」全名

Full Name of "Representer":

先生 Mr. Lau Ka Yeung

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
全張圖則反對	反對 Oppose	1. 涉違反程序公義 2. 未有完整進行生態評估 3. 發展影響后海灣生態 4. 涉違反國家保護生態承諾 5. 未完整呈交所有評估及生態計劃 6. 所進行之生態評估粗疏且過份樂觀 7. 未有進行光污染影響評估 8. 未有完整評估雀鳥飛行路線之影響 9. 部分地點發展高達130米影響景觀及帶來鳥撞危機 10. 未有與其它發展計算累計環境影響

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

暫緩製訂圖則，直至完整及具科學的生態研究完成，之後再研究發展方向

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-165912-90510

Submission Number:
TPB/R/S/STT/1-S1407

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1445

提交日期及時間
Date and time of submission: 08/05/2024 16:59:12

「申述人」全名
Full Name of "Representer": 女士 Ms. YEUNG TSZ CHING

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
魚塘納入科技城規劃	反對 Oppose	建議城規會重新考慮新田生態旅遊可行性，各種國際罕見品種的雀鳥、水獺及魚類可以吸引世界各地的遊客慕名而來，發展成旅遊景點的收益絕對不少。既可增加就業機會，亦可提升香港的國際地位，為何不為？請再三考慮。
淡水魚產量	反對 Oppose	淡水魚產量大減 新田淡水魚產量佔香港三分之一，失去新田魚塘將極度影響香港本地的淡水魚供應，短期內難覓新地方提供同樣產量，應付香港的需求。
破壞原有發展配套	反對 Oppose	善用本來資源，加入資源及技術，加強科技城的發展潛力。

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

請再次做環評，了解新田的生態價值，魚塘是否必須納入科技城的範圍？科技城內需要有休憩、綠化及自然保育用地，保留魚塘並發展成戶外自然景觀區，可以讓居民及遊客購買門票參觀，並聘請導賞員，發現成下一個「米埔」。本身已有的資源及配套，只需投放資金及技術去發展，很快就可見成效，帶動整個科技城的人流及經濟發展，有利十四五規劃的發展潛力。

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-174836-73292

Submission Number:
TPB/R/S/STT/1-S1408

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1446

提交日期及時間
Date and time of submission: 08/05/2024 17:48:36

「申述人」全名
Full Name of "Representer": 女士 Ms. Leung Yee Man

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
新田科技城發展項目	反對 Oppose	<p>新田科技城發展未有充份考慮所規劃用地的生態保育及生物多樣性，程序操之過急，欲先發展，後保育，與可持續發展的普世價值背道而馳。目前的規劃用地將大舉填平大量魚塘濕地，嚴重影響重要水鳥及生物多樣性棲地的完整性及連貫性，進而為來港棲息的候鳥帶來不可逆轉的危機。當中尤其以瀕危雀鳥首當其衝，例如香港引以為傲的黑臉琵鷺亦以該地為重要生境，在發展後族群會否因未能適應而急劇下跌，仍是未知之數。香港擁有豐富的生物多樣性，同時亦是人口密集的發達城市，但如只顧發展而妄顧環境保育，實是本末倒置，亦不符合國際期望。</p> <p>本人明白新田科技城在經濟、社會方面會帶來得益，而土地問題亦是香港一直面對的難題。唯香港依然有大量已發展的土地未經好好使用，例如荒廢的棕地。如在未有妥善規劃已發展土地的用途就大舉開發土地，就只會進入人不敷出的無底洞，亦會帶來無可挽救的生態浩劫。</p>

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

就圖則作出申述**Representation Relating to Plan**

參考編號

Reference Number:

240508-180427-08734

Submission Number:

TPB/R/S/STT/1-S1410

提交限期

Deadline for submission:

08/05/2024

Representation Number:

TPB/R/S/STT/1-R1447

提交日期及時間

Date and time of submission:

08/05/2024 18:04:27

「申述人」全名

Full Name of "Representer":

先生 Mr. HUI CHUNG HONG

「獲授權代理人」全名

Full Name of "Authorized Agent" :

與申述相關的圖則

Plan to which the representation relates: S/STT/1

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Permitted building height near the 300m bird flight corridor at LMC	反對 Oppose	Permitted height of +105mPD and +130mPD are not compatible with the rural landscape at Lok Ma Chau Village and the vicinity; it may also pose impacts to the bird flight corridor.
Zoning of existing active farmland near Shek Wu Wai to OU for the proposed cultural and recreational complex	反對 Oppose	Over 10 hectare of farmland is present in the existing plan area. The draft OZP does not consider any re-provision of agricultural land.
Zoning and permitted uses of OU(I&T)	反對 Oppose	Permitted uses in OU(I&T) are allowing too much flexibility, probably at the expense of conservation and human well-being. Also there is no detailed planning in the zone.

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

1. Enhancing the habitat connectivity at the northwest corner of STT
2. Improving the wildlife corridor for terrestrial mammals near Lok Ma Chau Boundary Control Point (LMC BCP)
3. Adopting Nature-based Solutions (NbS) in STT to increase flood resilience
4. Conserving flight corridors for birds
5. Promoting agricultural landscape and diverse landscape typologies of open space

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-192228-71331

Submission Number:
TPB/R/S/STT/1-S1418

提交限期
Deadline for submission: 08/05/2024

提交日期及時間
Date and time of submission: 08/05/2024 19:22:28

Representation Number:
TPB/R/S/STT/1-R1448

「申述人」全名
Full Name of "Representer": 先生 Mr. 鄭旭洋

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
環境影響評估可信性	反對 Oppose	首先，環境影響評估報告存違反環評「避免」原則。其次，生態基線及評估資料不足，與部分非政府組織所做的環境評估報告有顯著不同，有可能嚴重低估對雀鳥飛行路線的影響及嚴重低估對歐亞水獺的影響。
環境影響評估的程序	反對 Oppose	新田科技城在環評進行期間，去年中突然擴大發展規模，增加填平90公頃魚塘，政府卻未有循以往做法，即按法定要求重新申請環評研究概要，而環評研究中的額外生態調查又未有完全覆蓋所增加的面積，有可能作不好的先例。
未有完整的「生境管理計劃」	反對 Oppose	至今仍沒有公開完整的「生境管理計劃」，或在社會得到共識，導致各界不能作充分討論。

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

建議減少填平魚塘的數目及範圍

就圖則作出申述**Representation Relating to Plan**

參考編號
Reference Number: 240508-195502-43617

Submission Number:
TPB/R/S/STT/1-S1419

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1449

提交日期及時間
Date and time of submission: 08/05/2024 19:55:02

「申述人」全名
Full Name of "Representer": 女士 Ms. SO TSZ YIN

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
發展新田科技城	反對 Oppose	發展新田科技城的規劃範圍已是濕地緩衝區，臨近米埔自然保護區，此項目將會破壞環境、弄得烏煙瘴氣。香港是位於東亞-澳大利西亞遷飛區，本地的濕地是雀鳥在遷徙時的休息站。規劃範圍有不少珍貴、瀕危的動物出現。此項目會不但影響雀鳥飛行，還破壞本地哺乳類(紅頰獐、水獺)及螢火蟲的生境。引用我國領導人的理念「金山銀山不如綠水青山」，新田濕地有它的價值。為何執意發展新田濕地呢？懇請懸崖勒馬、三思而行、回頭是岸，不要發展新田濕地，另覓方案。請不要自私，濕地是大家的，我們還要留給下一代去欣賞、學習。

對圖則的建議修訂(如有的話)

Proposed Amendments to Plan(if any):

要發展科技城，請不要開懇新田濕地及濕地緩衝區。

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 240508-200856-30172

Submission Number:
TPB/R/S/STT/1-S1420

提交限期
Deadline for submission: 08/05/2024

Representation Number:
TPB/R/S/STT/1-R1450

提交日期及時間
Date and time of submission: 08/05/2024 20:08:56

「申述人」全名
Full Name of "Representer": 女士 Ms. Wong Fung Yan

「獲授權代理人」全名
Full Name of "Authorized Agent":

與申述相關的圖則
Plan to which the representation relates: S/STT/1

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

有關事項 Subject Matters	性質 Nature	理由 Reason
重新修訂《新田科技城分區計劃大綱草圖》(《新田科技城草圖》)	反對 Oppose	新規劃內容涉及濕地保育區，影響全球雀鳥遷徙路線
《米埔及錦繡花園分區計劃大綱核准圖》的修訂項目A1及B項	反對 Oppose	有違國家綠色政策，破壞自然

對圖則的建議修訂(如有的話)
Proposed Amendments to Plan(if any):

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