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Joint Green Groups' Appeal for a Development Permission Area (DPA) Plan for Tung Chung River Valley and Coast

Statutory Land Use Plan Crucial to New Town Extension

1. Green Groups requested in joint letters dated 3 May 2012 to the Secretary for Development and Director of Planning for the publication of a Development Permission Area Plan (DPA) to protect the rich biodiversity and ecological values of the Tung Chung River Valley and Coast from vandalism and unauthorized development.
2. After the draft Recommended Outline Development Plan (RODP) was published in August 2014 under the "Tung Chung New Town Extension Study – Stage 3 Public Engagement", the joint green groups again urged the Government on 15 September 2014 to proceed forthwith with the publication of a DPA for the area around Tung Chung not yet covered under the Town Planning Ordinance.
3. Green Groups are very concerned that the publication of the RODP of the future new town extension and associated increase in economic activities provide incentives for unauthorized land uses. Although the government may consider further community input and amendments to the RODP, we remind

government that a statutory DPA plan is now required urgently:

- (a) to ensure the RODP and proposed land uses can be implemented;
- (b) to ensure control over incompatible and/or unauthorized developments,
- (c) to terminate existing vandalism and to stem potential vandalism in Tung Chung Valley and Coast; and
- (d) to protect the ecology, hydrology and water quality of Tung Chung River and Bay, a major planning intention of RODP.

4. Green Groups' recommended DPA (version June 2015) for a sustainable planning for Tung Chung River, estuary, coastal areas and associated habitats is enclosed.

Drafting of Tung Chung West DPA

5. There are land use voids between the area covered by RODP, the existing Lantau North (Extension) Country Park, and the Tung Chung Town Centre Area Outline Zoning Plan. We recommend that these land parcels are designated as Country Park, "Site of Special Scientific Interest" (SSSI), "Conservation Area" (CA) and/or "Green Belt" (GB)¹. We propose further that the tributaries of Tung Chung River flowing through Mok Ka, Lam Che and Nim Un are protected by zoning its stream courses and banks as SSSI.
6. Regarding the land use of Tung Chung Valley, we suggested in 2012:
 - (a) To protect and conserve high quality natural habitats which are of rich biodiversity and ecological value through conservation planning, management and monitoring. In particular, the Tung Chung River, estuary, woodlands and the coast should not be exploited for any development and protected statutorily as "SSSI", "CA" and "CPA" zones as illustrated in our revised recommended DPA Plan attached to this letter.
 - (b) To promote compatible community uses and enjoyment of the Tung Chung River Valley and the estuary through environmental education and passive recreation activities. Ecologically-friendly facilities which encourage the public to access Tung Chung River and the estuary can be considered, for example, eco-trails, a riverside park, a nature education centre, resting places and look-out towers.
 - (c) To enhance the tourist appeal the river landscape and cultural heritage of the Tung Chung River Valley through improved linkage to existing Country Parks in Lantau. Tung Chung River Valley is located amongst existing tourist spots including Hong Kong International Airport, Ngong Ping Cable Car, Po Lin Monastery and the Tian Tan Buddha Statue.
7. Therefore, Green Groups proposed in our recommended DPA (version June 2015) an extensive **River Nature Park** to serve above-mentioned land use purposes and flood prevention.

Reduce Development Pressure

8. We call for a reduction in development pressure and wide ranging measures to alleviate development impacts. Much of Tung Chung Valley is allocated for residential development in the RODP. We consider that such planning is incompatible with the physical and ecological setting of Tung Chung Valley and the principles of the Convention on Biological Diversity. Under Article 8 of this Convention, each contracting party shall:
 - Regulate or manage biological resources important for the conservation of biological diversity whether within or outside protected areas, with a view to ensuring their conservation and sustainable use;
 - Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;
 - Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;

¹ Joint Green Groups' Statement on Protection and Conservation of Tung Chung River, Estuary, Coastal Areas and Associated Habitats, 19 Jun 2012

- Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, inter alia, through the development and implementation of plans or other management strategies;
 - Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components.
9. We are highly concerned that the residential development (plot ratio 0.75 near the Tung Chung River estuary and up to 6.5 to the east of the valley) would affect the natural landscape, hydrology and ecology of Tung Chung River, threaten the inhabited wildlife and impact the water quality of Tung Chung River.
 10. From the Hong Kong Observatory's past observation on and prediction of Hong Kong's future precipitation pattern, the scale and frequency of river floods is expected to increase. Tung Chung River is comparatively short and steep with an overall slope of 1: 4.9, (compared to Lam Tsuen River 1: 14.5, Kam Tin River 1: 14.4, Shing Mun River 1: 17.7, Tuen Mun River 1: 17.9). The average annual rainfall of its river basin reaches up to 2400 mm, which is higher than that of Hong Kong (i.e. 2200mm). Therefore, hydraulic and geotechnical conditions in small and narrow area of Tung Chung River Valley are highly unfavourable for dense and high-rise development.
 11. Thus, in the long run, the Government must make early precaution and preventive measures in river land use planning through a statutory DPA plan for Tung Chung River Valley, to decrease the threat posed by river floods due to climate change:
 - (a) Governments should avoid developing residential and industrial areas in Tung Chung River Valley, which are highly prone to flooding and landslide, to prevent risking the lives of residents and their properties.
 - (b) The government should allocate sufficient "permeable land use" by conserving vegetation and avoid covering large surface areas with concrete in Tung Chung Valley which helps allowing rainwater to infiltrate through the soil and alleviate flooding.
 - (c) Government should strengthen law enforcement on dumping, unauthorized vehicle access and developments on both sides of Tung Chung River or other activities which may affect drainage capacity of the rivers.

Land Resumption for Flood Control and Conservation as Public Interest - River Nature Park

12. We urge Government to seriously consider the resumption of all private land lots in the Tung Chung River Valley to be able to better conserve and enhance the ecological value and functions of the area, and to achieve a sustainable plan for Tung Chung West.
13. Control over unauthorized development and incompatible uses is needed to conserve the valley and estuary covering at least 30m buffer for two main streams and 20m buffer for tributaries. It is proposed that land is resumed and that the entire river valley, and estuary is managed as a River Nature Park (separately or jointly by DSD, AFCD and/or LCSD), to safeguard the hydraulic and ecological properties of the river valley. See enclosed plan.
14. Government could consider the Long Valley's model in the North East New Territories New Development Areas Planning and Engineering Study (Stage 3 Public Engagement) in which Long Valley was designated as "Other Specified Uses (Nature Park)" to enhance and conserve the existing ecological value and functions of Long Valley.
15. Similarly, Tung Chung River Valley can be considered as a biodiversity hotspot for Hong Kong as well as a "green lung" for the Tung Chung residents. Designation of Tung Chung River Valley as a River Nature Park can be implemented by the Government as part of the Tung Chung New Town Extension project. It will also allow for better control over the ecological and hydraulic values.
16. The estimated resumption cost for about 500 private land lots with a total area of 8.5 ha in Green

Groups' proposed River Nature Park is HK\$370 million.

17. It is noted that the proposed polder dykes could adversely impact the ecological connection within the whole Tung Chung Valley. Careful studies should be carried out to justify the necessity and assess potential ecological impacts of the polder dykes. Mitigation measures should be proposed to minimize the adverse ecological impacts if the dykes are proven necessary.
18. Government should explore and assess the feasibility and potential impacts of different alternative options for flood prevention such as resuming lands along the riparian zones of Tung Chung River so as to serve as natural floodplain to retain floodwater.

Adverse Impacts of Road Network

19. In the RODP of Tung Chung West, several proposed roads are concealed as they are zoned as "Non-Building Areas "(NBA) including:
 - (a) an extension of Yu Tung Road through "R4" zone to "CPA" on the eastern bank of Tung Chung River which is indicated as NBA,
 - (b) an extension from the proposed Area 39 PRH to "R4" zone across East River to reach Shek Lau Po.
 - (c) an "NBA" zone connecting "CA" through "R3" zone to the north of Shek Mun Kap.
20. Also, we are highly concerned about the proposed road access connecting existing Shek Mun Kap Road to Mok Ka, which runs across an Ecologically Important Stream designated by AFCD.
21. We are concerned that the launch of RODP will initiate eco-vandalism activities in ecologically important areas with road access, e.g. the "CA" zone adjoining Ngau Au, the "CA" and "GB" zone between Shek Mun Kap and the proposed "R3" zone.
22. Road access will promote development, air and noise pollution, and facilitate illegal dumping and landfilling on farmlands and riverbanks. In order to prevent uncontrollable and unenforceable vandalism in Tung Chung Valley and other potential adverse impacts of road access, we urge the Administration to review the proposed road network in the RODP and to impose traffic restriction in Tung Chung West, especially for construction trucks and machinery. We insist that all non-essential roads access to ecologically sensitive areas such as natural coastlines, river banks, fung shui wood and other ecologically important site is eliminated.

Thank you very much for your kind attention. We look forward to your favourable replies as soon as possible.

Yours faithfully,



Dr. CHENG Luk-ki (Division Head, Scientific Research and Conservation, Green Power)

On behalf of

**Designing Hong Kong
Eco-Education & Resources Centre
Green Power
Hong Kong Bird Watching Society**

**Hong Kong Outdoors
Lantau Buffalo Association
The Conservancy Association
World Wide Fund For Nature Hong Kong**

Encl. Joint green groups' recommended DPA Plan for Tung Chung River, estuary, coastal areas and associated habitats