

就規劃申請提出意見
Comments on Planning Application

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

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道333號北角政府合署15樓

傳真：2877 0245或2522 8426

電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

By hand or post: 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax: 2877 0245 or 2522 8426

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

有關的規劃申請編號 The application no. to which the comment relates: Y/I-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

The attached comments on Hong Kong Resort Company Limited's application to change the use of Area 6f have been prepared by the Parkvale Village Owners' Committee. Parkvale Village is adjacent to Area 6f and the only proposed means of access to Area 6f is through Parkvale Village.

The concerns which we expressed in our comments submitted in April 2016 have not been addressed at all or very inadequately in HKR's Further Information. Consequently, in this submission we highlight our principal concerns regarding the proposed development. We believe these concerns demonstrate that the TPB has no alternative but to reject HKR's application to change the usage of Area 6f from that of a 170m² GFA three storey building to two 18 storey buildings, including 476 flats, of 21,600 m² GFA.

「提意見人」姓名／名稱 Name of person/company making this comment: Simon MINSHALL on behalf of the Parkvale Village Owners' Committee.

簽署Signature:

日期 Date: 12 July 2016

Parkvale Village Owners' Committee

Comments on the Further Information Submitted in Support of Section 12A Application Number Y/I-DB/2 to amend Discovery Bay Outline Zoning Plan for rezoning the permissible use from Staff quarters to flats at Area 6f, Discovery Bay.

1. Introduction

In April 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay elected to represent the interests of the owners of the 606 flats in the village, submitted our comments on Hong Kong Resort Company Limited's (HKR) Section 12A Application "*To Amend Discovery Bay Outline Zoning Plan for rezoning the permissible use from staff quarters to flats at Area 6f, Discovery Bay*". Our comments were assigned number 1512 by the Town Planning Board (TPB).

This document includes our comments on the Further Information submitted by HKR in response to comments made by Government departments and by the public to HKR's original application.

2. Further Information

The Further Information submitted by HKR comprises:

1. Responses to comments made by Government Departments.
2. Responses to comments made by the public.
3. A revised Traffic Study (Appendix B to the original application).
4. A revised Environmental Study (Appendix C to the original application).

No change has been made to the main body of the original application.

The only substantive changes to the application included in the Further Information are the acknowledgement by HKR that the Siu Ho Wan Sewage Treatment Works (SHWSTW) has no spare capacity to cater for the additional sewage arising from the proposed further development in Discovery Bay and an increase in the current population of Discovery Bay from 15,000 to 19,585.

In its covering letter to its submission of the Further Information, Masterplan Limited, on behalf of HKR, notes that "*We have also reviewed the public comments received during notification of the application. It is considered that many of the concerns raised are also addressed in the response to the departmental comments, and does not require separation response. However, we would like to specifically address few issues in Annex E in the enclosure*". **However, our concerns which we expressed in our comments submitted in April have not been addressed at all or very inadequately in HKR's responses to the departmental comments, nor have they been addressed in Annex E.** Furthermore, as explained in section 10 below, HKR's responses, in many instances, inadequately or even ignore comments raised by Government departments. We have also drawn attention to access aspects, such as safety and emergency situations, which do not appear to have been raised by the TPB with either the Fire Services Department or the Police. Consequently, we resubmit the comments we submitted in April as an Annex to this submission.

In this submission we highlight our principal concerns regarding the proposed development of two 18 storey buildings, including 476 flats, of 21,600 m² GFA on a platform created to accommodate a 170m² GFA three storey building.

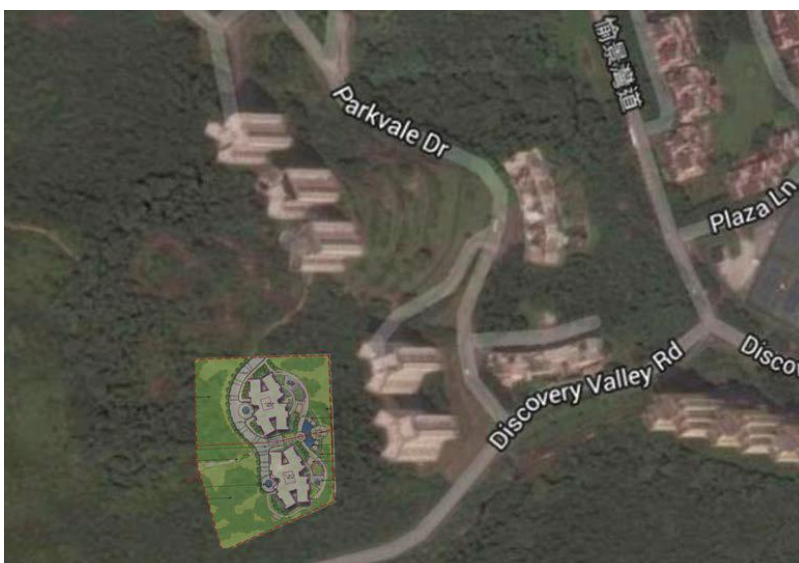
These principal concerns relate to:

1. Unsuitable access to the site:
 - a. No section of Parkvale Drive was constructed to support heavy usage and it will be unable to support additional construction and operational traffic.
 - b. Width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another.
 - c. Potential lack of emergency access to Parkvale Drive in the event of an accident.
 - d. The safety of local residents as the proposed access to the site is a pedestrian area used by children as a play area as well as by other residents.
 - e. HKR's lack of consideration of alternative access to the site.
2. The proposed provision of a local sewage treatment works to service the proposed development in Area 6f.
3. The cost of the proposed water supply to the proposed development in Area 6f.
4. The lack of any information on how the provision of other utilities will affect the owners and residents of Parkvale Village.
5. The safety of the slope on which the two proposed 18 story buildings will be built.
6. HKR's right to use Parkvale Drive as access to Area 6f.
7. The potential for the proposed developments in Areas 6f and 10f to cause the population of Discovery Bay to exceed its maximum allowed population of 25,000.
8. HKR's responses to comments raised by Government departments.

3. Access to the Site

Access to the site is by an extension to Parkvale Drive. In fact, the application states that "Area 6f is readily accessible, with an extension to the existing Parkvale Drive". As Parkvale Drive is the only means of access through our village, all traffic would have to pass through our village to access Area 6f. This is clear from Annex E of the Further Information and the aerial image below.

Aerial image of existing Parkvale Village with imposed 6f Development



Paragraph 10.15 of the application notes that *“The 476 units and 1,190 population increase as a result of the proposal is very modest development intensities”*. In the context of Parkvale Village, we do not agree with this statement, as it is proposed that all traffic and people generated by the proposed development would have to pass through our currently peaceful village. Not only will the considerable construction traffic have to drive up a hill past the existing low rise flats in the village and then past the Woodbury Court, Woodgreen Court and Woodland Court residential buildings, the significant increase in operational traffic, including the increase in the number of buses, required to service the proposed 476 flats, being nearly double the number of flats in the Woodbury Court, Woodgreen Court and Woodland Court residential buildings, will cause ongoing noise, poor air quality and disturbance to the residents of Parkvale Village.

Parkvale Drive comprises three sections, being:

1. Section 1 - from Discovery Valley Road to the junction with Middle Lane, being a relatively narrow hill covered in asphalt, which is also the only means of access to Midvale Village.



2. Section 2 - from the junction with Middle Lane to the start of the pedestrian pavement behind the Woodbury Court, Woodgreen Court and Woodland Court residential buildings, being a steep narrow hill covered in asphalt.



3. Section 3 – the “*Passageway*”, as defined in the Parkvale Village Sub-DMC, providing access to the Woodbury Court, Woodgreen Court and Woodland Court residential buildings, which is designed as a pedestrian pavement and made of paving blocks, not asphalt.



We noted in our comments on the initial application that **Parkvale Drive is totally unsuited as a means of access to Area 6f** due to concerns regarding its state of repair and its width constraints and due to emergency vehicle access and safety concerns.

We are very surprised and concerned that no Government Department has asked about the suitability of Parkvale Drive as the only means of access to Area 6f and that HKR has not addressed our concerns in its Further Information.

3.1 No section of Parkvale Drive was constructed to support heavy usage

No section of Parkvale Drive was constructed to support heavy usage and, as the photographs above show, the state of repair of Parkvale Drive is already poor. In particular, Section 3 is designed as a pedestrian pavement under BD regulations, and therefore is only currently designed to cater for 20 tonne FS and operational loading. There is significant concern over the existing and visible damage and settlement that has resulted from the current usage of all three sections of Parkvale Drive, especially of Section 3, the pedestrian pavement section. The surface was not built to be able to sustain usage by heavy construction traffic, or the increase in operational traffic, especially the increase in the number of buses, which would result from the number of proposed flats, being almost twice that of the existing Woodbury Court, Woodgreen Court and Woodland Court residential buildings.

Section 3 of Parkvale Drive.
Settlement evident to 20 tonne rated paving resulting from current traffic loading at start of proposed extension of Parkvale Drive to Area 6f.



Although this is known by HKR, no mention of it is made in its application or Further Information.

The costs of maintaining Section 1 of Parkvale Drive are not born directly by the owners of Parkvale Village, but they do bear a share of these costs and the costs of maintaining all other such roads in Discovery Bay. However, all the costs of maintaining Sections 2 and 3 of Parkvale Drive are born by the owners of Parkvale Village as these sections only serve Parkvale Village. **We are extremely concerned that the additional construction and operational traffic will cause serious damage and ongoing maintenance costs to the owners in Parkvale Village and other owners in Discovery Bay.**

3.2 Width Constraints

As well as the surface of Parkvale Drive not being built to support heavy traffic, its width does not support usage by large vehicles. When residential shuttle buses negotiate the sharp bends on Parkvale Drive, other small vans or delivery vehicles need to give way to them.

Section 1 of Parkvale Drive.
The view looking up the hill, illustrating the difficulty large vehicles have in passing one another.



When a residential shuttle bus enters the pedestrian pavement Section 3 of Parkvale Drive there is no ability for other vehicles to manoeuvre, especially while the bus turns in the cul-de-sac.

The corner of Woodbury Court is only 11 cm (see photograph below) from the edge of the Passageway. It seems unlikely that large equipment, such as earthmoving equipment, piling gear or tower crane segments, could safely transit this constricted area, if at all. In any event, there would be no safe place for pedestrians with such heavy equipment or construction vehicles passing.

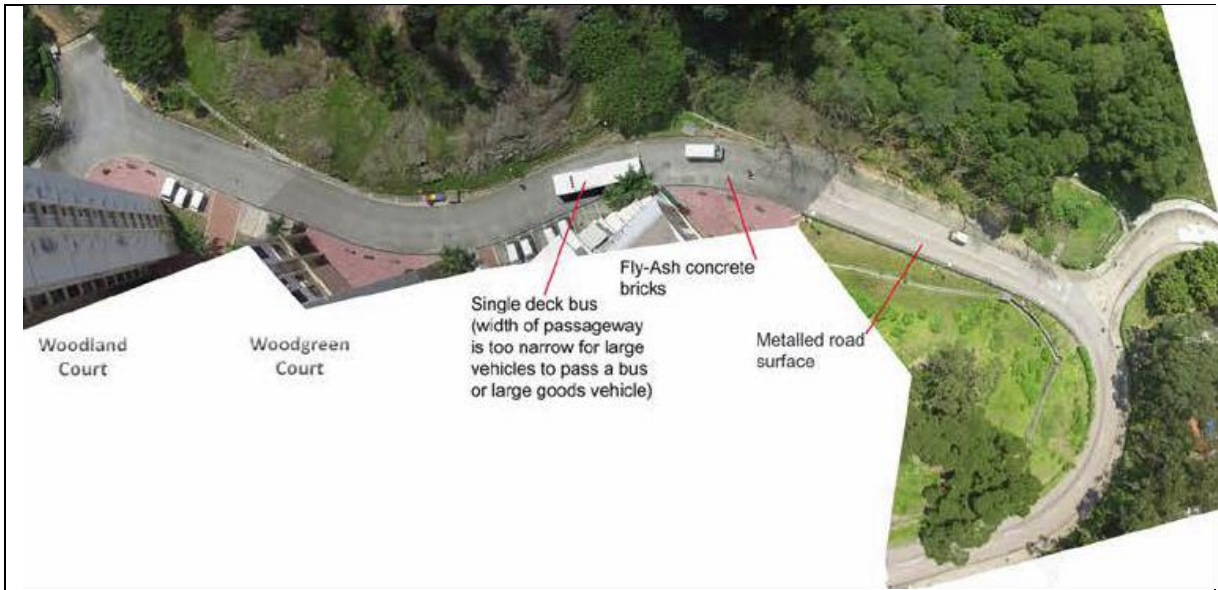


The considerable construction traffic will significantly exacerbate these problems, especially when a construction vehicle and a bus, or when two construction vehicles, are travelling in opposite directions along Parkvale Drive.

3.3 Emergency Access

In the event of a vehicle accident or a blockage on Parkvale Drive by two or more large vehicles in conflict, there would be no access for emergency vehicles, whether ambulances, fire appliances or police, to an emergency at either the construction site, the Woodbury Court, Woodgreen Court and Woodland Court residential buildings or the larger adjacent Midvale Village.

The question of adequate emergency access to the affected occupied residential blocks, as well as to the construction site, should have been referred to the Police and the Fire Services Department for consideration before these roads and driveways were proposed for construction site access. This issue may also create implications under the Construction Sites Safety Ordinance.



Bird's-eye view of the pedestrian pavement Section 3 of Parkvale Drive, to the rear of the Woodbury Court, Woodgreen Court and Woodland Court residential buildings, illustrating that this section is a narrow paved pedestrian and golf parking area providing access to the entrance lobbies of the buildings. It also provides access to service vehicles, local bus services and delivery vehicles which may traverse at low speeds to park in one of the only three unloading bays. It is not a properly engineered road and lacks a camber to allow for efficient drainage, being constructed of concrete bricks laid on non-reinforced sand underlay. This renders the surface prone to subsidence and minor flooding during heavy rainfall.

3.4 Safety

Section 3 pedestrian pavement of Parkvale Drive, being the access to the Woodbury Court, Woodgreen Court and Woodland Court residential buildings, is a quiet family pedestrian area that is used by children and young families for cycling, ball games and general recreation. It is also used by the elderly and for walking dogs, as well as for access to the residential buildings. **This area is wholly unsuitable for heavy traffic flow and poses a very real risk of residents being hurt or killed** by the heavy traffic required for the proposed construction and the increase in operational traffic, especially the increase in the number of buses, which would result from the number of proposed flats being almost twice that of the existing the Woodbury Court, Woodgreen Court and Woodland Court residential buildings.

The Passageway is a cul-de-sac and is primarily a pedestrian thoroughfare, although it is shared with parking spaces for a few golf carts and three goods vehicle unloading spaces, which were added out of necessity following the opening of the DB Tunnel Link. The Passageway also serves as a turning point for the village shuttle bus. However, it is very narrow, to the extent that a bus and a medium-sized delivery vehicle cannot pass. It is constrained because there is a steep slope on one side and the other side is right up against the entrances to the three occupied high-rise Woodbury Court, Woodgreen Court and Woodland Court residential buildings, whose main front doors open directly to the Passageway. There are no separate footpaths, and there is no room for any, and there are no railings or other protections. Children can run directly out onto and play on the pedestrian pavement and the elderly also use it for exercise as well as access. **The Passageway design constraints did not envisage the introduction of through traffic,**

especially heavy trucks and buses, the presence of which would destroy the safety and amenity of Parkvale Village.

Section 3 of Parkvale Drive.

View of the pedestrian pavement leading to the start of the proposed extension of Parkvale Drive to Area 6f, illustrating that it is primarily a pedestrian thoroughfare.



3.5 Alternative Access to Area 6f

After the proposed development of Area 6f was made known, a member of the Parkvale Village VOC proposed an alternative access to Area 6f from Discovery Valley Road. At a meeting of the Owners of Parkvale Village in March 2016 an employee of City Management, a wholly owned subsidiary of HKR, noted that HKR was considering this alternative. Subsequent to the meeting, HKR sent an email to the Chairman of the PVOC which stated that:

“We are aware of the potential traffic impact to the neighbourhood. As such, HKR is favourably considering to build either a temporary or permanent haul road from Discovery Valley Road”.

However, despite HKR’s comment in the email, it has not mentioned either the potential traffic impact or the possibility of an alternative access from Discovery Valley Road in either its Application or its Further Information. In fact, in those documents HKR states that there are no impacts on the surrounding areas and that they will use the Parkvale Drive access which we consider totally unsatisfactory.

Furthermore, no Government Department has requested HKR to propose an alternative access, despite the concerns regarding using Parkvale Drive as the only means of access to Area 6f and the alternative access which we noted in our comments on the original application.

The alternative access from Discovery Valley Road would not require the use of any part of Parkvale Drive. **We believe that the TPB should require HKR to adopt this alternative access or to demonstrate why it cannot be used.**

Alternative access to Area 6f from Discovery Valley Road.



4. Sewage Treatment

In its Further Information HKR has acknowledged that the Siu Ho Wan Sewage Treatment Works (SHWSTW) has no spare capacity to cater for the additional sewage arising from the proposed further development in Discovery Bay. The only alternative is, therefore, to build a local sewage treatment works in Discovery Bay to serve the proposed development in Area 6f, either in Area 6f or in Area 10b. If built in Area 10b, it would serve the proposed developments in Area 6f and Area 10b.

If a local sewage treatment works was built in Area 6f, its treated effluent would be discharged into “*the nullah*”, and from there into the sea in Discovery Bay.

If a sewage treatment works was built in Area in 10b, a pipe one kilometre in length would have to be built from Area 6f to Area 10b along Discovery Bay Road. The effluent from these works would also be discharged into the sea in Discovery Bay.

In its Further Information, HKR’s consultants admit that “*This additional effluent would have impacts on both water quality and marine ecology. All these would require a quantitative water quality model to be established for assessment as part of the subsequent EIA*”. (Revised Environmental Study, 6.3.1.3).

In paragraph 6.2.iii of its original application, HKR’s consultants also noted that “*alternative on-site sewage treatment plant could be provided, either at Area 6f or Area 10b. This is not preferred, having numerous STW in the area is considered to be ineffective in achieving economies for scale for the infrastructure and land area*”.

Furthermore, paragraph 5.6.2.2 of HKR’s Study on Drainage, Sewerage and Water Supply Systems for Area 6f notes that “*This STW will treat sewage only from 2 single residential towers for 476 units at Area 6f so it is considered not an efficient sewage planning strategy*”.

Paragraph 5.6.4.1 also notes that a local STW may cause “*an offensive smell and is health hazard*”.

Due to its proximity to our village, we consider that it is inappropriate to locate a STW in Area 6f, due to the potential smell and health hazard, especially as the effluent will be discharged into an open nullah, and as no mention has been made of what would happen to the sewage in the event that the STW broke down.

We are also concerned about the effluent being discharged into the sea in Discovery Bay. Although the effluent will have been treated, it will have a high concentration of nutrients which has been scientifically proven to encourage growth of harmful algae ("*red tides*"), particularly in shallow coastal areas (see page 170 of "*Harmful Algae*", volume 9, issue 10, 2010 of 'Elsevier') and, as the prevailing winds come from the east, blowing onto Discovery Bay, such harmful algae would not dissipate easily.

In response to the Drainage Services Department request to clarify the future maintenance responsibility for the proposed sewage treatment facilities under Option 2 and 3 in Sections 5.6.2 and 5.6.3, respectively, of HKR's Application, the Further Information states that "*The Option 2 sewage holding tank and Option 3 sewage treatment plant will be maintained by City Management at the costs of undivided shareholders of Area 6f and Area 10b proposed developments*".

It is not clear from HKR's response that all the maintenance costs arising from the proposed STW in Area 6f, or from the proposed STW in Area 10b, including the pipe from Area 6f to Area 10b, would be borne by the undivided shareholders of the Area 6f and Area 10b proposed developments. **HKR should be required to confirm that all costs arising from either the proposed STW in Area 6f, or from the proposed STW in Area 10b, including the pipe from Area 6f to Area 10b, will be borne by the undivided shareholders of Area 6f and Area 10b proposed developments.**

Furthermore, even if the owners of Parkvale Village will not be responsible for any of the costs of the proposed STW, **we believe that the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the one kilometre pipe.**

5. Water Supply

HKR's application has noted that the water supply from the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station may not be able to supply potable water to the proposed developments in Discovery Bay. HKR's proposed alternative is to supply private water using the raw water stored in the private Discovery Bay Reservoir and building a private water treatment works to make a private water supply exclusively for the additional 4,000 persons in Areas 6f and 10b.

This appears to be a very expensive alternative. **HKR should be required to confirm that the capital costs and the operating costs arising from adopting this alternative will be borne by either HKR or the undivided shareholders of the Area 6f and Area 10b proposed developments, and not by the owners of Parkvale Village or by the owners of any other village in Discovery Bay which have their water supplied using the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station.**

6. Provision of Other Utilities

A serious omission from the application is that all other utilities have been overlooked! These include electricity, LPG supply, telephone, TV and street lighting. As well as likely

substation capacity issues with all of these services needing to be laid through Parkvale Village, including the existing narrow and congested pedestrian pavement, adjacent to the Woodbury Court, Woodgreen Court and Woodland Court residential buildings, leading to Area 6f.

HKR should be required to confirm that the provision of these utilities will have no impact on the residents and owners of Parkvale Village or explain what the impact will be and how HKR will mitigate their impact.

7. Slope Safety

The site is defined as 8,300m² on rising ground from 44mPD to 70mPD. What is unclear from this description is that the site is only partially formed and is predominantly a slope leading down towards Crystal and Coral Courts in Parkvale Village. The present platform was only created to accommodate a 170m² GFA 3 Story Building and most, if not all, of the cleared flat area is only large enough to accommodate the road leading to the two proposed high rise buildings, not the buildings themselves. To establish the level site indicated on the concept plans would require considerable site formation to raise the grade from 44mPD to approximately a level 55mPD, and to cut back the existing formed slope.



In creating this much larger level site, the slopes towards Crystal and Coral Courts and towards Discovery Valley Road will be increased significantly. This raises the safety risk of slope failure and increases the slope drainage run-off towards the existing Parkvale properties.

HKR should be required to state how it will eliminate these risks.

8. HKR's right to use Parkvale Drive as access to Area 6f

The Sub-Deed of Mutual Covenant for Parkvale Village refers to Sections 2 and 3 (as described above) of Parkvale Drive, being from its junction with Middle Lane to its end at the start of the proposed extension to Area 6f, as a "Passageway".

In Annex E of its Further Information, HKR has stated that *“the ownership of the Passageways vests with the Registered Owner (HKR) who is entitled to grant a Right of Way to other parties to use the Passageways to the proposed development in Area 6f”*.

HKR’s assertion is its unilateral interpretation of the Principal Deed of Mutual Covenant for Discovery Bay and the Sub-Deed of Mutual Covenant for Parkvale Village. As there may be other interpretations, and as the owners of the undivided shares in Parkvale Village have been responsible for the costs of maintaining this *“Passageway”* for the past 28 years, we believe that **HKR should be required to present counsels’ independent legal opinions supporting its contention that it has the legal right to use the passageway as access to Area 6f.**

9. Population of Discovery Bay

HKR’s application noted that the current population of Discovery Bay is 15,000 and that the current approved OZP limits the population to 25,000. The difference between these two figures easily accommodates the proposed population of Areas 6f and 10b of not less than 4,003. However, the 15,000 was incorrect and misleading as Annex E of the Further Information now notes that according to the latest record of City Management, the property management company of Discovery Bay and a wholly owned subsidiary of HKR, the population of Discovery Bay is 19,585. The difference between the maximum of 25,000 and the sum of the current population and the proposed population of Areas 6f and 10b is only 1,412. Furthermore, the current population does not include the future occupants of properties in Discovery Bay which HKR is currently developing and planning.

Before the change in use is considered, **HKR must be required by Government to demonstrate, in a fully accountable manner, that the proposed developments in Areas 6f and 10b will not contribute, together with other areas in Discovery Bay being developed and planned, to exceeding the approved OZP maximum population of 25,000.** This should include an accurate count of the existing population and the expected population of areas for which HKR seeks approval to develop before the proposed developments in Areas 6f and 10b are expected to be occupied.

It is clear that the TPB is in danger of being persuaded by this incremental approach to considering projects, especially given the very small population difference of 1,412 mentioned above, to indirectly allow a breaching of the 25,000 population ceiling. There is an urgent need by Government to address this issue. Otherwise, in the future, there is likely to be an investigation by the Director of Audit as to why this issue was not addressed NOW by the TPB and why HKR was allowed to develop beyond the population ceiling of 25,000. In view of the serious nature of this issue, these comments will be sent to both the Director of Audit and the Discovery Bay District Councillor for their action.

Given the inappropriate access to Area 6f, and given the limit on the population of Discovery Bay, we are surprised that HKR has not proposed developing other areas of Discovery Bay instead on Area 6f.

10. HKR’s Responses to Comments Raised by Government Departments

HKR’s responses to Government departments are both deficient and inadequate. There is a need for Government departments to react to HKR’s responses and demand what they asked for – now! The following paragraphs which set out the PVOC’s comments on HKR’s responses to Government departments, will assist departments in this matter.

DEP's comments - HKR has refused to provide the information requested NOW in respect of waste management. This information is required now and not later!

DSD's comments re SIA - HKR only notes and has not agreed the sewage strategy with EPD to support its application.

AFCD's comments - HKR's response that 66% of the wooded area would be retained is inconsistent with the need to build the platform and the slope works and simplifies the impact on the area. The ecological aspects are dismissed too easily by saying the species are not protected, when the issue is how the area appears today and the use of the area by fauna, an issue completely ignored by HKR. Furthermore, HKR refuses to comply with the AFCD's statement that 50 compensatory trees are inadequate, stating that only an additional 20 trees can be planted due to the limited availability of planting space on the site. This position should be rejected by AFCD.

H(GEO,CEDD) has requested a GPRR in support of the application to be submitted by HKR NOW and has asked HKR to assess the geotechnical feasibility of the proposed development. HKR has refused to do so and will only submit a GPRR prior to implementation. HKR's position must be rejected.

CE/D(2), WSD has requested HKR to submit further information on the alternative water supply arrangement. There is almost a zero response. As to public perception of the proposed use of water from the Discovery Bay reservoir, HKR cannot talk about perception being anticipated because of a situation nearly 20 years ago. Perception can only be based on getting the community's views now on the specific issue of using the reservoir. This has not been done.

EPD's comments on water quality - EPD has requested HKR to provide the proposed locations of sewers, STW and discharge locations, but HKR, again, refuses to provide the requested detail, until later, during the subsequent EIA and only shows tentative locations. The actual locations should be provided now.

EPD's comments on waste management - EPD has requested HKR to address the potential waste management issues now, but HKR has refused to do so, saying this will be addressed later and has also stated that construction methodologies are yet to be developed. HKR should provide this information now.

EPD's comments on sewage infrastructure:

- EPD has requested that HKR remove misleading statements from its application. HKR has merely noted this request, but has not amended its application!
- EPD has requested an account of the design parameters of the on-site STP. HKR has only provided some preliminary design parameters and states that it will only properly address many detailed design parameters later, subsequent to approval of the rezoning application. These are important and, bearing in mind HKR's previous misleading statements about sewage, the information should be provided now and used in the vetting of the rezoning application.
- EPD has stated that HKR should make clear, now, in the Planning Statement, the proposed sewage treatment and disposal schemes and has requested confirmation that that Waste Disposal Authority consent has been obtained where necessary. HKR only says that the WDA consent will be sought after approval of rezoning application.

EPD should require HKR to deal with the above issues now, not after the rezoning application is heard by the TPB.

11. Conclusion

We (the Parkvale Village Owners Committee representing the Owners of Parkvale Village, which is adjacent to Area 6f and through which all traffic to Area 6f would pass) are surprised and disappointed that **no Government Department, nor HKR, appears to have considered the adverse impact of the proposed development on the owners and residents of Parkvale Village, especially the totally inadequate and unsuitable access to the site.**

For the reasons noted above, we consider that the Town Planning Board is in no other position than to reject HKR's application to rezone Area 6f.

We again encourage the Town Planning Board to visit the site and meet residents. In doing so, many of the issues highlighted in this report would be evident.

Signed on behalf of the PVOC:

Date:

12 July 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

Annex

Parkvale Village Owners' Committee's comments on the Section 12A application to amend Discovery Bay Outline Zoning Plan for rezoning the permissible use from staff quarters to flats at Area 6f, Discovery Bay submitted to the Town Planning Board on 7 April 2016.