

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy ☐Confidential

From: Roy Ng [REDACTED]
Sent: 2025-04-10 星期四 09:42:47
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: Representation relating to Tseung Kwan O Outline Zoning Plan (OZP) No. S/TKO/31
Attachment: TPB20250410(TKO137132).pdf

Submission Number:

TPB/R/S/TKO/31- S3

Dear Sir/Madam,

Please refer to the attachment for the captioned.

To comply with the requirement of TPB, here are the full name and first four alphanumeric characters of HKID card number.

Full name: NG HEI MAN

First four alphanumeric characters of HKIA card number: [REDACTED]

Yours faithfully,

Ng Hei Man (Mr.)

Campaign Manager

The Conservancy Association
[REDACTED]

Registered Name 註冊名稱 : The Conservancy Association 長春社

(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

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長春社

Since 1968

The Conservancy Association

10th April 2025

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

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

Dear Sir/Madam,

Representation relating to Tseung Kwan O Outline Zoning Plan (OZP) No. S/TKO/31

The Conservancy Association would comment on the proposed amendments Item A, D and E.

Item A

1. Tree and urban biodiversity

While we assume that Tree Management and Enhancement Plan would be prepared as usual, as one of the large-scale new town extension, Area 137 has potential to demonstrate how urban biodiversity can be well-incorporated during the process of urbanization. Study on Urban Biodiversity enhancement has already been conducted for Tung Chung New Town Extension¹ to identify existing and newly planned urban landscape assets and adjoining natural habitats, then propose short- and long-term landscape strategies and actions to build a functional ecological network for urban biodiversity. Measures can be implementing enrichment planting, planting host plants of target butterflies, creating tree clusters (the concept of “urban mini-forest” promoted by The Hong Kong Institute of Landscape Architect²), etc.. It is suggested that similar study could be conducted in Area 137 as well.

¹ Study on urban biodiversity enhancement for Tung Chung New Town
<https://bhecoweb.wixsite.com/restorationecologyhk/tung-chung-new-town-project>

² 都市微森林種植日 Mini-forest Planting Day
<https://www.facebook.com/share/p/15PvbKLUTi>



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2. Bird-window collision

Bird-window collision is one of the ecological concerns in our urban environment and results in bird injuries and mortality. In developed area in Tsung Kwan O, public reports on these are not uncommon³, with 10 and 7 reports in Hang Hau and near Tseung Kwan O Station respectively. We are concerned that similar conditions might be observed in future Area 137 with high-rise buildings and glass structures. We suggest that Bird friendly design could be incorporated in the urban design framework during planning stage to lower bird collision risk, such as minimizing glass coverage in buildings, adopting anti-collision designs to windows and glass railings, avoiding water features and vegetation from glass façade to reduce reflection of landscape, etc..

Item D

1. Protection of natural shoreline

Natural coastline is one of the valuable natural assets in Hong Kong and be protected from development in principle. We appreciate the effort of the project proponent to reduce the reclamation footprint in Area 132 from 25 hectares to 20 hectares. We reiterate that the coastal landscape near Area 132, comprising sandy shore, sea cliffs, wave-cut platform, etc., is one of the remaining natural coastlines in Tseung Kwan O after reclamation works associated with Tseung Kwan O new town development. The final Tseung Kwan O – Lam Tin Tunnel which replaced the previous Tseung Kwan O Western Coast Road has been a showcase that strike a proper balance between conservation and development. Therefore, it is suggested that alternatives should be further explored to largely reduce and minimize the reclamation footprint.

2. Noise in Area 132

It is noted that Fixed Noise Source Management Plan (FNMP) would be submitted prior to issuance of tender and commencement of the construction of proposed fixed noise sources. This implies that detailed noise assessment of the proposed six facilities, namely Electricity Facilities, Construction Waste Handling Facility, Refuse Transfer Station, Public Fill Transfer Facility, Sewage Pumping Station, Construction Batching Plant, would be conducted in later stage. Potential noise disturbance on On Luen Village (one of the nearest noise sensitive receivers) during construction and operation

³ Global Bird Collision Mapper <https://www.birdmapper.org/pages/explore-the-map>



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phase remains an issue to be addressed.

Regarding the potential road traffic noise near Ocean Shore, Food and Environmental Hygiene Committee of Sai Kung District Council⁴ has once discussed cumulative noise disturbance arise from construction of Tseung Kwan O – Lam Tin Tunnel, and the operation of Tseung Lam Highway. While no exceedance of noise limit was recorded from EPD, the chairperson once mentioned that as the condition was still approaching the noise limit, it was suggested that noise mitigation can be further explored once claimed that no proper noise mitigation measures have been implemented in Tseung Lam Highway. Currently the EIA report mentioned that road traffic noise near Ocean Shore ranged from 65 to 67dB(A). Such result, though not exceeding the noise limit (i.e. 70dB(A)), is approaching the limit. Based on the past experience, it may still arouse community attention.

Viewing that the entire project would last for probably more than 10 years, close communication and consultation with locals in respect of noise or other environmental impacts is needed. Besides, we also suggest to leave flexibility to review and amend the detailed design of planned use, in case particular environmental matters arise during both construction and operation phase.

Item E

We support the designation of Green Belt to reflect the existing condition.

Others

As mentioned in the Paper of Sai Kung District Council⁵ regarding the enhanced land creation proposal for Tseung Kwan O Area 137 and off Area 132, a connection between Area 132 and Lei Yue Mun, and a hiking trail connecting the promenade in Area 137 and Clear Water Bay Country Park would be explored. We understand that associated environmental issues might not be an issue in the current Tseung Kwan O OZP

⁴ Food and Environmental Hygiene Committee, Sai Kung District Committee meeting (16th May 2024)
https://www.districtcouncils.gov.hk/sk/doc/2024_2027/tc/committee_meetings_minutes/FEHC/FEHC_24_3_mcr.pdf

⁵ The enhanced land creation proposal for Tseung Kwan O Area 137 and off Area 132
https://www.districtcouncils.gov.hk/sk/doc/2024_2027/tc/dc_meetings_doc/27187/SK_2024_106_TC.pdf



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amendments. However, viewing the past controversy on various hiking trail construction work, such as cement trail and massive vegetation clearance in Tai Sheung Tok, Wood Plastic Composite (WPC) paving in Lantau, etc., we would particularly add that early dialogue and engagement with various concerned groups is necessary in future.

Yours faithfully,

The Conservancy Association

From: District Councilor Cheung Mei Hung
Sent: 2025-04-11 星期五 12:06:37
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 就將軍澳分區計劃大綱核准圖編號 S/TKO/30 的修訂提出意見
Attachment: 將軍澳分區計劃大綱的修訂提出意見.pdf

北角渣華道 333 號

北角政府合署 15 樓

規劃署

城市規劃委員會秘書：

電郵：tpbpd@pland.gov.hk

就將軍澳分區計劃大綱核准圖編號 S/TKO/30 的修訂提出意見

就將軍澳分區計劃大綱核准圖編號 S/TKO/30 的修訂，本人收到地區居民十分關注，他們有以下意見及建議：

1. 建議工作車輛如大型泥頭車、田螺車、垃圾車等必需直接進出油塘位置，以減少因工作車輛衍生的噪音及空氣污染。工程的上落裝卸區(車輛及躉船)及其具爭議的地方設置閉路電視，並實時上載至網上讓公眾共同監察，避免重蹈油塘水泥廠多次犯例的情況；
2. 建議為所有工程/設施訂立一系列的標準指標(例如粉塵 PM2.5 及噪音等等)。如發現任何指標超出標準，需即時停工，直至有關糾正工作完成為止；
3. 建議調景嶺公園動工前，盡早收回紅磚路的管理責任，並開通入口讓市民能夠經紅磚路通往將藍公路花園及將軍澳海濱公園；
4. 成立 132 區聯絡小組邀請將南沿岸、日出康城屋苑主席或代表加入(維景灣畔/ CAPRI/ 藍塘傲/帝景灣/天晉 3B/海天晉/Monterey Place/ THE PARKSIDE/ SAVANNAH/Malibu/Sea to Sky/Marini/康城 13 期等)，定期開會及跟進各項問題；

5. 建議研究 132 區對出填海工程興建的 5 個公共設施建議向南搬離將軍澳較遠位置或荒廢的鯉魚門舊石礦場，而在近年財政赤字下，5 個當中應考慮部份不必要的公共設施應進一步刪減，避免工程期間或完工後的運作對居民滋擾太大，另外所有設施必須優化及美觀性，尤其是外牆綠化；

6. 建議研究削坡 55 米的方案取代現時 30 米方案，雖然時間及成本增加，但這是永久的長遠方案，與此同時填海造地可進一步減少，保留更自然的海岸線，更理順地區居民意見；另外，距離方面也可以考慮移往鯉魚門石礦場方向，更遠離將軍澳，而部分設施使用較貴的岩洞方案仍可繼續研究；

7. 發展同時需改善交通，除了計劃中的將油隧道及提升將軍澳線信號系統外，也促請第四條過海隧道、將軍澳南延線延伸港島東等；

8. 短期內的改善交通方案是加密及全日化經將軍澳隧道的巴士；

9. 除了 6.5 公里長單車徑外，更應考慮 1.4 公里長的 137 區海濱長廊貫穿佛堂州及將軍澳創新園（工業邨）接駁現時的將軍澳海濱長廊，然後再研究通往鯉魚門，打造超級海濱長廊。

請積整考慮以上本人集合了將軍澳居民的地區意見，如有任何查詢，歡迎與張美雄議員聯絡。謝謝。

西貢區議員

張美雄

2025 年 4 月 11 日



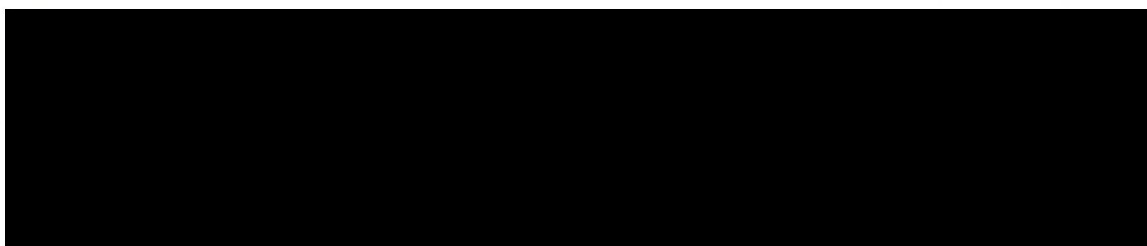
北角渣華道 333 號
北角政府合署 15 樓
規劃署
城市規劃委員會秘書：

電郵：tpbpd@pland.gov.hk

就將軍澳分區計劃大綱核准圖編號 S/TKO/30 的修訂提出意見

就將軍澳分區計劃大綱核准圖編號 S/TKO/30 的修訂，本人收到地區居民十分關注，他們有以下意見及建議：

1. 建議工作車輛如大型泥頭車、田螺車、垃圾車等必需直接進出油塘位置，以減少因工作車輛衍生的噪音及空氣污染。工程的上落裝卸區(車輛及躉船)及其具爭議的地方設置閉路電視，並實時上載至網上讓公眾共同監察，避免重蹈油塘水泥廠多次犯例的情況；
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5. 建議研究 132 區對出填海工程興建的 5 個公共設施建議向南搬離將軍澳較遠位置或荒廢的鯉魚門舊石礦場，而在近年財政赤字下，5 個當中應考慮部份不必要的公共設施應進一步刪減，避免工程期間或完工後的運作對居民滋擾太大，另外所有設施必須優化及美觀性，尤其是外牆綠化；
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8. 短期內的改善交通方案是加密及全日化經將軍澳南隧道的巴士；
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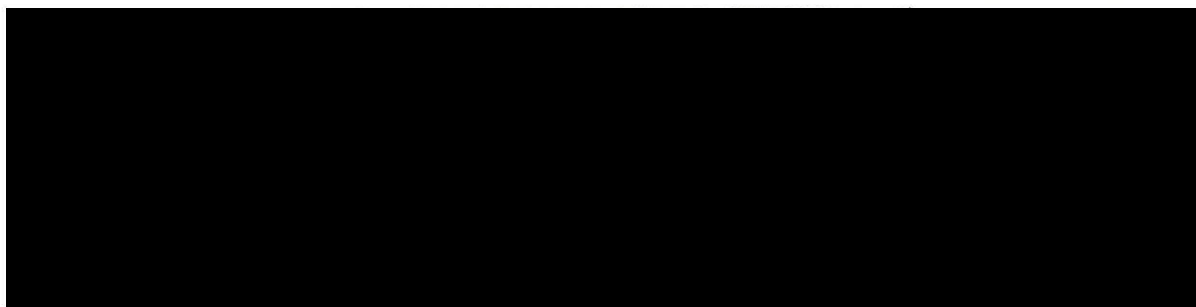
請積整考慮以上本人集合了將軍澳居民的地區意見，如有任何查詢，歡迎與張美雄議員 [REDACTED] 聯絡。謝謝。



西貢區議員

張美雄

2025 年 4 月 11 日



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From: Chair [REDACTED]
Sent: 2025-04-13 星期日 10:29:40
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: Re: Representation regarding Tseung Kwan O OZP No. S/TKO/31
Attachment: HKBIA_Tseung Kwan O no S TKO 31 objections by HKBIA April 2025.pdf; Poralu Marine - Waterfront Developement.pdf

Dear Town Planning Board,

Please refer to the attached letter in regards to Area 137 - there are many other opportunities for development instead of filling up the basin.

Some other ideas can be found via the following links:

<https://youtu.be/0jla5GhVY6g?feature=shared>

<https://www.beautiful.ai/player/-OB8CCMO3CqWldrBuv-d/PRES-TERCIEL-ENG>

Lawrence Chow
Chair

Submission Number: TPB/R/S/TKO/31- S5

Hong Kong Boating Industry Association (HKBIA)



Hong Kong Boating
Industry Association
香港遊艇業總會

MEMBERS OF:



ICOMIA
INTERNATIONAL COUNCIL OF
MARINE INDUSTRY ASSOCIATIONS



Hong Kong General Chamber of Commerce
香港總商會



Hong Kong Boating
Industry Association
香港遊艇業總會

Hong Kong, 13 April 2025

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

Email: tpbpd@pland.gov.hk

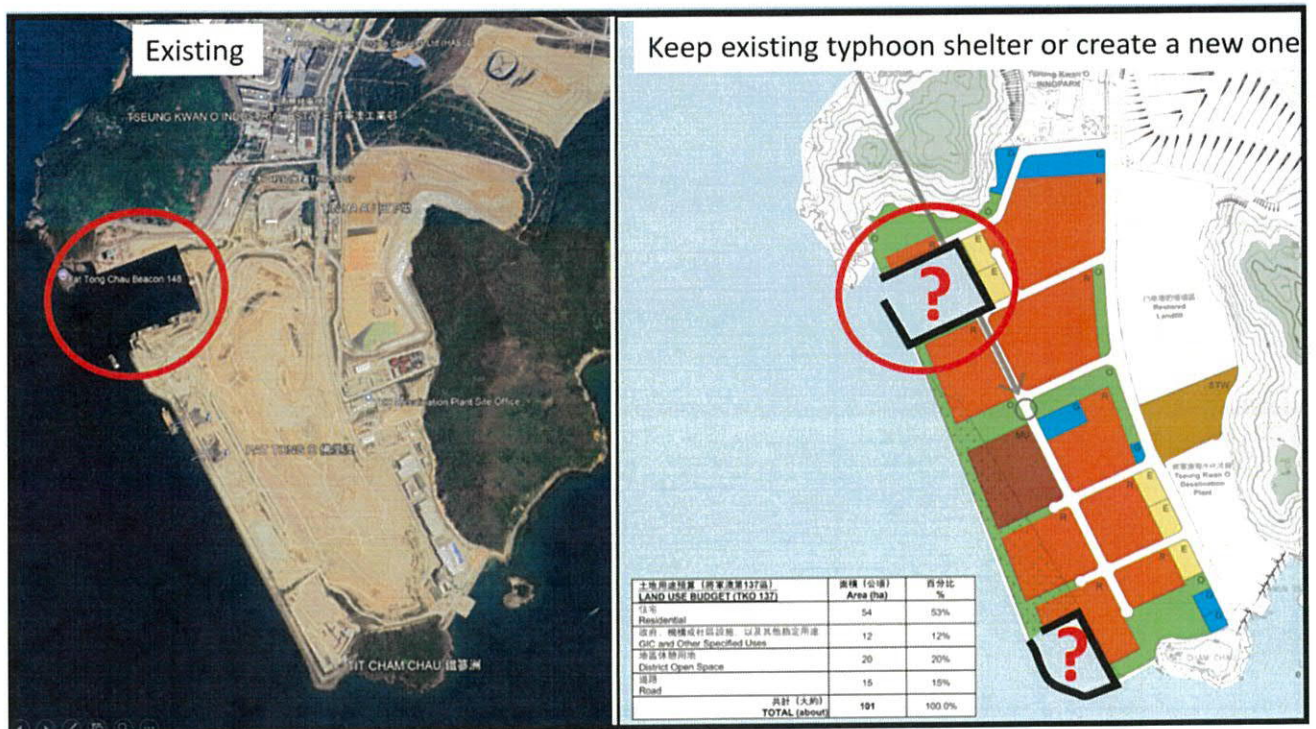
From: Lawrence Chow [REDACTED], Chair of HKBIA

Re: Representation regarding Tseung Kwan O OZP No. S/TKO/31

I write to you as the Chairman of the Hong Kong Boating Industry Association. We represent 69 members in the pleasure boating industry. We object the proposed rezoning for reasons set out for **Item A – Area 137**

We object to revising the land boundary and reclamation of the sheltered water body ('bay').

We call for re-use of the existing bay (or part thereof) as a public marine centre including sheltered moorings in support of yacht tourism and water sports (or alternatively create a new bay in the area).





Risk to vessels without shelter

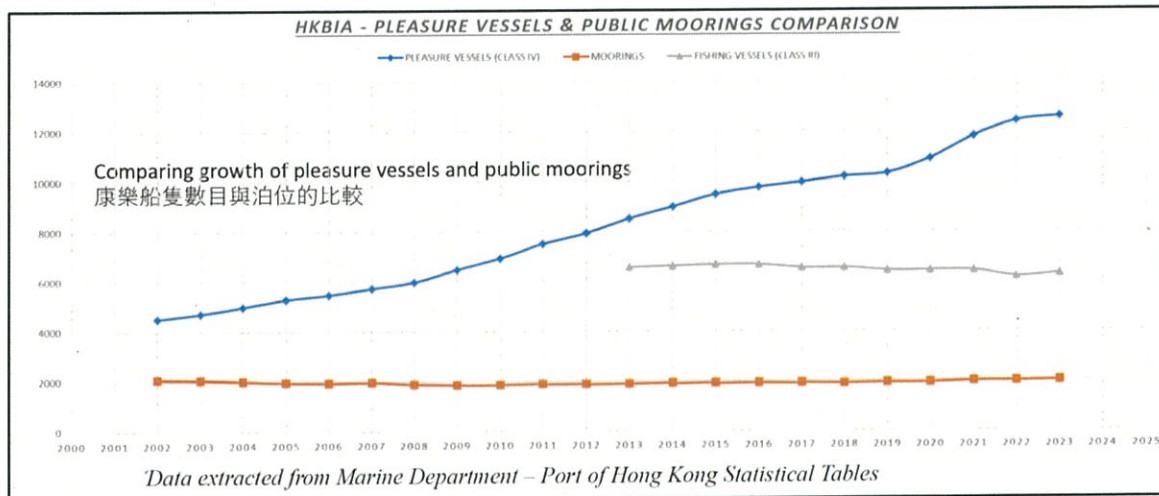
Sheltered moorings are essential for growing a marine based economy. Many vessels are currently moored on open waters at risk of adverse weather conditions. The damage caused by typhoons can be seen from a report by the Marine Department after typhoon Mangkhut.

Mangkhut damage reported by MarDep								
Location	Type of vessel					No of salvage	No of disposal	Amount(\$)
	I	II	III	IV	Others			
Sai Kung	-	1	1	38	206	67	243	2,998,500
Tai Po	-	-	-	3	5	2	8	63,000
Victoria Harbour	-	4	9	7	52	17	70	789,500
Southern District	-	1	5	13	55	13	59	721,000
Tuen Mun	-	-	3	-	13	11	16	136,500
Abandoned floating structures							78	996,500
Total	-	6	8	61	313	110	474	5,705,000

Salvage from Sep 2018 to Jan 2019. Others: vessel which do not need to be licensed or floating object of similar size.

Shortfall of 20,000 safe moorings in Hong Kong

The Hong Kong Boating Industry Association identified a shortfall of 10,000 safe public moorings for registered yachts and recreational boats (below). In addition, we estimate that there is a latent demand, suppressed due to the lack of safe, accessible and affordable moorings, for another 10,000 moorings.



The demand continues to grow

From 1999 onwards, the number of registered pleasure vessels constantly increased. Hong Kong's leisure marine industry is – for now – leading in the Asia Region. Hong Kong is also playing a key role in development of the yachting industry in our country and the Greater Bay Area.

Hong Kong has over 280 islands, 1,400km of mostly natural shorelines, and 1,500 sq km of water surface – more than our land. This is a magnificent resource in close proximity to business centres and residences. Hong Kong is an archipelago which provides a significant opportunity for developing marine recreation, tourism and supporting industries. A 'Monaco of the East' opportunity beyond that of our neighbours.

National and local policy to support the marine economy including yachting and water sports

The Chief Executive in his 2024 Policy Address gave direction to developing tourism products. He foresees yacht tourism as a growth opportunity for Hong Kong's economy. At national level, Xi Jinping called for promoting high-quality development of the marine economy (推進海洋經濟高質量發展) and recognised that 'lucid waters and lush mountains are invaluable assets.' (綠水青山就是金山銀山)

Town Planning Board identified the lack of leadership in developing the marine economy

The Chairman of the Town Planning Board called for a review of the need and provision of marine and water sports facilities at the 1037th Meeting of the Town Planning Board held on 12 July 2013 during the discussion regarding the Draft Pak Shek Kok (East) Outline Zoning Plan No. S/PSK/10 and proposals for a public marina:

- “76. On the proposed public marine centre, **the Chairman said** that after consultation with relevant bureau/departments including HAB, LCSD and MD, there was **no policy bureau to champion the provision of a public marine centre.**”
- “80. Other members considered that there was a need to seek policy support for the proposed public marine centre and, should that be confirmed, **a territorial study should be carried out** so as to identify a suitable site for the use.”
- “85. ... For the proposed public marine centre, the Board would request DEVB to consult relevant bureau for a **review of the need and provision of the marine and water sports facilities** including the proposed public marine centre (editor: at Pak Shek Kok).”

Speeding up the delivery of new sheltered mooring areas

The Hong Kong Boating Industry Association recognises 20 opportunities and actions required to improve the marine economy in Hong Kong. See Appendix 1 for the list in order of feasibility and immediacy.

Tseung Kwan O – Area 137 is readily available for mooring and other marine uses

Relative to all options, Tseung Kwan O – Area 137 has an existing basin (‘bay’) which can be readily used for moorings. A public marina here will serve visiting yachts and those living in Tseung Kwan O and the wider marine community in Hong Kong. The bay can be enhanced by adding a breakwater. Reclamation of this bay destroys value. Creating a new sheltered bay elsewhere is expensive and takes a long time. The existing bay is strategically located at the entrance of Tolo Harbour and near Victoria Harbour. The area will have rail access, rare for marinas. The government lacks alternatives for timely and cost-effective delivery of safe shelter for boats elsewhere in Hong Kong.



Hong Kong Boating
Industry Association
香港遊艇業總會

Summary of our recommendations

Item A – Area 137

To maintain in whole or in part the existing sheltered water body ('bay') and adjacent land for a public marine centre supporting yacht tourism and water sports.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Lawrence Chow'.

Lawrence Chow

Chair

Hong Kong Boating Industry Association





Appendix 1

Opportunities for new sheltered mooring areas

The Hong Kong Boating Industry Association recognises 20 opportunities and actions required to improve the marine economy in Hong Kong – in order of feasibility and immediacy:

A. Facilities for mooring and other marine uses which can be made readily available

1. Tseung Kwan O – Area 137 has an existing basin ('bay') which can be readily used for moorings. A public marina here will serve visiting yachts and those living in Tseung Kwan O and the wider marine community in Hong Kong. The bay can be enhanced by adding a breakwater. Reclamation of this bay destroys value. Creating a new sheltered bay elsewhere is expensive and takes a long time. The existing bay is strategically located at the entrance of Tolo Harbour and near Victoria Harbour. The area will have rail access, rare for marinas. The government lacks alternatives for timely and cost-effective delivery of safe shelter for boats elsewhere in Hong Kong.
2. Tai Tam Shek O Quarry – Existing basin ('bay') is readily available for moorings and water sports equipment storage. Question is when will government restart letting the site out?

B. Facilities for mooring and other marine uses under construction

3. Tung Chung East – Construction in progress of a small marina with club, repair and commercial facilities.
4. Aberdeen Harbour – Procedures for typhoon shelter expansion in progress.

C. Facilities for mooring and other marine uses under planning

5. Lamma ex-Quarry – The viability of the ex-Lamma Quarry area has yet to be proven. There is a need for a breakwater to protect the area from the prevailing easterly winds, and funding is required for compensation of fish farm operators. There are also viability lessons to be learned from the Sea Ranch debacle on Lantau.
6. Hung Hom Station Pier – The redevelopment of the pier and adjoining land into a retail and commercial development can provide support for local cruises and a small number of

visiting yachts. The viability is subject direct road access and pedestrian access to Tsim Sha Tsui, Hung Hom and the Hung Hom Station. The opportunity for sheltered moorings is limited.

7. Skytopia at the airport – Airport plans for marina facilities in its ‘Skytopia’ plans are speculative. The water depths are limited, the area is remote and enjoyment is restricted by noise and exhausts from air traffic. Viability studies are needed and implementation will require time.
8. Kau Yi Chau – Although the plans include marinas, formation of islands including water sports facilities are delayed and no clear timeline is available.

D. Proposals for facilities for mooring and other marine uses

9. Tseung Kwan O – In Area 77, the LCSD is planning a Water Sports Centre offering training. Once trained, these sailors, rowers and boaters will require space nearby to store their own equipment. In 2023, the Marine Department gazetted the Tseung Kwan O Sheltered Anchorage. The anchorage is located in the East Channel and was and is fully used. Adjacent to the channel is Area 65 which is allocated to the LCSD for a sports centre cum indoor heated pool and a Riverine Park. In support of the users of the anchorage we urge LCSD to set land aside here for a mariners’ club with changing facilities and a yard for boat repairs, and to construct of marine infrastructure (boat ramps, etc).
10. Tolo Harbour – Include a typhoon shelter in the planned reclamation at Ma Liu Shui. Extending the shoreline of the reclamation to create sheltered water is more cost-effective than constructing a stand-alone typhoon shelter. The example was set with Tung Chung East.
11. Kai Tak – Set land aside for a full-scale boat club at site 3E2 along the Kwun Tong Typhoon Shelter and Kai Tak Approach Channel – the last site available for such facility in the area.
12. Kai Tak – Provide space for a boat club with storage and changing facilities for water sports and other boat users at the head of the Kai Tak Approach Channel near the sports stadium, and construct landing steps and boat ramp.
13. Sai Kung – Increase mooring area in front of the Town Centre by adding breakwaters.

14. Sai Kung – Increase mooring area at Hebe Haven (Pak Sha Wan) with additional breakwaters.
15. Sai Kung – Allocate mooring spaces at Yim Tin Chai.
16. Yau Tong Bay – Add a breakwater and allocate moorings.
17. To Kwa Wan – Add landing steps to connect Victoria Harbour with Sports Stadium
18. Wan Chai (ex-Cargo Working Area) – Add breakwater

Supporting measures required for development of marine and yachting industries

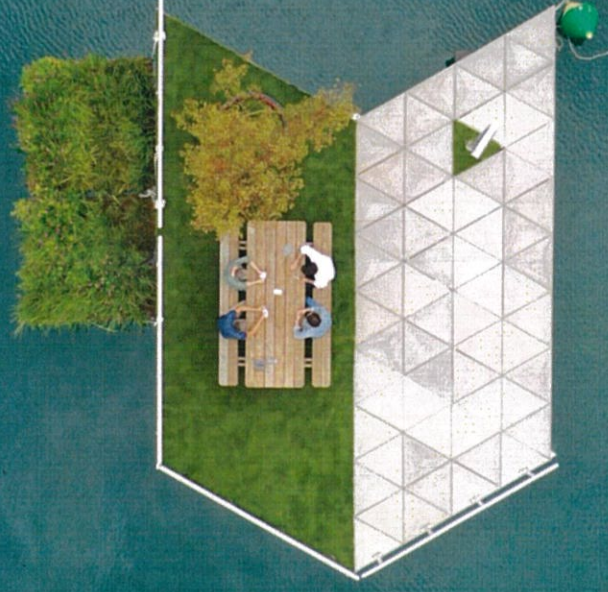
19. Land required – We urge government to solicit applications for marine supporting facilities along public and private waterfronts throughout Hong Kong, and to offer long term land leases for marine supporting industries along Aberdeen Harbour and the north shore of Tsing Yi.
20. Decision on leadership required – Policy support for marine tourism, recreation and sports, including visiting yachts and local vessels, goes beyond the Marine Department, Leisure and Cultural Services Department, Tourism Commission, and CEDD. We urge government to recognize a dedicated authority for development of marine tourism, recreation and sports.

WATERFRONT DEVELOPMENT

Highlight your blue land



PORALU
MARINE





Project vision

- ✓ Develop a **unique** Promenade or Leisure area matching a **high standard** level
- ✓ Set up a **multifunctional, modular and fully customizable** waterfront
- ✓ Using both **resilient and sustainable** solution adapted to **your environment**



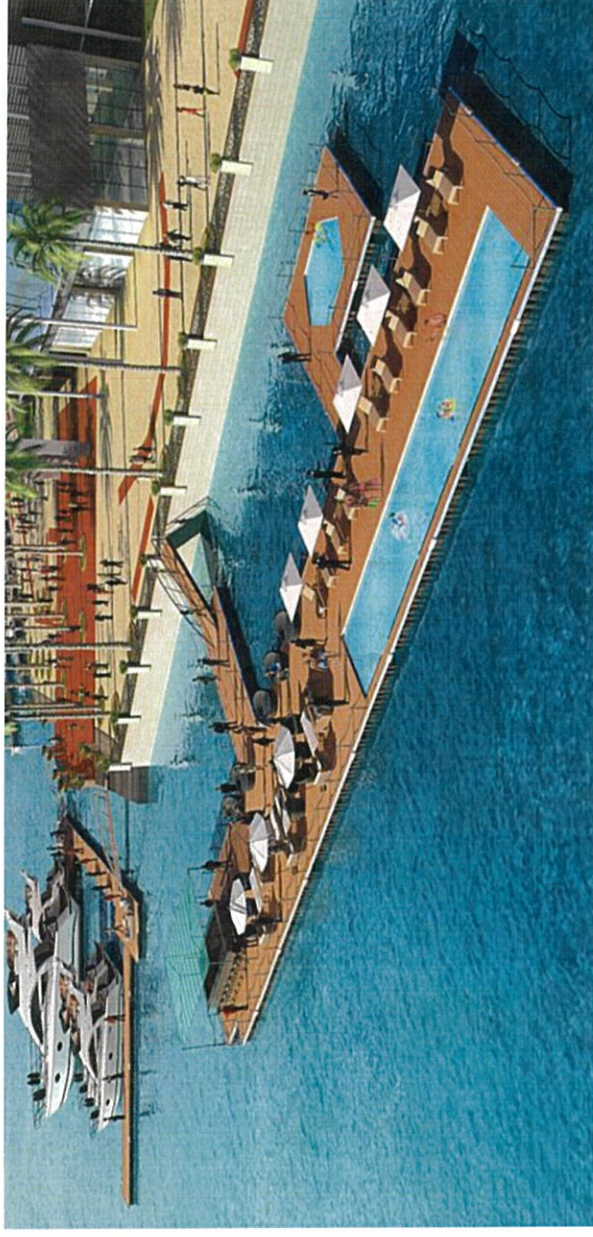
CANADA
Ile Bizard

PORALU
New Line



Needs that can be match

- ✓ Dress up your dock / bank
- ✓ Enhance your heritage
- ✓ Expand your territory on the water
- ✓ Improve the quality of life of city dwellers
- ✓ Offer a pleasant promenade to public along the coastline
- ✓ Develop business and social activities on the waterfront
- ✓ Bring fauna and flora into the city
- ✓ Improve quality of life and well being in the city
- ✓ Create eco-districts





Our solution

- ✓ We do not offer flooring
- ✓ Our goal is to take users for a ride
 - to make them enjoy an exceptional view
 - in a wonderful environment in harmony with water and nature
 - where they will feel good
 - and to which they will wish to return again and again
- ✓ All design & engineering you will request for your project are covered internally under our know-how developed during the past 36 years

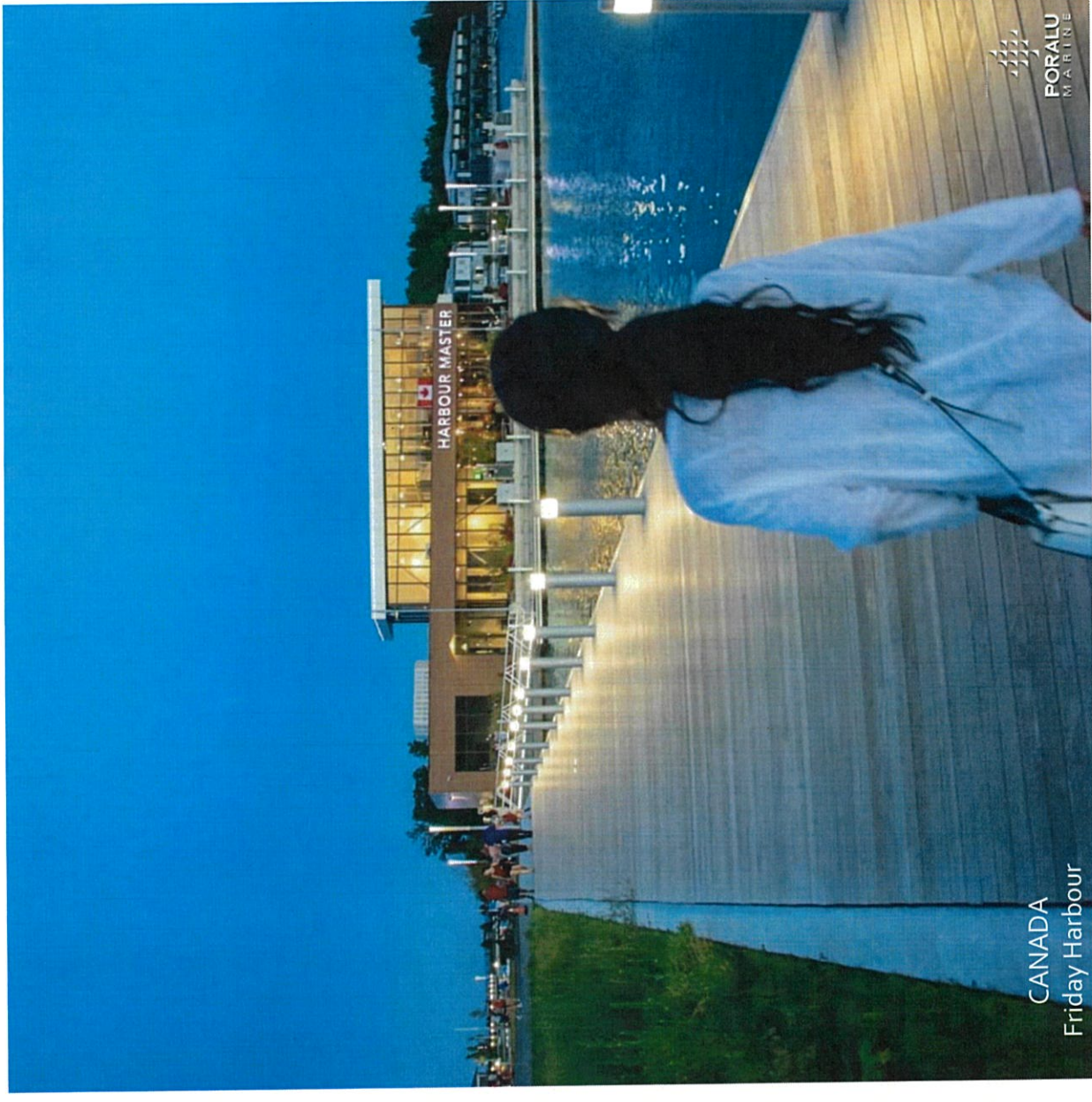


CANADA
Oka Parl



4 reasons to choose aluminium structures

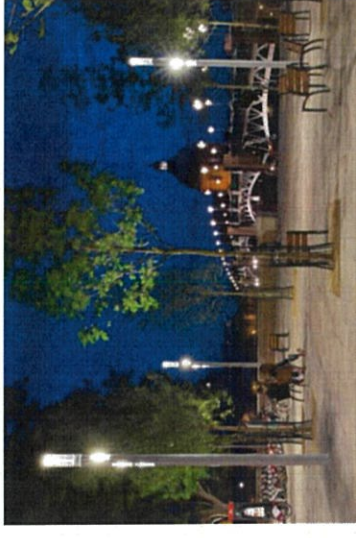
- ✓ Aluminum is Corrosion-resistant, making it hygienic and ever-lasting (over 50 years of life expectancy)
- ✓ Aluminum alloy we use provides the strength of steel with only one-third of the weight
- ✓ Aluminum has a strong capacity to deform itself leading to a good dampening
- ✓ Once extruded, aluminum can be recycled again and again, using a very small fraction of the energy required to make "new" metal
Recycling saves about 95% of the energy required for primary production



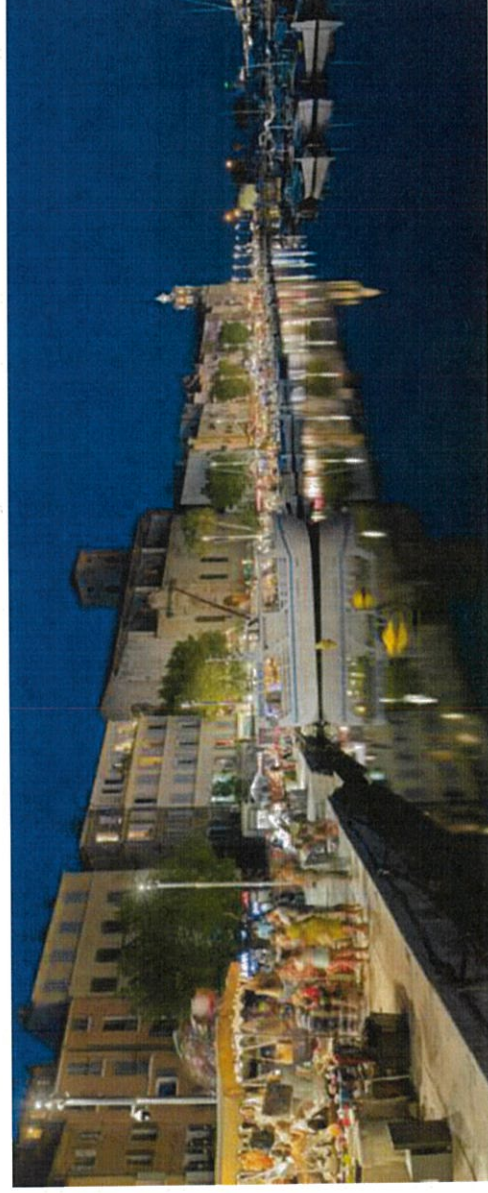
CANADA
Friday Harbour



Make your area a very attractive one



- ✓ Thanks to the **urban furniture** (such as (chairs, benches, tables, etc.)), boaters will be able to enjoy this **relaxing space**
- ✓ which will become a promenade at night with **lighting**
- ✓ A place where **events** can take place thanks to the **passage of networks** (electricity, water) under the platforms
- ✓ Where various **terminals** can be installed
- ✓ With an **easy maintenance** thanks to the **easy access for the maintenance operators**
- ✓ Accompanied by **vegetation**, these platforms will create a **unique waterfront**





Make this place a
fantastic space

Decking

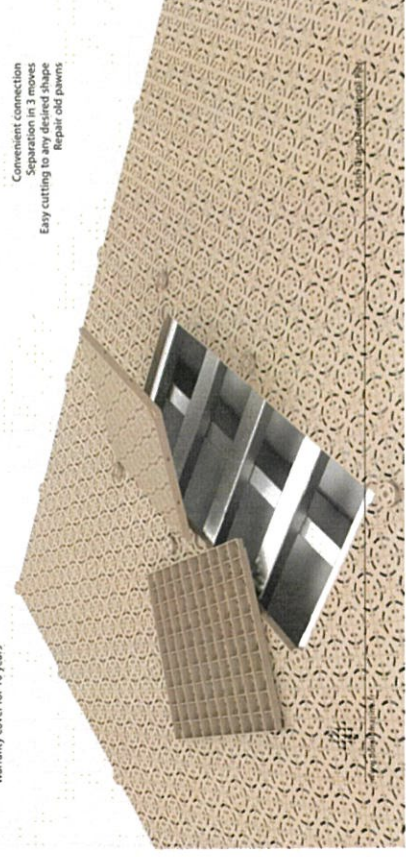
- ✓ Recyclable decking
- ✓ Wood composite
- ✓ Synthetic grass
- ✓ Paving stones
- ✓ Concrete slabs



Surface coatings

Polypropylene Tiles
No need for a nail or screw for installation, installation with special washers for easy handling
100% recycled material, without any environmental pollution
Non-slip surface for high security
Do not break, do not deform and does not smoke
Do not change color, ultraviolet radiation resistant
No maintenance required, no maintenance fee
Easy cleaning and no need for a woman brush
Warranty cover for 10 years

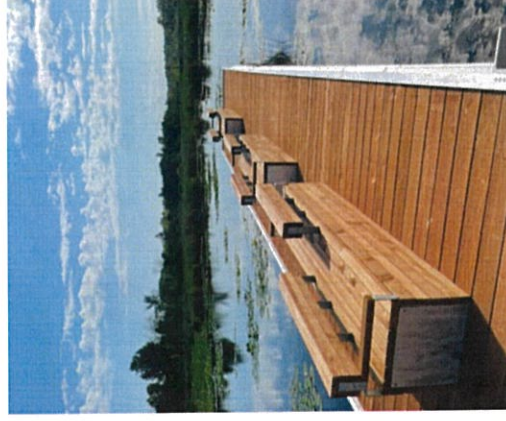
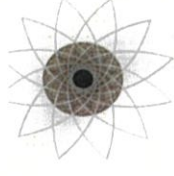
Convenient connection
Can be cut to any desired shape
Easy cutting to any desired shape
Repair old pavements





Make this place a fantastic space

Benches



Decking

- ✓ Ecofriendly
- ✓ Design
- ✓ Various material
- ✓ Integrated vegetation



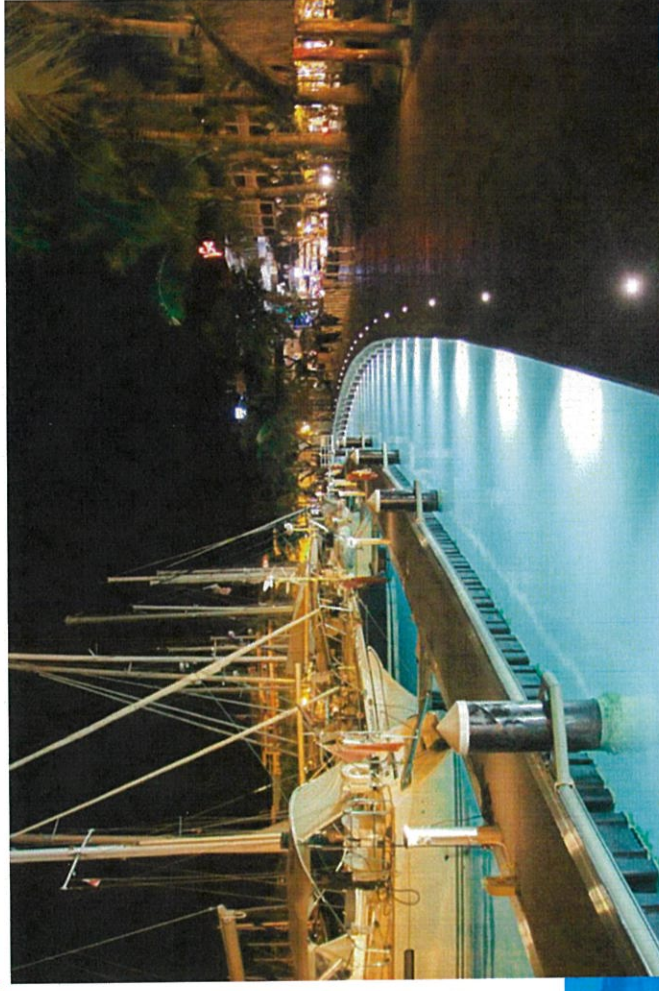
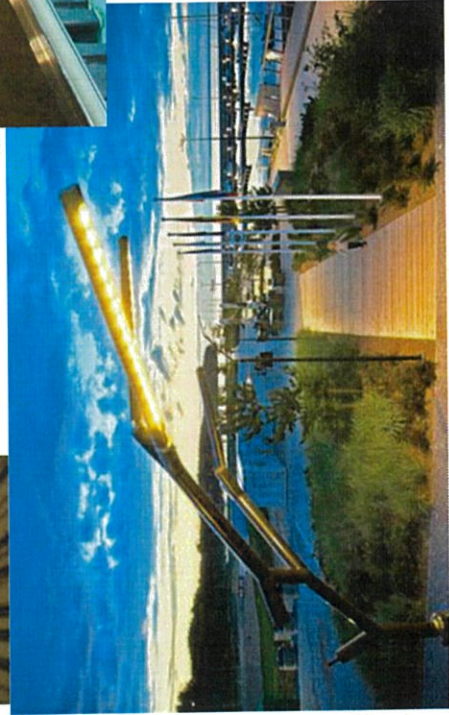
PORALU



Make this place a
fantastic space

Lighting

- ✓ Lampposts
- ✓ Ambient lighting
- ✓ Floor recessed lights

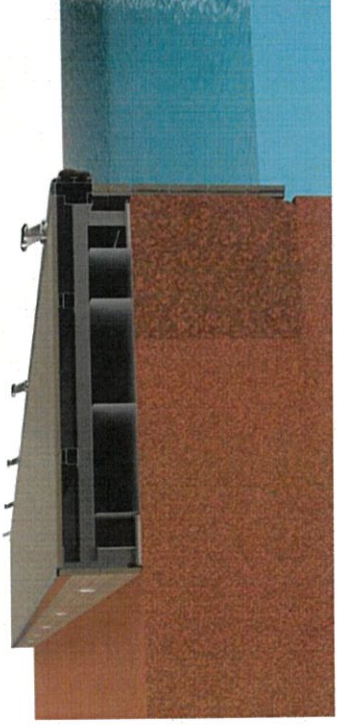
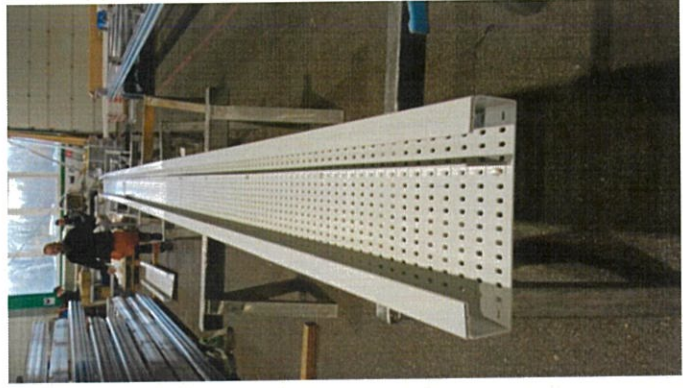




Make this place a
fantastic space

Networks

- ✓ Every kind of network
- ✓ Cables, pipes, pumps, etc.
- ✓ Easy access for maintenance





Some references and ideas

Nantua lake, France
Wetland





Some references and ideas

CANADA
Ottawa

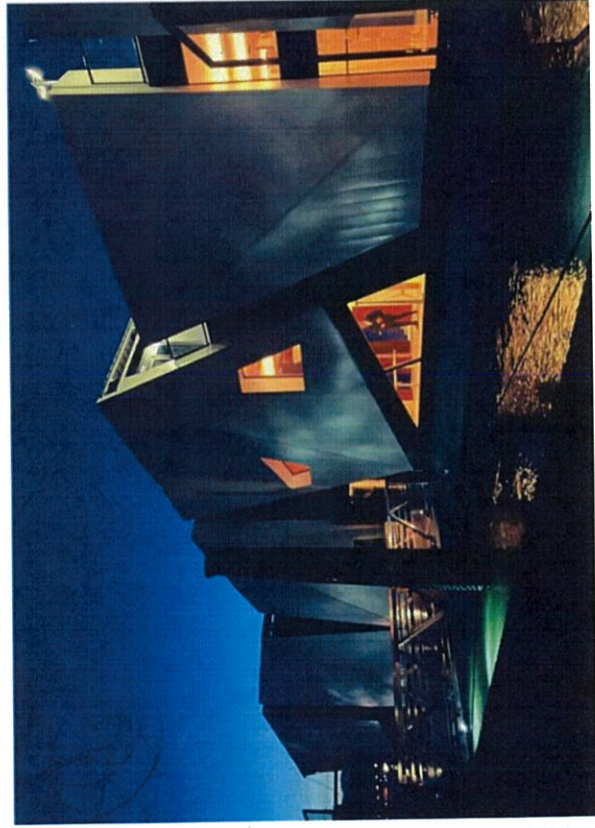
(Under development)





Some references and ideas

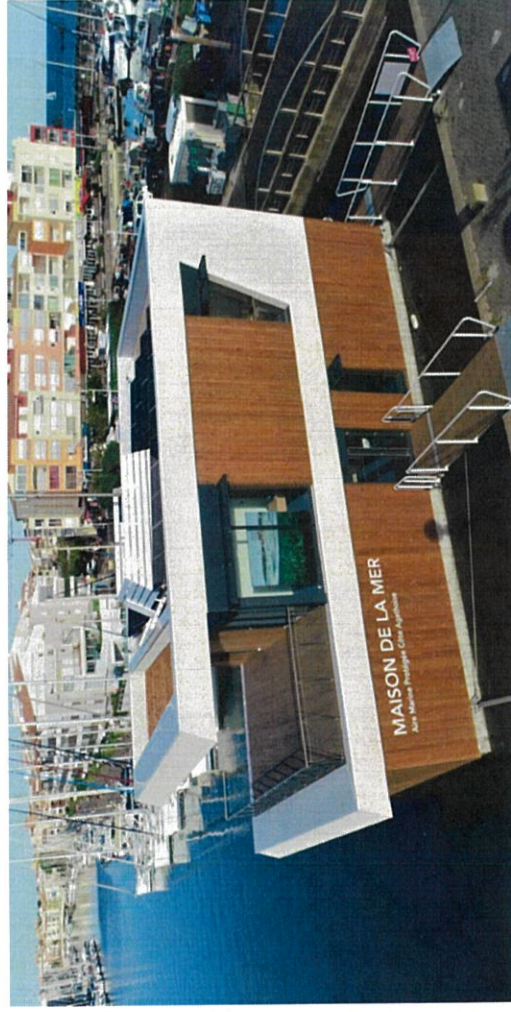
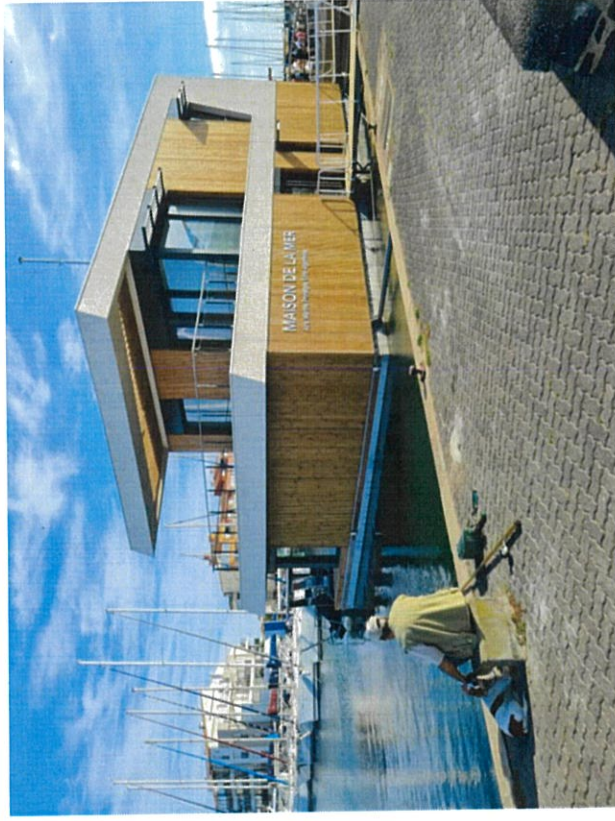
Lyon, France
Floating Théâtre





Some references and ideas

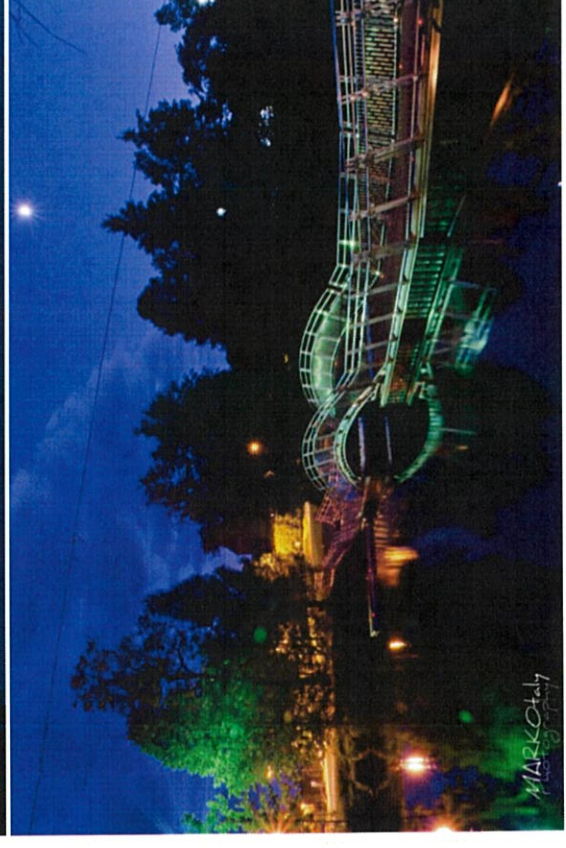
Agde, France
Floating Building





Some references and ideas

Joliette, Canada
Floating Bridge





Some references and ideas

Water Taxi Jetty's



Ottawa, Canada



Quebec, Canada



Doha, Qatar

222
222
222
222

FORALU
MARINE



Some references and ideas

Restaurant and leisure areas



Floating restaurant, Bruinisse, Germany



Floating VIP Restaurant Jetty, Pickering, Canada



Reception floating platform, Lamotte Beuvron, France



Floating swimming pool, Rocquebrune, France

Some references and ideas



Living Place
Roquebrune, France



Some references and ideas



Floating Hotel Project,
Vietnam



Floating sanitation facilities
Cap d'Agde, France

Some references

Public & leisure areas



Floating reception platform, Nanaimo, Canada



Floating Ice Hockey park, Montreal, Canada



Tourism Office floating platform, port Camargue, France



Floating sanitation facilities Cap d'Agde, France



Some references and ideas

AUSTRALIA
Hillary's marina





Some references and ideas

BAHAMAS
Walker's quay

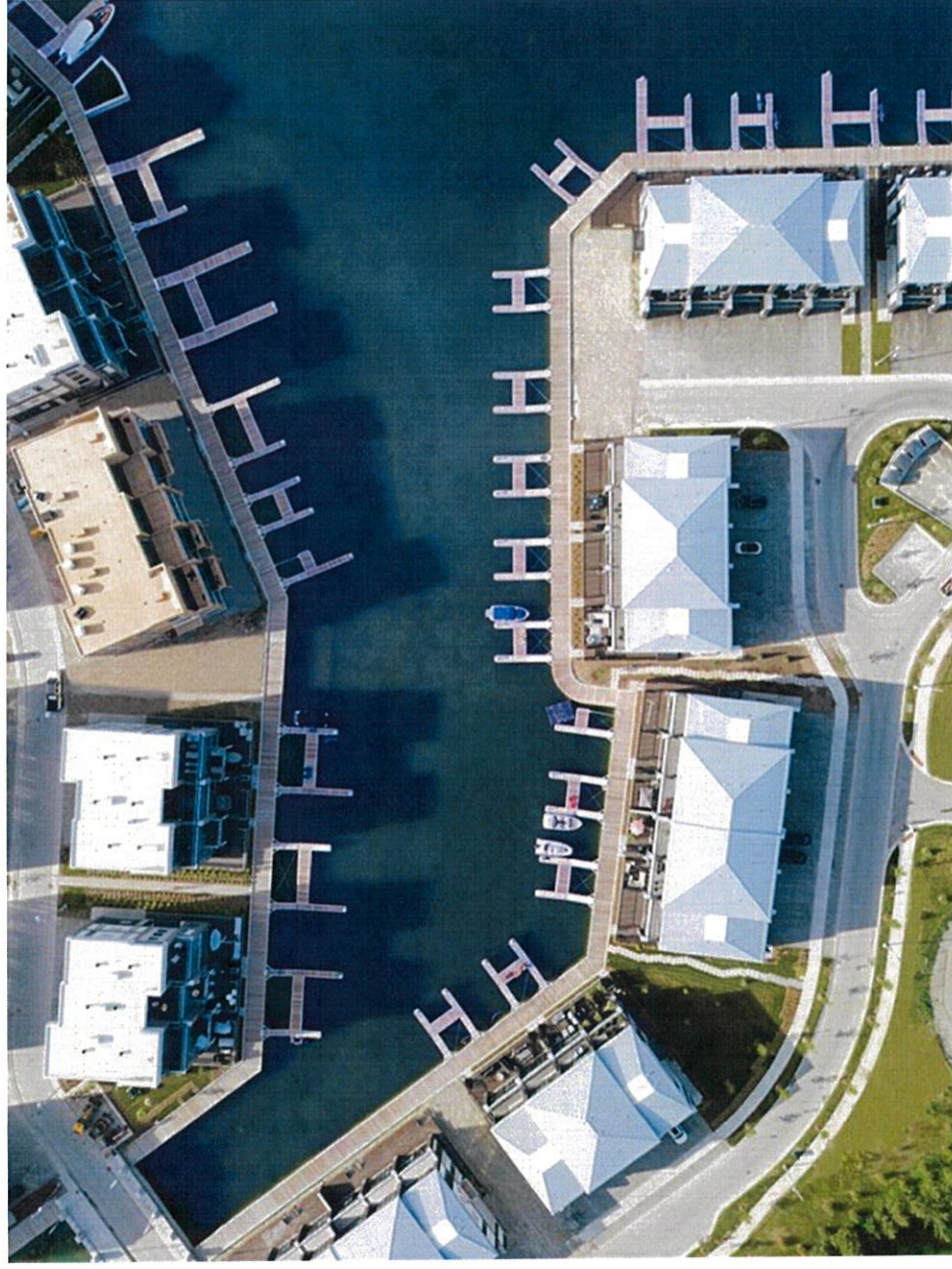


FORALU
MARINE



Some references and ideas

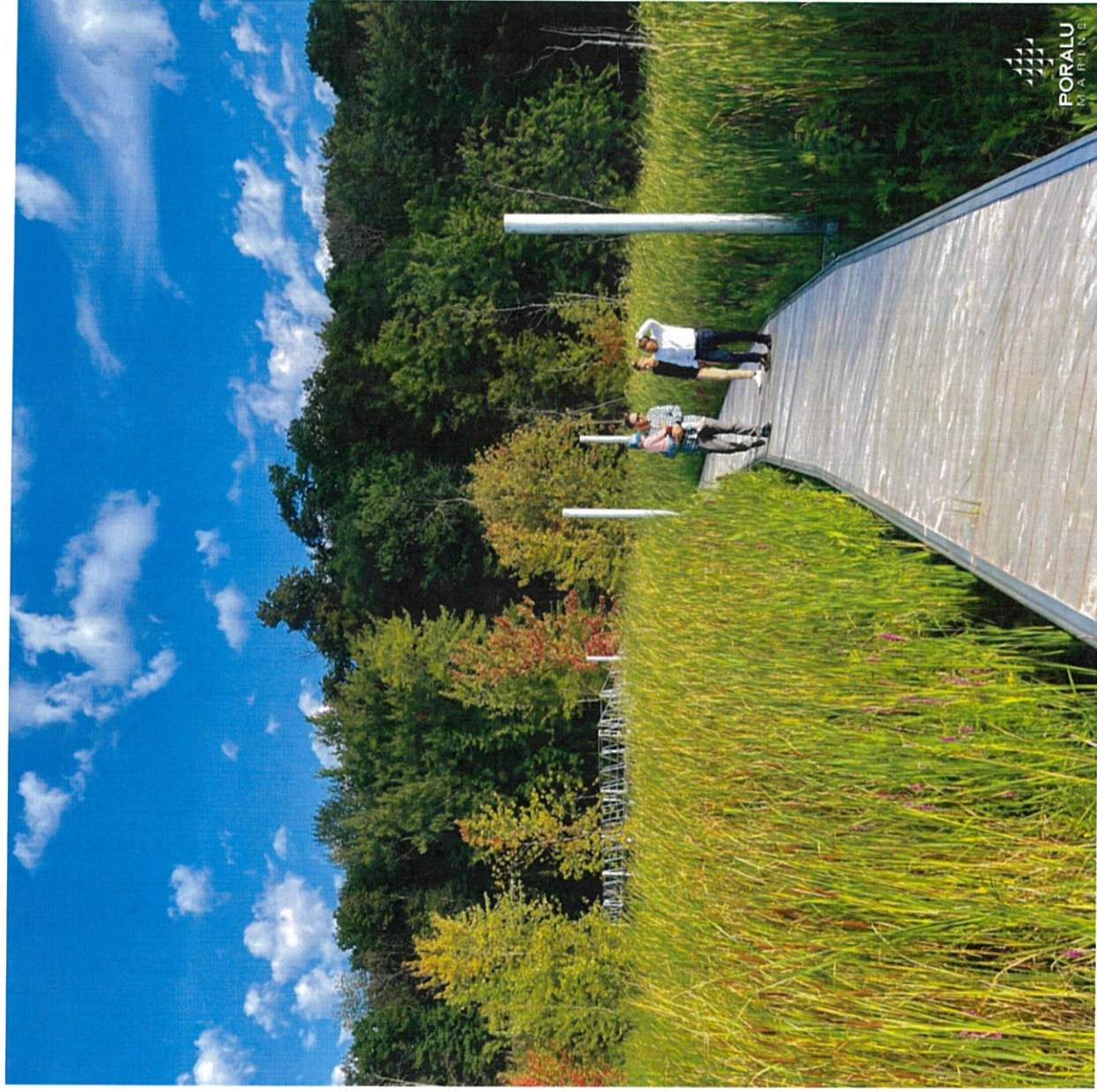
CANADA
Friday Harbour





Some references and ideas

CANADA
Ile Bizard





Some references and ideas

CANADA
Laval





Some references and ideas

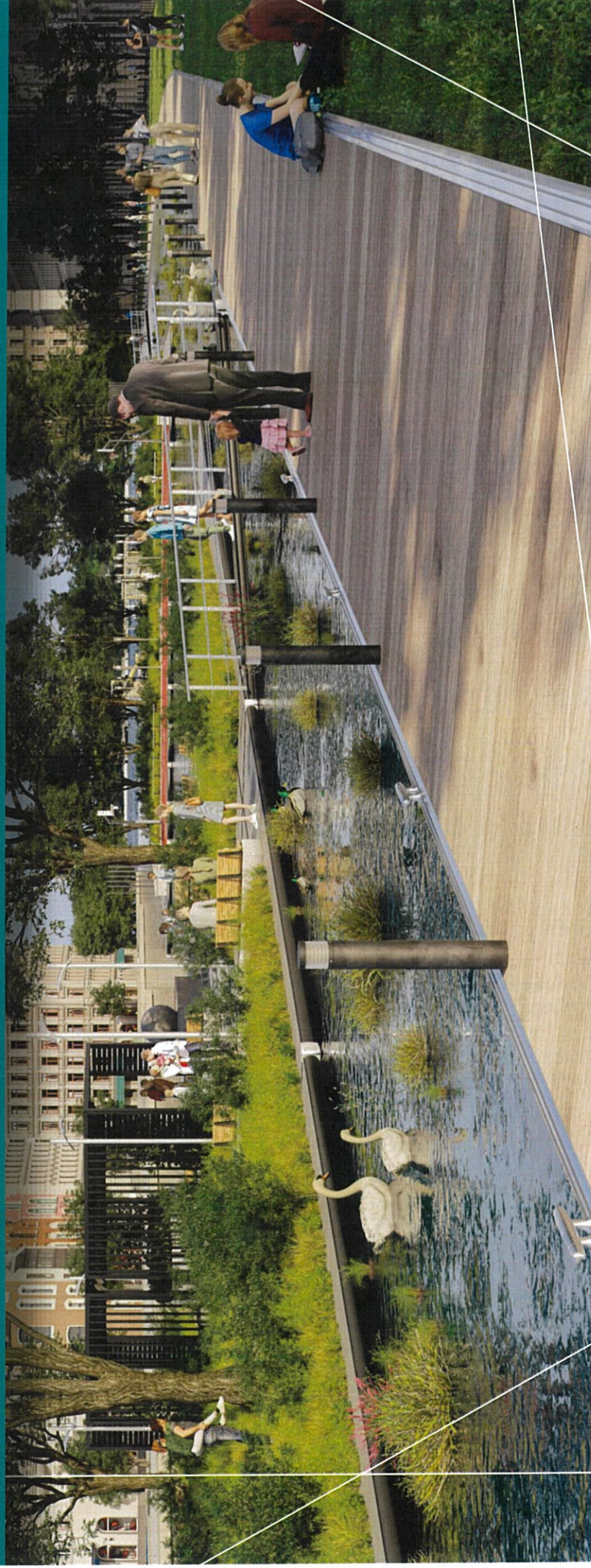
CANADA
Magog



WATERFRONT DEVELOPMENT



PORALU
MARINE



☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy ☐Confidential

From: Cindy Choi - [REDACTED]
Sent: 2025-04-14 星期一 10:53:25
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Cc: Cindy Choi [REDACTED] Daisy Fu
Subject: Representation relating to Draft Tseung Kwan O OZP No. S/TKO/31 ITEM D & E -AREA 132
Attachment: 2025-04-13 TPB OZP No. S_TKO_31 AGHK Objection.pdf; 2025-02-11 AGHK objection on EIA - 309.2024 Tseung Kwan O Area 132_.pdf

Dear Secretary,

We strongly oppose Item D & E of Area 132 and propose respective amendments.

Representer: Association for Geoconservation, Hong Kong

Representer's representative : Choi Mo Ching Cindy (ID Card No. [REDACTED])

Please confirm receipt of our representation with objections and proposed amendment as per attachment. We also attach our previous comments dated 11 Feb 2025 for your reference.

Submission Number:

TPB/R/S/TKO/31- S6

Best regards,

Choi Mo Ching Cindy

Chairman

Association for Geoconservation, Hong Kong
[REDACTED]

13 April, 2025

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

By Email :tpbpd@pland.gov.hk

**OBJECTION TO THE DRAFT TSEUNG KWAN O
OUTLINE ZONING PLAN NO. S/TKO/31
ITEM D & E -AREA 132**

SUMMARY

Regret or Pride for Our Future Generation?

REGRET:

Draft OZP reclamation scheme destroying the natural shorelines of Area 132

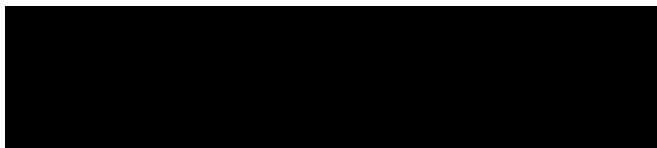
The west coast of Tseung Kwan O between Lei Yue Mun and Tiu Keng Leng was once a jewel for the new town, comprising magnificent sea cliffs, beaches, and rocky reefs of high geodiversity values. These were sadly lost just recently, in 2027, due to the insensitive and over-engineered reclamation scheme of Area 132. Similar to most other areas within the Victoria Harbour, the present waterfront of Tseung Kwan O is dominated by artificial constructions.

PRIDE:

Alternative holistic reclamation scheme preserving the natural shorelines of Area 132

The west coast of Tseung Kwan O is a jewel for the new town, comprising magnificent sea cliffs, beaches and rocky reefs of high geodiversity values. These have been carefully preserved thanks to the holistic reclamation scheme of Area 132. The natural shorelines are now the highlights of an urban geopark frequented by residents, visitors as well as international tourists. The trail from Lei Yue Mun to Tseung Kwan O has become another popular scenic walk in the city. The forward-looking urban design of Area 132 integrating different land use is an international showcase how nature conservation can be in harmony with urban development.

*** HONG KONG NEEDS TO MAKE THE RIGHT CHOICE ***



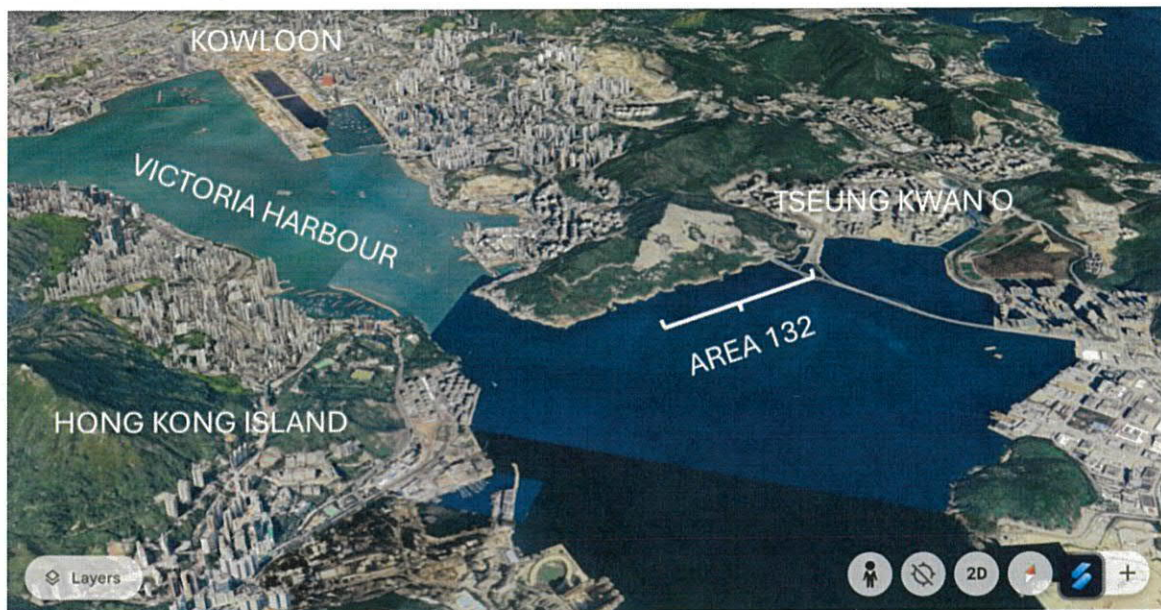
REASONS FOR OBJECTION TO ITEM D & E OF AREA 132

Significant Public Interest at Stake

Hong Kong is a highly compact city dominated by artificial constructions and commercial activities. This is unhealthy for the mental well-being of its citizens, and even more so, for our next generation. There is a real risk that our next generation becomes increasingly disconnected from Nature.

Hong Kong is gifted with a beautiful natural setting, but unfortunately this has not been systematically protected and utilised around the city. While vast areas in Hong Kong have been protected as country parks, these are more remote and often occupy hilly areas. Likewise, we are in need of natural areas highly visible and directly accessible by the public from the urban area. Developments in Hong Kong have been heavily based on engineering solutions, and rarely consider how to integrate the nature into urban development for the well-being and enjoyment of the public.

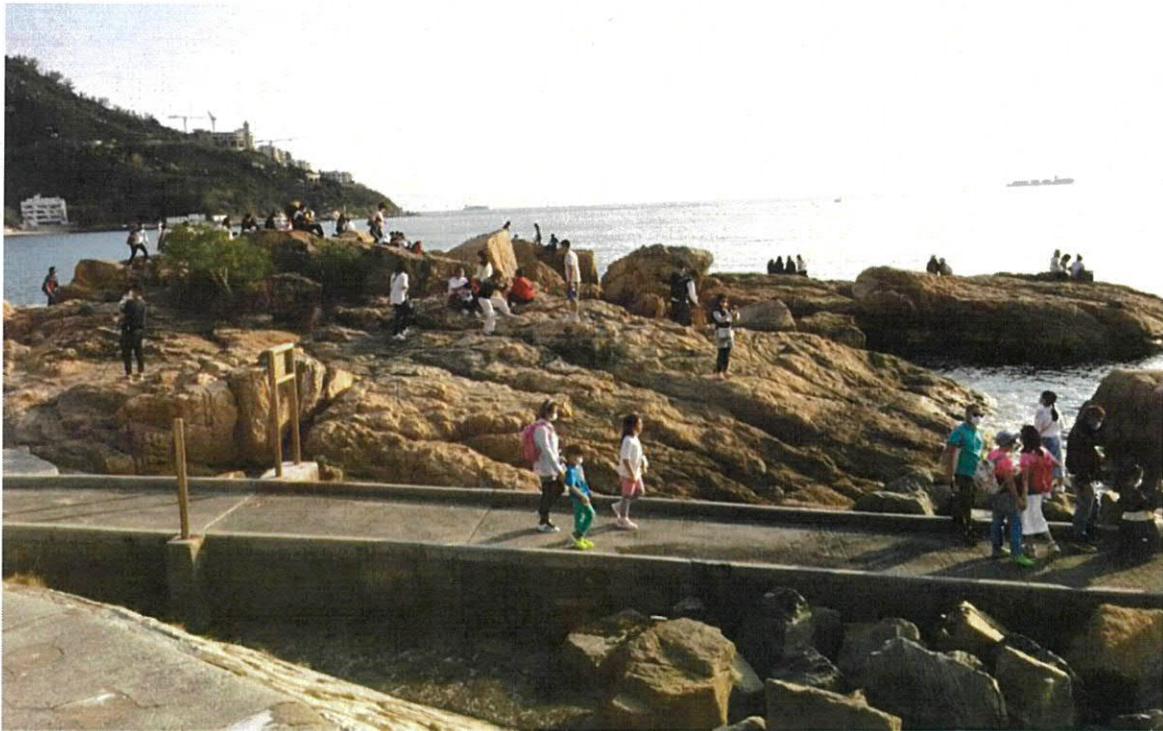
The proposed method of reclamation for Area 132 is outdated and will permanently and irreversibly destroy a valuable natural asset of Hong Kong.



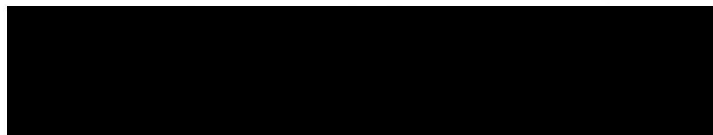
The entire length of one of the last and most important stretches of natural shorelines in the city area will be gone forever. Going ahead with the proposed reclamation scheme of Area 132 is certainly a major mistake for Hong Kong and will be regretted over generations! [Google Earth]



*This entire natural shorelines comprising **spectacular cliffs, beaches, rocky reefs**, etc. around the city will be wiped out by the proposed Area 132 reclamation scheme, yet this has been completely undermined in the EIA process. [Google Earth]*



The public appreciates and enjoys natural shorelines. Shorelines which are readily accessible are particular popular among visitors (Stanley, Hong Kong).



Irreversible Destruction of a Valuable Natural Asset for Hong Kong

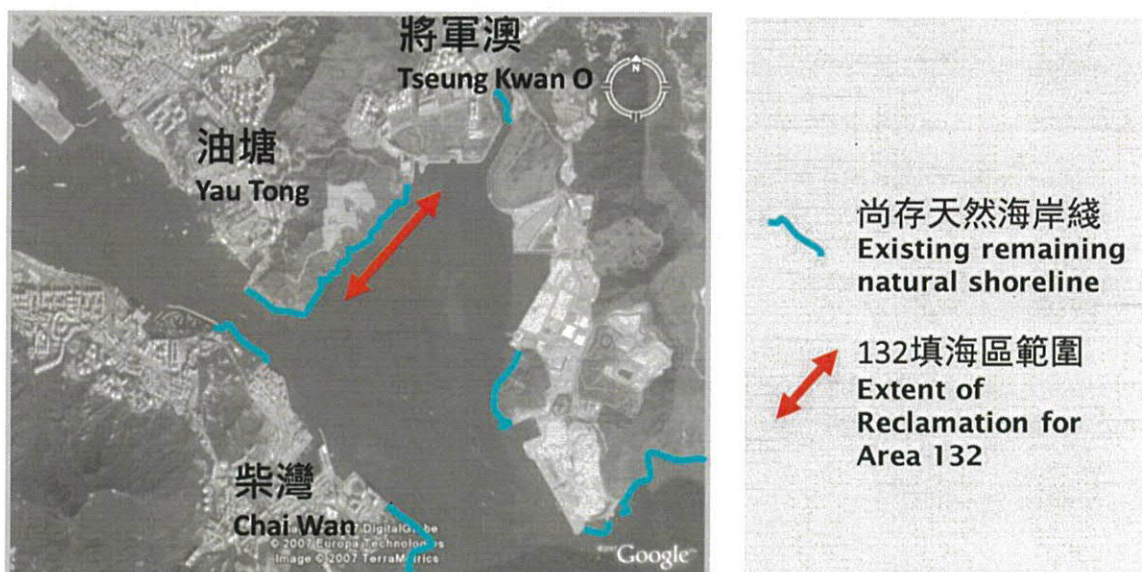
The proposed reclamation scheme at Area 132 is unacceptable as there will be permanent, massive, and irreversible destruction of the valuable natural shorelines with high geodiversity and landscape values.

The proposed reclamation scheme will permanently destroy a highly valuable natural asset of Tseung Kwan O right at the entrance gateway of Victoria Harbour. This point is particularly valid as Hong Kong is striving to uphold and promote its unique identity. Preserving scenic natural shorelines within the urban areas is vital to make Hong Kong unique and outstanding among other key cities.

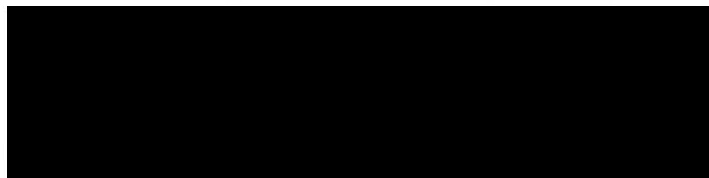
The proposed development plan for Area 132 solely for industrial purposes violates Government's current direction of encouraging multiple usage of valuable land resources. It may be noted that even the sludge treatment facility at T-Park, Tuen Mun is now promoted for recreation, education, and ecology for the public.

Government's current policy to promote Hong Kong is "There is no shortage of places to visit". It must be pointed out that such vision needs to be supported by a concrete strategy to conserve any valuable scenic resources from massive destruction by developments. Furthermore, Mr XIA Baolong, the Hong Kong Macau Affairs Office Director, urged Hong Kong to make good use of Hong Kong's 1,180 kilometres of coastlines ... for tourism in November 2024. It must be pointed out that, unlike Hong Kong, most other cities do not have the privilege of such proximity to scenic coastlines.

Overall, the proposed reclamation scheme is going to destroy a natural asset of immense value to Hong Kong. This must be stopped and replaced by a more holistic design scheme.

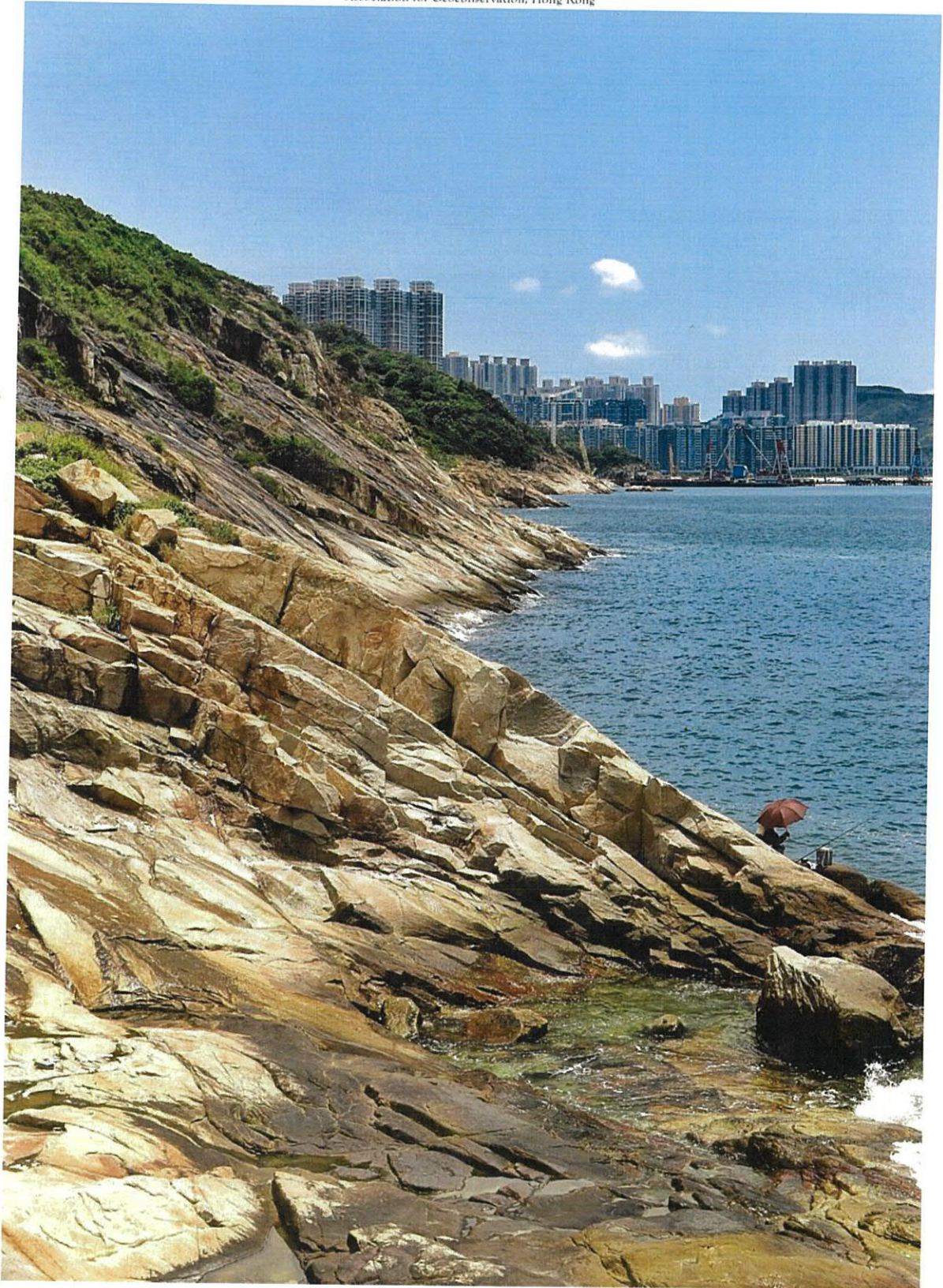


Natural shorelines around the city areas of Hong Kong are already scarce. The proposed scheme of Area 132 will be a major blow to the unique scenic setting of the city of Hong Kong.





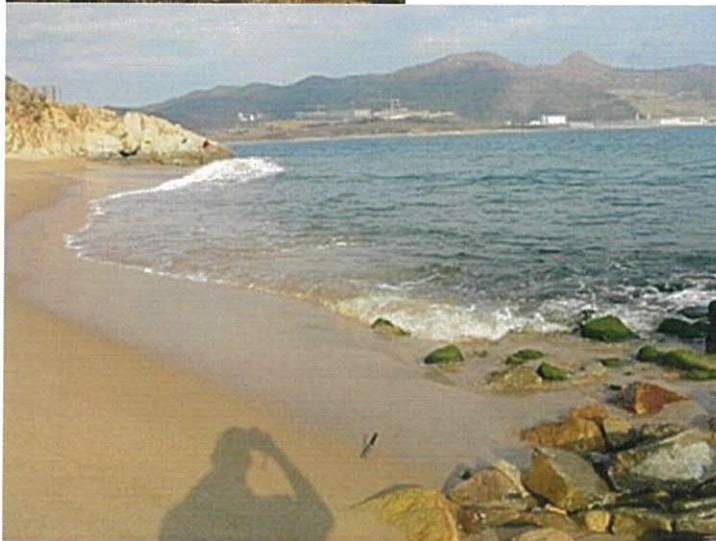
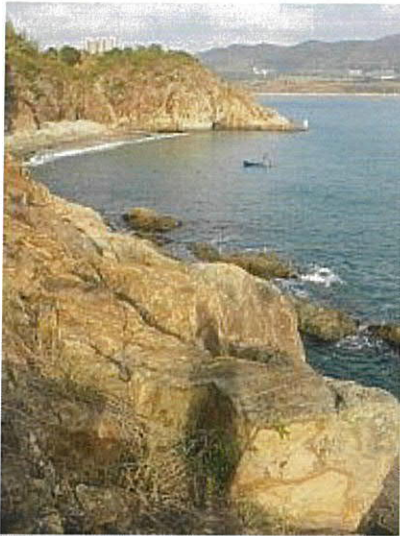
香港地質岩石保育協會
Association for Geoconservation, Hong Kong



The beautiful shorelines of Area 132 is a valuable asset of Tseung Kwan O New Town in the background. Hong Kong will regret if these are lost. (Courtesy: HKOWL)



香港地質岩石保育協會
Association for Geoconservation, Hong Kong

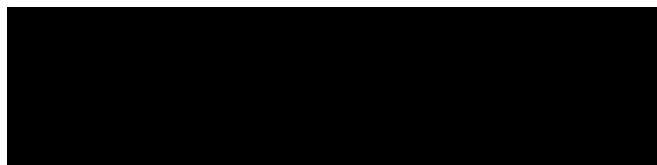


These beaches at Area 132 are the only remaining ones in Tseung Kwan O. Beaches are valuable recreational and tourism resources. They are also ideal landing sites for users from the planned Water Sports Centre at Tseung Kwan O Area 77

Geodiversity Values

In the past decades, Geodiversity is increasingly recognised worldwide and by the authoritative International Union for Conservation of Nature (IUCN) as the equal partner of Biodiversity in the definition of “Nature” (https://iucn.org/sites/default/files/2025-01/meaning-of-nature_pdf-final.pdf). Furthermore, UNESCO already designated the 6th October every year to be the “International Geodiversity Day” in 2021.

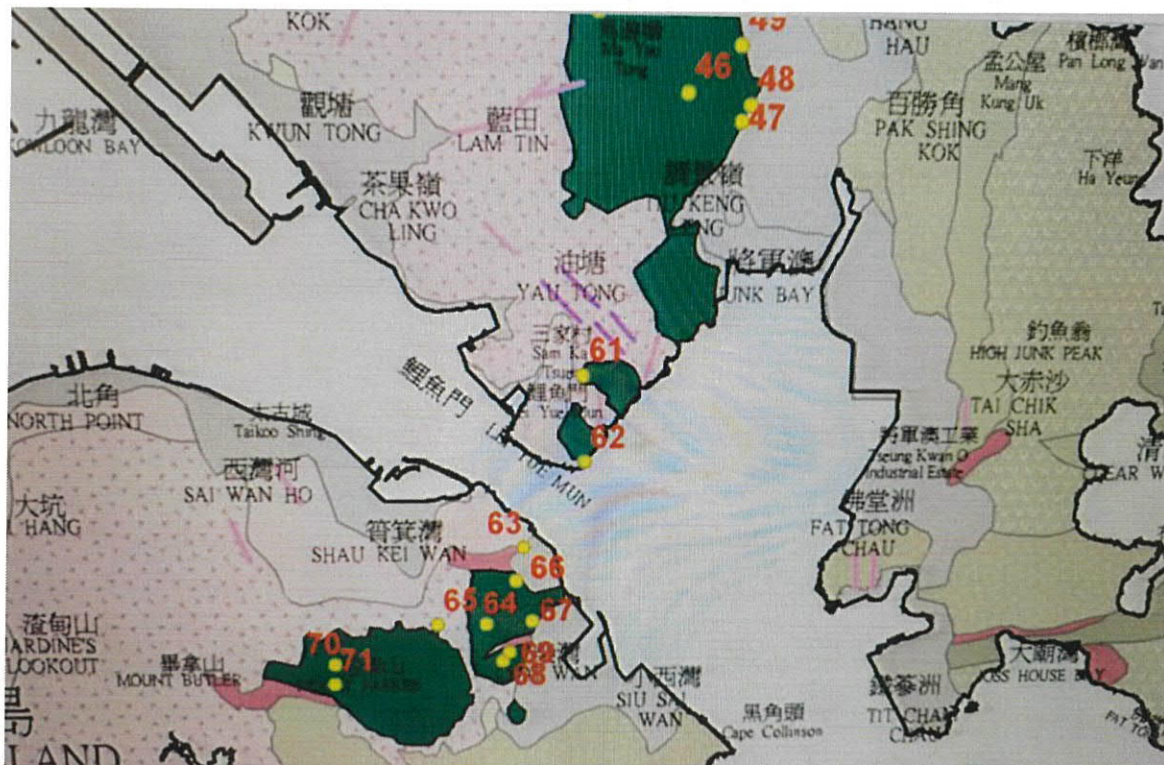
The natural shorelines at Area 132 have very high values in geodiversity, highlighting the transition from volcanic formation in Sai Kung to granitic intrusion in the city. In fact, the shorelines not only consist of both rock formations, but also granite which has been metamorphosed to “Greisen” with mineralisation including beryl, wolframite and other interesting minerals. The stretch of coastlines also consists of dramatic “Sheeting Joints” in



granite featuring steeply inclined rock faces plunging into the sea. The coastal landscape has been formed over a very long period of times in terms of thousands of years, yet the proposed reclamation will erase such heritage in a matter of no time.

The diversified rock formations have been impacted by weathering, wave erosion and deposition, forming beaches, sea cliffs and rugged rock slopes of very high scenic and landscape values. The area is an invaluable natural asset which contributes to the unique scenery of the Tseung Kwan O New Town. There are immense opportunities for scientific research, earth science education, natural landscape appreciation, and recreation.

There may also be potential of finding ancient rock carvings in the area, given that six sites of monument status have been discovered in the eastern coastal area of Hong Kong.



Geological setting at Area 132 with alternating volcanic formation (green) and granitic intrusion (pink) [CEDD geological map]

The flawed EIA Process

We have been active in advocating the preservation of the natural shorelines at Area 132 as early as 2007 when a major reclamation was proposed at the same location to construct the toll plaza of Tseung Lam Tunnel. Thanks to the understanding of the then Civil Engineering and Development Department (CEDD), the tunnel route was completely revised and the entire shorelines were preserved.

By March 2023, CEDD again announced the plan for a reclamation scheme at Area 132 which was a real shock. We immediately submitted a letter to CEDD on 28 March 2023 and subsequently met the then responsible CEDD staff on 25 July 2023, pointing out the value of the shorelines and urging for a far more sensitive solution.

We were astonished when the Environmental Impact Assessment (EIA) report was released in December 2024. It was obvious that CEDD had decided not to pay any attention to our concerns on natural shorelines. Subsequently we submitted a letter of objection on the EIA dated 11 Feb 2025 (attached) to substantiate our viewpoint.

The minutes of the EIA Subcommittee meeting and recommendations to the Advisory Council on the Environment (ACE) are contained in the following documents:

- ACE Paper 5/2025 For advice on 7 April 2025 Report on the 160th Environmental Impact Assessment Subcommittee Meeting
- Annex B to ACE Paper 5/2025 "Relevant extract of the draft minutes of the Environmental Impact Assessment Subcommittee meeting held on 17 March 2025"

In these documents, key points raised by our organisation and many others sharing similar views have been omitted completely. In this respect, we have lost confidence in the credibility of the EIA process and have to resort to the OZP stage in changing the development scheme.

Further Damage with the Tiu Keng Leng- Yau Tong Highway.

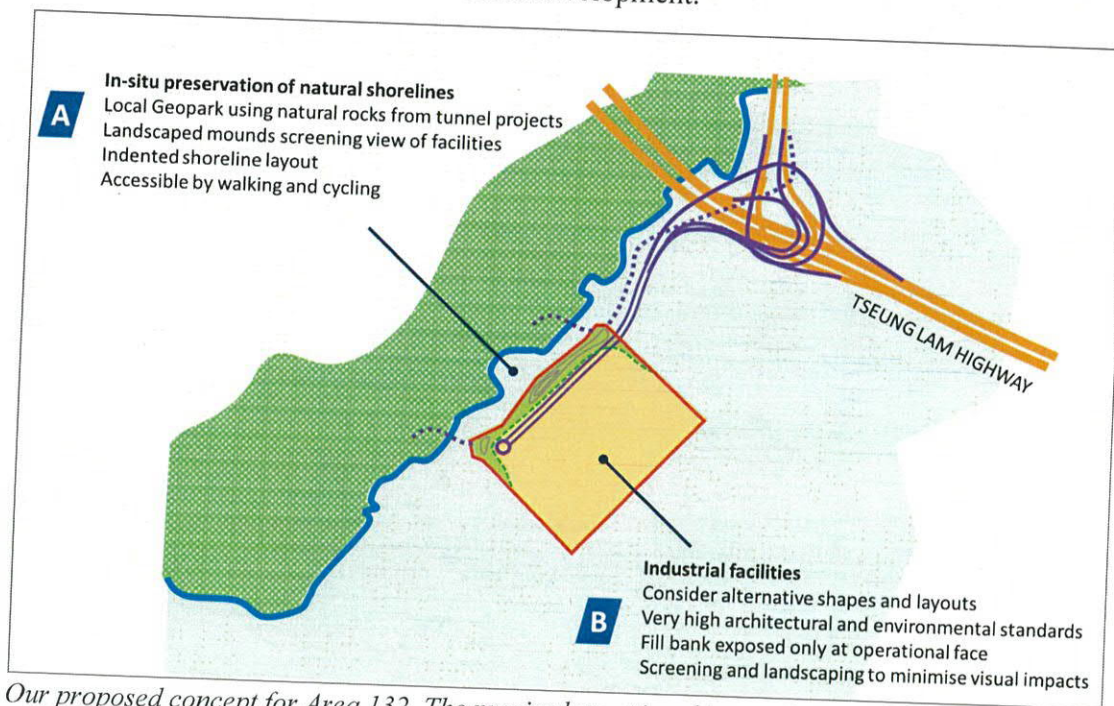
There is little information about the routing of this highway currently under investigation. We are very concerned that the highway may become an extension of the access road for Area 132. This will further destroy the natural shorelines in the area but the issue has not been addressed in the draft OZP or the previous EIA.

OUR PROPOSED AMENDMENT TO THE DRAFT OUTLINE ZONING PLAN NO. S/TKO/31 ITEM D & E -AREA 132

We are seeking to have the entire shorelines of Area 132, Tseung Kwan O rezoned as "Coastal Protection Area" whereas the reclamation is shifted offshore, with the side facing the shorelines rezoned for "Recreation and Open Space".

It is our aim to rezone 100% of the affected shorelines as CPA and to have an entirely offshore reclamation, but some reduction would be acceptable if the primary objective of preserving the natural shorelines is attained.

This will in turn provide an excellent showcase for urban design integrating nature conservation and recreation with industrial land use. This is also in line with the latest international trend for sustainable urban development.



Our proposed concept for Area 132. The precise layout is subject to further evaluation.

Case for Coastal Protection Area

The shorelines of Area 132 fits well into the planning intention of CPA as "This zoning is intended to conserve, protect and retain the natural coastlines and the sensitive coastal natural environment, including attractive geological features, physical landform or area of high landscape, scenic or ecological value, with a minimum of built development. It may also cover areas which serve as natural protection areas sheltering nearby developments against the effects of coastal erosion."

https://www.tpb.gov.hk/en/forms/Schedule_Notes/msn_cpa_e.pdf

Precedence of Offshore Reclamation

In Hong Kong there are already ample precedent examples of intentionally preserving the natural shorelines in reclamation projects. These include:

- Disneyland Hong Kong (very long narrow one-way channel)
- Offshore island for incinerator site at Shek Kwu Chau (narrow two-way channel)
- Tung Chung, Airport (wide two-way channel)
- Hoi Sham Park (shorelines preserved)
- Tai Ho Bay (entire stream mouth preserved)
- Central Waters reclamation (complete avoidance of natural shorelines)

These examples illustrate the forward thinking in town planning throughout the history of Hong Kong. The proposed reclamation scheme of Tseung Kwan O at Area 132 will be a very backward showcase of town planning for Hong Kong. On the other hand, alternative offshore reclamation will be an excellent model of how to integrate development with nature conservation in Hong Kong.

It is understood that the project proponent has rejected the proposal of an offshore island for the following reasons:

- To minimise the size of the reclamation
- To push back the reclamation onto the hillside to minimise visual impacts
- To provide a direct land connection for the power cables

We are unconvinced with these arguments in that:

- The potential of the highly valuable natural shorelines will be permanently lost while the benefits in minimising the reclamation and mitigating visual impacts will only be marginal. This point needs to be clearly conveyed to residents in the area.
- There are many options for the routing of power cables- along bridges, under water, in tunnels, and overhead. All these can and have been adopted in Hong Kong without security or technical problems.
- Even if the power cables have to be directly connected to the land, the natural shorelines can still be largely preserved with a one-way channel in conjunction with a culvert. The one-way channel at Disneyland Hong Kong is 2km in length.



香港地質岩石保育協會
Association for Geoconservation, Hong Kong



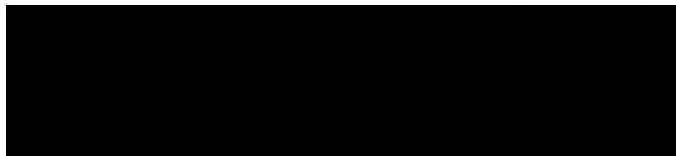
In-situ preservation of the 2km long natural shorelines at Disneyland Hong Kong, Lantau Island. It would be an excellent idea to further convert the strip of the reclamation along the channel to become a linear public park where visitors can enjoy the scenery of the preserved relic of the coastal landscape. [Google Earth]

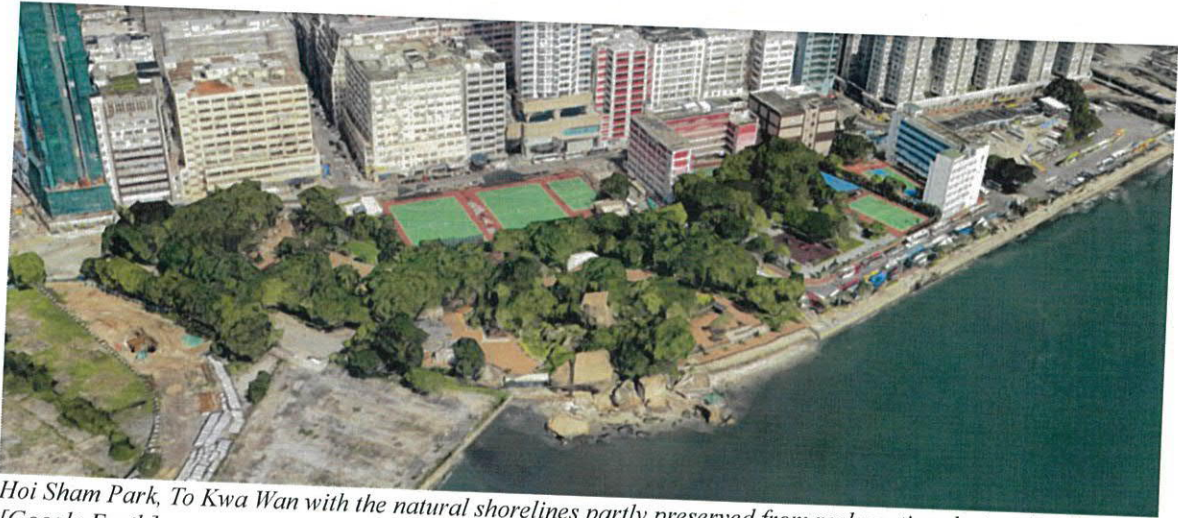


Intentional preservation of natural shorelines at Shek Kwu Chau with offshore reclamation island for the incinerator site [Google Earth]

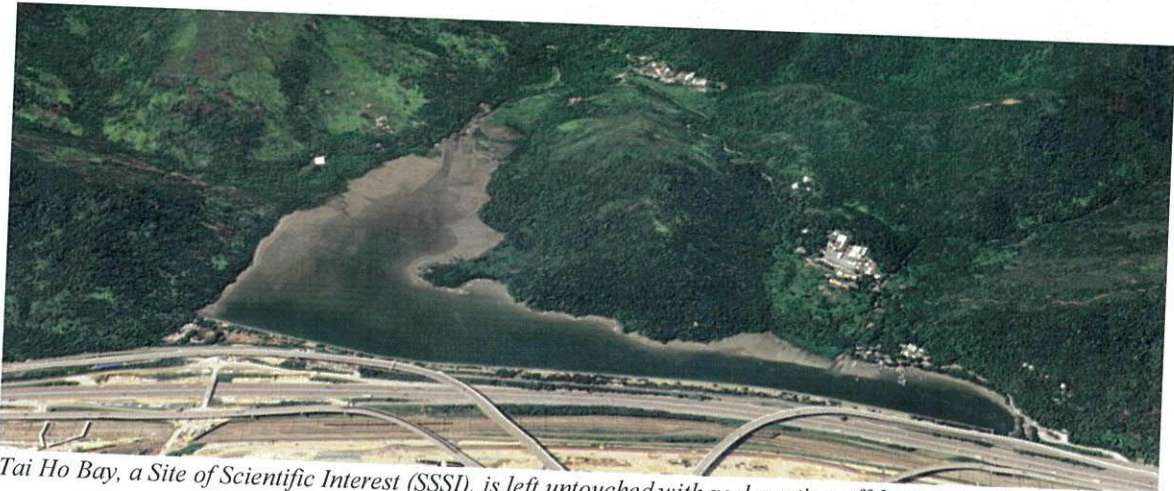


Intentional preservation of natural shorelines at Tung Chung, Hong Kong International Airport and the Hong Kong-Zhuhai-Macao Bridge corridor [Google Earth]





Hoi Sham Park, To Kwa Wan with the natural shorelines partly preserved from reclamation during the 1960s. [Google Earth]



Tai Ho Bay, a Site of Scientific Interest (SSSI), is left untouched with reclamation offshore [Google Earth]



The island of Kau Yi Chau and other nearby islands with their natural shorelines will be entirely preserved in the proposed Central Waters reclamation. They are considered valuable assets for the urban design rather than constraints to the development. [source: DevB]

We strongly oppose Item D & E of Plan No. S/TKO/31 and sincerely wish our proposed amendment will be seriously studied and considered.

Best regards,

As signed

Choi Mo Ching Cindy (ID Card No [REDACTED])
Chairman
Association for Geoconservation, Hong Kong
[REDACTED]

Enclosed our previous submission dated 11 Feb 2025 for your reference.



香港地貌岩石保育協會
Association for Geoconservation, Hong Kong

11 February, 2025

By email only : [REDACTED]

[REDACTED]

Attn: Dr. Samuel CHUI, JP, Director of Environmental Protection

URGENT

Dear Dr. Samuel CHUI, JP

Re: EIA - 309/2024 Development of Tseung Kwan O Area 137 and Associated Reclamation Sites

COMMENTS AND OBJECTION

We are writing to strongly object to the proposed reclamation at Tseung Kwan O Area 132 which has been proposed to support the development at Area 137.

We have been active in advocating the preservation of the natural shorelines at Area 132 as early as 2007 when a major reclamation was proposed at the same location to construct the toll plaza of Tseung Lam Tunnel. Thanks to the understanding of the then Civil Engineering and Development Department (CEDD), the tunnel route was completely revised and the entire shorelines were preserved.

By March 2023, CEDD again announced the plan for a reclamation at Area 132 which was a real shock to our organisation. We immediately submitted a letter to CEDD on 28 March 2023 and subsequently met the then responsible CEDD staff on 25 July 2023, pointing out the value of the shorelines and urging for a far more sensitive solution. The key materials we prepared remain valid and are attached here to form part of this letter.

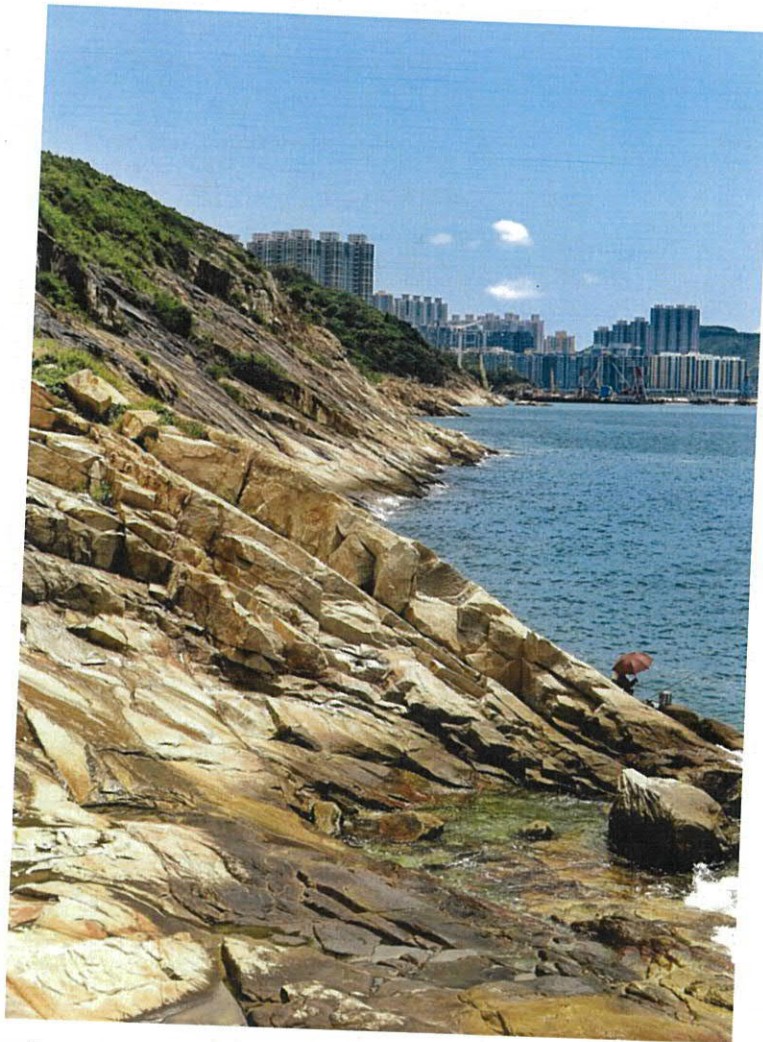
In summary, we would like to reiterate the following points:

- The proposed reclamation at Area 132 is unacceptable as the primary impacts are permanent, massive, and irreversible destruction of the invaluable natural shorelines with high geodiversity and landscape values.
- The proposed reclamation will permanently destroy a highly invaluable natural asset of Tseung Kwan O right at the entrance gateway of Victoria Harbour. This point is particularly valid as Hong Kong is striving to uphold and promote its unique identity. Preserving scenic natural shorelines within the urban areas is vital to make Hong Kong different from other cities.
- The proposed development plan for Area 132 solely for industrial purposes violates Government's current direction of encouraging multiple usage of valuable land resources. It may be noted that even the sludge treatment facility at T-Park, Tuen Mun is now promoted for recreation, education, and ecology for the public by EPD.



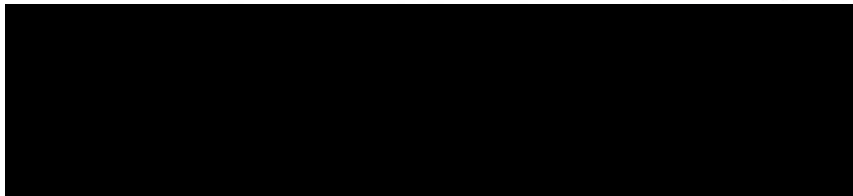
香港地貌岩石保育協會
Association for Geoconservation, Hong Kong

- Government's current policy to promote Hong Kong is "There is no shortage of places to visit". It must be pointed out that such vision needs to be supported by a concrete strategy to conserve any valuable scenic resources from massive destruction by developments. Furthermore, Mr XIA Baolong, Director of Hong Kong and Macao Work Office, urged Hong Kong to make good use of Hong Kong's 1,180 kilometres of coastlines ... for tourism in November 2024. It must be pointed out that, unlike Hong Kong, most other cities do not have the privilege of such proximity to scenic coastlines. In this respect, any further loss of natural shorelines, must be avoided.



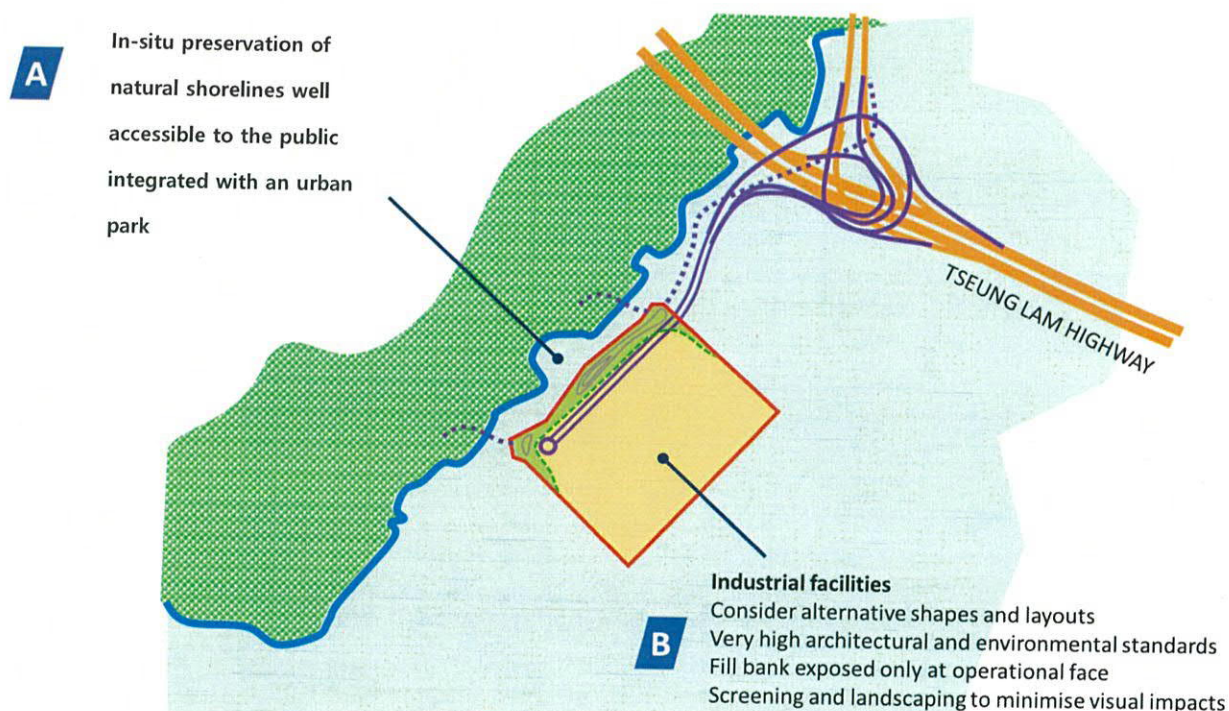
*The beautiful shorelines of Area 132 is a valuable asset of Tseung Kwan O New Town in the background
(Courtesy: HKOWL)*

- As a minimum acceptable solution, the proposed reclamation of Area 132 would be an offshore island with the primary objective of preserving the integrity of the entire natural shorelines. It may be noted that there are already ample precedent examples of such design- Offshore island for incinerator at Shek Kwu Chau (two-way channel), Hong Kong Disneyland (very long one-way channel), Tai Ho Bay (Entire stream mouth preserved), etc. Furthermore, the preserved shorelines should be well accessible to the public and be integrated with an urban park.





香港地貌岩石保育協會
Association for Geoconservation, Hong Kong



Offshore island and urban park concept (subject to refinement)

COMMENTS ON CHAPTER 11 LANDSCAPE AND VISUAL IMPACT ASSESSMENT (LVIA) OF THE EIA REPORT

Key Points of the EIA Report

The landscape impacts on the shorelines of Area 132 are covered in Table 11.3 *Landscape Resources and Their Sensitivity* under Section 11.5, as follows:

- LR 9: Rocky Shore along Western Coastline of Junk Bay “The quality and significance of these natural coastlines are high with relatively low tolerance to change. Hence, the sensitivity of this LR is considered as High.”
- LR 13: Sandy Shore along Western Coastline of Junk Bay “The quality and significance of these sandy beaches are high with relatively little tolerance to change, hence the sensitivity of the landscape resources is High.”

The impacts for LR 9 and LR 13 are given in Table 11.6 *Magnitude of Landscape Changes during Construction and Operation* and related paragraphs, as follows:

LR 9 – Rocky Shore along Western Coastline of Junk Bay

11.6.15 This LR refer to the rocky coastline at the foothill of southeast of Devil's Peak within the Study Area. The sensitivity of this LR is considered as high due to its natural formation characteristics. Approx. one-third of the coastline would be affected by the proposed reclamation works and road works for TKO 132 during the construction phase due to the proposed reclamation



works and road works. Upon the completion of works, some of the existing vegetation along the coastline would be removed permanently and replaced by artificial seawall. The compatibility of the proposed works is low while changes are irreversible. Considered that the proposed works are relatively in large scale, the magnitude of impact on this LR due to the Project is considered as moderate. The it is assumed that the resultant unmitigated impact during construction and operational phases would be moderate.

LR 13 – Sandy Shore along Western Coastline of Junk Bay

11.6.19 The natural coastal features of this LR mainly located at the foothill of the east of Chiu Keng Wan and Devil's Peak within the Study Area. A small portion of this LR may potentially be affected by the construction works of the proposed roads connecting to Tseung Lam Highway during the construction. Upon completion of works, a small portion of the sandy beaches and the associated vegetation may be permanently replaced by viaduct structures. The changes would be irreversible while the degree of compatibility of the proposed works is considered as low. The magnitude of change on this LR due to the Project is considered as slight and localised. Given to its high sensitivity, the resultant unmitigated impact during construction and operational phases is moderate.

Section 11.8 *Landscape and Visual Mitigation Measures* summarises the residue impacts upon implementation of the proposed mitigatory measures, as follows:

11.9.7 For LR 6 and LR13, a small portion of the existing water body and natural sandy shoreline will be permanently lost to the proposed development primarily for housing provision without mitigation measures. Reclamation method should avoid massive destruction to the existing seabed and its habitat. Mitigation measures to adopt the eco-shoreline design to enhance the landscape and ecological value to the new reclaimed land is one of the factors to mitigate the disturbed shoreline amenity. It is considered that the residual impact on LR13 is moderate during the construction phase and in Day 1 of operation, but slight in Year 10 of operation with the implementation of mitigation measures. In view of the loss of water area to LR 6 is irreversible, the residual impact on LR6 is moderate during the construction phase, and maintain as moderate in Day 1 and Year 10 of operation with the implementation of mitigation measures.

11.9.8 For LR 9, a portion of the natural rocky shoreline will be permanently lost similarly to LR 6 and LR 13. The mitigation measures for LR6 and LR 13 should be applied to LR 9. Due to the relatively larger portion, it is considered that the residual impact on this LR is moderate during the construction phase and in Day 1 of operation, but moderate to slight in Year 10 of operation with the implementation of mitigation measures when the shoreline treatment with eco-design and buffer screen planting is well-established.

Our Comments

1. Arbitrary and Unsubstantiated Conclusion

Regarding LR9 and LR13, the report considers “The quality and significance of these natural coastlines are high with relatively low tolerance to change. Hence, the sensitivity of this LR is considered as High.” and that “The compatibility of the proposed works is low while changes are irreversible.”. Yet para. 11.6.15 and 11.6.19 of the report only consider that “the resultant unmitigated impact during construction and operational phases would be moderate” rather than high in terms of the magnitude of landscape changes.



It is not clear how this leads to the assertion of para. 11.9.27 (ii) that “The magnitude of residual landscape and visual impacts of LR9, LR13, VP2, VP9, VP11 are slight and minor in scale.” and that “... the residual landscape impacts are localised and limited to the reclamation extent only without affecting existing community, while the residual visual impacts are confined within the visual envelope either involving few numbers of public viewers along hiking trail and ferry route”.

In fact, notwithstanding the high landscape values as stated in early sections, and without convincing reasoning, the stated impacts become much undermined in these latter parts of the report, as if the primary impacts of permanent destruction of a significant length of natural shorelines are trivial and readily amenable to mitigation.

Para. 11.9.28 of the report states that “Although not all landscape and visual impacts can be fully reduced or eliminated through the implementation of mitigation measures, the design principles set in the RODP and urban design and landscape framework of this Project provided enhancement by specifically outlining and dedicating areas for open spaces, roadside amenity areas, blue-green network, breezeways, view corridors, massing control, building height restrictions, aesthetic above-ground structure design, greenery coverage, provision of compensatory planting proposal etc.”. It must be pointed out that all such measures are only compensatory in nature without meaningfully addressing the massive destruction of the natural shorelines.

The above weakly substantiated logic then leads to the conclusion under para. 11.9.28 that “In view of the above, with full implementation of the recommended mitigation measures, unacceptable adverse residual landscape and visual impacts are not expected, ...”.

In summary, while the LVIA does consider the landscape values of the shorelines to be high, it appears that the subsequent assessment is mainly geared towards the need to downplay the impacts in order that the project can be given the green light to go ahead.

2. Inadequate Consideration of Visual Impacts and Water Sports Opportunities

In terms of visual assessment, view points are given in Table 11.5 *Key Public Viewers and Their Sensitivity* of the EIA report. However, the magnificent view of bus passengers travelling on Tseung Lam Tunnel/Cross Bay Link towards the shorelines of Area 132 has not been identified. This would have undermined the completeness of the visual impact assessment.

Furthermore, a major weakness of the visual impact assessment is that this only addresses existing user patterns and do not consider the lost opportunities of users coming close to the shorelines if these become more accessible.

The assessment also has not addressed the impacts and lost opportunities for users of water sports to access and enjoy the natural shorelines of Area 132. It may be noted that the water sports are being promoted in Tseung Kwan O with the availability of a major water sports centre at Area 77.

3. Lack of Geodiversity Considerations

Although the process of LVIA is well-structured, it is relatively subjective in terms of assigning values in landscape and aesthetics. Another fundamental and intrinsic weakness is the lack of assessment from the Geodiversity perspective. Rather than attributing landscape resources with relatively crude and simple descriptions, Geodiversity could better identify the value of landscape resources with a strong scientific basis.



In the past decades, Geodiversity is increasingly recognised worldwide and by the authoritative International Union for Conservation of Nature (IUCN) as the equal partner of Biodiversity in the definition of “Nature” (https://iucn.org/sites/default/files/2025-01/meaning-of-nature_pdf-final.pdf). Furthermore, UNESCO already designated the 6th October every year to be the “International Geodiversity Day” in 2021.

As for Area 132, the shorelines highlight the transition from volcanic formation in Sai Kung to granite in the city. In fact, the shorelines not only consist of both rock formations, but also granite which has been metamorphosed to “Greisen” with mineralisation including beryl, wolframite and other interesting minerals. The stretch of coastlines also consists of dramatic “Sheeting Joints” in granite featuring steeply inclined rock faces plunging into the sea. The coastal landscape has been formed over a very long period of times in terms of thousands of years, yet the proposed reclamation will erase such heritage in a matter of no time.

Although to date Geodiversity has not been incorporated as a designated subject of assessment in the EIA process, this should not have precluded professionals to assess landscape from such perspective in the EIA. After all, environmental and landscape impacts should never be confined to what are prescribed in established guidelines as these may lag behind international practices and trends.

4. Lack of Broader Considerations

Another inherent weakness of the EIA report is that it fails to address the impacts from a much wider angle for the benefits of Hong Kong as a whole:

- That the opportunity of utilising the pristine shorelines for the enjoyment of residents will be lost.
- That Tseung Kwan O will lose its unique character and identity of having such attractive nature amidst urban development.
- That the remaining unique beauty around the harbour of Hong Kong will be further damaged on a large scale.
- That our future generation will become even more disconnected from mother nature as they increasingly live in an over-engineered and artificial built environment.

OTHER ISSUES

Archaeological potentials are evaluated in Chapter 12 *Impact On Cultural Heritage* of the EIA Report. Based on desktop review of three previous reports, para. 12.4.3.21 states that “The results of the desk-based review concluded that no known archaeological sites or areas with terrestrial archaeological potential have been identified within the EIA study area.”

As there are 6 rock carving sites of declared monument status along the coastline in the eastern part of Hong Kong between Po Toi Island and Kau Sai Chau, the possibility of having similar artefacts in Area 132 should not be ruled out without suitable investigation.

We trust that our views will be seriously studied and considered in your handling of the EIA.



香港地貌岩石保育協會
Association for Geoconservation, Hong Kong

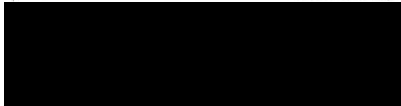
Best regards,

(As signed)

Cindy Choi

Chairman

Association for Geoconservation, Hong Kong



Enclosed previous submissions

Copies:

Chief Executive of HKSAR



Secretary for Development



Secretary for Culture, Sports and Tourism



Secretary for Environment and Ecology



Director of Planning



Director of Civil Engineering and Development



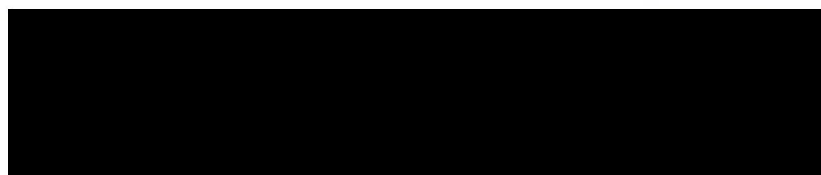
Commissioner for Tourism



PM(E), CEDD



Chairman and Members of Panel on Development, Legislative Council



☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy

Submission Number:

TPB/R/S/TKO/31- S7

From: Ivan To [REDACTED]
Sent: 2025-04-13 星期日 02:10:58
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Subject: 反對政府 132 區和 137 區計劃

強烈反對政府在將軍澳 132 區計劃興建公共設施。將軍澳居民已長期承受厭惡性行業影響。137 區的建設也會增加目前地鐵運輸的交通壓力。

[Yahoo Mail：輕鬆搜尋和整理郵件，助你解決問題](#)

From: inq [REDACTED]
Sent: 2025-04-14 星期一 12:02:12
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Cc: Pak To CHU/LAO/LANDSD <[REDACTED]>
Subject: Subject: Objection to Amendments in Tseung Kwan O Outline Zoning Plan (OZP) – Areas 132 and 137
Attachment: PAC-25-011_LETTER TO TOWN PLANNING BOARD_TKO_14TH APRIL.pdf; PAC-25-001-Objection to Tseung Kwan O Area 132 Development.pdf

Submission Number:

TPB/R/S/TKO/31- S8

Reference Number: [REDACTED]

14 April 2025

By email: tpbpd@pland.gov.hk

Town Planning Board Secretariat

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

Subject: Objection to Amendments in Tseung Kwan O Outline Zoning Plan (OZP) – Areas 132 and 137

Dear Sir / Madam,

On behalf of Hong Kong Institute of Urban Design (HKIUD), I write to formally submit our objection to the recent amendments made to the Tseung Kwan O Outline Zoning Plan (OZP), announced by the Town Planning Board on February 14, 2025. This objection is submitted in addition to our previous letter dated February 11, 2025 to Environmental Protection Department (copy attached), in which we raised significant concerns regarding the development of Area 132.

This development sits at the East entrance to Victoria Harbour. For all Cruise ship passengers arriving in Hong Kong and departing, Lei Yue Mun and Pak Sha Wan Shores are the gateway to their arrival in Victoria Harbour, the east entrance to the Harbour Metropolis, the natural equivalent of the beautiful arrival on the designed west side of the Victoria Harbour with ICC and IFC landmarks. What would the tourists think of this new industrial complex, which is hardly a welcoming sight and a poor reflection of Hong Kong's image as a harbour renowned for its natural and designed beauty? The scale and industrial nature of the proposed facilities don't belong here. We suggest relocating most of the facilities within a cavern with a marine frontage in the form of a pier that does not obviate the natural East entrance of Victoria Harbour.

We note that the current amendments, particularly the proposed reclamation and rezoning in Areas 132 and 137, have not adequately addressed the above core issues raised in our earlier objection. These ongoing concerns warrant further attention, and we urge the Town Planning Board to reconsider the proposed changes.

We also refer to the following key documents:

1. **Annex B of ACE Paper 5/2025:** This contains the draft minutes of the EIA Subcommittee meeting held on March 17, 2025. The meeting raised concerns about shoreline reclamation

and marine habitat disruption from the development in Tseung Kwan O Area 137, which may also affect Area 132.

2. **ACE Paper 5/2025 (For advice on April 7, 2025):** This report from the 160th Environmental Impact Assessment Subcommittee meeting emphasized the need for a comprehensive review of the development's impact on both Areas 137 and 132, particularly regarding shoreline destruction and marine life.

Key Concerns from Our Initial Objection and Relevant EIA Responses:

1. Destruction of Natural Shoreline

- *Our Concern:* The proposed reclamation of the coastline in TKO 132 could harm a natural environment of significant value, especially due to its proximity to Victoria Harbour.
- *EIA Response:* The EIA acknowledges the environmental impact but proposes mitigation measures, such as marine transportation to reduce congestion. However, it does not directly address the destruction of the shoreline.

2. Missed Opportunity for Urban Design

- *Our Concern:* The development focuses too much on infrastructure and not enough on creating spaces that connect people to nature, particularly along the waterfront.
- *EIA Response:* The EIA mentions plans for a waterfront promenade and cycling tracks, but there is no strong emphasis on human-centred urban design or making the waterfront more accessible and engaging.

3. Incompatibility with Surrounding Areas

- *Our Concern:* The scale and industrial nature of the facilities in TKO 132 are incompatible with the surrounding recreational spaces and the view of Victoria Harbour's eastern entrance.
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4. Damage to Hong Kong's Iconic Landscape

- *Our Concern:* The development could disrupt Hong Kong's iconic landscape, particularly at the eastern entrance to Victoria Harbour.
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- *Our Concern:* We suggest relocating the facilities to caverns with marine frontage to protect the natural shoreline and avoid blocking the entrance to Victoria Harbour.
- *EIA Response:* The report does not consider cavern development but mentions low-carbon construction methods as a potential alternative innovation.

Conclusion:

While the EIA report acknowledges certain environmental concerns, such as dust control and visual impacts, it does not adequately address the core issues we raised regarding the destruction of the natural shoreline, the scale of industrial development, and the need for a more thoughtful and integrated approach to the waterfront. The suggestion of cavern development to preserve the shoreline is not considered, and the visual impact on Victoria Harbour remains largely unaddressed.

We urge the Town Planning Board to carefully review and reconsider the proposed amendments to the zoning plan. A more comprehensive and sustainable approach is essential to protect the environment and ensure the development enhances the community while preserving the area's natural beauty.

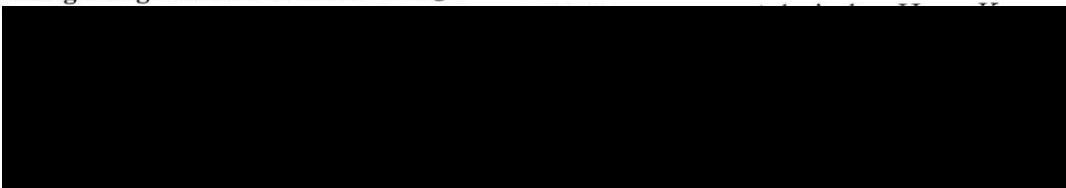
Yours sincerely,

Benny Chan Chak Bun

President of HKIUD



Hong Kong Institute of Urban Design





香港城市設計學會
Hong Kong Institute of Urban Design

Reference Number: [REDACTED]

14 April 2025

By email: tpbpd@pland.gov.hk

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

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Hong Kong Institute of Urban Design Limited

[REDACTED]



香港城市設計學會
Hong Kong Institute of Urban Design

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香港城市設計學會
Hong Kong Institute of Urban Design

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We urge the Town Planning Board to carefully review and reconsider the proposed amendments to the zoning plan. A more comprehensive and sustainable approach is essential to protect the environment and ensure the development enhances the community while preserving the area's natural beauty.

Yours sincerely,

Benny Chan Chak Bun
President of HKIUD



香港城市設計學會
Hong Kong Institute of Urban Design

Reference Number: [REDACTED]

11 Feb 2025

By email: [REDACTED]

The EIA Ordinance Register Office
Environmental Protection Department
27th floor, Southorn Centre,
130 Hennessy Road,
Wanchai, Hong Kong

Subject: Objection to Tseung Kwan O Area 132 Development

Dear Sir,

On behalf of the Hong Kong Institute of Urban Design, we express our deep concern regarding the development proposal for Tseung Kwan O Area 132, as detailed in the Environmental Impact Assessment (EIA) Report. While Area 137 is also part of the plan, we are particularly concerned about what is proposed for Area 132.

Why This Matters

Since March 2023, there has been growing concerns on the impact of this project. Many stake-holders and concern groups have spoken out, warning that the environmental and geological value of the natural coastline in Area 132 must be preserved for future generations. In our collective view, the shoreline in this prominent location close to the Victoria Harbour and TKO has significant value in terms urban design, and must be sensitively respected and preserved in the process of urban development.

The proposed reclamation threatens this priceless resource, and the shoreline's loss would be permanent and irreversible, and therefore Government should assess the environment impacts prudently.

Key Concerns

1. Destruction of a Priceless Natural Shoreline

- The proposal for Area 132 involves reclaiming the coastline, which would damage an unspoiled natural environment. Other environmental groups have argued that this cannot be justified. Government should consider their views with an open mind.
- We suggest relocating most of the facilities within a cavern with a marine frontage in the form of a pier that does not obviate the natural East entrance of Victoria Harbour.

Hong Kong Institute of Urban Design Limited



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Hong Kong Institute of Urban Design

2. Missed Opportunity for Urban Design

- The current plan seems to focus purely on infrastructure—waste facilities, refuse stations—without any thought given to the people who will live and work nearby. Area 132 should be a place that connects with the waterfront and contributes to a sustainable future. It should be human and nature-centred.



Victoria Harbour East entrance, its last remaining natural shoreline.

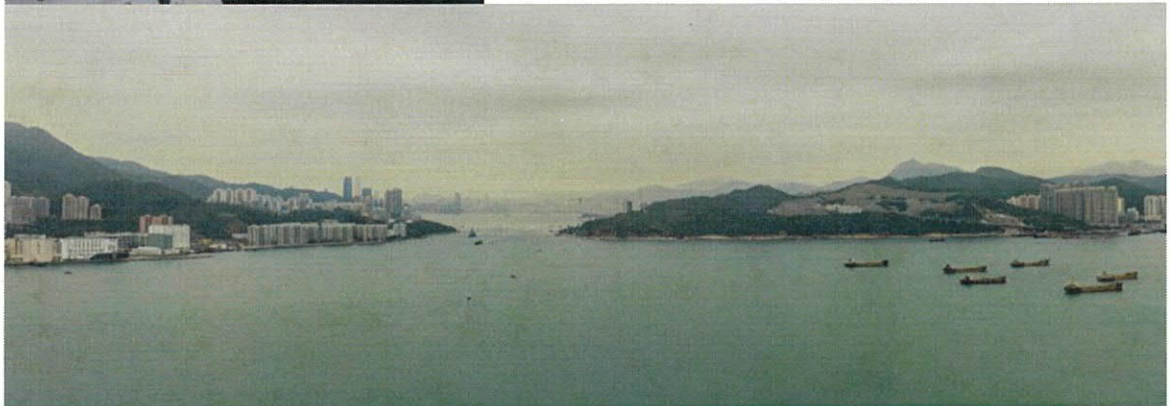
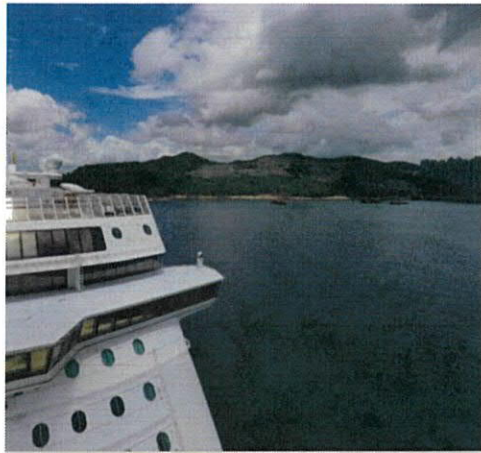
3. Incompatibility with Surrounding Areas

- Recreational spaces surround area 132. The scale and industrial nature of the proposed facilities don't belong here. In addition, this development sits at the



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Hong Kong Institute of Urban Design

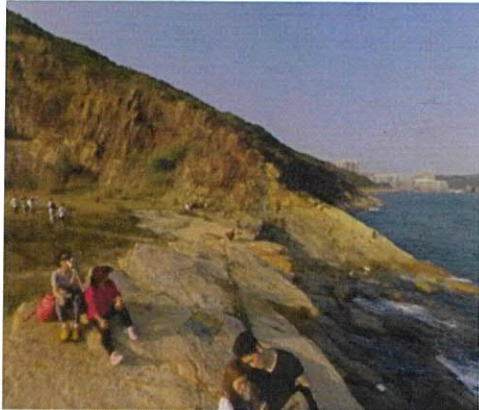
East entrance to Victoria Harbour. For all Cruise ship passengers arriving in Hong Kong and departing, Lei Yue Mun and Pak Sha Wan Shores are the gateway to their arrival in Victoria Harbour, the east entrance to the Harbour Metropolis, the natural equivalent of the beautiful arrival on the designed west side of the Victoria Harbour with ICC and IFC landmarks. What would the tourists think of this new industrial complex, which is hardly a welcoming sight and a poor reflection of Hong Kong's image as a harbour renowned for its natural and designed beauty?



Arriving at Hong Kong Victoria Harbour, East entrance.



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Hong Kong Institute of Urban Design



- The proposed reclamation 132 and its complex will also be an eyesore for all visitors to Junk Bay Chinese Permanent Cemetery and its columbarium, which currently enjoys an unadulterated view of the shore and the sea. We think showing such a lack of regard to ancestors' ritual visits is a disgrace.
- To the many Devils Peak and Lei Yue Mun Point visitors, the shore is a sightseeing attraction with many photos posted on social media.

4. Damage to Hong Kong's Iconic Landscape

- The EIA Report rightly admits that the visual disruption to surrounding natural landmarks—like the ridgelines of Chiu Keng Wan Shan and Tin Ha Shan—will be substantial.
- We disagree with the EIA's attempt to compare this development to other urbanized surrounding areas. Area 132, as the East gateway to Victoria Harbour, is unique and irreplaceable, and it cannot be treated like just another industrial plot.
- To call this area "relatively obscure" (LC Paper No. CB(1)44/2023(05)) shows a complete lack of understanding of the potential of this area as the East gateway to Victoria Harbour. Area 132 adverse development would pre-empt and obviate such potential and need to be rethought. The 2030+ policy calls the Harbourfront "the foremost natural asset of our city." The Victoria Harbour east entrance's natural shoreline deserves to "adopt a vision-driven and forward-looking approach." It should not just be an ad hoc, thoughtless fix for developing area 137 and locating facilities needed for Hong Kong East.

What We Recommend

- We strongly urge the government to preserve the natural shoreline of Area 132 as a natural enhancing asset to the value of the Victoria Harbour east entrance.

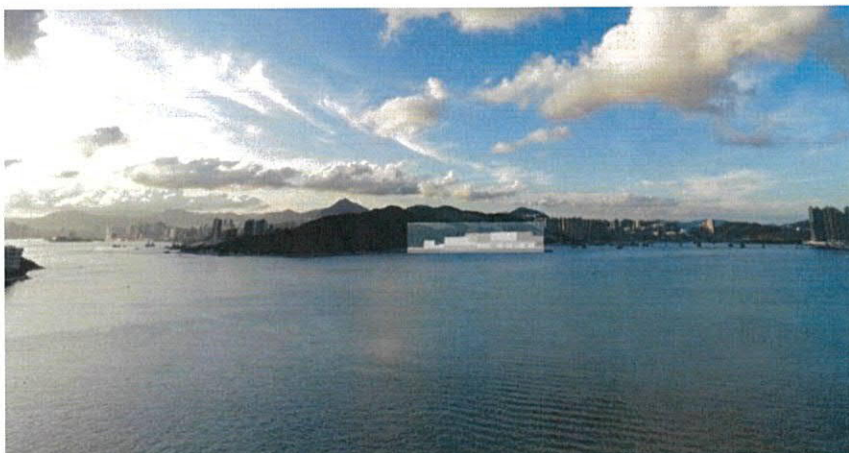


香港城市設計學會
Hong Kong Institute of Urban Design

- We suggest relocating most of the facilities within the cavern with marine frontage elsewhere that does not obviate the east entrance of Victoria Harbour. Provision of utility facilities inside cavern is a mature technology worldwide, and has been promulgated vide Development Bureau Technical Circular (Works) No. 2/2024 after a study on the long-term strategy for cavern development. A strategic cavern area close to site 132 has been identified by Government, which might be suitable for relocation of those planned facilities in Area 132.
- We call for a rethinking of the location of these facilities to prevent further damage to the iconic Victoria Harbour, the city's visual identity and the foremost asset of the city.

We urge the government to review if there is an absolute need to locate the proposed facilities within Area 132 and if there can be other alternative locations. We trust that you will consider these points carefully before moving forward. We appreciate your attention to this matter.

Sincerely,
Mr. Benny Chan
President
Hong Kong Institute of Urban Design



CC: Development Bureau, Culture, Sports and Tourism Bureau, Civil Engineering and Development Department, Planning Department, Tourism Commission, Tourism Board, Town Planning Board, Association for Geoconservation, Hong Kong

就圖則作出申述

Representation Relating to Plan

參考編號

Reference Number:

250414-114750-66727

提交限期

Deadline for submission:

14/04/2025

提交日期及時間

Date and time of submission:

14/04/2025 11:47:50

「申述人」全名

Full Name of "Representer":

先生 Mr. CHAN CHAK BUN

「獲授權代理人」全名

Full Name of "Authorized Agent":

機構 Organization Hong Kong Institute of Urban Design

與申述相關的圖則

Plan to which the representation relates:

S/TKO/31

申述詳情

Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
Objection to Amendments in Tseung Kwan O Outline Zoning Plan (OZP) – Areas 132 and 137	反對 Oppose	<p>On behalf of Hong Kong Institute of Urban Design (HKIUD), I write to formally submit our objection to the recent amendments made to the Tseung Kwan O Outline Zoning Plan (OZP), announced by the Town Planning Board on February 14, 2025. This objection is submitted in addition to our previous letter dated February 11, 2025 to Environmental Protection Department (copy attached), in which we raised significant concerns regarding the development of Area 132.</p> <p>This development sits at the East entrance to Victoria Harbour. For all Cruise ship passengers arriving in Hong Kong and departing, Lei Yue Mun and Pak Sha Wan Shores are the gateway to their arrival in Victoria Harbour, the east entrance to the Harbour Metropolis, the natural equivalent of the beautiful arrival on the designed west side of the Victoria Harbour with ICC and IFC landmarks. What would the tourists think of this new industrial complex, which is hardly a welcoming sight and a poor reflection of Hong Kong's image as a harbour renowned for its natural and designed beauty? The scale and industrial nature of the proposed facilities don't belong here. We suggest relocating most of the facilities</p>

within a cavern with a marine frontage in the form of a pier that does not obviate the natural East entrance of Victoria Harbour.

We note that the current amendments, particularly the proposed reclamation and rezoning in Areas 132 and 137, have not adequately addressed the above core issues raised in our earlier objection. These ongoing concerns warrant further attention, and we urge the Town Planning Board to reconsider the proposed changes.

We also refer to the following key documents:

1. Annex B of ACE Paper 5/2025: This contains the draft minutes of the EIA Subcommittee meeting held on March 17, 2025. The meeting raised concerns about shoreline reclamation and marine habitat disruption from the development in Tseung Kwan O Area 137, which may also affect Area 132.

2. ACE Paper 5/2025 (For advice on April 7, 2025): This report from the 160th Environmental Impact Assessment Subcommittee meeting emphasized the need for a comprehensive review of the development's impact on both Areas 137 and 132, particularly regarding shoreline destruction and marine life.

Key Concerns from Our Initial Objection and Relevant EIA Responses:

1. Destruction of Natural Shoreline

- Our Concern: The proposed reclamation of the coastline in TKO 132 could harm a natural environment of significant value, especially due to its proximity to Victoria Harbour.

- EIA Response: The EIA acknowledges the environmental impact but proposes mitigation measures, such as marine transportation to reduce congestion. However, it does not directly address the destruction of the shoreline.

2. Missed Opportunity for Urban Design

- Our Concern: The development focuses too much on infrastructure and not enough on creating spaces that connect people to nature, particularly along the waterfront.

- EIA Response: The EIA mentions plans for a waterfront promenade and cycling tracks, but there is no strong emphasis on human-centred urban design or making the waterfront more accessible and engaging.

3. Incompatibility with Surrounding Areas

- Our Concern: The scale and industrial nature of the facilities in TKO 132 are incompatible with the surrounding recreational spaces and the view of Victoria Harbour's eastern entrance.

- EIA Response: The EIA acknowledges the visual impact on nearby landmarks but does not suggest changes to the scale of development or the relocation of industrial facilities to reduce this impact.

4. Damage to Hong Kong's Iconic Landscape

- Our Concern: The development could disrupt Hong Kong's iconic landscape, particularly at the eastern entrance to Victoria Harbour.

• EIA Response: The EIA recognizes the visual disruptions caused by the development, but it does not fully address the significance of the impact on Victoria Harbour's landscape or propose a more visionary approach to its preservation.

5. Suggestions for Relocation and Cavern Development

• Our Concern: We suggest relocating the facilities to caverns with marine frontage to protect the natural shoreline and avoid blocking the entrance to Victoria Harbour.

• EIA Response: The report does not consider cavern development but mentions low-carbon construction methods as a potential alternative innovation.

Conclusion:

While the EIA report acknowledges certain environmental concerns, such as dust control and visual impacts, it does not adequately address the core issues we raised regarding the destruction of the natural shoreline, the scale of industrial development, and the need for a more thoughtful and integrated approach to the waterfront. The suggestion of cavern development to preserve the shoreline is not considered, and the visual impact on Victoria Harbour remains largely unaddressed.

We urge the Town Planning Board to carefully review and reconsider the proposed amendments to the zoning plan. A more comprehensive and sustainable approach is essential to protect the environment and ensure the development enhances the community while preserving the area's natural beauty.

對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。

Any proposed amendments to the plan? If yes, please specify the details.

☐Urgent ☐Return receipt ☐Expand Group ☐Restricted ☐Prevent Copy ☐Confidential

From: Alexander Duggie [REDACTED]
Sent: 2025-04-14 星期一 17:12:46
To: tpbpd/PLAND <tpbpd@pland.gov.hk>
Cc: Libra Ng [REDACTED]
Subject: OZP S/TK)/31
Attachment: Form S6x1x_new_Alexander M DUGGIE.pdf; OZP S-TKO-31_OBJECTION_A M Duggie.pdf

Submission
 TPB/R/

Submission Number:
TPB/R/S/TKO/31- 59

Dear Sirs,

I attach my objections to Draft OZP S/TKO/31.

Kind regards,

Sandy

Alexander (Sandy) M Duggie | Managing Director

URBIS Limited

HKILA LANDSCAPE AWARDS 2024: URBIS Limited's outstanding landscape design work was recognised with the receipt of **2 Awards** at the HKILA Landscape Awards 2024. **1. GOLD AWARD** for **Taikoo Place**; **2. SILVER AWARD** for **Hong Kong-Shenzhen Innovation and Technology Park**.

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

- The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Processing of Representations and Further Representations" before you fill in this form. The Guidelines can be obtained from the Secretariat of the Board (15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong – Tel.: 2231 4810 or 2231 4835) and the Planning Enquiry Counters (PECs) of the Planning Department (Hotline: 2231 5000) (17/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong and 14/F., Sha Tin Government Offices, 1 Sheung Wo Che Road, Sha Tin, New Territories), or downloaded from the Board's website at <http://www.tpb.gov.hk/>.
填寫此表格之前，請先細閱有關「根據城市規劃條例提交及處理申述及進一步申述」的城市規劃委員會規劃指引。這份指引可向委員會秘書處（香港北角渣華道 333 號北角政府合署 15 樓 - 電話：2231 4810 或 2231 4835 及規劃署的規劃資料查詢處（熱線：2231 5000）（香港北角渣華道 333 號北角政府合署 17 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：<http://www.tpb.gov.hk/>）。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the PECs of the Planning Department. The form should be typed or completed in block letters, preferably in both English and Chinese. The representation may be treated as not having been made if the required information is not provided.
此表格可從委員會的網頁下載，亦可向委員會秘書處及規劃署的規劃資料查詢處索取。提出申述的人士須以打印方式或以正楷填寫表格，填寫的資料宜中英文兼備。倘若未能提供所需資料，則委員會可把有關申述視為不曾提出論。
- In accordance with the Town Planning Ordinance (the Ordinance), the Board will make available all representations received for public inspection as soon as reasonably practicable at the Board's website and the PECs. The representations will be available for public inspection until the Chief Executive in Council has made a decision on the plan in question under section 9 of the Ordinance.
根據《城市規劃條例》（下稱「條例」），委員會會在合理地切實可行的情況下，盡快將所有收到的申述上載至委員會的網頁及存放於規劃資料查詢處供公眾查閱，直至行政長官會同行政會議根據條例第 9 條就有關圖則作出決定為止。

1. Person Making this Representation (known as "Representer" hereafter) 提出此宗申述的人士（下稱「申述人」）
Full Name 姓名 / 名稱 (Mr./ Ms./Mrs./Miss * 先生/女士/公司/機構*) Alexander Main Duggie (Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided) (注意：若個人提交，須填上與香港身份證／護照所載的全名)

2. Authorized Agent (if applicable) 獲授權代理人(如適用)
Full Name 姓名 / 名稱 (Mr./ Ms./Company/Organization* 先生/女士/公司/機構*) Not Applicable (Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided) (注意：若個人提交，須填上與香港身份證／護照所載的全名)

* Delete as appropriate 請刪去不適用者

Please fill in "NA" for not applicable item 請在不適用的項目填寫「不適用」

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

The plan to which the representation relates (please specify the name and number of the plan) 與申述相關的圖則 (請註明圖則名稱及編號)		Draft Tseung Kwan O OZP No. S/TKO/31
Nature of and reasons for the representation 申述的性質及理由		
Subject matters 有關事項@	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由^
The Area 132 reclamation	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	See Attachment
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the plan? If yes, please specify the details. 對圖則是否有任何擬議修訂? 如有的話，請註明詳情。 Yes. The addition of a Coastal Protection Area (CPA) along the entire west coast of Tseung Kwan O bay, and the redesign of the Area 132 reclamation to avoid any impact on the CPA.		

If the representation contains more than 20 pages, or any page larger than A4 size, 4 hard copies and 1 soft copy are required to be provided for the submission. Provision of email address is also required.
若申述超過 20 頁或有任何一頁大小超過 A4，則須提交硬複本一式四份和一份軟複本。另須提供電郵地址。

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

^ Please also note that section 6(3A) of the Ordinance provides that any representation received under section 6(1) **may be treated as not having been made** if, in the opinion of the Board that, the reason for the representation is a reason concerning compensation or assistance relating to, or arising from resumption/acquisition/clearance/obtaining vacant possession of any land by the Government. The above matters should be dealt with in accordance with the relevant statutory provisions on compensation and/or promulgated policy on compensation. Should you have any views on compensation or assistance matters, you may separately raise your views to the Director of Lands or the relevant authority. 請注意，條例第 6(3A)條訂明，如委員會認為根據第 6(1)條收到的任何申述所提出的理由是與政府收回／徵用／清理／取得任何土地的空置管有權而引起的補償或援助有關，則有關申述可被視為不曾提出。上述事項應該按照相關補償的法律條文和／或已公布的補償政策處理。如對補償或援助事宜有意見，可另行向地政總署署長或有關當局提出。

Please fill "NA" for not applicable item 請在不適用的項目填寫「不適用」

☒ at the appropriate box 請在適當的方格內加上 ☒ 號

DRAFT TSEUNG KWAN O OUTLINE ZONING PLAN No. S/TKO/31

OBJECTION

DUGGIE, Alexander Main [REDACTED]

I wish to submit an objection to the draft Tseung Kwan O OZP No. S/TKO/31 because of the permanent and irreversible damage that it will cause to invaluable and irreplaceable natural coastline along the western coast of Tseung Kwan O. I propose that the current coastline should be zoned as a Coastal Protection Area (CPA), and the proposed reclamation in Area 132 should be reconfigured to avoid impact on the CPA by adopting similar design solutions to those already adopted in several locations elsewhere in Hong Kong to protect other valuable natural coastlines.

The reasons for my objection are described briefly below. As TPB Members may not read all Representations, I request that any summary briefing provided by the TPB Secretariat to TPB Members lists (by bold title) each of the **six** categories of objection listed below. Thank you.

1. The EIA Report for the Development of Tseung Kwan O Area 137 and Associated Reclamation Sites – I, D & C [Application No. EIA-309/2024] failed to properly identify Substantial Adverse Landscape Impacts that should prevent the Area 132 reclamation from being approved to proceed in its current layout.

In February 2025 I submitted a six-page objection to the findings and conclusion of the EIA Report [Application No. EIA-309/2024] because the Landscape and Visual Impact Assessment (LVIA) failed to identify several adverse landscape impacts of substantial significance which, in turn, means that the correct objective conclusion of the assessment, in accordance with the five criteria in EIAO TM Annex 10, should be that the landscape impacts are 'Unacceptable'. A copy of the Objection is provided in **APPENDIX 1**.

The principal failures of the LVIA are summarised as follows:

- **Assessment Methodology:** Under the heading 'Landscape Impact Assessment Methodology', the LVIA §11.4.1, bullet 5 (page 11-4) correctly states "Identification of potential landscape mitigation measures.....may take the form of **adopting basic engineering design to prevent and/or minimise adverse landscape impact** before adopting other mitigation or compensatory measures to alleviate the impacts. Potential mitigation measures should also include the **preservation of** vegetation and **natural landscape resources**....." (emphasis added). Unfortunately, the project proponent, CEDD, singularly failed to adopt a 'basic engineering design' that has been previously adopted by CEDD elsewhere in Hong Kong, which would prevent destruction of the natural

DRAFT TSEUNG KWAN O OUTLINE ZONING PLAN No. S/TKO/31

OBJECTION

DUGGIE, Alexander Main [REDACTED]

coastline of Junk Bay, namely the creation of a continuous sea channel between the existing natural coastline and the proposed reclamation. The LVIA fails to highlight this fundamental flaw in the design that fails the test of 'preventing or minimising adverse landscape impact'.

- **Sources of Impact:** LVIA §11.6.3 fails to identify the permanent and irreversible loss of natural coastline and the permanent presence of the large reclamation as sources of landscape impact in the operational phase. These are glaring omissions and professionally incompetent.
- **Magnitude of Change:** LVIA Table 11.6 "Magnitude of Landscape Changes during Construction and Operation" wrongly categorises the magnitude of change to the existing coastal landscape resources and coastal landscape character area as 'moderate', whereas the quantitative measurements provided in the LVIA indicate that the correct magnitude should be 'substantial'.
- **Significance of Unmitigated Landscape Impacts:** These are underestimated due to the aforementioned underestimation of Magnitude of Change.
- **Landscape and Visual Mitigation Measures:**
 - There is no attempt to 'adopt basic engineering design to prevent and/or minimise adverse landscape impact' which the LVIA methodology earlier identifies as being necessary.
 - The mitigation measure CM2 '*Preservation of Natural Coastline. Natural Coastline without impact from the proposed works should be retained.*' is nonsensical and meaningless and does not mitigate any of the reclamation impacts.
 - There is no mitigation measure in Tables 11.10 to 11.12 that would mitigate or compensate for impacts caused by destruction of natural coastlines.
- **Residual Impacts:** The above listed failures, mistakes and omissions result in seriously underestimated Residual Landscape Impacts, as explained in detail in **Appendix 1.**

It may be seen that whilst the LVIA is presented in a seemingly thorough manner, it is only a 'tick-box' exercise, and a critical review exposes serious flaws in the assessment and conclusions. The analysis shows that a correct professional assessment of the landscape impacts identifies what is probably glaringly obvious to the layman – namely that the proposed development will cause **substantial permanent and irreversible adverse landscape impacts to both the natural coastline (rocky and sandy shores) along the western edge of Junk Bay as well as the overall landscape character of**

DRAFT TSEUNG KWAN O OUTLINE ZONING PLAN No. S/TKO/31

OBJECTION

DUGGIE, Alexander Main [REDACTED]

Junk Bay. These are landscapes of very high value which, in turn, means that the correct objective conclusion of the assessment, in accordance with the five criteria in EIAO TM Annex 10, should be that the landscape impacts are '**Unacceptable**'.

2. Substantial Adverse Visual Impact on Eastern Sea Approaches to Hong Kong.

The statement in the EIA Executive Summary §2.2.2.2 "Location-wise, the land to be created off TKO 132 is at a relatively obscure area..." is very wrong and misguided, firstly because the area is not 'obscure' but very widely visible at the eastern approaches to Victoria Harbour (including all cruise ships arriving from that direction), and secondly because remoteness or inaccessibility is no excuse or justification for degrading a pristine high-quality landscape, especially for the creation of facilities that are essentially temporary in nature.

3. The relevant extract of the draft minutes of the ACE Environmental Impact Assessment Subcommittee meeting held on 17 March 2025 reveals that the EIA failures identified in item 1 above were ignored, not addressed and not remedied, which represents a failure in the public consultation process.

It is clear from Annex B to ACE Paper 5/2025 "relevant extract of the draft minutes of the ACE Environmental Impact Assessment Subcommittee meeting held on 17 March 2025" (copy attached) that CEDD/EPD ignored the objections I made in February 2025 and did not present or discuss them with ACE in any manner, shape or form. This is a serious failure in the public consultation process.

4. There are no Registered Landscape Architects on ACE which means that basic failures in LVIA's are being overlooked. This is a continuing problem in all EIAs.

The continued absence of a Registered Landscape Architect (RLA) in ACE means that there is no-one in ACE capable of critically and professionally analysing the detail of the LVIA component of EIAs. This means that failures in an LVIA that would be obvious to any competent RLA are overlooked by ACE, which consequently can lead to EIAs with sub-standard LVIA's being approved by DEP who can claim no objection from ACE.

5. Planning Department is apparently failing in its duty to conduct thorough professional checking of LVIA's.

Planning Department (PlanD) is delegated by DEP to provide comment and advice to DEP on the LVIA component of all EIAs. However, it appears to me that PlanD is failing in its duty to conduct thorough professional checking of LVIA's. This is evidenced by PlanD's failure to identify any of the fundamental flaws in the TKO Reclamation EIA that I identified above, and which any competent RLA should have identified. I had a similar

DRAFT TSEUNG KWAN O OUTLINE ZONING PLAN No. S/TKO/31

OBJECTION

DUGGIE, Alexander Main (HKID [REDACTED])

experience of this problem in the Fanling Housing Development EIA completed in 2022. During the public consultation, I prepared (for Hong Kong Golf Club) a very long list of fundamental faults with the Fanling LVIA, which EPD/PlanD subsequently ignored. In the subsequent Judicial Review (currently under appeal by Government), the Judgement supported all my principal technical criticisms of the LVIA. Furthermore, during the exchange of legal documents, it was clear that PlanD's review of the Fanling LVIA was extremely brief, cursory and superficial, and had not been undertaken by RLAs.

PlanD is effectively the gatekeeper/protector of Hong Kong Landscape with a duty to protect it from unnecessary and unwise adverse development, both private and public. It is extremely worrying to me that recent evidence suggests PlanD appears to be failing in this duty, especially in regard to Government projects.

6. Town Planning in Hong Kong is suffering from 'Shifting Baseline Syndrome'.

With ongoing environmental degradation at local, regional, and global scales, people's accepted thresholds for environmental conditions are continually being lowered. In the absence of past information or experience with historical conditions, members of each new generation accept the situation in which they were raised as being normal. This psychological and sociological phenomenon is termed shifting baseline syndrome (SBS), which is increasingly recognized as one of the fundamental obstacles to addressing a wide range of today's global environmental issues.

As a Landscape Architect practicing in Hong Kong since 1985, my 40-years' experience of undertaking landscape projects all over Hong Kong (including a Landscape Value Mapping Study for PlanD for the entire territory in 2004-2006) tells me that town planning here is suffering from SBS because we are continually chipping away at our remaining natural landscapes and underestimating the net cumulative effect. The potential loss of the natural coastlines of Tseung Kwan O is a prime example of the dangers of SBS.

We are like the proverbial frog in water being gradually brought to boiling point.

Attachments:

APPENDIX 1: OBJECTION (11 Feb 2025) to EIA Report

ANNEX B to ACE Paper 5/2025

APPENDIX 1: OBJECTION (11 Feb 2025) to EIA Report [Application No. EIA-309/2024]

Agreement CE 40/2023(CE)

Development of Tseung Kwan O Area 137 and Associated Reclamation Sites – I, D & C

by

Alexander M DUGGIE [BPhil, RLA, FHKILA, CMLI, HKIUD, HKIQEP, HKIEIA, BEAM Pro (NB, EB, ND)]

Dr Samuel CHUI, JP

Director of Environmental Protection

Dear Dr Chui,

Thank you for the opportunity to make these comments.

I have reviewed the Landscape and Visual Impact Assessment (LVIA) and I find that there are some fundamental errors and omissions in the LVIA with respect to the predicted impacts on the existing Junk Bay natural coastline (LR9 and LR13) and landscape character (LCA5) that have resulted in an erroneous conclusion which grossly underestimates the adverse landscape impacts of the project.

As a consequence, I must strongly object to the proposed Area 132 reclamation and to the conclusion of the LVIA.

The relevant observations and comments are provided below.

1. **Assessment Methodology:** Under the heading ‘*Landscape Impact Assessment Methodology*’, the LVIA §11.4.1, bullet 5 (page 11-4) correctly states “*Identification of potential landscape mitigation measures. These may take the form of **adopting basic engineering design to prevent and/or minimise adverse landscape impact** before adopting other mitigation or compensatory measures to alleviate the impacts. Potential mitigation measures should also include the **preservation of vegetation and natural landscape resources**.....*” (emphasis added). Unfortunately, the project proponent, CEDD, has failed to adopt a ‘*basic engineering design*’ that has been previously adopted by CEDD elsewhere in Hong Kong, which would prevent destruction of the natural coastline of Junk Bay, namely the creation of a continuous sea channel between the existing natural coastline and the proposed reclamation.
2. **Landscape Resources:** The landscape resources “*LR9 – Rocky Shore along Western Coastline of Junk Bay*” and “*LR13 – Sandy Shore along Western Coastline of Junk Bay*” are both identified as possessing “*High*” sensitivity to change in both construction and operation phases. This is correct. Natural coastlines are rare in the eastern central harbour area (Victoria Harbour and Junk Bay) and their preservation is of paramount importance so as to maintain the geodiversity, biodiversity and landscape character of Hong Kong’s beautiful natural coastlines for future generations. It should not be necessary to remind that the Government has a duty to preserve and protect the existing natural landscape, including natural coastlines, and prevent unnecessary destruction of it, or damage to it, for the benefit of current and future generations.
3. **Landscape Character Area:** The landscape character area ‘*LCA5 – Junk Bay Landscape*’ is identified as possessing “*High*” sensitivity to change in both construction and operation phases. This is correct for similar reasons to those identified in item 2 above.
4. **Sources of Impact:** LVIA §11.6.3 fails to identify the permanent and irreversible loss of natural coastline and the permanent presence of the large reclamation as sources of landscape impact in the operational phase. These are glaring omissions.
5. **Magnitude of Change:** LVIA Table 11.6 “*Magnitude of Landscape Changes during Construction and Operation*” assesses the degree of change to landscape resources and landscape character areas due to potential unmitigated impacts of the development.
 - a. LR9 – Rocky Shore along Western Coastline of Junk Bay: The unmitigated impacts to LR9 are assessed as ‘*moderate*’. Considering that, according to the description in the table, ‘*Approx. one-third of natural rocky shore (i.e. approx. 32% of this LR) would be permanently taken up by the*

APPENDIX 1: OBJECTION (11 Feb 2025) to EIA Report [Application No. EIA-309/2024]

Agreement CE 40/2023(CE)

Development of Tseung Kwan O Area 137 and Associated Reclamation Sites – I, D & C

by

Alexander M DUGGIE [BPhil, RLA, FHKILA, CMLI, HKIUD, HKIQEP, HKIEIA, BEAM Pro (NB, EB, ND)]

reclamation works' and 'A portion of the rocky shoreline in a length of approx. 512m (out of total 1600m natural shoreline) and existing coastal vegetation that close to the marine viaduct works would be affected', such a loss should, more correctly, be considered 'substantial' not 'moderate' as recorded in the table. It stands to reason that losing one third of a valuable and irreplaceable resource, with potential for additional, but undefined, impacts on the remaining two thirds due to the 'marine viaduct works', is not a 'moderate' impact on that resource. This fundamental error has consequent adverse impact on the subsequent assessment, as noted later below.

- b. LCA13 – Sandy Shore along Western Coastline of Junk Bay: The unmitigated magnitude of impacts to LR13 are assessed as 'slight'. The precise locations of the sandy shores are not very clear, but given that Figure 11.2.3 indicates five sandy shore locations, two of which will apparently be permanently removed by the reclamation, the magnitude of unmitigated impact should more correctly be 'substantial'.
- c. LCA5 – Junk Bay Landscape: The unmitigated impacts to LCA5 are assessed as 'moderate'. The description given is 'Approx. 18% (i.e. 19 ha) of this LCA area would be permanently affected' and 'Some portion of the LCA would be permanently replaced as TKO 132 reclamation landscape and Tseung Kwan O transportation corridor landscape'. The quantification '18%' appears to be used as a reason to classify the impact as 'moderate' but this is misleading and incorrect, and the impact should be categorised as 'substantial' for the following two reasons:
 - i. Percentages of landscape area alone do not adequately express degrees of landscape character impacts. If 18% of someone's face is damaged by severe burns or skin disease, the effect on the character of their face is 'substantial' not 'moderate'. The same principle applies to landscape character when, as in this case, the proposed development has a totally different landscape character from the existing landscape character.
 - ii. The entire western coastline of Junk Bay located to the south of the Cross Bay Link is natural and unaffected by any development and has very high landscape value. It is by far the largest remaining natural coastline in Junk Bay (the only other natural coastline being the stretch north of Area 137) with resultant huge significance for the overall landscape character of Junk Bay. To insert the proposed large reclamation and road viaducts into this entirely natural landscape is obviously a 'substantial' change that entirely changes the landscape character of the western edge of Junk Bay and therefore the landscape character of Junk Bay as a whole. To claim the magnitude of the impact is only 'moderate' is very misleading and incorrect.

6. Significance of Unmitigated Impact:

- a. LR9 – Rocky Shore along Western Coastline of Junk Bay: LVIA §11.6.16 identifies the significance of the unmitigated impact on LR9 as 'moderate'. Given that the sensitivity to change is assessed in the LVIA as 'high' and the magnitude of change as 'moderate' then according to 'Table 11.1 Relationship between Sensitivity and Magnitude of Change in Defining Impact Significance', the impact significance is in the range from 'moderate' to 'substantial'. No reasoned explanation is given as to why 'moderate' is chosen. If, as explained in item 5a above, the correct magnitude of change had been identified as 'substantial' then it would be clear from Table 11.1 that the impact significance should also be 'substantial'.

APPENDIX 1: OBJECTION (11 Feb 2025) to EIA Report [Application No. EIA-309/2024]

Agreement CE 40/2023(CE)

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- b. LR13 - Sandy Shore along Western Coastline of Junk Bay: If, as explained in item 5(b) above, the correct magnitude of change had been identified as 'substantial' then it would be clear from Table 11.1 that the impact significance should also be 'substantial'.
- c. LCA5 – Junk Bay Landscape: LVIA §11.6.25 identifies the significance of the unmitigated impact on LCA5 as 'moderate'. This is strange given that the preceding description '*the changes are irreversible and compatibility is low...*' and '*...the affected area is relatively extensive*', which would suggest 'substantial' rather than 'moderate'. Even so, given that the sensitivity to change is assessed in the LVIA as 'high' and the magnitude of change as 'moderate' then according to '*Table 11.1 Relationship between Sensitivity and Magnitude of Change in Defining Impact Significance*', the impact significance is in the range from 'moderate' to 'substantial'. Yet, same as for LR9, no reasoned explanation is given as to why 'moderate' is chosen. If, as explained in item 5(c) above, the correct magnitude of change had been identified as 'substantial' then it would be clear from Table 11.1 that the impact significance should also be 'substantial'.

7. Landscape and Visual Mitigation Measures:

- a. No attempt to design the reclamation to avoid impacts: As mentioned in paragraph 1 above, LVIA §11.4.1, bullet 5 (page 11-4) correctly states "*Identification of potential landscape mitigation measures. These may take the form of **adopting basic engineering design to prevent and/or minimise adverse landscape impact** before adopting other mitigation or compensatory measures to alleviate the impacts. Potential mitigation measures should also include the **preservation of vegetation and natural landscape resources**.....*" (emphasis added). Yet, LVIA section 11.8 omits to identify or describe any specific mitigation measure related to the fact that the reclamation could be designed to avoid impact on the natural coastline. As CEDD, EPD and PlanD know very well, the avoidance of any adverse impact in the first place is the prime target of good design. There are numerous examples of reclamation design in Hong Kong that have been designed with channels between the reclamation and natural coastline, specifically to avoid impacts on the natural coastline, such as at Hong Kong Disneyland, Tung Chung, and Hong Kong Airport. Yet it appears this was not considered at all in the project design or in the LVIA, which is a huge oversight.
- b. A Meaningless Mitigation Measure: Mitigation Measure CM2 in Table 11.9 'Proposed Landscape Mitigation Measures for Construction Phase' is described as '*Preservation of Natural Coastline. Natural Coastline without impact from the proposed works should be retained.*' This so-called mitigation measure is simply good site practice to ensure construction impacts do not extend outside the project site boundary. However, it has zero effect on mitigating the project impacts identified in the assessment.
- c. No Operational Mitigation Measure for Impacted Coastlines: There is no mitigation measure in Tables 11.10 to 11.12 that would mitigate or compensate for impacts caused by destruction of natural coastlines, which is very important to remember when considering the assessment of residual impacts, as noted below.

- 8. **Residual Impacts**: LVIA section 11.9 and Table 11.14 describe the residual impacts on landscape resources and landscape character. The errors and omissions described above have consequent adverse impact on the assessment, which is further flawed for additional reasons, as explained below:

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- a. LR9 – Rocky Shore along Western Coastline of Junk Bay:
- i. LVIA Table 11.14 identifies six mitigation measures which are claimed to mitigate impacts on LR9, however these claims are entirely incorrect as explained below:
 - *CM2 – Preservation of Natural Coastline.* This has zero effect on mitigating impacts on LR9 as explained in paragraph 7(b) above.
 - *CM4 - Management of Construction Activities and Facilities.* Like CM2, this is simply good site management which has zero effect on mitigating impacts of the project on LR9.
 - *CM5 – Reinstatement of the affected landscaped area.* There can be no effective ‘reinstatement’ of the lost natural rocky coastline, so this has zero effect on mitigating impacts on LR9.
 - *OM2 – Buffer Screen Planting.* It is a mystery how this could possibly mitigate the loss of the natural rocky coastline. To claim such is pure nonsense.
 - *OM7 – Landscape Treatments on Slope or Retaining Structure.* Likewise, to claim this can mitigate the loss of the natural rocky coastline is pure nonsense.
 - *OM8 – Shoreline Treatment.* Of the six cited mitigation measures, this is the only one that might appear to bear any relation to the impacted LR9, but the appearance is illusory, because it is not mitigating the loss of the natural rocky landscape coastline itself - rather it is mitigating the loss of the shoreline ecology and biota that live on the rocky shoreline and that will also be lost when that rocky shoreline landscape is lost. So, OM8, whilst a laudable design element (which I support in principle), it is really an ecological mitigation measure, not a landscape mitigation measure (to be consistent with the manner in which landscape and ecology are split in an EIA). Consequently, and obviously, OM8 does not mitigate the loss of the geodiversity represented by the existing natural rocky shoreline itself.
 - ii. LVIA §11.9.8 contains the following text to describe the residual impacts on LR9: *‘For LR9, a portion of the natural rocky shoreline will be permanently lost similarly to LR6 and LR13. The mitigation measures for LR6 and LR13 should be applied to LR9. Due to the relatively larger portion, it is considered that the residual impact on this LR is moderate during the construction phase and in Day 1 of operation, but moderate to slight in Year 10 of operation with the implementation of mitigation measures when the shoreline treatment with eco-design and buffer screen planting is well established.’* This assessment is seriously flawed for two reasons:
 - As explained above (in 8(a)(i)), none of the six mitigation measures have any mitigation effect on the loss of the rocky shoreline itself. Therefore, the residual impact significance cannot be reduced by them, nor can it change to ‘slight’ in year 10, as claimed, and it should remain (according to the LVIA assessment of unmitigated impact) at ‘moderate’.
 - However, as explained above (in 6(a)), the correct unmitigated impact is not ‘moderate’ but should be ‘substantial’, meaning that **the correct residual impact should also be ‘substantial’**.

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- b. LR9 – Sandy Shore along Western Coastline of Junk Bay: The criticisms of the mitigation measures described above in 8(a)(i) and (ii) for LR9 are equally valid for LR13. The so-called mitigation measures will have zero mitigation effect. As explained in 6(b) above, the correct unmitigated impact for LR13 is not ‘moderate’ but should be ‘substantial’, meaning that **the correct residual impact should also be ‘substantial’**.
- c. LCA5 – Junk Bay Landscape:
- i. LVIA Table 11.14 identifies three mitigation measures which are claimed to mitigate impacts on LCA5, however these claims are incorrect as explained below:
 - *CM2 – Preservation of Natural Coastline*. This has zero effect on mitigating impacts on LCA5, for the same reasons as explained above for LR9.
 - *CM4 - Management of Construction Activities and Facilities*. Like CM2, this is simply good site management which has zero effect on mitigating impacts of the project on LCA5.
 - *OM8 – Shoreline Treatment*. As explained above this mitigation measure is mitigating the loss of the shoreline ecology and biota that live on the shoreline and that will also be lost when that rocky shoreline landscape is lost. So, whilst a laudable design element (which I support), it is really an ecological mitigation measure, not a landscape mitigation measure (to be consistent with the manner in which landscape and ecology are split in an EIA). Consequently, and obviously, OM8 does not mitigate the adverse impact on landscape character.
 - ii. LVIA §11.9.12 contains the following text to describe the residual impacts on LCA5: *‘For LCA 4 and 5, there will be moderate residual landscape impact during the construction phase due to the proposed construction of housing development and public facilities respectively. The affect (sic) area of water bodies is relatively larger in LCA4 than LCA5. In view of the loss of water area is irreversible, the impact caused by the proposed works are maintained as moderate in Day 1 and Year 10 for LCA4 and LCA5 with implementation of landscape mitigation measures’*.
 - iii. This assessment is seriously flawed because, as explained above, the correct unmitigated impact should be ‘substantial’, meaning that **the correct residual impact should also be ‘substantial’**.

It can be seen from the above detailed analysis that whilst the LVIA is presented in a seemingly thorough manner, a critical review exposes serious flaws in the assessment and conclusions. The analysis shows that a correct professional assessment of the landscape impacts identifies what is probably glaringly obvious to the layman – namely that the proposed development will cause **substantial permanent and irreversible adverse landscape impacts** to both the natural coastline (rocky and sandy shores) along the western edge of Junk Bay as well as the overall landscape character of Junk Bay. These are landscapes of high value.

In this context the statement in in the Executive Summary §2.2.2.2 *“Location-wise, the land to be created off TKO 132 is at a relatively obscure area...”* is very wrong and misguided, firstly because the area is not ‘obscure’ but very widely visible at the eastern approaches to Victoria Harbour, and secondly because remoteness or inaccessibility is no excuse or justification for degrading a pristine high-quality landscape, especially for the creation of facilities that are essentially temporary in nature.

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CEDD should find an alternative location for the temporary facilities planned for Area 132. To permanently destroy this beautiful natural landscape to create temporary facilities is indefensible.

Even if no other location can be found, adoption of a sensitive reclamation design similar to what has been adopted in other locations in Hong Kong could entirely avoid the substantial adverse impacts on the rocky shores (LR9) and sandy shores (LR13), and thus help to mitigate, to some extent, the adverse impacts on the landscape character of Junk Bay (LCA5), which would nevertheless still remain substantial adverse.

For these reasons I strongly object to the proposals and to the findings of the EIA and I strongly recommend that CEDD return to the drawing board and preferably relocate elsewhere the temporary facilities planned for the Area 132 reclamation so that it is cancelled or, at the very least, redesign the reclamation to preserve the natural coastline and also create a more curvilinear reclamation plan.

Thank you for your serious consideration of these comments.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Alexander M Duggie', with a stylized flourish at the end.

Alexander M DUGGIE

BPhil, RLA, FHKILA, CMLI, HKIUD, HKIQEP, HKIEIA, BEAM Pro (NB, EB, ND)

**Relevant extract of the draft minutes of
the Environmental Impact Assessment Subcommittee meeting
held on 17 March 2025**

**EIA report on “Development of Tseung Kwan O Area 137
and Associated Reclamation Sites”**

Question-and-Answer Session (Open session)

Impacts to Marine and Terrestrial Organisms

1. At the Chairman's invitation to address those public comments on coral communities, Ms Gigi Lam briefed Members on their findings about the distribution of coral reefs in TKO Area 132 (TKO 132) and TKO 137 which included hard coral, soft coral and black coral species. Ms Lam confirmed that no rare coral species were found in the project areas and the found ones were mainly common species with respectively less than 10% coverage in TKO 132 and 5% in TKO 137. As for the eight coral species with higher ecological value covered in the EIA study, only three species, namely *Acropora solitaryensis*, *Favites flexuosa* and *Montipora peltiformis*, were sporadically found in TKO 132 or outside the project site. While the proposed marine works were not expected to have significant impacts on the coral communities, Ms Lam assured that arrangements would be made for the transplantation of those affected corals, in particular those with high ecological values with a view to minimising the potential impacts caused by the reclamation works. Ms Lam furthered that apart from translocating those corals attached to rocks under 50 cm in size, an unconventional method would be deployed to collect bodies of unmovable corals. To enhance the ecological value of the marine environment, the opportunity would be taken to create an eco-shoreline with improved seawalls and artificial reefs as a habitat and shelter for marine organisms. The Chairman suggested that the project proponent should explore the feasibility to adopt eco-shoreline design with a wave-like structure to provide diverse habitats for marine organisms.

2. The Chairman was glad that corals grown on larger rocks would also be collected for plantation or translocation as this would help alleviate the public's concerns. A Member was pleased with the proposal on conserving the marine environment and the additional enhancement measures such as reef tiles for corals. In response to the Chairman's suggestion, Ms Gigi Lam confirmed that more detailed studies would be conducted to check the location, quantity, condition and suitability for translocation of the affected coral communities. A mitigation plan with the coral mapping results would be submitted to the authorities for approval before the commencement of the proposed marine works.

3. Considering that some coral species listed as vulnerable by the International Union for Conservation of Nature (IUCN) were found in the project areas and not all of them might be successfully translocated, a Member proposed that proactive actions should be taken for their conservation such as through collaboration with non-governmental organisations or the academic sector in cultivating more coral reefs of the vulnerable species. Mr Michael Leung replied that CEDD would collaborate with the relevant experts including green groups to achieve better conservation results.

4. In response to a Member's enquiry about the number of Black Kite in the project area and the impacts to their nests, Ms Gigi Lam explained that only one Black Kite nest was found in a mixed woodland at some distance from the project site during the dry season. To minimise the potential impacts, site clearance or construction activities in the vicinity would be avoided as far as practicable. For any unavoidable works, they would be conducted during the non-breeding season. The project proponent would preserve the existing Black Kite nest and check if there were any birds or eggs inside before conducting any works.

Landscape Impact

5. Noting the proposed 1:1 compensation ratio for the 1,250 number of affected trees, a Member opined and another Member echoed that the project proponent should take the opportunity to consider more proactive conservation measures to enhance the overall ecological value of the environment. To address Members' concern, Ms Elly Leung confirmed that none of the surveyed trees were Registered Old and Valuable Trees, rare or endangered tree species, or Trees of Particular Interest. Apart from meeting the required tree compensation ratio, the project proponent would strive to improve the quality of the replacement trees by introducing more native species and species with high ecological value. Ms Leung said that more greening would be included in the streetscape design, open space, along roadside and the cycling network to enhance the ecological connectivity between the urban area and the neighbouring country park. In response to one of the above Members' questions on the species and percentage of the replacement trees, Ms Gigi Lam replied that high-valued native, floral and fruit bearing plant species would be adopted to provide a friendly environment for birds and butterflies. Ms Lam said that they would balance both the aesthetic and ecological functions of the plants for enhancing urban biodiversity as a whole.

6. Two Members enquired about the deciding factors for in-situ preservation and translocation of the Small Persimmons as they were classified by IUCN as critically endangered species. Ms Gigi Lam advised that only a limited number of Small Persimmons were found in a shrubland near a works area in TKO 137. In accordance with the Technical Memorandum on EIA Process (TM), the project proponent would accord the first priority to preserving the Small Persimmons in their original locations as far as practicable and create a tree protection zone by fencing them off with a 1.5-metre buffer distance to avoid damage from works. If in-situ

conservation was not feasible, the plants would be transplanted to a nearby shrubland with favourable conditions to support their growth and survival. Ms Lam believed that transplantation would be able to mitigate the potential impacts on them. Compensatory planting would be carried out if transplantation was not feasible. A transplantation proposal would be submitted to AFCD for approval before action would be taken.

7. The Chairman suggested that the project proponent should devise a Tree Plantation and Enhancement Plan and be more proactive in suggesting environmental enhancement measures, such as by providing ecological corridors and introducing plant species that could enhance urban biodiversity etc.

Environmental Impacts associated with Electricity Facilities (EFs)

8. Regarding the Chairman's questions on the offshore design for the EFs, Mr Ivan Tsang replied that a large curvature would be required for the submarine power cables as they were huge in size and there were safety concerns about their connections to the EFs. He indicated that if the submarine power cables were installed in L-shape through bridge piers, there would be an undesirable impact to the water quality. To address the Chairman's further question, Mr Tsang said that the costs involved would be at least one-fourth higher as the seawalls required would be longer if the cables were to go along the shoreline of the new reclamation.

9. Mr DC Cheung supplemented that the proposed EFs would need to be located close to the existing power distribution facilities of the CLP Power, which would serve also as a new connecting point of supply between HK Electric and CLP Power, while posing the minimum impact to the residents in the area. He remarked that the installation of the submarine power cables would have to be carefully designed to meet the relevant technical and safety requirements for proper power transmission. Apart from addressing the essential security considerations, Mr Cheung said that CEDD would also take into account the views of the relevant stakeholders and explore to adopt various green features in the design such as green roofs, photovoltaic panels, more vibrant colour scheme etc. to make the facilities visually pleasing and environmental friendly. Different government departments would also explore the possibility to share common facilities in the area so that the scale of reclamation could be kept to the minimum. Mr Cheung added that the targeted completion of the EFs by 2035 was an important step for Hong Kong to achieve carbon neutrality by 2050 as the facilities could support the transmission of about one-third of Hong Kong's electricity requirements by clean energy. As the development project was still in the preliminary planning stage, he said that a separate EIA report on the EFs would be prepared and submitted at the later stage in accordance with the requirements of EPD and the ACE would be consulted again.

10. To address a Member's query on the presentation about the mitigation measures for electric and magnetic field in the executive summary of the EIA report, Mr DC Cheung clarified that the facilities, commonly found in many districts, were odourless with neither gas nor pollutant emission since no burning or chemical

processes were involved. As for the electromagnetic fields generated by the installations of the power companies, he said that they had to be in strict compliance with the requirements of the International Commission on Non-Ionizing Radiation Protection and would be monitored regularly by the Electrical and Mechanical Services Department to ensure that the relevant safety standards were met.

11. While appreciating the proposed green measures, a Member held the view that the project proponent could go beyond the minimum requirements and take a further step to consider the installation of green roofs under the photovoltaic panels as there were already successful precedents. Highlighting the importance of the vertical sides of the facilities, the Member also suggested to provide more vertical greening to enhance the aesthetic treatment of the façade of the facilities. The Chairman added that printable photovoltaic panels could be adopted to increase the colour variation. Ms Christine Au clarified that the height of facilities would range from 35 m to 60 m. She assured that CEDD would strive to enhance the greening in the vicinity and reduce carbon footprint of the project.

Water Quality Impact

12. Noting that an effluent polishing plant (EPP) would be set up in TKO 137, a Member questioned why the Government did not take on Stage 2B of the Harbour Area Treatment Scheme (HATS) in the current project. Although the discharged sewage would be in full compliance with the water quality assessment criteria after secondary plus treatment, he was still concerned about the large volume of treated sewage to be discharged to Tathong Channel which would bring up the levels of *E.coli* and other bacteria in the water. The Member proposed that the Government should consider the planning of HATS Stage 2B and upgrading the Tseung Kwan O Preliminary Treatment Works in a holistic manner with a view to further improving the water quality of the Victoria Harbour including the east buffer zone. As there was a pressing need for the project to meet the housing needs of Hong Kong and HATS Stage 2B was a policy beyond the purview of the current development, Mr Michael Leung said that CEDD had made the current sewage treatment proposal in consultation with EPD and DSD.

13. To address a Member's question on the location of the proposed discharge outlet and whether the water quality report had analysed the extent of dispersion with reference to the tidal current, Mr Marco Lee explained that the discharge port would be located at the north of TKO 137 and results of hydrodynamic models showed that there would be rapid current to take away the discharged sewage to ensure that the water quality would meet the required standards. Mr Lee added that they would continue to discuss with the departments concerned to consider the arrangement and capacity for treatment of the sewage in TKO 137 and TKO as a whole in order to achieve the highest efficiency for sewage treatment in the area.

14. Dr Samuel Chui explained that under HATS, sewage from both sides of the Victoria Harbour would be carried by submarine tunnels from the eastern side of the Hong Kong Island for central treatment at the Stonecutters Island Sewage Treatment

Works. While the treatment capacity at Stonecutters Island was not an issue, there was currently a bottleneck at the Kwun Tong Sewage Pumping Station where there was already a large influx of sewage from TKO. Considering that the existing pumping station in Kwun Tong might not be able to handle the large volume of sewage from the new development in TKO 137, the project proponent was required to set up a local EPP with a standard to meet the requirements of secondary plus treatment level. Dr Chui clarified that the places with higher levels of *E.coli* were in fact located at Po Toi O and the treated sewage of the project was to be discharged to Junk Bay which was a complete different water body. As the level of *E.coli* at relevant water sensitive receivers would be below the water quality objectives for bathing beach, Dr Chui said that significant impact to the water quality at Junk Bay was not expected.

15. A Member enquired whether the existing seawater desalination plant in TKO would be able to support the additional population intake of 135,000 in the future and whether there were mitigation measures to reduce the related impacts. Mr Michael Leung replied that the capacity of the seawater desalination plant in TKO 137 would be sufficient to cater for the population intake as its current supply accounted only for about 5% of the water consumption in Hong Kong.

16. In reply to a Member's enquiry about the impacts on fisheries, Ms Gigi Lam explained that there was no fish culture zone in Junk Bay and the closest ones were in Tung Lung Chau and Po Toi O which were at least 1.5 km away. As shown in the port survey of AFCD, there was only low to moderate level of fishery activities in Junk Bay. Another survey conducted by the project proponent showed that mainly recreational fishing activities and fish species of low-commercial value were found in the area. Considering that the water quality would be monitored constantly during the construction period, there should not be significant impacts to fishery-related activities.

Noise Impact

17. A Member expressed that the marine traffic noise criteria based on the measured noise level during peak hours could be presented more clearly. Besides, she opined that the current assessment based on the assumed nominal routings in Victoria Harbour might not reflect the actual situation as different marine traffic routes could be involved during operation. The Member suggested that the assessment should be reviewed at design stage with respect to the latest marine traffic routing. Ms Anna Chung explained that the assessment was based on the calculation of the predicted number of vessels during peak hours and the noise level of each kind of vessels was obtained by on-site measurement. While the routings were based on assumption, Ms Chung clarified that marine traffic would unlikely take a closer route in the future given the existing Junk Bay Dangerous Goods Anchorage Area. Nevertheless, since the Refuse Transfer Station (RTS) was a designated project under the Environmental Impact Assessment Ordinance (EIAO), a separate EIA report with more updated assessment would be submitted before the commencement of the relevant works. In response to the Member's question, Ms

Chung confirmed that the assessment fulfilled both the criteria for the day time and night time and Mr Gary Tam supplemented that the marine traffic assessment was made on the basis of the predicted marine traffic noise in year 2041 after full population and full operation of the five facilities in TKO 132 and no adverse noise impact from marine traffic was expected.

Odour and Air Quality Impact

18. A Member enquired if there were measures to mitigate the odour impacts. He suggested that the project proponent should clarify the current source of odour to alleviate the public's concern about the project. The Chairman suggested that mitigation measures should be put in place to minimise the odour issue of the RTS and construction waste in TKO 132.

19. Ms Anna Chung replied that the RTS and the proposed sewage pumping station should be the main source of the odour in TKO 132. Those two facilities would be provided with negative pressure and deodourising units with 95% odour removal efficiency. Ms Chung indicated that the odour modelling results at the nearest air quality sensitive receivers were well below the criteria of the TM i.e. 5 odour units. As for the air quality issues in connection with the concrete batching plant (CBP), public fill transfer facility, construction waste handling facilities and the pollutant emission of vehicles and vessels within 500 meters of the site, Ms Chung shared that the results of the air quality modelling assessment at the air sensitive receivers were in full compliance with the current and upcoming new air quality objectives standards. Ms Chung said that enclosed design of odourous facilities with negative pressure and 95% odour removal efficiency was also recommended. The odour modelling results at nearby existing and planned air sensitive receivers were well below the 5 odour units criterion.

20. While the air quality modelling results showed that there would not be significant impacts arising from the relocation of the CBP from TKO 137 to TKO 132, a Member was concerned about the potential nuisance to the local residents as non-compliant incidents of CBPs were often reported. He asked whether the raw materials would be transported to the CBP by sea or by road and whether CEDD had worked out mitigation measures to minimise the impacts to the residents of TKO 132. He highlighted the importance of maintaining close communication with the residents in TKO 132 to alleviate their concerns. The Member furthered that the project proponent should not overlook the greening design in TKO 132. Given the unsatisfactory performance of some CBPs in Yau Tong, the Chairman suggested that, in addition to regulatory control, the design of the facility should also be improved such as through the installation of double doors to avoid the spreading of dust.

21. As the CBP in TKO 132 would be located near the pier, Mr Gordon Yeung said that marine transportation would be adopted to avoid adding pressure to the road traffic. Addressing a Member's concern, Mr Michael Leung shared a successful example of CBP in Sai Kung where no complaints were received from the neighbouring residents. He expressed that if the mitigating measures were

carefully implemented by the operators, impacts to the residents would be minimal. Mr Yeung added that the operation of a CBP was regulated by the Air Pollution Control Ordinance through a Specified Process Licence (SPL). The CBP would be required to submit a detailed air pollution control plan for EPD's review before an SPL would be granted. Dr Vanessa Au supplemented that in addition to the quantitative air impact assessment in the EIA, the CBP would also need to submit a series of mitigation measures in accordance with the Best Practicable Means for Specified Processes, such as dust control measures, full enclosure for delivery vessels, thorough cleaning procedures for cement trucks to avoid dust emission etc. EPD would consider granting the license only if the dust control measures of the CBP facilities had met the requirements of the SPL. Dr Au shared that unlike the older CBPs, the new CBPs including the one currently located in TKO 137 had put in place satisfactory dust control and truck cleaning measures. Ms Christine Au added that specific requirements or conditions could be included in the tender specifications for the CBP in TKO 132. A tender submission could be rejected if its track records were unsatisfactory. Ms Au opined that the licensing control plus the tendering specifications would help ensure the environmental performance of the CBP in TKO 132.

22. A Member was concerned about the impacts of the extended area of landfill for construction waste which was next to TKO 137 and asked if there were any mitigation measures. Ms Anna Chung explained that the landfill site would be closed before the population intake. She said that while there would be flaring emission from the landfill during the aftercare period, the modelling results showed that such emissions would meet the environmental standards. Mr Tony Cheung explained that the South East New Territories (SENT) Landfill and its extension area (SENTX) was a designated project under the EIAO, and an EIA report was approved with the Environmental Permit (EP) granted under the EIAO for the construction and operation of the SENTX landfill. Among other things, an environmental monitoring and audit (EM&A) system, including monitoring of landfill gas from SENTX landfill, had been included as one of the requirements to ensure that the operation of the SENTX landfill would not cause adverse environmental impacts to the nearby sensitive receivers. Mr Cheung also highlighted that the EIA report of the project had assessed the potential environmental impacts on the proposed developments in TKO 137 arising from the operation of SENT and SENTX.

Waste Management

23. As there was limited coverage on mitigation measures for waste in the EIA report, a Member suggested that the project proponent should cover also the treatment measures for municipal solid waste, food waste and other operational waste in the environmental management plan. Considering that the Government had been conducting tests on food shredders installed on sinks and the construction of another O-PARK for processing food wastes would be costly and time-consuming, the Chairman asked if the project proponent would take the opportunity to adopt the new technology in the project as the shredded food waste could be treated by the EPP in the area. Dr Samuel Chui indicated that EPD welcomed the installation of food

waste disposers in buildings as the processed food waste could be subsequently treated through the Drainage Services Department (DSD)'s sewerage system and sewage treatment works.

24. As a waste reduction effort, the Chairman suggested that the project proponent should as far as possible reuse and recycle on-site waste materials generated from the construction works such as felled trees and soils. Mr Michael Leung replied that they would consider including such requirements in the tender documents.

Traffic Impact

25. Given that the first population intake would be in 2030, a Member asked for the time table for re-routing the traffic of heavy vehicles away from the residential area, the provision of transportation facilities for the new population in TKO 137, and the expected impacts on Wan Po Road. She opined that the residents should be well informed of the development schedule.

26. Mr Michael Leung responded that the Transport and Logistics Bureau had been planning on an extended MTR line to TKO 137. In case the residents needed to use other public transport for commuting at the initial stage, Wan Po Road which was a dual 2-lane carriageway road had the capacity to cater for such need before the completion of the MTR extension. Mr Leung supplemented that the project was undergoing the gazettal process. Subject to the Legislative Council's funding approval in early 2026 for the commencement of the construction works in TKO 132, diversion of the traffic of heavy vehicles was expected to be in around 2030. He highlighted that CEDD would strive to meet the planned development schedule with a view to handing over the subject site to EPD in 2028 for the construction of the EFs to support Hong Kong's achievement in its carbon neutrality target.

Communication with Local Residents

27. A Member noted that the first population intake in TKO 137 would be in 2030 while the whole development in TKO 132 and TKO 137 would last till 2040. The Member and two other Members opined that the Government should keep the residents especially the first intake informed of the progress of the project, the mitigation measures that had been put in place to minimise the impacts of the works, the government's monitoring efforts as well as other matters of concerns such as the emission situation of landfill gas. Given that the whole development project would last for more than 10 years, the Government should build in a review mechanism in the EM&A report so that the different parameters would be updated on a regular basis to ensure effective monitoring. One of the above Members suggested that the Government should consider the above matters as a whole and to follow through the plan while sharing the relevant information to the residents to secure their continual support to the project.

28. Mr Michael Leung indicated that CEDD would maintain close communication with the relevant parties and ensure data transparency through various means including submissions to the District Council and regular liaison meetings with local residents following their practices for other projects. With the feedbacks collected, CEDD would make continual improvements and adjustments as far as practicable. Mr Leung explained that once funding was approved, different community liaison groups would be set up to facilitate communication with the stakeholders including local residents, the District Council, fisheries bodies etc. Mr Gary Tam supplemented that the EM&A was a dynamic process involving re-evaluation procedures to ensure the satisfactory environmental performance.

Sustainable Development

29. A Member was pleased to note that 50,000 residential units would be provided in TKO 137. Taking into consideration the population size which was comparable to that of a city and the cumulative impacts of various concurrent projects in the neighbourhood, the Member opined that the project proponent could consider creating an eco-city through the inclusion of nature-based solutions, go-green infrastructure, resources circularity, waste-to-energy etc. to help achieve carbon neutrality in the area. Mr Michael Leung indicated that there would be a 1.4 km waterfront promenade with a cycling track connecting to the TKO section as the area was planned to be a green and eco-friendly community. He said that government buildings in the project area would be requested to set an example in adopting green building design in accordance with the established guidelines of the Government. Mr Leung indicated that CEDD would strive to achieve Gold or Platinum Standard for the government buildings in TKO 132 and TKO 137. The Member opined and another Member echoed that the project proponent should take the opportunity to consider more proactive conservation measures in different aspects including trees, corals, greenings etc. with a view to enhancing the overall ecological value of the environment.

30. Three Members were glad that the proposed project could bring benefits to the environment including contribution to the carbon neutrality targets. In view of the location of the project areas, one of the above Members sought to have more details about the measures to address storm surge and sea level rise caused by extreme climate.

31. Mr Marco Lee explained that they had followed the Port Works Design Manual issued by CEDD and Stormwater Drainage Manual issued by DSD in the design of storm drain and seawall. In addition, the Hong Kong Observatory (HKO) had also been consulted and agreed that the current design should be able to cope with certain extreme weather conditions arising from climate change in the coming century. Mr Lee highlighted the three main aspects of the seawall design, namely setting a suitable height for the seawall; keeping a suitable buffer distance with the buildings; and reserving sufficient resilient capacity for the seawall to accommodate further enhancement if needed in the future. With the experience gained from the Cross Bay Link and Tseung Kwan O-Lam Tin Tunnel projects where the construction

works underwent Typhoon Hato and Typhoon Mangkhut, Mr Michael Leung indicated that CEDD would bear in mind the potential power of strong waves in its design and strive to enhance the relevant measures with reference to HKO's advice.

32. The Chairman held the view that during the construction process, equipment with low carbon emission should be deployed as far as practicable to minimise carbon emissions. Mr Michael Leung shared that the adoption of high-strength steel and electric concrete trucks would be considered to reduce carbon footprint. He said that CEDD would work with the project consultant to explore the incorporation of such requirements in the tender documents.

33. Mr Michael Leung thanked all Members for their valuable comments and suggestions. He said that CEDD and the consultant would take into account Members' advice, such as to strengthen communication with the residents, enhance the project design and eco-shoreline, mitigate further the impacts on coral reefs, incorporate more greening etc.

(A Member left the meeting during the Question-and-Answer Session while the presentation team left the meeting at the end of this session.)

Internal Discussion Session (Closed-door Session)

34. The Chairman informed Members that a Member had submitted before the meeting written comments on the capacity of the sewage system suggesting to conduct analysis and verification with modelling data to ensure that the system would meet the criteria. In addition, the Member had also suggested that the EM&A programme should be reviewed with reference to the latest situation.

35. At the Chairman's invitation, Ms Virginia Lee had shared with Members the existing compensation mechanism for fishermen in case they were affected by development projects. Ms Lee indicated that under the prevailing policy of AFCD, fishermen who suffered from permanent loss of fish culture zone(s) or temporary impacts from works projects would be provided with an ex-gratia allowance with a view to alleviating their financial pressure due to the works. Ms Lee said that AFCD would work out an arrangement for the current project with the project proponent at a later stage.

36. The Chairman advised Members that the EIASC could make one of the following recommendations to the ACE on the EIA report –

- (i) endorse the EIA report without condition; or
- (ii) endorse the EIA report with condition(s) and/or recommendation(s); or
- (iii) reject the EIA report and inform the project proponent of the right to go to the full Council.

If the EIASC could not reach a consensus during the meeting, it might–

- (i) ask for a 2nd submission to the EIASC; or
- (ii) defer the decision to the full Council and highlight issues or reasons for

not reaching a consensus for the full Council's deliberation.

37. Members supported the endorsement of the EIA report in general, but considered that conditions and recommendations should be included.

Conditions and Recommendations

38. In the light of the discussions made during the meeting, the following conditions and recommendations were proposed by the EIASC –

(a) Conditions

The Project Proponent should –

- (i) in consultation with the AFCD, submit a Coral Translocation and Enhancement Plan (CTEP) to the DEP for approval no less than three months before commencement of marine works of the relevant parts of the Project. The CTEP should provide details on the results of the pre-construction coral survey, coral translocation methodology, location and suitability of the coral recipient site(s), the post-translocation monitoring programme, the implementation details of the proposed coral enhancement measures (such as collection of bodies of unmovable corals, and coral fragments for coral plantation, etc.) and the overall implementation programme;
- (ii) prepare a Tree Management and Enhancement Plan (TMEP) covering individual trees that would be affected by the Project, proposed compensatory planting and enhancement measures, and maintenance and monitoring programme. The TMEP should be deposited with the DEP no less than one month before commencement of construction of the relevant parts of the Project involving tree felling works; and
- (iii) set up community liaison group(s) comprising representatives from the concerned and affected parties to facilitate communication and enquiries handling on all environmental issues related to the Project.

(b) Recommendations

The Project Proponent was recommended to –

- (i) explore the feasibility to adopt eco-shoreline design with a wave-like structure (i.e. not a straight shoreline) to provide diverse habitats for marine organisms;
- (ii) explore the use of construction methods and materials with low carbon emission to reduce carbon emission of the Project as technically and economically feasible and practicable;

- (iii) consider climate resilience in the seawall design to prevent flooding at the proposed development of the Project;
- (iv) consider planting native species for greening to enhance ecological connectivity and urban biodiversity; and
- (v) enhance waste reduction, reuse and recycling during construction and operation phases of the Project.

(Post-meeting notes: The draft conditions and recommendations was circulated to Members for comment on 28 March 2025. Members' comments had been incorporated in ACE Paper 5/2025 which would be discussed at the ACE meeting on 7 April 2025.)

(A Member left the meeting during the Closed-door Session.)

**EIA Subcommittee Secretariat
April 2025**

就圖則作出申述

Representation Relating to Plan

Submission Number:

TPB/R/S/TKO/31- S10

參考編號

Reference Number: 250414-104550-82189

提交限期

Deadline for submission: 14/04/2025

提交日期及時間

Date and time of submission: 14/04/2025 10:45:50

「申述人」全名

Full Name of "Representer": 機構 Organization Lee Yuk Ming

「獲授權代理人」全名

Full Name of "Authorized Agent": 機構 Organization

與申述相關的圖則

Plan to which the representation relates: S/TKO/31

申述詳情

Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
N/A		N/A

對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。

Any proposed amendments to the plan? If yes, please specify the details.

Comments only (not proposed amendments):-

"A proposed new MTR extension should avoid impact on (i) the submarine cables buried under the seabed off TKO InnoPark and (ii) the operations of vessels berthing along the waterfront of TKO InnoPark".