

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161221-150405-18264

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

21/12/2016 15:04:05

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Yau

Name of person making this comment:

意見詳情

Details of the Comment :

The developer has provided more supplement information. It is fine and has addressed most concern from various parties and the community. The development can provide more residential units in Hong Kong which are highly desired. I support the development.

5425

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161221-151351-00574

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

21/12/2016 15:13:51

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

小姐 Miss Wong

意見詳情

Details of the Comment :

It can be seen that sewage treatment and water supply have been well considered and described. Environment will face minimal impact as realised from the information provided in this consultation. I don't see any problem. The development has my support.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161221-151925-60536

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

21/12/2016 15:19:25

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Jun

意見詳情

Details of the Comment :

Further provided information has clarified the adverse rumour in the community. I don't see why I am not going to support the development.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161221-205112-80411

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

21/12/2016 20:51:12

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Peter Tsang

Name of person making this comment:

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。
至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161222-134228-39079

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

22/12/2016 13:42:28

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Hugo Cheung

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。
至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161223-124439-29320

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

23/12/2016 12:44:39

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Samuel Ip

Name of person making this comment:

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個嶼山灣。

就規劃申請 覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-124840-89711

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 12:48:40

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. IP

意見詳情

Details of the Comment :

這項在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務，提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公三原則，在發展大嶼山時，考慮擴大小嶼山水務及污水處理廠處理能力至覆蓋整個嶼山。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-125116-80173

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 12:51:16

有關的規劃申請編號

The application no. to which the comment relates:

Y/1-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

小姐 Miss May Ip

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161223-125256-95454

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

23/12/2016 12:52:56

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Sam

Name of person making this comment:

意見詳情

Details of the Comment :

這宗在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個嶼山。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-124648-42552

提交限期

Deadline for submission:

30 12 2016

提交日期及時間

Date and time of submission:

23 12 2016 12:46:48

有關的規劃申請編號

The application no. to which the comment relates:

YI-DB 2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Samuel

意見詳情

Details of the Comment :

這個在私人土地之上興建自備電力之屋宇，雖然在環境、交通、能源、及社會等各方面，均屬合理，但由於該屋宇之興建，將會對附近之居民造成不便，故本署建議，該屋宇之興建，應以不影響附近居民之生活為前提。至於供水和污水處理方面，務須確保該屋宇之興建，不會對附近之居民造成不便。此外，該屋宇之興建，亦應符合有關之規例及標準。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

161223-125438-40227

Reference Number:**提交限期**

30/12/2016

Deadline for submission:**提交日期及時間**

23/12/2016 12:54:38

Date and time of submission:**有關的規劃申請編號**

Y/I-DB/2

The application no. to which the comment relates:**「提意見人」姓名/名稱**

先生 Mr. Ricky Luk

Name of person making this comment:**意見詳情****Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-131714-38335

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 13:17:14

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

小姐 Miss GRACE MAK

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-130957-70588

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 13:09:57

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

小姐 Miss TRACEY LEUNG

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

161223-125544-10025

Reference Number:**提交限期**

30/12/2016

Deadline for submission:**提交日期及時間**

23/12/2016 12:55:44

Date and time of submission:**有關的規劃申請編號**

Y/I-DB/2

The application no. to which the comment relates:**「提意見人」姓名/名稱**

先生 Mr. Luk

Name of person making this comment:**意見詳情****Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-130448-06200

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 13:04:48

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Yip

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

161223-131107-37871

提交限期**Deadline for submission:**

30/12/2016

提交日期及時間**Date and time of submission:**

23/12/2016 13:11:07

有關的規劃申請編號**The application no. to which the comment relates:**

Y/I-DB/2

「提意見人」姓名/名稱**Name of person making this comment:**

女士 Ms. Leung

意見詳情**Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-125715-07946

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 12:57:15

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

小姐 Miss Zhang

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-131818-09477

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 13:18:18

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Leo Lo

意見詳情

Details of the Comment:

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

161223-131934-72146

Reference Number:**提交限期**

30/12/2016

Deadline for submission:**提交日期及時間**

23/12/2016 13:19:34

Date and time of submission:**有關的規劃申請編號**

Y/I-DB/2

The application no. to which the comment relates:**「提意見人」姓名/名稱**

小姐 Miss Choy

Name of person making this comment:**意見詳情****Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個偷景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

161223-132050-22789

提交限期**Deadline for submission:**

30/12/2016

提交日期及時間**Date and time of submission:**

23/12/2016 13:20:50

有關的規劃申請編號**The application no. to which the comment relates:**

Y/I-DB/2

「提意見人」姓名/名稱**Name of person making this comment:**

先生 Mr. Chu

意見詳情**Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161223-131241-86351

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

23/12/2016 13:12:41

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Edmund Lai

Name of person making this comment:

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

161223-130629-72916

提交限期**Deadline for submission:**

30/12/2016

提交日期及時間**Date and time of submission:**

23/12/2016 13:06:29

有關的規劃申請編號**The application no. to which the comment relates:**

Y/I-DB/2

「提意見人」姓名/名稱**Name of person making this comment:**

先生 Mr. GARY LEE

意見詳情**Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

161223-132223-80638

Reference Number:**提交限期**

30/12/2016

Deadline for submission:**提交日期及時間**

23/12/2016 13:22:23

Date and time of submission:**有關的規劃申請編號**

Y/I-DB/2

The application no. to which the comment relates:**「提意見人」姓名/名稱**

先生 Mr. KEITH HO

Name of person making this comment:**意見詳情****Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

161223-125941-07873

提交限期**Deadline for submission:**

30/12/2016

提交日期及時間**Date and time of submission:**

23/12/2016 12:59:41

有關的規劃申請編號**The application no. to which the comment relates:**

Y/I-DB/2

「提意見人」姓名/名稱**Name of person making this comment:**

小姐 Miss Jacky Ip

意見詳情**Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161223-130045-12657

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

23/12/2016 13:00:45

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Ip

Name of person making this comment:

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-131416-44435

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 13:14:16

有關的規劃申請編號

The application no. to which the comment relates:

Y1-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Lam

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161223-130818-46992

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

23/12/2016 13:08:18

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Sophia Lau

Name of person making this comment:

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

161223-142824-62902

提交限期**Deadline for submission:**

30/12/2016

提交日期及時間**Date and time of submission:**

23/12/2016 14:28:24

有關的規劃申請編號**The application no. to which the comment relates:**

Y/I-DB/2

「提意見人」姓名/名稱**Name of person making this comment:**

先生 Mr. PAUL YEUNG

意見詳情**Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個偷景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-131556-44300

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 13:15:56

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Tsang

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小塘灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號**

161223-132342-84688

Reference Number:**提交限期**

30/12/2016

Deadline for submission:**提交日期及時間**

23/12/2016 13:23:42

Date and time of submission:**有關的規劃申請編號**

Y1-DB/2

The application no. to which the comment relates:**「提意見人」姓名/名稱**

女士 Ms. SALLY KO

Name of person making this comment:**意見詳情****Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號.

161223-142615-67056

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

23/12/2016 14:26:15

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Anka Lee

Name of person making this comment:

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161223-142252-84160

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

23/12/2016 14:22:52

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Terry Ko

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161223-142519-56600

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

23/12/2016 14:25:19

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Stanley Ng

Name of person making this comment:

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

161223-142342-90107

提交限期**Deadline for submission:**

30/12/2016

提交日期及時間**Date and time of submission:**

23/12/2016 14:23:42

有關的規劃申請編號**The application no. to which the comment relates:**

Y/I-DB/2

「提意見人」姓名/名稱**Name of person making this comment:**

女士 Ms. Amy Ko

意見詳情**Details of the Comment :**

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number: 161223-142717-64655

提交限期

Deadline for submission: 30/12/2016

提交日期及時間

Date and time of submission: 23/12/2016 14:27:17

有關的規劃申請編號

The application no. to which the comment relates: Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment: 小姐 Miss Mickey Lee

意見詳情

Details of the Comment :

這是在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮讓大小蠔灣水務及污水處理廠處理能力至覆蓋整個偷景灣。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161223-160307-15052

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

23/12/2016 16:03:07

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

夫人 Mrs. David Grant

Name of person making this comment:

意見詳情

Details of the Comment :

THE DELIBERATION PROCESS

This is the THIRD time I have been asked to make a submission on this matter.

WHY ?

Is it because the developers keep changing the plans to offset the objections? Were there too many objections previously? How many more times will we be asked to make submissions?

It is also extremely interesting to note the timings of these submissions always fall during holiday periods when many residents are out of town on holiday and therefore not in a position to make any submissions. The previous call for submissions was in either July or August, during the summer holidays, and this one falls during the Christmas holiday period. Is that just a co-incident? I don't think so.

Another indication that the submission process may be flawed is the very nature of those submissions IN SUPPORT of the development.

It does not need a detective to examine them and notice the very similar, and in some cases, IDENTICAL features of the submissions, possibly indicating they are written by the SAME person or person.

Looking at those submissions purporting to SUPPORT the development, most of them:-

- Consist of ONE single line or sentence
- Use similar or identical phrases such as "I support the development because there is a shortage of housing" or "I support the development because it is good for the economy"
- The names used by those making the Support submissions are names that are easy to fabricate or difficult to identify the person such as Annie LAM, Winnie WONG, Carrie LEUNG, Steven MAK etc etc. Very few submissions have FULL Chinese names such as LEE Kit Yee, CHAN Chi Fai etc etc.

It would appear that ANYONE can make a submission; it seems regardless of whether they have a genuine interest in the issue.

In contrast to this, those submissions OBJECTING to the development are DETAILED and CO

IMPREHENSIVE and almost certainly, GENUINE.

I would therefore urge the TPB to pay attention to the CONTENT of ALL submissions and not just deliberate on the matter in terms of the NUMBER of submissions either supporting or objecting to the development.

to be continued...

MY OBJECTIONS

I have twice previously forwarded my objections to the proposal. In sum, the proposed site is simply inappropriate for the development because:-

- The proposed site is TOO SMALL to accommodate a development of this size
- Any expansion of the area would IMPACT SEVERELY on the surrounding countryside. A large area of green land and rock would have to be removed, numerous (200+) trees would be destroyed and wildlife including barking deer, porcupines, wild pigs, snakes etc would be affected.
- The proposed building size and design does not blend in with the landscape. It would be a MONSTROSITY and an EYESORE.
- There is a PUBLIC RIGHT OF WAY through the proposed site. This means that the public have enjoyed unchallenged access through this area to the surrounding hillside for more than 20 years. IT IS ONLY IN RECENT MONTHS THAT HKR have sought to impose ownership on the area through placing warning signs at the entrance to the site. These signs are new. THIS IS A MATTER OF COMMON LAW.
- There is ONE ACCESS ROAD to the site. That road is 20' wide and passes directly beside three buildings, Woodbury, Woodgreen and Woodland. It is a PRIVATE ROAD which has an EXTREMELY STEEP SLOPE which already presents a problem, for buses, goods vehicles and EMERGENCY SERVICE vehicles. On several occasions recently buses and fire engines have had difficulties accessing this stretch of road. Has the FIRE SERVICES been consulted on the suitability of EMERGENCY ACCESS to the proposed development? As said, the road passes directly beside Woodbury, Woodgreen and Woodland. There is NO PAVEMENT and even now children playing in this area, people walking or walking dogs are at risk from vehicles on this CONGESTED stretch of road. This has necessitated the installation of a speed bump outside Woodbury. If there was not an EXISTING DANGER TO PEDESTRIANS there would be no need for a speed bump. THIS ROAD IS TOO SMALL TO ACCOMMODATE ANY INCREASE IN TRAFFIC WITHOUT PRESENTING A REAL DANGER TO PEDESTRIANS. The road, in fact, is an EXTENSION OF THE CHILDRENS' PLAYGROUND.
- Still dealing with ACCESS, any increase in vehicular traffic would result in a SIGNIFICANT INCREASE IN NOISE AND ATMOSPHERIC POLLUTION that would affect the existing residents.
- Finally, the population of Discovery Bay is already at capacity. The transport, water and sewage systems are struggling to keep pace. This proposal is badly conceived and shows the 'profit at any cost' philosophy of the developer.

The TPB is urged to visit the proposed site for development to see for themselves that the proposed site is NOT SUITABLE FOR A DEVELOPMENT OF THIS MAGNITUDE.

5460

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161225-202757-26035

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

25/12/2016 20:27:57

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. WONG Sai Ho

Name of person making this comment:

意見詳情

Details of the Comment :

Re: Hong Kong Resort Co Ltd's Application to Develop Areas 6f (behind Parkvale) and 10b (Waterfront near Peninsula Village)

Being a Discovery Bay resident for many years, I would like to express my request to preserve Discovery Bay as a natural, low density and private car free residential area, which was the original philosophy of living style and town planning of this area. New plans to further develop this place with substantial increase of buildings, population and traffic which exceed the existing Master Plan and OZP are not to the benefits of the residence and I would object to the above-mentioned development application.

At present, the total number of units in the whole Parkvale Village is 606. However, the 6f project aims to build 476 units more. It represents that there will be an increase of 78.5% density of the small Village. The proposed buildings are closely opposite to the Crystal and Coral Court. The Crystal and Coral court are mainly facing east and west. If the 6f project is approved, the side facing west (half of the view) will be entirely blocked. Therefore, the proposal is absolutely unacceptable.

Even worse, the project 10 plans to drastically increase the total number of units in the Peninsula Village which represents that the population density will be highly increased. The natural environment will be seriously damaged.

People choosing Discovery Bay as home are fond of the natural, quiet and low dense environment. For enjoying the environment, they pay for the long traveling time and the high traveling expenses. They also disregard the low investment value. If the project is approved, they will be betrayed. Besides, all the pledges of the Hong Kong Government previously made are overturned.

In the Meeting of the Parkvale Village Owners Committee on 5 March 2016, the Presentations of the Lantau Overall Development Plan by representatives from the Development Bureau, Planning Department and Civil Engineering and Development Department on 2 April 2016 and the Hong Kong Resort's application to the Town Planning Board for the development of 6f and 10b held at the DB Community Hall on 3 April 2016, the project of 6f and 10b were strongly opposed by most of the participants against the projects. It reflects that DB residents regard the projects as

unwelcome.

In view of the aforesaid, I strongly oppose the above projects.

To ensure that my opinions are received proper attention, please acknowledge the receipt of this e-mail.

5461

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161226-002203-62700

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

26/12/2016 00:22:03

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

小姐 Miss WONG Miranda

Name of person making this comment:

意見詳情

Details of the Comment :

Re: Hong Kong Resort Co Ltd's Application to Develop Areas 6f (behind Parkvale) and 10b (W aterfront near Peninsula Village)

Being a resident of Discovery Bay for many years, I would like to express my request to preserve Discovery Bay as a natural, low density and private car free residential area, which was the original philosophy of living style and town planning of this area. New plans to further develop this place with substantial increase of buildings, population and traffic which exceed the existing Master Plan and OZP are not to the benefits of the residence and I would object to the above-mentioned development application.

At present, the total number of units in the whole Parkvale Village is 606. However, the 6f project aims to build 476 units more. It represents that there will be an increase of 78.5% density of the small Village. The proposed buildings are closely opposite to the Crystal and Coral Court. The Crystal and Coral court are mainly facing east and west. If the 6f project is approved, the side facing west (half of the view) will be entirely blocked. Therefore, the proposal is absolutely unacceptable.

Even worse, the project 10 plans to drastically increase the total number of units in the Peninsula Village which represents that the population density will be highly increased. The natural environment will be seriously damaged.

People choosing Discovery Bay as home are fond of the natural, quiet and low dense environment. For enjoying the environment, they pay for the long traveling time and the high traveling expenses as well as low investment value. If the project is approved, they will be betrayed. Besides, all the pledges of the Hong Kong Government previously made are overturned.

In the Meeting of the Parkvale Village Owners Committee on 5 March 2016, the Presentations of the Lantau Overall Development Plan by representatives from the Development Bureau, Planning Department and Civil Engineering and Development Department on 2 April 2016 and the Hong Kong Resort's application to the Town Planning Board for the development of 6f and 10b held at the DB Community Hall on 3 April 2016, the project of 6f and 10b were strongly opposed by most of the participants against the projects. It reflects that DB residents regard the projects as

PEMS Comment Submission

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unwelcome.

In view of the aforesaid, I strongly oppose the above projects.

To ensure that my opinions are received proper attention, please acknowledge the receipt of this e-mail.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161226-001819-60831

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

26/12/2016 00:18:19

Date and time of submission:

有關的規劃申請編號

Y/-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. TSANG Monita

Name of person making this comment:

意見詳情

Details of the Comment :

Re: Hong Kong Resort Co Ltd's Application to Develop Areas 6f (behind Parkvale) and 10b (Waterfront near Peninsula Village)

Being a resident of Discovery Bay for many years, I would like to express my request to preserve Discovery Bay as a natural, low density and private car free residential area, which was the original philosophy of living style and town planning of this area. New plans to further develop this place with substantial increase of buildings, population and traffic which exceed the existing Master Plan and OZP are not to the benefits of the residence and I would object to the above-mentioned development application.

At present, the total number of units in the whole Parkvale Village is 606. However, the 6f project aims to build 476 units more. It represents that there will be an increase of 78.5% density of the small Village. The proposed buildings are closely opposite to the Crystal and Coral Court. The Crystal and Coral court are mainly facing east and west. If the 6f project is approved, the side facing west (half of the view) will be entirely blocked. Therefore, the proposal is absolutely unacceptable.

Even worse, the project 10 plans to drastically increase the total number of units in the Peninsula Village which represents that the population density will be highly increased. The natural environment will be seriously damaged.

People choosing Discovery Bay as home are fond of the natural, quiet and low dense environment. For enjoying the environment, they pay for the long traveling time and the high traveling expenses as well as low investment value. If the project is approved, they will be betrayed. Besides, all the pledges of the Hong Kong Government previously made are overturned.

In the Meeting of the Parkvale Village Owners Committee on 5 March 2016, the Presentations of the Lantau Overall Development Plan by representatives from the Development Bureau, Planning Department and Civil Engineering and Development Department on 2 April 2016 and the Hong Kong Resort's application to the Town Planning Board for the development of 6f and 10b held at the DB Community Hall on 3 April 2016, the project of 6f and 10b were strongly opposed by most of the participants against the projects. It reflects that DB residents regard the projects as

unwelcome.

In view of the aforesaid, I strongly oppose the above projects.

To ensure that my opinions are received proper attention, please acknowledge the receipt of this e-mail.

5463

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161226-133906-45820

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

26/12/2016 13:39:06

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Andreas Oberecker

Name of person making this comment:

意見詳情

Details of the Comment :

To the Town Planning Board

Objection against the rezoning of Area 6f in Parkvale area, Discovery Bay

The application must be rejected.

The project is not feasible and comes at high costs to environment and citizens that will have to be born by the public, not the applicant. This is not acceptable. The applicant HKR, in every resubmission, is still ignoring all valuable comments made by the public and concerned citizens.

The sewage from this development will spill into the South plaza bay located behind the Ferry area which is approx. ONLY 270 meters to the BEACH and Boardwalk Restaurants (with this additional sewage will the water quality remain safe?).

To construct a sewage plant in area 6f, as proposed, will significantly impact the environment and living conditions of Parkvale.

HKR has ignored all traffic safety concerns for all of DB, possible traffic blockages to Midvale and Parkvale, as well as that fact that there will be limited emergency access in these areas.

The proposed construction site access via Parkvale village is violating incorporate owner rights. Furthermore the road is not suitable for the additional traffic load. HKR has failed to propose alternative site access and construction waste management plan.

It is clear from the latest submission and new masterplan that the population will breach 25,000 residents.

Finally, all currently ongoing construction projects in DB are poorly managed with frequent noise complaints, fire hazards, delays and traffic accidents. HKR is not capable of managing such large scale projects without significant risks to the people and environment: The application must be rejected.

Sincerely,

Andreas Oberecker

5464

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161226-134133-19767

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

26/12/2016 13:41:33

Date and time of submission:

有關的規劃申請編號

Y/T-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

夫人 Mrs. Anna Putina

Name of person making this comment:

意見詳情

Details of the Comment :

To the Town Planning Board

Objection against the rezoning of Area 6f in Parkvale area, Discovery Bay

The application must be rejected.

The project is not feasible and comes at high costs to environment and citizens that will have to be born by the public, not the applicant. This is not acceptable. The applicant HKR, in every resubmission, is still ignoring all valuable comments made by the public and concerned citizens.

The sewage from this development will spill into the South plaza bay located behind the Ferry area which is approx. ONLY 270 meters to the BEACH and Boardwalk Restaurants (with this additional sewage will the water quality remain safe?).

To construct a sewage plant in area 6f, as proposed, will significantly impact the environment and living conditions of Parkvale.

HKR has ignored all traffic safety concerns for all of DB, possible traffic blockages to Midvale and Parkvale, as well as that fact that there will be limited emergency access in these areas.

The proposed construction site access via Parkvale village is violating incorporate owner rights. furthermore the road is not suitable for the additional traffic load. HKR has failed to propose alternative site access and construction waste management plan.

It is clear from the latest submission and new masterplan that the population will breach 25,000 residents.

Finally, all currently ongoing construction projects in DB are poorly managed with frequent noise complaints, fire hazards, delays and traffic accidents. HKR is not capable of managing such large scale projects without significant risks to the people and environment. The application must be rejected.

Sincerely,

Anna Putina

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161227-130622-69798

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

27/12/2016 13:06:22

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Joe Lau

Name of person making this comment:

意見詳情

Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

5466

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161228-162056-48816

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

28/12/2016 16:20:56

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Andy Lau

Name of person making this comment:

意見詳情

Details of the Comment :

I support the plan submitted by HKR.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161228-163929-98776

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

28/12/2016 16:39:29

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Martha Ko

Name of person making this comment:

意見詳情

Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161229-093605-98616

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

29/12/2016 09:36:05

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

小姐 Miss Olivia Newton

Name of person making this comment:

意見詳情

Details of the Comment :

seems the location is quite good and near the pier and terminus, waiting for it.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161229-094728-03370

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

29/12/2016 09:47:28

Date and time of submission:

有關的規劃申請編號

Y/T-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

夫人 Mrs. Panky

Name of person making this comment:

意見詳情

Details of the Comment :

I wish to state my opposition/objections to the proposed development because the proposed site is totally unsuitable and will have a disastrous impact on the environment and those who live there because :-

1. It is too small to accommodate 416 flats without expanding the existing area by cutting massively into the surrounding slopes. This would involve removal of a huge amount of rock, soil, trees etc. This is an area of natural beauty frequented by walkers and abundant wildlife. Removal of this hillside would involve a massive removal operation using the existing small road beside Woodbury, Woodgreen and Woodland courts.
2. This road is already very small and dangerous. There are speed bumps in place to slow down traffic. Even two small gold carts cannot pass each other safely. There is no pavement and children and the elderly use this area for recreation. This road struggles to accommodate the existing traffic. It cannot definitely not accommodate construction traffic without impacting on the residents in all sorts of ways from noise and dust pollution to presenting a danger to their lives.
3. Any attempt to widen the existing road would have to involve removing a large area of bedrock which abuts the slope outside Woodgreen Court. This bedrock is a natural barrier to erosion and prevents a hillside on what is a very large and dangerous slope. If the existing bedrock is removed the slope would be exposed creating the very real threat of a huge landslide. Already there are 'Danger' notices posted on this slope warning people to keep away etc etc. Tamper with this and you are tampering with people's lives. Ask the experts.

This is a proposed PRIVATE development. It is not aimed at alleviating the shortage of housing in Hong Kong. It is just an attempt by the greedy development to squeeze in more sellable luxury properties at whatever cost to the residents. Discovery Bay is already too busy and cannot cope with further development.

Please take the time to inspect the area in question to understand the threat that the proposed development presents.

Thank you.

5470

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161229-064832-76492

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

29/12/2016 06:48:32

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Thomas Gebauer

Name of person making this comment:

意見詳情

Details of the Comment :

The Town Planning Board:
Application Y/I-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company, who with thousands of owners are bound together by a Deed of Mutual Covenant.
2. Discovery Bay (DB) is a UNIQUE development in HongKong, quasi an enclave, isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC. Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR).
3. The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR.
4. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind; this proposed development as well as the application Y/I-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.
5. In 6f it is proposed to build a sewage treatment plant "on site" and the effluent is planned to be delivered through a gravity- sewerage -pipe, or even considered to be delivered through a tunnel, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.
6. We are living in the 21st century and Town Planning must be a forward looking endeavour. To me it is outrageous to even consider in "Asia's World City" to put nowadays a sewage treatment plant into a housing development,
7. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes, this effluent is in addition to the already polluted waters in the South of Hongkong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "typographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water -pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals; AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds; DB IS SEMI-ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



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

5471

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/L-DB/2 (9.12.2016)(E.L.)

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

POC comments of April, July + December continue to be ignored or inadequately addressed. THIS SUBMISSION includes a reminder of all the POC concerns and detail comments on the insufficient and unacceptable sewage treatment and discharge proposal. I said the POC consider that the TPB has no alternative but to reject HKP's application to change the usage of Area 69 from that of 170m² GFA 3 storey building to two 18 storey buildings including 476 flats, of 21,600m² GFA

「提意見人」姓名/名稱 Name of person/company making this comment Mr. KENNETH J. BRADLEY

簽署 Signature K Bradley

日期 Date 29/12/16

Mr. KENNETH J. BRADLEY J.P.

Chairman

Parkvale Village Owners Committee (PVOC)

Discovery Bay

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	

重要提示：

Important Notes:

- (1) 意見必須於指定的法定期限屆滿前向城市規劃委員會（委員會）提出；
the comment should be made to the Town Planning Board (the Board) before the expiry of the specified statutory period;
- (2) 委員會考慮申請的暫定會議日期已上載於委員會的網頁(www.info.gov.hk/tpb/)。考慮規劃申請而舉行的會議(進行商議的部分除外)，會向公眾開放。如欲觀看會議，請最遲在會議日期的一天前以電話(2231 5061)、傳真(2877 0245或2522 8426)或電郵(tpbpd@pland.gov.hk)向委員會秘書處預留座位。座位會按先到先得的原則分配；
the tentative date of the Board to consider the application has been uploaded to the Board's website (www.info.gov.hk/tpb/). The meeting for considering planning applications, except the deliberation parts, will be open to the public. For observation of the meeting, reservation of seat can be made with the Secretariat of the Board by telephone (2231 5061), fax (2877 0245 or 2522 8426) or e-mail (tpbpd@pland.gov.hk) at least one day before the meeting. Seats will be allocated on a first-come-first-served basis;
- (3) 供委員會在考慮申請時參閱的文件，會在發送給委員會委員後存放於規劃署的規劃資料查詢處(查詢熱線 2231 5000)，以及在會議當日存放於會議轉播室，以供公眾查閱；及
the paper for consideration of the Board in relation to the application will be available for public inspection after issue to the Board Members at the Planning Enquiry Counters of the Planning Department (Hotline: 2231 5000) and at the Public Viewing Room on the day of meeting; and
- (4) 在委員會考慮申請後，可致電2231 4810或2231 4835查詢有關決定，或是在會議結束後，在委員會的網頁上查閱決定摘要。
after the Board has considered the application, enquiry about the decision may be made at tel. no. 2231 4810 or 2231 4835 or the gist of the decision can be viewed at the Board's website after the meeting.

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. **All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.**

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

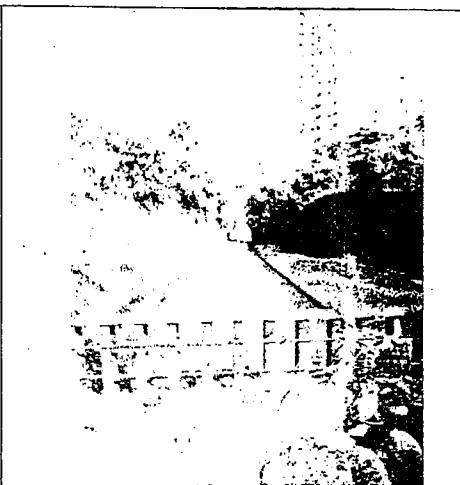
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of *E. coli*.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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",

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

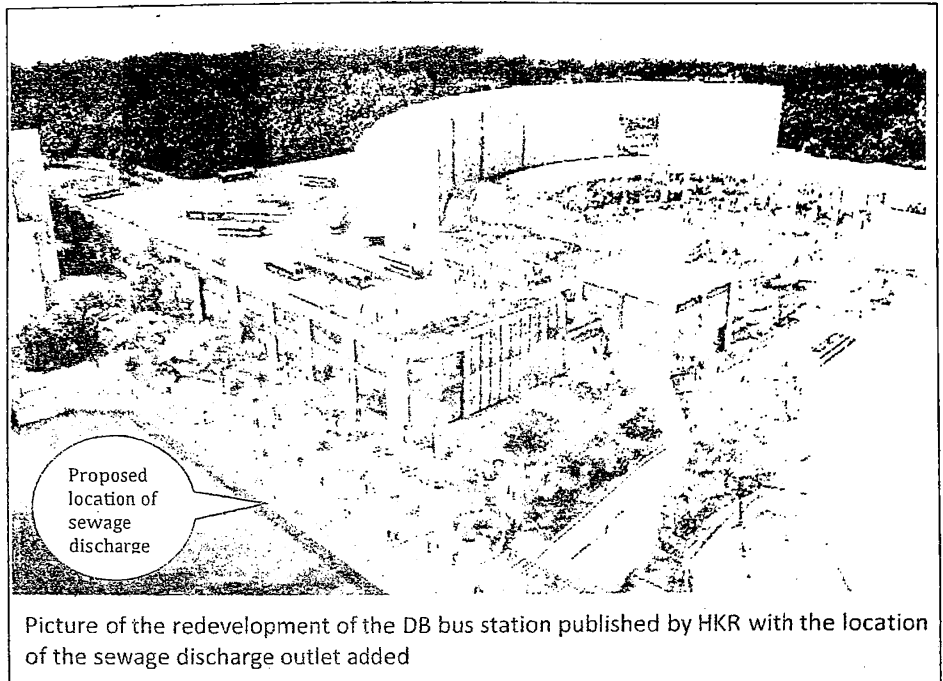
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volume 9, issue 10, 2010 of 'Elsevier') and, as the prevailing winds come from the east, blowing onto DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
 - b. 6.3.1.5 – *“The computed N: P ratio concluded that the possibility of having red tide is still low.”*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *“occurrence of red tides will be unlikely”*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *“the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA”* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that "The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is **POSITIVELY BUOYANT** and will tend to rise towards the surface." This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D "CORMIX model output" to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the "**REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE**".
 5. The full name of the model is "**CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007**". It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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*".
 - b. "*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*". (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G "*Revised Study on Drainage, Sewerage and Water Supply*", paragraph 5.6.1.4, stated that "*As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy”.

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR’s first and second submissions of what would happen to the sewage in the event that the STW broke down. **Only in its third and fourth submissions was the subject of emergency arrangements addressed.** These include: dual feed power supply for the STW; “suitable backup” of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. **Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.**
4. Also the **only access to Pumping Station No. 1** (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that **this issue of access be addressed by HKR and the Lands Department.**
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government’s efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day’s sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? **HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.**

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. **HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.**
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

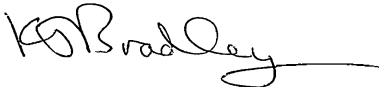
be surprised and disappointed that no Government Department, nor HKR, appears to have considered the adverse impact of the proposed development on the owners and residents of Parkvale Village, especially the totally unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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 PVOOC:

Date:



29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman



寄件者:
寄件日期:
收件者:
副本:
主旨:

John Antweiler [redacted]
24日12月2016年星期六 10:02
tpbpd@pland.gov.hk
[redacted]
Y/I-DB/2 Area 6f; Y/I-DB/3 Area 10b

5472

Dear Town Planning Board,

My wife and I, owners and residents of Discovery Bay, object to the referenced two applications on the basis that the environmental impact of the two applications has not been presented in detail. In particular, we are concerned that the applications do not specifically deal with the issues surrounding sewage disposal. We strongly object to any plan that would involve disposing of treated sewage into the nullah adjacent to Elegance Court, Hillgrove Village, or a plan that would involve discharging of treated sewage in either Discovery Bay or Nim Shui Wan. Children and teenagers frequently play in the waters of the nullah and, of course, all residents of, and visitors to, Discovery Bay enjoy the beaches and sea surrounding our home.

The development plans for Discovery Bay stipulate that our sewage pass through the tunnel to the Government sewage treatment works in Sui Ho Wan, but the capacity of those works will be fully utilised by already agreed developments. As residents and owners we must insist that the environmental impact, and specifically the issue of sewage disposal, of these new planned developments be fully detailed and agreed before any approval is granted.

Most respectfully,

Suet Lun Ng
John Christian Antweiler
[redacted]



tpbpd

寄件者: Arrann [REDACTED]
寄件日期: 24日12月2016年星期六 11:57
收件者: tpbpd@pland.gov.hk
主旨: Planning consent objection to Area 6F discovery bay

5473

Dear sir,

The Woods access road outside of my property [REDACTED] is a minor access road ending in a dead end and used regularly by families with small children and dogs - knowing as they do that buses arrive every 15 minutes. Any increase in traffic could lead to children or animals being injured or worse. The three Woods blocks are popular with young families because of the efficiency of the units but construction and construction related traffic will create significant road noise and cause great distress to young children, retirees and animals. This in turn will have a significant negative impact on the value of our properties. The increase in population will put unnecessary additional stress on already heavily stretched peak hour travel services the ecological as well and scenic impact would also be severe as land is cleared and yet another green area is covered in concrete. There is no benefit whatsoever to the current owners or tenants in the Woods or parkvale area by adding all of these extra units and placing a sewage treatment plant near residential properties is likely to result in young children being drawn to this hazardous area with potentially disastrous consequences.

I object to any development of the area contained in 6F documents.

Thanks

Arrann Young
[REDACTED]
[REDACTED]

Sent from my iPad

附件者:
附件日期:
收件者:
主旨:

Eva Leung [REDACTED]
24日12月2016年星期六 15:50
tpbpd@pland.gov.hk
Objection - Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016

5474

Dear Sir,

As a 30 years resident and landlord in Discovery Bay, I strongly object the application of the development on Area 6f. In fact, we do not need a shopping and commercial malls nor highly density living environment. Instead, we need more green, playground and clean sewage collection points away from the residential areas.

Once again. I object the above development.

Yours truly,
E Leung

[REDACTED]

tpbpd

寄件者: John Antweiler [REDACTED]
寄件日期: 25日12月2016年星期日 9:27
收件者: tpbpd@pland.gov.hk
副本: [REDACTED]
主旨: Y/L-DB/2 Area 6f; Y/L-DB/3 Area 10b

5475

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The development plans for Discovery Bay stipulate that our sewage pass through the tunnel to the Government sewage treatment works in Sui Ho Wan, but the capacity of those works will be fully utilised by already agreed developments. As residents and owners we must insist that the environmental impact, and specifically the issue of sewage disposal, of these new planned developments be fully detailed and agreed before any approval is granted.

Most respectfully,

Suet Lun Ng
John Christian Antweiler
[REDACTED]

附件数:
附件日期:
收件者:

26日12月2016年星期一 14:35

Fwd: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016
fbpd@pland.gov.hk

5476

Copied

Begin forwarded message:

From: Copini <[REDACTED]>

Date: 26 December 2016 at 10:58:33 AM HKT

To: fbpd@pland.gov.hk

Subject: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016

Dear Sir, Mme,

As a home owner in Discovery Bay, I strongly object to the above mentioned application due to the environmental impact and the uncertainties in regards to the sewage treatment. This project should be better considered and address all probable impacts in future. This should not be seen as a short term gain project for it might have great negative implications in the long run. If you keep undermining the main reasons Discovery Bay is a success, namely it's low level of high rises, it's green environment, the undisturbed nature trails, you will destroy it's appeal for present owners and future buyers. Please reconsider and adjust according to the needs and wants of your present population.

Sincerely yours,

M. Wehry

tpbpd

寄件者: Susan Ho [REDACTED]
寄件日期: 27日12月2016年星期二 20:25
收件者: tpbpd@pland.gov.hk
主旨: Discovery bay Planning Applications
附件: 6f Objection SH 27.12.16.docx; Peninsular VOC Letter for Area 10b Objection 27.12.16 SH.docx

5477

Please see two objection letters attached

Susan ho

The Secretariat
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
(Via email: tpbpd@pland.gov.hk)

Dear Sir,

Section 12A Application No. Y/I-DB/2
Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay

Objection to the Submission by the Applicant

I refer to the Response to Comments submitted by the consultant of Hong Kong Resort ("HKR"), Masterplan Limited, to address the departmental comments regarding the captioned application as it primarily relates to the treatment of sewage, reclamation and dredging.

Kindly please note that I strongly object to the submission regarding the proposed development of the Lot and the latest information reinforces my concerns.

I am an Owner in Discovery Bay and this development will seriously impact the quiet and peaceful enjoyment I have in Discovery Bay and its environs.

I have raised previous objections to this development; I do not find that this latest submission addresses them adequately or at all. Indeed, on the contrary further concerns are now apparent.

My main reasons for objection on this particular submission are listed as follows:-

1. The disruption, pollution and nuisance caused by the construction to the immediate residents and property owners nearby are substantial. Whilst attempts to particularise best practice to reduce such issues is referred to it is in an encapsulated manner as it relates only to the particular area and the submission does not address the wider area that is impacted by the development and the need for such contaminants to pass through such areas before leaving the wider area of discovery Bay.
2. The ecological and substantial environmental impacts to the immediate natural setting are not addressed in any confirmed manner. The proposal is

unsatisfactory as it merely refers to good practice and does not provide details of actual measures as the detail is still not sufficiently developed to know what are the real impacts arising from the development.

3. The nullah is an important natural setting within Discovery Bay which is used by many for recreational purposes, the proposed use of the nullah to dispose of sewage is likely to result in serious health impacts for those that come in to contact with this waste.
4. As more detail is provided it becomes more apparent that a larger footprint in Discovery Bay is actually impacted by the proposed development. The advertising of this development is restricted to a small number of residents in the immediate area of the development, the development should be more widely promoted and the true impact to all residents that use the nullah and beaches around Discovery Bay should be made.

Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 6f should be withdrawn.

Susan Ho

tpd

寄件者:
寄件日期:
收件者:
主旨:

27日12月2016年星期二 12:47
tpbpd@pland.gov.hk
Application No. Y/1-DB/2 Area 6f.

5478

To whom it may concern,

As the husband of the owner of [REDACTED]

[REDACTED], I wish to object against Application Y/1-DB/2 Area 6f. The baseline situation is that DB sewage goes through the tunnel to a Government sewage treatment works at Siu Wan O, the capacity of which places a limit on DB sewage up to our theoretical 25,000 population. The full capacity will be taken up by the developments already agreed, in particular from unbuilt projects near the North Plaza.

The HKR Application creates problems, because HKR is pushing beyond the planned population and infrastructure.

There is also the question of the different types of output depending on the sewage treatment process. This sewage treatment output will end up in the calm waters around Discovery Bay.

Specifically for 6f and Hillgrove, there must be concern that every day 440 cu m of "treated sewage" (peak 40 litre/sec) will flow down the nullah passing below Elegance Court on its way to the sea.

Points of environmental concern in the Application and submissions include:

- a new sewage plant will be built
- total inorganic nitrogen [TIN] limit quality to be minimised
- standby sewage tankers
- reclamation and dredging are proposed
- discharge has been minimised as much as practicable to ensure the increase in TIN is minimised
- most of the concentrations would comply with the relevant criteria
- the dredging works for the outfall and for the navigation channel
- the discharge is away from the fish culture zones
- water quality will comply with relevant criteria
- the effluent discharge would have certain impact on the marine ecology
- 118 trees to be felled 169 trees to be felled
- air quality relatively low traffic volume

This is enough for me to believe we would move towards a worse environment. This is also inconsistent with the Government's recent:

150 million HKD Biodiversity Strategy and Action Plan

<https://www.hongkongfp.com/2016/12/21/150-million-hkd-biodiversity-strategy-and-action-plan/>

附件名:
附件日期:
收件者:
主旨:

27日12月2016年星期二 12:37
tpbpd@pland.gov.hk
Application No. Y/1-DB Area 6f.

5479

To whom it may concern,

As the husband of the owner of [REDACTED]

[REDACTED] I wish to object against Application Y/1-DB/3 Area 10b. The baseline situation is that DB sewage goes through the tunnel to a Government sewage treatment works at Siu Wan O, the capacity of which places a limit on DB sewage up to our theoretical 25,000 population. The full capacity will be taken up by the developments already agreed, in particular from unbuilt projects near the North Plaza.

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150 million HKD Biodiversity Strategy and Action Plan

<https://www.hongkongfp.com/2016/12/21/hong-kong-govt-announces-first-biodiversity-strategy-and-action-plan/>

Yours faithfully,
Brian Bunker

tpbpd

寄件者: Itb Tham [REDACTED]
寄件日期: 27日12月2016年星期二 12:28
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016

5480

To whom it may concern,

As the owner of [REDACTED], I wish to object against Application Y/I-DB/3 Area 10b. The baseline situation is that DB sewage goes through the tunnel to a Government sewage treatment works at Siu Wan O, the capacity of which places a limit on DB sewage up to our theoretical 25,000 population. The full capacity will be taken up by the developments already agreed, in particular from unbuilt projects near the North Plaza. The HKR Application creates problems, because HKR is pushing beyond the planned population and infrastructure.

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<https://www.hongkongfp.com/2016/12/21/hong-kong-govt-announces-first-biodiversity-strategy-and-action-plan/>

Yours faithfully,
Tham Moo Cheng



致城市規劃委員會秘書：

5481

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/E, 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/L-DB/2 (9.12.2016)(E1)

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

I STRONGLY OBJECT ABOVE DEVELOPMENT AND
REQUEST T.P.B. TO REJECT APPLICATION.

PROPOSED DEVELOPMENT IS CONTRADICTIONARY TO
DEFINED DISCOVERY BAY POPULATION DENSITY
AND WOULD ALSO CREATE NEGATIVE
IMPACT ON ENVIRONMENT AND RESIDENTS IN
NEIGHBOURING RESIDENTIAL AREAS.

「提意見人」姓名/名稱 Name of person/company making this comment MILAN VIGNJEVIC

簽署 Signature

[Signature]

[Signature]

日期 Date

27. DEC. 2016

tpbpd

寄件者: Rena Yee Fan Mok [REDACTED] 代理 Robert Morland Smith [REDACTED]
寄件日期: 28日12月2016年星期三 13:48
收件者: tpbpd@pland.gov.hk
主旨: Section 12A Application No Y/1 - DB/2
附件: 10.1.251.40_Scan_to_Desktop_12-28-2016_13-45-59.pdf

5482

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致城市規劃委員會秘書：

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傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

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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）

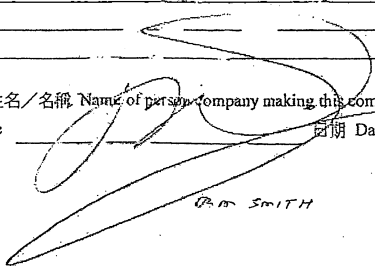
Details of the Comment (use separate sheet if necessary)

「提意見人」姓名/名稱 Name of person/company making this comment _____

簽署 Signature _____

日期 Date _____

28th DECEMBER 2016



P.M. SMITH

Comments on the Fourth Further Information submitted by Masterplan dated 28th November 2016 on behalf of the applicant in support of the Section 12A Application No Y/1-DB/2 to amend Discovery Bay Outline Zoning Plan for rezoning the area 6/f development permissible case from Staff Quarters to Flats at Area 6/f, Discovery Bay

I refer to my previous submissions to the Town Planning Board on 8th April 2016, July 2016 and 8th December 2016 and have the following observations and comments in respect of the Masterplan submission which generally relates to local sewage treatment and the discharge of residue from such local treatment into the sea immediately adjacent to the central plaza and ferry terminal area very close to the popular restaurant and beach area

- 1) It mostly contains technical data and some models \pm 50% but appears not to allow for a margin of error in the designed A.T and does nothing to address the fundamental question ie. the discharge of partially treated sewage into the sea in the very heart of Discovery Bay
- 2) It does not address the adverse impact in respect of odour, noise, access or arrangements for servicing, and clearing of sludge and the associated health concerns on the adjacent residential community in Parkvale Village, and in particular the 3 No Woodland residential blocks and the 2 No Crystal / Coral residential blocks the latter being situated immediately below the proposed 6/f development and which would be the direct recipients of any accidental discharge of sewage from an insitu sewage treatment plant
- 3) The adverse impact both visual possibly from the outfall plume and generally upon the wider Discovery Bay community in regard to health, safety, leisure and swimming activities in Discovery Bay and which is already very susceptible to red tides leading to greater algal blooms and water pollution at certain times of the year and which will have secondary health impacts
- 4) It does not address the restricted road access road to area 6/f and the impact of the need for tankers to gain access to an insitu sewage treatment plant to clear sludge
- 5) It appears to imply that in the event of a worst case emergency that sewage would be discharged in the nullah and into the sea (which is basically the stream running down the mountain from beyond the reservoir and past residential units at Highgrove Village and through the shopping plaza)
- 6) No definitive details are provided as to the type of insitu sewage treatment plant are provided or its location on the 6/f site
- 7) The local insitu treatment of sewage is neither environmentally friendly or efficient. It should also be noted that the another local insitu sewage treatment plant is also being proposed under the application for the larger Area 10b development in Discovery Bay which will further worsen the sea water quality and general health of the community and as a consequence will impact the whole of Hong Kong

- 8) The details provided by Masterplan again fail to adequately address in any creditable way the detailed and particular concerns raised by many concerned residents in earlier objections to the 6/f development
- 9) I attach two recent articles in the SCMP on the topics of sewage treatment and water quality in Hong Kong (marked A and B). This proposed development will in no way help address these urgent environmental issues raised in the articles

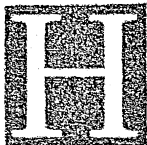
Conclusion

It is patently clear that the need for an insitu sewage treatment plant is a short term expedient measure, taken to the detriment to the environment of the residents of Parkvale Village, Discovery Bay and Hong Kong. It is only proposed by the developer who purely for commercial reasons wishes to increase the population of Discovery Bay above the OZP permitted population of 25,000 people without a world class sewage infrastructure and without a clear and proper public consultation on the proposed change in total population.

Having taking cognizance of the Masterplan submission 28th November 2016, I consider the proposal for the insitu treatment of sewage at area 6/f as submitted to be totally inadequate and unworthy of Asia's World City.

The proposed 6/f development should be rejected for the above reasons and those stated in my previous submissions dated 8th April 2016, July 2016 and 8th December 2016

Why HK can't be flushed with pride



Hong Kong likes to portray itself as "Asia's world city", with sophisticated town planning and top-notch hygiene standards. But that image soon fades as we move away from urban areas. The poor infrastructure and slack supervision in some rural places means many residents are still living with facilities found in the third world.

The problem was highlighted by the Audit Commission in its regular report on public spending and compliance. Currently, more than 510,000 people are living in village houses, squatter huts and private housing that are not connected to public sewerage facilities. At least 70,000 village houses are using unlicensed septic tanks to treat waste water; another 84,000 squatter homes just discharge sewage – either untreated or filtered through interceptors – into nearby rivers or water bodies. The damage to the environment can only be imagined.

At issue is not just environmental nuisance. As discovered by the auditor, the levels of E coli at nearly 90 per cent of the city's river monitoring stations last year exceeded water quality objectives. The contamination is presumably caused by improper sewage discharge. Given the countryside is such an attraction for locals and visitors alike, there exists serious threats to public health.

It has to be asked why substandard sewage facilities are still tolerated in an affluent city like Hong Kong. The auditor rightly hit out at the slow implementation of a village sewerage programme launched in 2001. Instead of being commissioned between 2004 and 2009 as planned, the programme only covered a quarter of the 662 villages targeted as of June this year.

The sorry state of affairs owes much to bureaucracy and inertia of the relevant authorities. Not only does it make a mockery of our claim to be Asia's world city, it damages our precious environment and jeopardises public health. We trust the damning report should give the government a push to do a better job in cleaning up the city.

CITY

QUALITY GOALS'

Environmental, drainage authorities taken to task over delays in enforcing village sewerage programme, and lax oversight on septic tanks

Ernest Kao
ernest.kao@scmp.com

Levels of *E. coli* at nearly 90 per cent of the city's river monitoring stations exceeded corresponding water quality objectives last year, the government auditor found, suggesting authorities need to rapidly step up pollution control in unsewered rural areas.

In a report, the Audit Commission criticised environmental and drainage officials over slow implementation of a village sewerage programme and lax oversight on private septic tank systems.

It stressed more than 510,000 people – mostly residents of village houses, squatters and those in private housing across the New Territories – were still not connected to public sewerage facilities and at least 70,000 village houses were relying on mostly unlicensed septic tank systems to treat their waste water.

About 84,000 squatter homes were still discharging sewage, untreated or filtered through basic flow interceptors, into near-by rivers or water bodies.

Meanwhile, only a quarter of the programme, rolled out in 2001 and which covered 662 villages, was completed as of June this year. It was originally targeted for completion between 2004 and 2009. "The long delays in completing the programme are undesirable [as they] would defer improvements to village sewerage in rural areas and perpetuate the hygiene and environment problems caused by the less than satisfactory sewerage systems in these areas," the report read.

The Environmental Protection Department bore the brunt of the criticism, as the auditor slammed it for not conducting periodic assessments on the extent of pollution in rivers due to sewage discharge.

An audit examination of the department's 71 river monitoring stations in water control subzones revealed average levels of *E. coli* at 63 had exceeded last year's corresponding statutory water quality objectives. A higher *E. coli* count indicates faecal contamination.

It also found there was a lack of effective ways to prevent septic tank systems from causing pollution, with only 1,912 of the 154,000 village and squatter homes having a licence. There was also no licensing system to hold companies that carry out private disposal of septic sludge accountable.



The long delays in completing the [village sewer] programmes are undesirable

AUDIT COMMISSION

Baptist University assistant professor of biology Jill Chiu Man-ying said septic tanks could not remove nutrients such as nitrogen from waste water, and when such water is discharged into marine environments, it could lead to algal blooms. She agreed there was need for tighter regulation.

"Audit recommended the department consider periodically conducting assessments of the extent of pollution of major rivers caused by village sewage discharge, and publishing the results," the auditor said.

It also urged the department to explore ways to beef up control over septic tank systems and ensure houses were linked to public sewers within a reasonable time. The departments agreed with the recommendations.

South China Morning Post

AUDITS

E. COLI LEVELS 'DIDN'T MEET QU

B

致城市規劃委員會秘書：

5484

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

3/2-D17/a 2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

I support the plan

「提意見人」姓名/名稱 Name of person/company making this comment

Samantha Li

簽署 Signature

[Signature]

日期 Date

2012-12-2016

RECEIVED

30 DEC 2016

Town Planning Board

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

5483

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

TM-DB/102

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

I support the plan

「提意見人」姓名／名稱 Name of person/company making this comment

Tong Chi Ping

簽署 Signature

[Signature]

日期 Date

28.11.2011



5485

新城市規劃委員會秘書：

專人接聽熱線：香港北角政府辦事處 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@tpb.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@tpb.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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Jacky Leung

簽署 Signature Leung

日期 Date 24-12-16



致城市規劃委員會秘書：

5486

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)

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「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Roy Sin

Roy

27-12-16



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

5487

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)

這個在私人土地的工程項目進行了十分詳盡及廣泛的計劃、諮詢和影響評估，以低密度發展改善社區和服務，提供更多休憩空間，本人十分支持。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

KW Lam

日期 Date

Kay Lam
23.12.2016



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

5488

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)

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該處是對香港整體發展問題的一體解
答，為個十分正確。

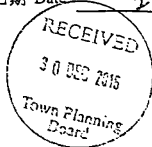
「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Michael Chan

日期 Date

KONSTANTIN CHAN
29/12/2016



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

5489

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

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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/1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Pacty

日期 Date

Patty Chan
22/12/16



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

5490

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Israel Cheu

簽署 Signature Israel

日期 Date 25-12-16



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

5491

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Ho Siu Yan

簽署 Signature

日期 Date 26-12-2016



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

5492

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/1-18/a

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人支持發展

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Edy Wong

日期 Date

28.11.2016

RECEIVED

30 DEC 2016

Town Planning
Board

5493

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/T-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community
leisure spaces.

「提意見人」姓名/名稱 Name of person/company making this comment

Jason Li

簽署 Signature

Jason Li

日期 Date

28-12-2016



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

5494

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/11-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持愉景灣發展更多休憩空間

「提意見人」姓名／名稱 Name of person/company making this comment

鄧榮榮

簽署 Signature

鄧榮榮

日期 Date

2016-12-27



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

5495

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

Y1-D13/L

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

為提高愉景灣住戶的生活質素, 支持增加休閒設施。
以促進這地區經濟發展。

「提意見人」姓名/名稱 Name of person/company making this comment

Lee Hoi Shun

簽署 Signature

Lee Hoi Shun

日期 Date

27 DEC 2016



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

5496

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)

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Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature



日期 Date

Timothy Lai

28/11/2016



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

5497

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

Y1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持區內增加發展, 增加車明空間

「提意見人」姓名/名稱 Name of person/company making this comment 梁鑑恆

日期 Date 25/DEC/2016

簽署 Signature 梁鑑恆



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

5498

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Kitty Lau
27-12-16



滙

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

5499

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 YI-08/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

愉景灣是一個很美丽的地方 那里有阳光与海浪
可以游泳, 也可以游船, 让人超级享受, 让人流连忘返
希望将来更加兴旺昌盛。

「提意見人」姓名/名稱 Name of person/company making this comment

陳翠娟

簽署 Signature

陳翠娟

日期 Date

25-12-2016



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

5500

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/1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Jolly Leung

簽署 Signature

Jolly

日期 Date

27.12.16



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

5501

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 41-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

愉景灣在香港是獨一無二的，希望發展得
更好！

「提意見人」姓名／名稱 Name of person/company making this comment 李美蘭

簽署 Signature [Signature] 日期 Date 15-12-16



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

5502

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)

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Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Terrence Wong

26-12-16



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

5503

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

Y1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持區內增加綠化, 增加空間

「提意見人」姓名/名稱 Name of person/company making this comment

江輝

簽署 Signature

江輝

日期 Date

28/12/16



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：tpbd@pland.gov.hk

5504

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: tpbd@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)

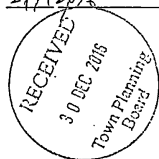
I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Bary dan

簽署 Signature Bary dan

日期 Date 27/12/15



致城市規劃委員會秘書：

5505

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

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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/H - 08/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持愉景花園發展, 增加透明建設措施

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Ng

日期 Date

25/DEC/2016

RECEIVED

30 DEC 2016

Town Planning Board

致城市規劃委員會秘書：

5506

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Joe

日期 Date

Joe Tsang
26-12-2016



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

5507

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

Y1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持區內發展

「提意見人」姓名／名稱 Name of person/company making this comment

CHAN K-T

簽署 Signature

[Signature]

日期 Date

2016-12-28



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

5508

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/1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

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Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Coly Lau

簽署 Signature Coly Lau

日期 Date 22/12/16



致城市規劃委員會秘書：

5509

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/E, 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/11-DB/12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

Y/11-DB/12

I support the facilities of the town planning

「提意見人」姓名/名稱 Name of person/company making this comment JAN YUSRA

簽署 Signature

Yusra

日期 Date

28/12/16



致城市規劃委員會秘書：

5510

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)

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「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Test Ho
25-12-16



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

5511

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Brian Koon

簽署 Signature Brian Koon

日期 Date 27-12-16



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

5512

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/Z-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

這個在私人土地的改善工程項目
進行十分詳盡及廣泛的諮詢和影響評估，
以低密度發展改善社區設施和服務，
提供更完善生活環境，本人支持改善
計劃。

「提意見人」姓名/名稱 Name of person/company making this comment _____

簽署 Signature Wong Suet Man 日期 Date 27-12-2016



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

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To: Secretary, Town Planning Board

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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 YII - DR/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

我相信今日的發展是為明日更美好的生活, 整個
私人土地發展, 是給予更新所有設施, 包括保養
屋宇的數目, 增加社區設施及服務, 項目亦
進行諮詢及聆聽民意, 而該是一個不錯的發展
項目, 本人支持改善計劃。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

J. Louisa Tsui

日期 Date

28.12.2016



致城市規劃委員會秘書：

5514

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Carol Lam

簽署 Signature Carol

日期 Date

19/12/2016



致城市規劃委員會秘書：

5515

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Karen Ng

簽署 Signature [Signature]

日期 Date 28-12-16



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

5516

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

Y1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持愉景灣發展

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Cony Fung Hui
27/12/16



致城市規劃委員會秘書：

5517

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Apple Yip

日期 Date

20/12/16



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

5518

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)

建議增加休閒設施, 提高生活質素, 吸引
更多住家, 以便促進本區經濟發展。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Yenny Chi Fung

27/12/16



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

5520

傳真：2877 0245 或 2522 8426

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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/1-DB-2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持愉景灣增加休閒設施

「提意見人」姓名/名稱 Name of person/company making this comment Fan Kinik Leung

簽署 Signature Jeny 日期 Date 27-12-16



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

5519

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)

不贊成興建增加綠地設施

「提意見人」姓名／名稱 Name of person/company making this comment AU FU KEUNG

簽署 Signature

AFK

日期 Date

27-12-2016



致城市規劃委員會秘書：

5521

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment FRANKIE CHONG

簽署 Signature

Frankie Chong

日期 Date

23-12-16



致城市規劃委員會秘書：

5522

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

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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）

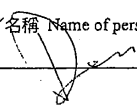
Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Dennis Lo

簽署 Signature



日期 Date

27/12/2016



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

5523

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/1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持愉景灣新發展。

「提意見人」姓名/名稱 Name of person/company making this comment THI FAN SANG

簽署 Signature [Signature] 日期 Date 2016/12/27



致城市規劃委員會秘書：

5524

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Ivan Ng

Ivan Ng

24-12-16



致城市規劃委員會秘書：

5525

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)

我十分支持暫不灣發展，以增加更多的商戶
在市區發展長有實效選擇。

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

27/12

Cindy Li



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

5526

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

YI-DB2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持改善及發展工程，因為可增加休憩地區綠化
環境，同時也可增加綠化，配合原有步徑改建及更新
建築物及重新規劃及土地發展

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Carman Hui

日期 Date

Carman Hui
28.12.2016



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

5527

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

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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/1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持愉景灣新發展

「提意見人」姓名/名稱 Name of person/company making this comment

楊永梅

簽署 Signature

[Signature]

日期 Date

27.12.2016



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

5528

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

K. C.

日期 Date

Kelvin Chei

26-12-2016



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

5529

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 Y1-DB/02

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

為位文信寺區經濟發展吸引更多住客, 十分支持外間多增加建屋
白話語法

「提意見人」姓名/名稱 Name of person/company making this comment 樊國寧

簽署 Signature 字

日期 Date 27/12/2011



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

5530

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Vanessa Ch

簽署 Signature Vanessa Ch

日期 Date 7-12-16



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

5531

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)

本人也支持愉景灣增加綠地設施, 這可提高生活質素, 吸引更多人入住, 從而促進本區的經濟發展。

「提意見人」姓名/名稱 Name of person/company making this comment

CHAN MING YIP

簽署 Signature

Chan Ming Yip

日期 Date

27-12-2016



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

5532

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Alex

日期 Date

Alex Choi
26-12-2016



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

5533

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/DA/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

為促進本區的經濟發展以及提高生活質素，支持
愉景灣增加康樂設施，可以吸引更多人居住。

「提意見人」姓名/名稱 Name of person/company making this comment

LAI CHI WA

簽署 Signature

[Signature]

日期 Date

27-12-2016



致城市規劃委員會秘書：

5534

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Irene Ho

簽署 Signature [Signature]

日期 Date 24-12-16



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

5535

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

Y1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持增加休憩空間

「提意見人」姓名／名稱 Name of person/company making this comment

Conric

簽署 Signature

CC

日期 Date

24/12/2016



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

5536

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Yvonne Lam

日期 Date

28/12/2016



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

5537

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)

強極支持增加休憩空間。

「提意見人」姓名／名稱 Name of person/company making this comment

黃啟興

簽署 Signature

nj

日期 Date



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

5538

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Manfred Chow
24-12-16



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

5539

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)

這個在私人土地的工程項目進行了十分詳盡
及廣泛的計畫、諮詢和影響評估, 以儘量廣
發展改善社區和服務, 提供更多休憩空間,
本人十分支持。

「提意見人」姓名/名稱 Name of person/company making this comment _____

簽署 Signature Stanley 日期 Date 24 Dec 2016



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

5540

傳真：2877 0245 或 2522 8426

電郵：tpbd@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: tpbd@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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Peggy

日期 Date

27/12/16

RECEIVED

30 DEC 2016

Town Planning Board

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

5541

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-08/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持資助計劃

「提意見人」姓名/名稱 Name of person/company making this comment

林詠美

簽署 Signature

[Signature]

日期 Date

28-12-16



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

5542

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Jenny Poon

Jenny

12/16



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

5543

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/2-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

同意增加汽水設施, 及以上規劃

「提意見人」姓名/名稱 Name of person/company making this comment

N/A HKT Company

簽署 Signature

吳偉強

日期 Date

28.12.16



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

5544

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

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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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Edmond Liu

簽署 Signature

[Signature]

日期 Date

24-12-2016



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

5545

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/L - 88/D

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

本人十分支持以上計劃

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

林

日期 Date

林翠鈞

28.12.16



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

5546

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Siu Ho Lam

簽署 Signature Lam

日期 Date 26-12-16



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

5547

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/L-DB/3

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

愉景灣人口最多, 排污尤其重要, 對全港環境
排污處理極需, 因此強烈要求增加污水
處理設施

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

黃錦明

26/12/2010



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

5548

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Thomas Chan

日期 Date

21/12/16



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

5549

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)

我支持愉景灣發展, 可增加更多的村民設施

「提意見人」姓名/名稱 Name of person/company making this comment

陳翠嫻

簽署 Signature

[Signature]

日期 Date

24-12-2016



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

5550

傳真：2877 0245 或 2522 8426

電郵：tpbd@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: tpbd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

Y/I DS-2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

本人對愉景灣開發持支持。

「提意見人」姓名/名稱 Name of person/company making this comment

莫小華

簽署 Signature

莫小華

日期 Date

25-12-2016



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

5552

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/L-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

愉景灣人口有老有青年亦有小童在籍極考慮增加休憩
設施，使居民及訪客都有休閒地方。支持愉景灣增加
休憩設施。

「提意見人」姓名／名稱 Name of person/company making this comment

黃啟興

簽署 Signature

Handwritten signature

日期 Date

26/12/2016



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

5551

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

YL-DB2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持愉景邨改善工程，配合整體發展善用空間增加
休憩地方，擴大綠化地較，環境更好，改建是年呈
文及知作環境

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Law S.M.

日期 Date

羅世民

28.12.2016



新界土地管理局委員會
新界土地管理局 香港政府總部 333 號北角政府辦事處 15 樓
傳真 2577 2245 或 2522 3420
電郵 tpob@pland.gov.hk

5553

To: Secretary, Town Planning Board
By hand or post: 15/F, North Point Government Offices, 333 Jave Road, North Point, Hong Kong
By Fax: 2577 2245 or 2522 3420
By e-mail: tpob@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

0715-028/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure
facilities and services through suitable developments
on smaller plots of land with well thought out planning
in cellular and logical arrangements

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Li Wai King

日期 Date

22-12-2016



政府土地審裁處委員會秘書：

香港九龍彌敦道政府辦事處，333 彌敦道，北角，香港

傳真：2877 2245 或 2522 8426

電郵：gdpd@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 2245 or 2522 8426

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

有關的規劃申請編號 The application no. to which the comment relates

97-282

意見詳情 (如用簡體、標符或英文)

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessment.

Regarding the water supply and sewage treatment option, though not germane to the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提供意見」姓名 / 名稱 Name of person/company making this comment

簽署 Signature

日期 Date



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

5555

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

X/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)

建議 ~~增加~~ 擴大大小環流 水務及污水處理廠產
量 能 盡 整 個 灣 區

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

clu

日期 Date

20-12-2016



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

5556

To: Secretary, Town Planning Board

By hand or post: 15/E, 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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

Joanna Lee

簽署 Signature

日期 Date

27/11/2016



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

5557

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/H-DIS/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持愉景灣發展 再區內單位一向不足 ✓

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature



日期 Date

22/DEC/2016



致城市規劃委員會秘書：

5558

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：tpbd@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: tpbd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates V/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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Karin Chan
Karin Chan
29/12/16



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

5559

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 Y11-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

改善舒適環境，適合居住

「提意見人」姓名／名稱 Name of person/company making this comment 曹潔明
簽署 Signature 曹潔明 日期 Date 21.12.16



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

5560

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/1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

Sally

日期 Date

Sally Ho
26/12/2016



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

5561

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

5/1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

陳永成

「提意見人」姓名/名稱 Name of person/company making this comment

趙敬宗

簽署 Signature

[Signature]

日期 Date

22/12/16



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

5562

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Jacky

日期 Date

Jacky Wong
28-12-2016



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

5563

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 Y11-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

增加樓宇供應

「提意見人」姓名/名稱 Name of person/company making this comment

岑樂鳳

簽署 Signature



日期 Date

22-12-2016



致城市規劃委員會秘書：

5564

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Francis

日期 Date

Francis Yik
26-12-2016



致城市規劃委員會秘書：

5565

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

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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)

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Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Ben Yeung
簽署 Signature Ben 日期 Date 19/12/2016



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

5506

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)

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「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

Michael Siu

日期 Date

Michael Siu
26-12-16



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

5567

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

Y11-DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

略

「提意見人」姓名/名稱 Name of person/company making this comment

徐玉芬

簽署 Signature

徐玉芬

日期 Date

22-12-2016



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

5568

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

411-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

增加物業

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

王元荷
22/12/2016



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

5569

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/1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Jessica Yu
25-12-16



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

5570

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Kathy Ng

27.12.16



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

5571

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 Y11-DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

贊成, 可以提供舒適環境給市民及增加就業機會

「提意見人」姓名/名稱 Name of person/company making this comment 梁嘉健

簽署 Signature [Signature] 日期 Date 23-12-2016



致城市規劃委員會秘書：

5572

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

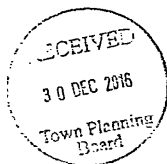
簽署 Signature

Sandy Cheung

日期 Date

26/12

Sandy Cheung



致城市規劃委員會秘書：

5573

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Jvis Ho

簽署 Signature [Signature]

日期 Date 19/12/2016



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

5574

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 411-DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

贊成, 可以提昇舒環境給市民及增加就業機會。

「提意見人」姓名/名稱 Name of person/company making this comment 陳玉芳
簽署 Signature Amy 日期 Date 23-12-2016





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：tpbpc@pland.gov.hk

5575

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: tpbpc@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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Josephine Lai

Josephine Lai
27/12/2016



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

5576

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 711-DR/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

鑒於, 可以提供舒適的環境, 給市民, 及增加就業机。

「提意見人」姓名/名稱 Name of person/company making this comment 丁美倫

簽署 Signature 丁美倫 日期 Date 23-12-2016



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

5577

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 511-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

贊成可以探討造 環翠給市民及僑就業機會

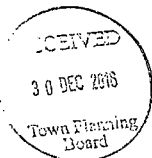
「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

周淑怡

日期 Date

23-12-2016



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

5578

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Ticky Yip

簽署 Signature [Signature]

日期 Date 24-12-16



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

5579

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

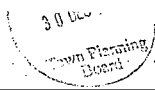
「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

K. K. Cheng

日期 Date

22/12/16



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

5580

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

Y11-DB/12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

十分贊同

「提意見人」姓名／名稱 Name of person/company making this comment

潘正權

簽署 Signature

[Signature]

日期 Date

23/12/2016



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：tpbd@pland.gov.hk

5581

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: tpbd@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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Winnie Ho

簽署 Signature

日期 Date

19/12/2016



致城市規劃委員會秘書：

5582

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

Fiona Yau

日期 Date

29/12/16

RECEIVED

30 DEC 2016

Town Planning Board

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

5584

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

9/1-DB/12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

增加居住單位數目。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Paula Ho

日期 Date

22-12-16



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

5583

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 Y11-DB12

意見詳情 (如有需要, 請另頁說明)

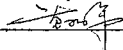
Details of the Comment (use separate sheet if necessary)

龔成

「提意見人」姓名/名稱 Name of person/company making this comment

黃禮祥

簽署 Signature



日期 Date

22/12/2016



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

5586

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/2 DS-2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

我中心支持愉景灣發展，可以增加社康樓宇

「提意見人」姓名／名稱 Name of person/company making this comment

李軒龍

簽署 Signature

Terry

日期 Date

26/DEC/16



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

5585

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 YK DB-2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持有關的申請，以協助更動就業
機會

「提意見人」姓名/名稱 Name of person/company making this comment 劉偉權

簽署 Signature 劉偉權

日期 Date 25/12/2016



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

5587

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Winnie Hung

簽署 Signature Winnie 日期 Date 28-12-2016



致城市規劃委員會秘書：

5588

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

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「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Carl Ng
20/12/16



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

5589

To: Secretary, Town Planning Board

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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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Stella Chung

簽署 Signature Stella

日期 Date 27-12-2016



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

5590

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

YI-DB2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

期望增加休憩地方, 綠化比例更多, 改善環境
質, 支持物業發展, 興建三線

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Law 2

日期 Date

Law 2
28.12.2016



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

5591

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/1 DB-2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

本人支持愉景灣發展的可行政

「提意見人」姓名/名稱 Name of person/company making this comment

黃耀明

簽署 Signature



日期 Date

25/DEC/2016



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

5592

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 DS-2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持 愉景灣發展 以增加就業機會

「提意見人」姓名／名稱 Name of person/company making this comment

梁瑞坤

簽署 Signature

Tomy

日期 Date

25/DEC/2016

RECEIVED

30 DEC 2016

Town Planning
Board

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

5594

To: Secretary, Town Planning Board

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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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

Bowie

日期 Date

Bowie
26-12-2016

RECEIVED

30 DEC 2016

Town Planning Board

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

5593

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 DB2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持暫緩發展可發展土地

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

ⓐ

日期 Date

SYK 偉明
26/DEC/2016



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

5595.

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment FLORENCE HO

簽署 Signature

Florence

日期 Date

23-12-16

RECEIVED

30 DEC 2016

Town Planning Board

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

5596

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

3/1-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

贊成

「提意見人」姓名／名稱 Name of person/company making this comment

橫岩

簽署 Signature



日期 Date

23.12.16



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

5598

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 711-DB/12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持 有足量 航運 出入

「提意見人」姓名／名稱 Name of person/company making this comment Lee Kam Toek

簽署 Signature [Signature]

日期 Date

22-12-2016



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

5597

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 911-DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

評鑒成, 如果可以增加設施, 給居民使用。

「提意見人」姓名/名稱 Name of person/company making this comment 李凱霖

簽署 Signature 李凱霖 日期 Date 23/12/16



啟城市規劃委員會秘書：

5599

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

專真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

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/E DB2

見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持橋滙及灣區內發展

「提意見人」姓名／名稱 Name of person/company making this comment

吳家文

簽署 Signature

[Handwritten Signature]

日期 Date

28/DEC/2016



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

5600

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

YH-082

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持，惟不淺關懷

「提意見人」姓名/名稱 Name of person/company making this comment

梁志忠

簽署 Signature



日期 Date

28 DEC 2016



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

5601

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/2 DS-32

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持愉景灣區內發展，以增加受助就業機會

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

人。

RI Hong

日期 Date

28/12/2016



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

5602

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/H DB / 2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

所有支持樹木應獲保留, 以增加更多康樂
設施。

✓
「提意見人」姓名/名稱 Name of person/company making this comment 陳雲志

簽署 Signature CHAN YIN SHUN

日期 Date 28/12/2016



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

5603

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 Y11-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

碼頭是對外交通主要一部份，而且舊碼頭以經
有若干年歷史，如果時候更新碼頭，請注意，更新的時候
應更加注意標圖套，及向內屋道碼頭一個範圍
沒有好的交通配套，碼頭就如廢物一樣。

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

何秀宜

何秀宜
23-12-2016



Name of person/company making...
日期 Date

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

5604

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 Y11-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

FOR ME IS BETTER ^{TO} DEVELOPE A NEW FACILITIES
OR NEW PIER SO THE PEOPLE MAKE IT EASIER ^{TO} COME &
OUT TO THE NEW FACILITIES.

「提意見人」姓名/名稱 Name of person/company making this comment CHING, JOHN

簽署 Signature [Signature] 日期 Date 23-12-16



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

5605

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

Agnes

日期 Date

27/12/2016

RECEIVED

30 DEC 2016

Town Planning Board

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

5606

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

Y11 - D13/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

建議可以增加土地用途帶動就業人口

「提意見人」姓名/名稱 Name of person/company making this comment

陳志雄

簽署 Signature

[Handwritten Signature]

日期 Date

23-12-2016



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

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電郵：tpbpd@pland.gov.hk

5607

To: Secretary, Town Planning Board

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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)

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「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

Richard Mak

日期 Date

Richard Mak
28-12-16



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

5608

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

Y11 - D1312

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

達成，可以增加住宅單位及就業機會。

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

蔣栢悅

日期 Date

蔣栢悅
23-12-16



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

5610

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)

本人對此項計劃十分支持, 以確保原有足夠公眾
空間

「提意見人」姓名/名稱 Name of person/company making this comment Tommy To.

簽署 Signature To KWAN KA!

日期 Date 21 Dec 2015



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

5609

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 3/1-DB/12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

王傑龍

「提意見人」姓名/名稱 Name of person/company making this comment 王傑龍

簽署 Signature 王傑龍 日期 Date 23/12/2016



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

5611

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

Y11-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

李慶成

「提意見人」姓名/名稱 Name of person/company making this comment

劉榮業

簽署 Signature

[Signature]

日期 Date

23/12/2016



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

5612

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

7/1 - DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

李賢祐

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

Paul

日期 Date

23-12-2016

RECEIVED

30 DEC 2016

Town Planning
Board

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

5613

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 DS/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

對社會發展及改善，本人十分支持

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

Yin Pang

日期 Date

28/12



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

5614

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 411 - DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

張潤華
23/12/2016



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

5615

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

311-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

贊成

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

盧

日期 Date

22-12-2016



致城市規劃委員會秘書：

5616

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：tpbd@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: tpbd@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）

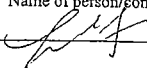
Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature



日期 Date

Fong Ho
24-12-16

RECEIVED

30 DEC 2016

Town Planning
Board

致城市規劃委員會秘書：

5618

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 YI / -DB / 2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

本人對愉景灣區內發展表示支持, 以增和更
朋友遊覽, 吸引更多人來投資

「提意見人」姓名/名稱 Name of person/company making this comment 陳潔英
簽署 Signature Clare 日期 Date 25/12/2016



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

5617

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Bodco Chu

日期 Date

21.12.16

RECEIVED

30 DEC 2016

Town Planning
Board

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

5619

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-D8/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Choi

Choi Lai
31-12-2016



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

5620

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Angel Ho

簽署 Signature Angel Ho

日期 Date 25-12-16

RECEIVED

30 DEC 2016

Town Planning Board

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

5619

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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)

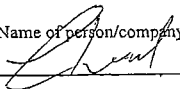
I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

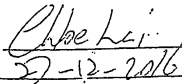
Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date




27-12-2016



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

5620

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)

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「提意見人」姓名／名稱 Name of person/company making this comment Angel Ho

簽署 Signature Angel Ho

日期 Date 23-12-16



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

5622

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

711-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

增 A/C

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Wilson Poon

日期 Date

PUN KA FUN

23 12 16



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

5621

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

K/E-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

管 A6

「提意見人」姓名/名稱 Name of person/company making this comment

胡志聰

簽署 Signature

[Signature]

日期 Date

23-12-16



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

5623

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/1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Maggie Lam

簽署 Signature

Maggie

日期 Date

28-12-2016



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

5624

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/H - DB / 2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

十分支持愉景邨表達強盛

「提意見人」姓名/名稱 Name of person/company making this comment 陳玉芳

簽署 Signature

陳玉芳

日期 Date

2016-12-16



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

5625

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

YI-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

曾鳳

「提意見人」姓名/名稱 Name of person/company making this comment

Hw. Chi Shum

簽署 Signature

Paul Hw.

日期 Date

28 12 16



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

5626

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

Y11-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

贊成，每點單位供電

「提意見人」姓名/名稱 Name of person/company making this comment

韓振東

簽署 Signature

CHEUNG CHUN TUNG

日期 Date

23-12-2016

RECEIVED

30 DEC 2016

Town Planning
Board

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

5627

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/1 DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

讚成愉不造開張更明發展空間讓居民有更明
潔樂設施

「提意見人」姓名/名稱 Name of person/company making this comment

Tsang Chi Ngan

簽署 Signature

Betty Tsang Chi Ngan

日期 Date

28-12-2016

RECEIVED

30 DEC 2016

Town Planning
Board

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

5628

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 - DB2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持愉東灣發展，以增加就業機會

「提意見人」姓名／名稱 Name of person/company making this comment 蘇志儀
簽署 Signature 蘇志儀 日期 Date 28.12.2016



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

5629

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 511-DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

~~贊成增加樓房後意見~~

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Peter Shing

日期 Date

Peter Shing
23-12-2016

RECEIVED

30 DEC 2016

Town Planning
Board

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

5630

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/1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Nichole Loon

簽署 Signature

N. K.

日期 Date

27.12.16



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

5631

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

7/11 - DB/12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

增加服務機會

「提意見人」姓名/名稱 Name of person/company making this comment

Sing Ng Shun Wah

簽署 Signature

Sing

日期 Date

23-12-2016



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

5632

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

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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

YH-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人支持增加設施

「提意見人」姓名/名稱 Name of person/company making this comment

HUI YING KIM

簽署 Signature

HUI YING KIM

日期 Date

28-11-2016



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

5633

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

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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/T-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

美化環境及提供足夠住宅以減輕住屋
的需求。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

KS

日期 Date

23-12-2016



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

5634

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-D8/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

May

日期 Date

May Cheung
18-12-2016



致城市規劃委員會秘書：

5635

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 711-DB13

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

增加樓宇高度

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

五日榮
22/12/2016



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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment K H Chan

簽署 Signature Chan

日期 Date 27.12.16



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

5637

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

T/1-DB-02

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持增加愉景灣休閒設施

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Wong Kin Shing

日期 Date

WONG KIN SHING

28-12-2016



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

411 - DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

增加就業機會, 發展用地。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

李俊龍

22-12-2016



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：tpbd@pland.gov.hk

5639

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: tpbd@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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Winnie Lai
簽署 Signature [Signature] 日期 Date 27/12/2016



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

5640

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)

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Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Yan Lan

簽署 Signature Yan

日期 Date 22-12-16



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

5641

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

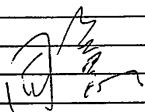
By e-mail: tpbpd@pland.gov.hk

有關的規劃申請編號 The application no. to which the comment relates

Y11 - DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)



「提意見人」姓名/名稱 Name of person/company making this comment

陳靜

簽署 Signature



日期 Date

22.12.16



致城市規劃委員會秘書：

5642

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

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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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Dick

Vicky Ho
18-12-2016



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

5643

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

411-0019

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

發展荒廢地, 降低市區人口密度以及改善市區環境

「提意見人」姓名/名稱 Name of person/company making this comment

林文杰

簽署 Signature

[Signature]

日期 Date

22-12-2016



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

5644

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Winnie Law

簽署 Signature [Signature]

日期 Date 28/12/2016



致城市規劃委員會秘書：

5645

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

Y1-DB/a

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持增加休閒設施

「提意見人」姓名／名稱 Name of person/company making this comment

黃潤新

簽署 Signature

黃潤新

日期 Date

28-12-2016



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

5646

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 Y11-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

可建多些房屋，令到有需要
居民可以快些上樓。改善
港一版免担。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

陽楠

日期 Date

陽楠

23-12-2016



致城市規劃委員會秘書：

5647

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 Y11-DB12

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

土地問題，可建多些房屋，解決沒屋
住的居民，可早些有屋住。

「提意見人」姓名/名稱 Name of person/company making this comment 郭樹龍

簽署 Signature 郭樹龍 日期 Date 23-12-16



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

5648

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Chris Lee
27-12-2016



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

5649

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/11-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

同意

增加高度

Abbas ying

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

AS

日期 Date

22-12-16



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

5650

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

911 - 0312

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持土地改建, 增加樓宇數量

「提意見人」姓名/名稱 Name of person/company making this comment

LEUNG Oi2 / 27

簽署 Signature

日期 Date

22 / 12 / 2016



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

5651

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/1-DB-2

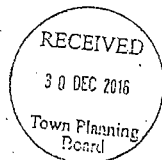
意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

支持增設休閒空間。

「提意見人」姓名/名稱 Name of person/company making this comment 陳金蓮

簽署 Signature LD 日期 Date 24-12-2016



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

5652

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/1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature



日期 Date

張志華

28/12/2016



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

5653

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/1 - DB/02

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人十分支持增設休憩設施

「提意見人」姓名/名稱 Name of person/company making this comment

CHAN SHEK SHUN

簽署 Signature

Shun

日期 Date

28/12/2016



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

674
6554

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

711-DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

增
因
本人同意計劃, 因為建樓, 可集中人類居住, 形成無形的
社會鍊, 當微少的社會鍊集合就有強大的推動力, 令人類
進步, 但祇要有適當的綠化環境, 就可。

「提意見人」姓名/名稱 Name of person/company making this comment

Sir Wai Ming

簽署 Signature

蘇偉明

日期 Date

22-12-15



致城市規劃委員會秘書：

5655

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Shirley Lam

日期 Date

Shirley Lam
27/12/2016



致城市規劃委員會秘書：

5656.

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

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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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment Becky Lo

簽署 Signature



日期 Date

27/12/2016



致城市規劃委員會秘書：

5657

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

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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)

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Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Siu

日期 Date

26/12/2016



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

5658

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

XII-DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持土地改建

「提意見人」姓名/名稱 Name of person/company making this comment

羅志強

簽署 Signature

[Signature]

日期 Date

23-12-2016



致城市規劃委員會秘書：

5659

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

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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

Y11 - DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持, 可改善社區設施和服務及
增加單位供應。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Sz Chi King
22 Dec 2016



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

5660

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/1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

本人支持增加休閒設施

「提意見人」姓名/名稱 Name of person/company making this comment

CHAN SEE WAN

簽署 Signature

[Signature]

日期 Date

28/12/2016



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

5661

To: Secretary, Town Planning Board

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有關的規劃申請編號 The application no. to which the comment relates

Y/1-DB/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Fu

日期 Date

Yvonne Fu

26-12-2016



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

5662

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To: Secretary, Town Planning Board

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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

111-DB12

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

管成發展, 因可提供就業機會, 增加居住人口可帶動
區內繁榮

「提意見人」姓名/名稱 Name of person/company making this comment

Leung Kwok-hing A. J. J. J.

簽署 Signature



日期 Date

2016 Dec 22



致城市規劃委員會秘書：

5663

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/1-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment K.K. Yu

簽署 Signature [Signature]

日期 Date 25-12-16



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

5664

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

T/I-DB/02

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

支持增加休閒設施

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

CHU KERRY YEE

日期 Date

27-12-2016



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

5666

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

5/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)

增加地盤供應住屋需求是香港每一位未致
業的人事夢想, 但查詢配套卻罕有發展

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

M. Byrner

日期 Date

MacGover
22/12/2016



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

5665

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/11-DB/2

意見詳情（如有需要，請另頁說明）

Details of the Comment (use separate sheet if necessary)

本人支持發展

「提意見人」姓名／名稱 Name of person/company making this comment. CHOW CHI WAI

簽署 Signature CHOW CHI WAI 日期 Date 24-12-16



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

5667

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名/名稱 Name of person/company making this comment Simon Ho

簽署 Signature [Signature]

日期 Date 26-12-16



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

5668

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

711285

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

Agree the plan. It can
improve the water pollution and
improve the environment in the
near-by area.

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature



日期 Date

22-12-16

MUHAMMAD AFZAL
PURI



致城市規劃委員會秘書：

5669

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)

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

「提意見人」姓名／名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Andy Cheu

[Signature]

28/12/16



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

5670

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

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有關的規劃申請編號 The application no. to which the comment relates

Y/E-DR/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

本人十分支持發展。

「提意見人」姓名/名稱 Name of person/company making this comment

蔡偉芳

簽署 Signature

Signature

日期 Date

2016-12-22

RECEIVED

30 DEC 2016

Town Planning Board

致城市規劃委員會秘書：

5671

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

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有關的規劃申請編號 The application no. to which the comment relates

Y/1-DB/2

意見詳情（如有需要，請另頁說明）

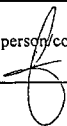
Details of the Comment (use separate sheet if necessary)

支持發展

「提意見人」姓名／名稱 Name of person/company making this comment

MAG TAI KUNG

簽署 Signature



日期 Date

2016-12-22



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

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5672

To: Secretary, Town Planning Board

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By Fax: 2877 0245 or 2522 8426

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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)

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「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Sandy Shum

Sandy

26-12-16



致城市規劃委員會秘書：

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5673

To: Secretary, Town Planning Board

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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 Y11-08/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

讚成此計劃, 有助改善污水問題
因人口不斷增加, 需要持續改善

「提意見人」姓名/名稱 Name of person/company making this comment Sau Cheung

簽署 Signature [Signature] 日期 Date 2016-12-22



(8)

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

5674

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 4/11-08/2

意見詳情 (如有需要, 請另頁說明)

Details of the Comment (use separate sheet if necessary)

續成以計劃 因為人口不 斷增加, 可增
加住所, 尤其是 適合退休人 居住, 因
因環境, 清潔。

「提意見人」姓名/名稱 Name of person/company making this comment LEUNG, S/LI HUNG

簽署 Signature [Signature] 日期 Date 2016-12-22



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

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5675

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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)

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「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

日期 Date

Patrick Chan
[Signature]
20/12/16

RECEIVED

30 DEC 2016

Town Planning
Board

致城市規劃委員會秘書：

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傳真：2877 0245 或 2522 8426

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5676

To: Secretary, Town Planning Board

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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)

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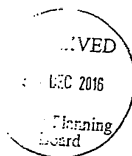
「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

Jmm84

日期 Date

Ivy Ho
30/12/16



致城市規劃委員會秘書：

5677

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

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「提意見人」姓名/名稱 Name of person/company making this comment Michelle Tong

簽署 Signature Michelle

日期 Date 27-12-2016



5678

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

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「提意見人」姓名/名稱 Name of person/company making this comment Sharon Lee

簽署 Signature Lee

日期 Date 26-12-16



城市規劃委員會秘書
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

5679

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： Paul Hui

聯絡 (地址/電郵/傳真/): [REDACTED]



城市規劃委員會秘書
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

5681

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

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姓名：張國柱 PC

聯絡 (地址/電郵/傳真/):



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5682

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: Jennifer Lam

Contact (address/ email/ fax): 



城市規劃委員會秘書
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

5684

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

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姓名： Celine Wong

聯絡 (地址/電郵/傳真/): [REDACTED]



城市規劃委員會秘書
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

5683

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

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姓名：黃伙嬌

聯絡 (地址/電郵/傳真/):



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5685

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: TERESITA T. BALMORES

Contact (address/ email/ fax): 



城市規劃委員會秘書
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

5686

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

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姓名： DELYS Chan

聯絡 (地址/電郵/傳真/): [REDACTED]



Town Planning Board Secretariat
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333 Java Road, North Point, Hong Kong
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5688

Section 12A Application No.Y/I-DB/2
Public comment-application at Area 6f, Discovery Bay

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Name: Chloe Chan

Contact (address/ email/ fax): 



城市規劃委員會秘書

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傳真：2877 0245或2522 8426

電郵：tpbpd@pland.gov.hk

5687

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

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姓名： Kenneth Lau

聯絡 (地址/電郵/傳真/): _____



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15/F, North Point Government Offices
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Email: tpbpd@pland.gov.hk

5689

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: Katie Wong

Contact (address/ email/ fax): [REDACTED]



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15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
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Email: tpbpd@pland.gov.hk

5690

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name:

Cherry Lau

Contact (address/ email/ fax):



城市規劃委員會秘書

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

5692

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

TSE YIP WONG

聯絡 (地址/電郵/傳真/):



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30 DEC 2015

Town Planning
Board

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15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5691

Section 12A Application No. Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

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Name: Felice Lam

Contact (address/ email/ fax): 



城市規劃委員會秘書

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

5693

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

黃煜光

聯絡 (地址/電郵/傳真):



城市規劃委員會秘書
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

5694

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：



聯絡 (地址/電郵/傳真/):



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5696

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 蔡國威

聯絡 (地址/電郵/傳真)： [REDACTED]



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5695

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公眾意見-愉景灣第 6f 區發展計劃

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姓名：

李仲仁

聯絡(地址/電郵/傳真)：

[REDACTED]



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5697

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公眾意見-愉景灣第 6f 區發展計劃

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姓名：LAZ CHUNG LAZ

聯絡 (地址/電郵/傳真) _____



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5698

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公眾意見-愉景灣第 6f 區發展計劃

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姓名： Mrs. Wong

聯絡 (地址/電郵/傳真/): [REDACTED]



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5700

第 12A 條 - 規劃申請編號 Y/I-DB/2
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姓名：

周振

聯絡 (地址/電郵/傳真/):



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5699

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：Olivia Lee

聯絡 (地址/電郵/傳真/): 



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5701

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

胡志雄

聯絡(地址/電郵/傳真)



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5702

第 12A 條 - 規劃申請編號 Y/I-DB/2
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姓名：WONG HOI - CAROL

聯絡 (地址/電郵/傳真/): [REDACTED]



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5703

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姓名：



聯絡 (地址/電郵/傳真/):





城市規劃委員會秘書

香港北角渣甸道333號北角政府合署15樓

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5705

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 陳亦根

聯絡 (地址/電郵/傳真/): 



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245 / 2522 8426
Email: tpbpd@pland.gov.hk

5706

Section 12A Application No. Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: Vincent Lau

Contact (address/ email/ fax):



城市規劃委員會秘書
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

5708

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：_____

鄭金成

聯絡 (地址/電郵/傳真): _____



城市規劃委員會秘書

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5707

第 12A 條 - 規劃申請編號 Y/1-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 張榮傑

聯絡 (地址/電郵/傳真): [REDACTED]



會秘書

第333號北角政府合署15樓

， 0245或2522 8426

tpbpd@pland.gov.hk

5709

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： Mr Kwong

聯絡 (地址/電郵/傳真/): [REDACTED]



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5710

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： W. Tse

聯絡 (地址/電郵/傳真/): [REDACTED]



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5712

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：林國光³⁷

聯絡 (地址/電郵/傳真/)



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5711

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： Eric Tuen Chan

聯絡 (地址/電郵/傳真/): [REDACTED]



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5713

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 高志強

聯絡 (地址/電郵/傳真/): [REDACTED]



5714

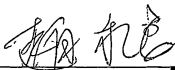
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姓名：



聯絡 (地址/電郵/傳真/):



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5716

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： Wong Man Wa

聯絡 (地址/電郵/傳真/): 



城市規劃委員會秘書
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

5717

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： 陳生文

聯絡 (地址/電郵/傳真/): [REDACTED]



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5718

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名：

陳志明

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書

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


5720

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： Sam Wong

聯絡 (地址/電郵/傳真/): 



城市規劃委員會秘書
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

5719

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-偷景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個偷景灣。

姓名：

S. Sin Han

聯絡 (地址/電郵/傳真/):

[REDACTED]



城市規劃委員會秘書

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

5721

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： Vanessa Chen

聯絡 (地址/電郵/傳真/): _____



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax:2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5722

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: _____

LAM TAI

Contact (address/ email/ fax): _____



城市規劃委員會秘書
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

5724

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名：Chau Wing Kong

聯絡 (地址/電郵/傳真): _____



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電郵：tpbpd@pland.gov.hk


5723

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： Susanna Wong

聯絡 (地址/電郵/傳真/): 



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5725

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名：

Yip Chi Yip Sam

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書

香港北角渣華道333號北角政府合署15樓

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5726

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名：

區永新

聯絡 (地址/電郵/傳真):



城市規劃委員會秘書
香港北角渣華道333號北角政府合署15樓
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5728

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小嶼灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： CEDRIC LO

聯絡 (地址/電郵/傳真): [REDACTED]



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5727

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名：Wah (Cheng Kwok Wah)

聯絡(地址/電郵/傳真/): 



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5729

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小嶼灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： CHIK POON MING

聯絡 (地址/電郵/傳真): _____



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15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax:2877 0245/ 2522 8426
Email: tbbpd@pland.gov.hk

5730

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: Calla Wan

Contact (address/ email/ fax): 



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5731

Section 12A Application No. Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: F. D. Wong

Contact (address/ email/ fax): 



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5732

Section 12A Application No. Y/I-DB/2
Public comment-application at Area 6f, Discovery Bay

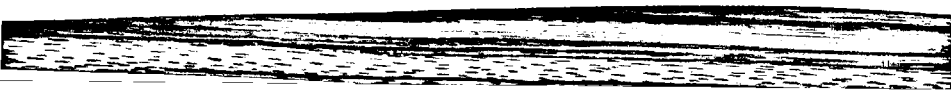
I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: _____

C.W.

Contact (address/ email/ fax): _____



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15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5733

Section 12A Application No. Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: JIM MAN HEI

Contact (address/ email/ fax): 



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5734

Section 12A Application No. Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: _____

Contact (address/ email/ fax): _____



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333 Java Road, North Point, Hong Kong
Fax:2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5736

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: TANG SHUN YVET

Contact (address/ email/ fax):



Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: Jim Hung Kin

Contact (address/ email/ fax): 



城市規劃委員會秘書

香港北角渣華道333號北角政府合署15樓

5738

傳真：2877 0245或2522 8426

電郵：tpbpd@pland.gov.hk

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： 何健榕

聯絡(地址/電郵/傳真/): [REDACTED]



城市規劃委員會秘書
香港北角渣甸道333號北角政府合署15樓
傳真：2877 0245或2522 2426
電郵：tpbpd@pland.gov.hk

5745

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見/愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務，提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大吐露灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名： 陳少娟

聯絡 (地址/電郵/傳真/): [REDACTED]



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香港北角渣華道333號北角政府合署15樓
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電郵：tpbpd@pland.gov.hk

5742

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名：

李家馳

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書
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

5743

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

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姓名：楊以海

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書
香港北角渣華道333號北角政府合署15樓
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電郵：tpbpd@pland.gov.hk

5746

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

李淑媛

聯絡 (地址/電郵/傳真/):

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5748

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 吳天榮

聯絡 (地址/電郵/傳真/): [REDACTED]



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5750

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：溫雁敏

聯絡(地址/電郵/傳真): _____



香港房屋委員會

香港房屋委員會辦事處

地址：257 225 號 2522 8426

電話：2572 2572 或 2522 8426

5751

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見查詢編號 6F 區發展計劃

請向在式二十八之二圖則目錄中十分詳細及廣泛的規畫、諮詢和
標圖報告，以及該項發展計畫在區發展計劃，提供更多休憩空間，
共六十六支等。

區內在大坑可水灣道注冊，雖然發現前顯示了建議的可行性，但我
認為及可讓其以公平公眾原則，在發現大坑止時，考慮大小坑灣
大坑及可水灣道發展區第六區發展計劃發展。

姓名：黃靜雲

聯絡 (住宅/電話/傳真)： 



城市規劃委員會秘書
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

5752

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：



聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書
香港北角渣華道333號北角政府合署15樓
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5753

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

盧志華

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書
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

5755

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：霍樹基

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書
香港北角渣華道333號北角政府合署15樓
傳真：2877 0245或2522 8426
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5758

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

聯絡 (地址/電郵/傳真)：

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5757

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 吳志平

聯絡 (地址/電郵/傳真/): [REDACTED]



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5762

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：_____

李冠文

聯絡 (地址/電郵/傳真/): _____



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5761

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

梁凱華

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書
香港北角渣華道333號北角政府合署15樓
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5763

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 劉金蓉

聯絡 (地址/電郵/傳真/): _____



城市規劃委員會秘書
香港北角渣華道333號北角政府合署15樓
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5764

第 12A 條 - 規劃申請編號 Y/I-DB/2
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姓名：何振榮

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書
香港北角渣華道333號北角政府合署15樓
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5766

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公眾意見-愉景灣第 6f 區發展計劃

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姓名：董紅珍

聯絡 (地址/電郵/傳真/):



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第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：李丹婷

聯絡 (地址/電郵/傳真/): 



城市規劃委員會秘書

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5767

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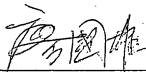
電郵：tpbpd@pland.gov.hk

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：



聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書
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

5768

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： Anna F. Lai F.

聯絡 (地址/電郵/傳真/): _____



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5770

Section 12A Application No. Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: Anka Lee

Contact (address/ email/ fax): _____



城市規劃委員會秘書

香港北角渣華道333號北角政府合署15樓

5769

傳真：2877 0245或2522 8426

電郵：tpbpd@pland.gov.hk

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

傅沛基

聯絡 (地址/電郵/傳真/):



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5771

Section 12A Application No. Y/I-DB/2
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Name: Susan Szeto

Contact (address/ email/ fax): [REDACTED]



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5772

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Name: Ray Lee

Contact (address/ email/ fax): 



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15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

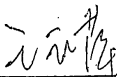
5773

Section 12A Application No. Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

Name: _____



Contact (address/ email/ fax): _____



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15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tbbpd@pland.gov.hk

5774

Section 12A Application No. Y/1-DB/2
Public comment- application at Area 6f, Discovery Bay

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Name: MARLOXA NIANALOXI

Contact (address/ email/ fax): 



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tpbpd@pland.gov.hk

5775

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Public comment- application at Area 6f, Discovery Bay

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Name: Elizabeth D. Gammon

Contact (address/ email/ fax): _____



城市規劃委員會秘書

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電郵：tpbpd@pland.gov.hk

5776

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名：



聯絡 (地址/電郵/傳真/):



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5777

Section 12A Application No. Y/I-DB/2
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Name: Hartatik (Hartatik)

Contact (address/ email/ fax): 



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15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax: 2877 0245/ 2522 8426
Email: tbbpd@pland.gov.hk

5778

Section 12A Application No. Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

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Name: _____

Ian Lee

Contact (address/ email/ fax): _____



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傳真：2877 0245或2522 8426

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5779

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 林秀麗

聯絡 (地址/電郵/傳真/): _____



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5780

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： SO CHAUN HUNG

聯絡 (地址/電郵/傳真/): [REDACTED]



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5782

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： 徐玉芬

聯絡 (地址/電郵/傳真/): [REDACTED]



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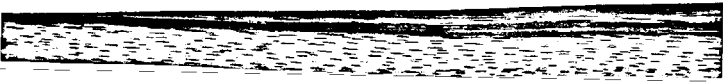
第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：周靜清

聯絡 (地址/電郵/傳真/): 



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5783

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：

胡然成

聯絡 (地址/電郵/傳真/):




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5786

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

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Name: Etik Aprilia Ruffa Sari 

Contact (address/ email/ fax): 



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5785

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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Wen (PO YEE WILLIAM AU)

姓名：_____

聯絡 (地址/電郵/傳真/): _____



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香港北角渣華道333號北角政府合署15樓
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5787

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公眾意見-愉景灣第 6f 區發展計劃

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姓名： 馮玉清

聯絡 (地址/電郵/傳真/): [REDACTED]



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5790

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公眾意見-愉景灣第 6f 區發展計劃

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姓名：林鈺玉

聯絡 (地址/電郵/傳真/):



城市規劃委員會秘書

香港北角渣華道333號北角政府合署15樓

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電郵：tpbpd@pland.gov.hk

5789

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： Wong Kae Siang

聯絡 (地址/電郵/傳真/): _____



Town Planning Board Secretariat
15/F, North Point Government Offices
333 Java Road, North Point, Hong Kong
Fax:2877 0245/ 2522 8426
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5792

Section 12A Application No.Y/I-DB/2
Public comment- application at Area 6f, Discovery Bay

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Name: _____



Contact (address/ email/ fax) _____



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電郵：tpbpd@pland.gov.hk


5794

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公眾意見-愉景灣第 6f 區發展計劃

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姓名：

聯絡 (地址/電郵/傳真/): 



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電郵：tpbpd@pland.gov.hk

5793

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公眾意見-愉景灣第 6f 區發展計劃

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姓名：Becky Chan

聯絡(地址/電郵/傳真/):



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5795

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名：



聯絡 (地址/電郵/傳真/):



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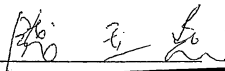
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第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

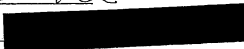
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姓名：



聯絡 (地址/電郵/傳真/):



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5798

第 12A 條 - 規劃申請編號 Y/T-DB/2
公眾意見-愉景灣第 6f 區發展計劃

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姓名： Paul

聯絡 (地址/電郵/傳真/): [REDACTED]



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傳真：2877 0245或2522 8426
電郵：tpbpd@pland.gov.hk

5797

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公眾意見-愉景灣第 6f 區發展計劃

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姓名：李志文

聯絡 (地址/電郵/傳真/):



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傳真：2877 0245或2522 8426

電郵：tpbpd@pland.gov.hk

5799

第 12A 條 - 規劃申請編號 Y/I-DB/2
公眾意見-愉景灣第 6f 區發展計劃

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。

至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

姓名：

林宇文

聯絡 (地址/電郵/傳真/):



The Secretary, Town Planning Board
 15/F North Point Govt. Offices
 333 Java Road, North Point, HK.

23 December, 2016

Ref. TPB/Y/1-DB/2

Area 6 of Lot 385 RP & Ext. (Part)
 in D.D. 352 Discovery Bay

It's disheartening to have learnt that somebody has plans to sabotage the existing tranquillity in close proximity that residents share especially those inhabitants who feel they are at home.

Destruction — Creation

Destruction will only be tenable should there be NO inimical impacts on all living things (flora/fauna/human beings). What will destruction — work in progress bring to us? No sensible Government wish to create human uproars in our fragile heart. Only those uppity could have such horrendous proposals!

Show EMPATHY



就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-145742-03098

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 14:57:42

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Anthony Walsh

意見詳情
Details of the Comment :

I have grave concerns that the additional 476 flats proposed in this development is totally not in keeping with the feel of the area. The population increase dwarfs that of the adjacent "wood" courts and the lower "crystal" and "coral" courts. If the area must be developed then this should be in keeping with the buildings that currently surround it and not the monstrosity that is planned. The area is currently enjoyed by hikers, dog walkers and children playing in one of the last accessible undeveloped sanctuaries in Discovery Bay and will be a grave loss to the surrounding community. To exchange an area of peace and tranquility for a further 1190 persons and the increased traffic that will bring is entirely unacceptable.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-155408-98959

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 15:54:08

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

「提意見人」姓名/名稱
Name of person making this comment: 夫人 Mrs. Kara Walsh

意見詳情
Details of the Comment :

Building work considered for Area 6f will cause a huge amount of disruption to local residents. There is already a large scale engineering project taking place in Discovery Bay plaza, building of new bus station, building of 'temporary bus station', a bridge construction and building additional retailing shopping space.

Additional construction work in Area 6f will cause undue noise pollution to local residents. Discovery Bay is an area that prides itself on being 'serene resort' and a 'peaceful oasis away from hectic Hong Kong'. Area 6f contravenes the principles which Hong Kong Resort Co. is priding itself on. In addition, the destruction of natural landscape to build the entrance into the new site is directly through a residential village (Parkvale Village). The land proposed for the entrance is also constantly used by local residents as an area of public recreation and natural parkland.

It is understandable that there is a constant struggle to keep up improvements to a community. However, using Area 6f to increase residential buildings, an additional 476 flats and 1190 residents is not within the communities best interest. Apart from more people, noise, pollution, huge disruption, destruction of natural landscape and removal of public recreational land there is no community or environmental benefit to changing the land usage of Area 6f.

**就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**

參考編號
Reference Number: 161229-171936-78985

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 17:19:36

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

「提意見人」姓名/名稱
Name of person making this comment: 夫人 Mrs. Ellen Kwok

意見詳情
Details of the Comment :

It optimises the land use to alleviate the land shortage issue in HK, and provides more housing choices.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-172521-26649

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 17:25:21

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

夫人 Mrs. Adian Yu

意見詳情

Details of the Comment :

I support the application as it will provide more housing supply in DB where the plot ratio is extremely low.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-215908-65475

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 21:59:08

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Galen Wong

意見詳情**Details of the Comment :**

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.
Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-220309-12993

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 22:03:09

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. HC Wong

意見詳情

Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-220525-02037

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 22:05:25

有關的規劃申請編號

The application no. to which the comment relates: Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Wong Hon Chong

意見詳情

Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-221140-27937

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 22:11:40

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

「提意見人」姓名/名稱
Name of person making this comment: 小姐 Miss Ka Yin

意見詳情
Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-220744-26500

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 22:07:44

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Hon

意見詳情

Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-220955-48208

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 22:09:55

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

「提意見人」姓名/名稱
Name of person making this comment: 女士 Ms. Kathy Ho

意見詳情
Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments. Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-221259-60791

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 22:12:59

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Nick Wong

意見詳情
Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.
Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-221709-71537

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 22:17:09

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. David Chan

意見詳情
Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.
Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-221429-28791

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 22:14:29

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Wayne Wong

意見詳情

Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-221544-37774

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 22:15:44

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

「提意見人」姓名/名稱
Name of person making this comment: 夫人 Mrs. Ho

意見詳情
Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.
Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-221826-45307

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 22:18:26

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Wong

意見詳情
Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.
Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161230-095750-13538

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

30/12/2016 09:57:50

有關的規劃申請編號

The application no. to which the comment relates: Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. William Yau

意見詳情

Details of the Comment :

Sewage treatment and water supply have been detailedly described in the supplement. Environment has been well considered. It creates minimal impact to adjacent developed areas. The development is supported by me.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-221934-13015

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 22:19:34

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Wong

意見詳情

Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning, consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161230-093958-90875

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 30/12/2016 09:39:58

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

「提意見人」姓名/名稱
Name of person making this comment: 小姐 Miss Nancy Ng

**意見詳情
Details of the Comment :**

The construction affects the surrounding areas not just during the construction period. It also has an ongoing impact on the neighbourhood in particular if there are roads to be built from Parkvale Drive to the new site. The roads surrounding Parkvale Drive are narrow and not cater for the increase in number of residents in the area. The noise of increased traffic/transportation will deeply damage the environment of Parkvale Village.

In addition, the utilities and other support, such as sewage systems, are not cater for the addition. Its definitely affecting the peaceful environment of Discovery Bay, in particular the Parkvale Village, which has long been providing peaceful homes for DB residents.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161230-115342-67754

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 30/12/2016 11:53:42

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. W. Yau

意見詳情
Details of the Comment :

The newly provided supplementary information proves that Area 6F development has had utilities well considered such as water supply, sewage, storm drain, etc. and they are feasible without adverse impact to the existing developments. To this extent, I agree with the development without hesitation.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161230-124214-42879

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

30/12/2016 12:42:14

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Mr. Yau

意見詳情

Details of the Comment :

這個在私人土地的工程項目進行了十分詳盡及廣泛的規劃、諮詢和影響評估，以低密度發展改善社區設施和服務、提供更多休憩空間，本人十分支持。至於供水和污水處理方案，雖然發展商展示了建議的可行性，但我認為政府應該以公平公正原則，在發展大嶼山時，考慮擴大小蠔灣水務及污水處理廠處理能力至覆蓋整個愉景灣。

就規劃申請/表格提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-234652-72197

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 23:46:52

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Wong Hiu Hei

意見詳情

Details of the Comment :

1. I strongly object to the planned development as presented by the Hong Kong Resort Company, who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in Hong Kong . quasi an enclave , isolated from Hong Kong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hong Kong Resort Co. Ltd, (HKR). The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR.

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/IDB/3 Area 10b ...cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to build a sewage treatment plant "on site" and the effluent is planned to be delivered through a gravity-sewerage-pipe or even considered to be delivered through a nullah, to the sea, next to the Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour. To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development

6. The effluent is planned to be discharged into the shoreline next to a housing develop

ment and to a communal beach which is used by DB residents and others for recreational purposes, this effluent is in addition to the already polluted waters in the South of Hong Kong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "a s is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution" beside the pollution of HK waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8. The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting". Not even to mention the matter of storm-surge, back-flow and the like. All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply : effluent to the sea = generally considered is "water pollution".

9. From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a) To avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b) To seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a) proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other

...

THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED. THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c) adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c) the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT. THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of

f buildings as well as meteorology...

AS FOR AN ONSITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban

areas and new towns to take advantage of the prevailing northeasterly winds;
DB IS ENCLOSED BY MOUNTAINS!

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND.

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The waterbased developments should be

located such that bulk water exchange is maximised.

AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent



discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING. THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB, IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT. ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE HANDLING, SEPARATING, SORTING FOR RECYCLING AND REUSE.

10. IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION.

Wong Hiu Hei



就規劃申請/覆核提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	161229-234652-72197
提交限期 Deadline for submission:	30/12/2016
有關的規劃申請編號 The application no. to which the comment relates:	Y/I-DB/2
「提意見人」姓名/名稱 Name of person making this comment:	先生 Mr. Wong Hiu Hei
聯絡人 Contact Person	Wong Hiu Hei
通訊地址 Postal Address :	
電話號碼 Tel No. :	
傳真號碼 Fax No. :	
電郵地址 E-mail address :	

就規劃申請 / 覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-234727-85578

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 23:47:27

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

小姐 Miss Hui Sau Ying

意見詳情

Details of the Comment :

1. I strongly object to the planned development as presented by the Hong Kong Resort Company, who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in Hong Kong . quasi an enclave , isolated from Hong Kong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hong Kong Resort Co. Ltd, (HKR). The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR.

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/IDB/3 Area 10b ...cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be delivered through a gravity-sewerage-pipe . or even considered to be delivered through a nullah, to the sea, next to the Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour. To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development

6. The effluent is planned to be discharged into the shoreline next to a housing develop

ment and to a communal beach which is used by DB residents and others for recreational purposes, this effluent is in addition to the already polluted waters in the South of Hong Kong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution" beside the pollution of HK waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8. The "sensitive receivers" the sea at the Discovery Bay would be "typographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting". Not even to mention the matter of storm-surge, back-flow and the like. All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply : effluent to the sea = generally considered is "water pollution".

9. From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a) To avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b) To seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a) proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other

...
THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED. THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c) adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c) the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT. THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of

f buildings as well as meteorology...

AS FOR AN ONSITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing northeasterly winds; DB IS ENCLOSED BY MOUNTAINS!

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND.

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The waterbased developments should be

located such that bulk water exchange is maximised.

AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent

discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING.

THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB, IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT. ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE HANDLING, SEPARATING, SORTING FOR RECYCLING AND REUSE.

10. IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION.

Hui Sau Ying
owner



就規劃申請/覆核提出意見 Making Comment on Planning Application / Review...

參考編號

Reference Number:

161229-234727-85578

提交限期

Deadline for submission:

30/12/2016

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

小姐 Miss Hui Sau Ying

聯絡人

Contact Person

Hui Sau Ying

通訊地址

Postal Address :

電話號碼

Tel No. :

傳真號碼

Fax No. :

電郵地址

E-mail address :

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-173552-61735

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 17:35:52

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Ken Bradley

意見詳情
Details of the Comment :

My principal concerns with HKR's 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 are -

A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.

B. Public Consultation is inadequate and non-transparent.

C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.

D. A Risk Assessment has not been undertaken.

E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so that the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.

F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that at a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing

- ing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "is considered not an efficient sewage planning strategy".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161229-173746-14067

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

29/12/2016 17:37:46

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱



先生 Mr. Ken Bradley

Name of person making this comment:

意見詳情

Details of the Comment :

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review	
參考編號 Reference Number:	161229-173746-14067
提交限期 Deadline for submission:	30/12/2016
有關的規劃申請編號 The application no. to which the comment relates:	Y/I-DB/2
「提意見人」姓名/名稱 Name of person making this comment:	先生 Mr. Ken Bradley
聯絡人 Contact Person	Ken Bradley
通訊地址 Postal Address :	
電話號碼 Tel No. :	
傳真號碼 Fax No. :	
電郵地址 E-mail address :	

就規劃申請/或核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-174021-26726

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 17:40:21

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Ken Bradley

意見詳情

Details of the Comment :

STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, I am concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover - general design considerations; design parameters; practical design and installation; operation and maintenance and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in its latest Further Information which could according to paragraph 2.9 of the guidelines have included for example - key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detail process design calculations; detailed drawings with plan and elevation showing plant room layout including pipework and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc.(the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.
- 3.
4. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained t

he design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.

5. Due to its proximity to our village, I consider that it is inappropriate to locate a STW in Area 6f, due to the potential smell and health hazard, especially as the effluent seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal I believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.



就規劃申請/撥款提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-174220-43038

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 17:42:20

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Ken Bradley

意見詳情**Details of the Comment :****THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE**

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are simulated by a near-field model, CORMIX. The key inputs to CORMIX include the outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "The exit of the gravity sewage pipe into sea is near surface." However, in each of the CORMIX scenarios, under "Buoyancy assessment", it is stated that "The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface." This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.
4. The results of the modelling scenario are set out in Appendix D "CORMIX model output" to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the "REMARKS: The user must take note that HYDRODYNAMIC MODELLING by any kn

own technique is NOT AN EXACT SCIENCE".

5. The full name of the model is "CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0 GT HYDRO1: Version-5.0.1.0 December, 2007". It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD.

With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-174439-12681

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 17:44:39

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Ken Bradley

意見詳情

Details of the Comment :

EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as a backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it can not feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the

event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale Village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

就規劃申請/審核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 161229-174603-79894

提交限期
Deadline for submission: 30/12/2016

提交日期及時間
Date and time of submission: 29/12/2016 17:46:03

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

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. Ken Bradley

意見詳情
Details of the Comment :

MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. And in the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that "In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"

2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

就規劃申請 / 覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-175304-57975

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 17:53:04

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Ken Bradley

意見詳情

Details of the Comment :

CONSULTATION

1. The approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-175729-20720

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 17:57:29

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Ken Bradley

意見詳情

Details of the Comment :

DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village.

2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161229-175519-36847

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

29/12/2016 17:55:19

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Ken Bradley

意見詳情

Details of the Comment :

INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT

1. In its Application and Further Information of June and October, HKR's consultants have said:

a. In paragraph 6.2.iii of its original application, 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 of 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".

b. "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". (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.

c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G "Revised Study on Drainage, Sewerage and Water Supply", paragraph 5.6.1.4, stated that "As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area 6f so this decentralized scheme is considered not an efficient sewage planning strategy".

寄件者:
寄件日期:
收件者:
主旨:

William Matthew [REDACTED]
28日12月2016年星期三 23:41
tbpdp@pland.gov.hk
Application No. Y/1-DB/2 Area 6f.

5824

To whom it may concern,

As the son of the owner of [REDACTED] I wish to object against Application Y/1-DB/2 Area 6f. The baseline situation is that DB sewage goes through the tunnel to a Government sewage treatment works at Siu Wan O, the capacity of which places a limit on DB sewage up to our theoretical 25,000 population. The full capacity will be taken up by the developments already agreed, in particular from unbuilt projects near the North Plaza. The HKR Application creates problems, because HKR is pushing beyond the planned population and infrastructure.

There is also the question of the different types of output depending on the sewage treatment process. This sewage treatment output will end up in the calm waters around Discovery Bay.

Specifically for 6f and Hillgrove, there must be concern that every day 440 cu m of "treated sewage" (peak 40 litre/sec) will flow down the nullah passing below Elegance Court on its way to the sea.

Points of environmental concern in the Application and submissions include:

- a new sewage plant will be built
- total inorganic nitrogen [TIN] limit quality to be minimised
- standby sewage tankers
- reclamation and dredging are proposed
- discharge has been minimised as much as practicable to ensure the increase in TIN is minimised
- most of the concentrations would comply with the relevant criteria
- the dredging works for the outfall and for the navigation channel
- the discharge is away from the fish culture zones
- water quality will comply with relevant criteria
- the effluent discharge would have certain impact on the marine ecology
- 118 trees to be felled 169 trees to be felled
- air quality relatively low traffic volume

This is enough for me to believe we would move towards a worse environment. This is also inconsistent with the Government's recent:

150 million HKD Biodiversity Strategy and Action Plan

<https://www.hongkongfp.com/2016/12/21/hong-kong-govt-announces-first-biodiversity-strategy-and-action-plan/>

I also object to HKR employees who neither own property nor reside in DB from supporting HKR's application as this is a clear conflict of interest.

Yours faithfully,

Antony Bunker

寄件者:
寄件日期:
收件者:
主旨:

james william [REDACTED]
28日12月2016年星期三 23:44
jpbpd@pland.gov.hk
Application No. Y/I-DB/2 Area 6f.

5825

To whom it may concern,

As the son of the owner of [REDACTED] I wish to object against Application Y/I-DB/2 Area 6f. The baseline situation is that DB sewage goes through the tunnel to a Government sewage treatment works at Siu Wan O, the capacity of which places a limit on DB sewage up to our theoretical 25,000 population. The full capacity will be taken up by the developments already agreed, in particular from unbuilt projects near the North Plaza. The HKR Application creates problems, because HKR is pushing beyond the planned population and infrastructure.

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I also object to HKR employees who neither own property nor reside in DB from supporting HKR's application as this is a clear conflict of interest.

Yours faithfully,

James Bunker

文件者:
文件日期:
文件者:
主旨:

29日12月2016年星期四 6:53
Tpbd
APPLICATION Y/I-DB/2 Area 6f

5826

The Town Planning Board:
Application Y/I-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company, who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in HongKong. quasi an enclave, isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC. Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR).

The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR.

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind; this proposed development as well as the application Y/I-DB/3 Area 10b ...cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be delivered through a gravity- sewerage -pipe. or even considered to be delivered through a nullah, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour. To me it is outrageous to even consider in "Asia's World City" to put nowadays a sewage treatment plant into a housing development,

5. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes, this effluent is in addition to the already polluted waters in the South of Hongkong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution" beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water -pollution".

9
From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED. THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE , ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments. THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB , TRANSFER AND DISPOSAL FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE , DB HAS LIMITED CAPACITY TO ACCEPT ALREADY THE LIMITS REGARDING 25.000 RESIDENTS INDICATE THAT. THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to

cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5
Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6
In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORESO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10
IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Thomas Gebauer

tpbpd

寄件者:
寄件日期:
收件者:
主旨:
附件:

Lulu Bechgaard Lisse

29日12月2016年星期四 16:39

tpbpd@pland.gov.hk

Application No. Y1-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

B. PVOG Fourth Comments on the Section 12A Application further information_final - Copy.pdf; ATT00032.htm; APPLICATION Y_1-DB_2 Area 6f.pdf; ATT00035.htm

5827

Application No. Y1-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

Dear Sir or Madam,

I am a Hillgrove Village owner of the

I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself.

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December.

I OBJECT TO THE ABOVE APPLICATION

Best regards

Lulu Kirstine Bechgaard Lisse

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B *"Guidelines – for submission of comments on various applications under the Town Planning Ordinance"*. The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are **not** available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. **Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information** which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

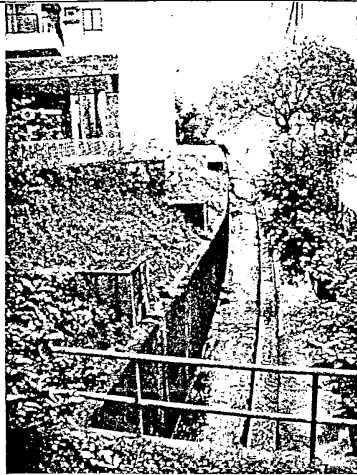
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that *"Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW."* This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

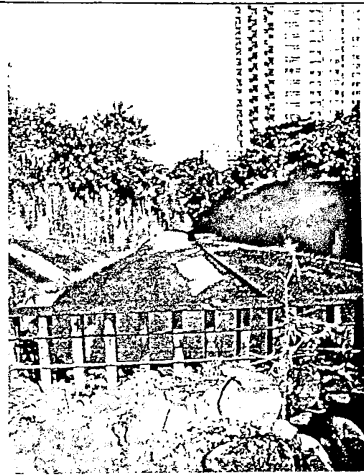
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

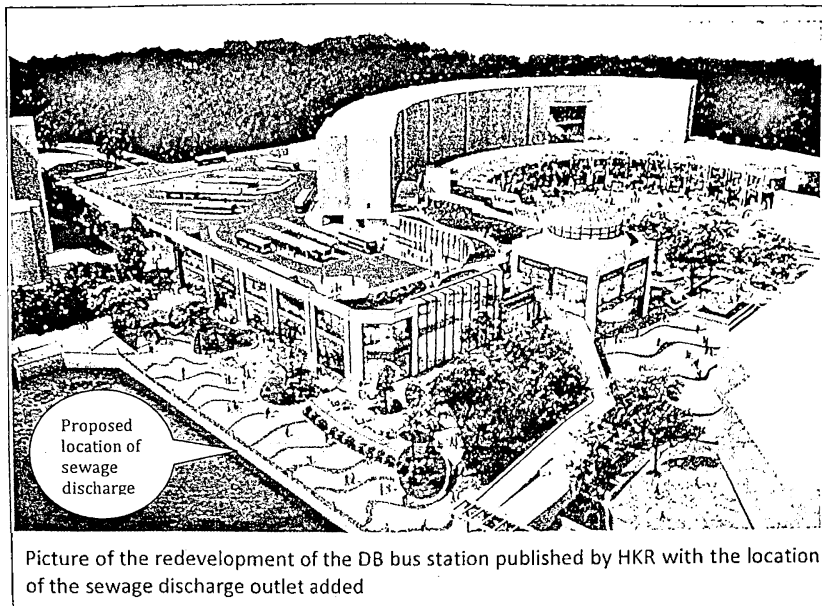
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. **We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.**
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
 - b. 6.3.1.5 – *“The computed N: P ratio concluded that the possibility of having red tide is still low.”*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *“occurrence of red tides will be unlikely”*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *“the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA”* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.

G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewerage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy”.

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. **Only in its third and fourth submissions was the subject of emergency arrangements addressed.** These include: dual feed power supply for the STW; “suitable backup” of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. **Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.**
4. Also the **only access to Pumping Station No. 1** (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that **this issue of access be addressed by HKR and the Lands Department.**
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. **There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations.** In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. **Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.**

K. CAPITAL AND OPERATING COSTS

1. **HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.**
2. **Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.**

L. CONSULTATION

1. **The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.**

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34

[REDACTED]
Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6f

The Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company

who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry.

Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) .

The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ...cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah,

to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,

6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.
7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm-surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water-pollution".

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From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

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To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

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NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

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THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

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the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

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It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

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Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING ,- SEPARATING ,- SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



寄件者: Martyn Keen [REDACTED] 5828
寄件日期: 29日12月2016年星期四 16:59
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/I-DB/2 Area 6f
附件: APPLICATION_Y_1-DB_2 Area 6f.pdf; B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf

I am a Hillgrove Village owner I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach [B.PVOC for both and pick either 6f or 10b as appropriate] the following excellent submissions concerning the above, from neighbouring villages, which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself.

I OBJECT TO THE ABOVE APPLICATION

Martyn Keen
[REDACTED]

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34

Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

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2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "*In summary, the Further Information relates to the following issues:*

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road.*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "*This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32*".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B *"Guidelines – for submission of comments on various applications under the Town Planning Ordinance"*. The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. **Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information** which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

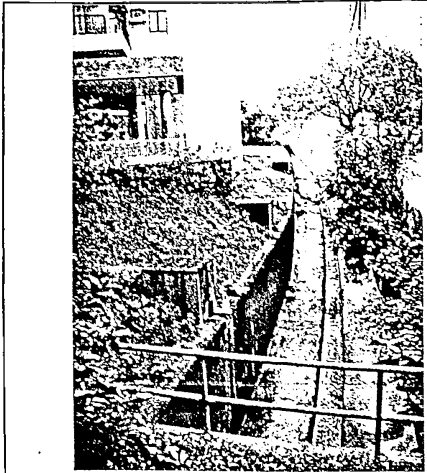
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that *"Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW."* This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

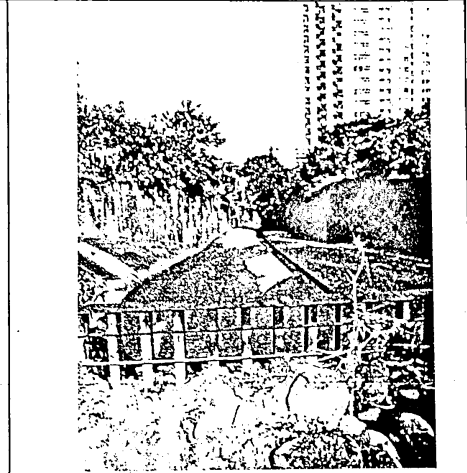
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

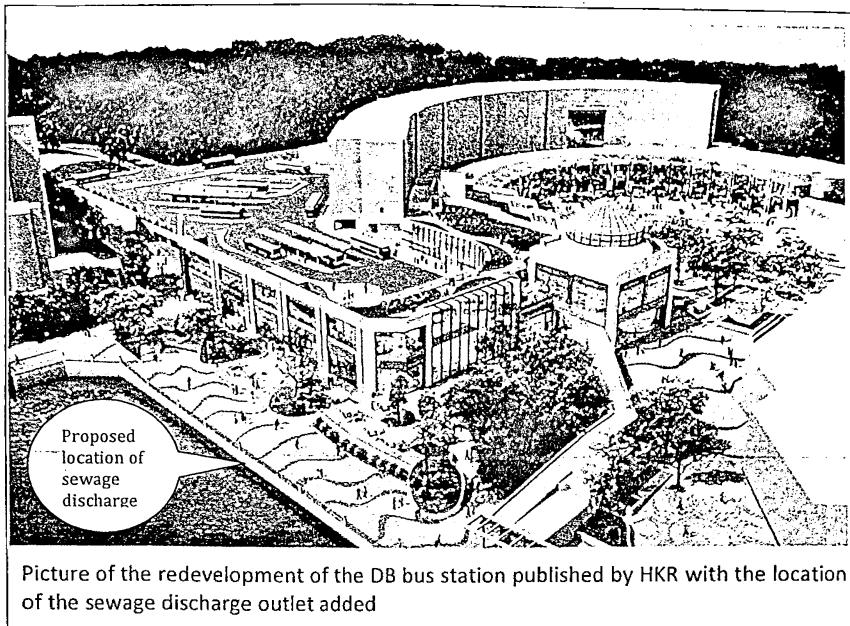
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. **We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.**
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? **Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.**
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Picture of the redevelopment of the DB bus station published by HKR with the location of the sewage discharge outlet added

Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

“Buoyancy assessment”, it is stated that “The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface.” This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *“CORMIX model output”* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *“REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE”*.
5. The full name of the model is *“CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007”*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.

G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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”*.
 - b. *“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”*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *“Revised Study on Drainage, Sewage and Water Supply”*, paragraph 5.6.1.4, stated that *“As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy'.

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. **Only in its third and fourth submissions was the subject of emergency arrangements addressed.** These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. **Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.**
4. Also the **only access to Pumping Station No. 1** (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that **this issue of access be addressed by HKR and the Lands Department.**
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? **HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.**

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. **HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.**
2. **Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.**

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

rbpd

寄件者:
寄件日期:
收件者:
主题:
附件:

Morten Lisse [REDACTED]
29日12月2016年星期四 16:31

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tpbd
Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf; ATT00060.htm; APPLICATION_Y_1-DB_2
Area 6f.pdf; ATT00063.htm

Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

Dear Sir or Madam,

I am a Hillgrove Village owner at [REDACTED]

I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself.

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December.

I OBJECT TO THE ABOVE APPLICATION

Morten Lisse
Owner



Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "*In summary, the Further Information relates to the following issues:*

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road.*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m³ per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "*This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32*".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B *"Guidelines – for submission of comments on various applications under the Town Planning Ordinance"*. The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are **not** available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. **Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information** which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

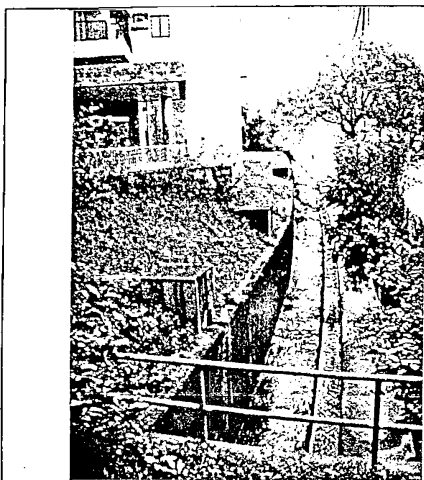
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that *“Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.”* This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

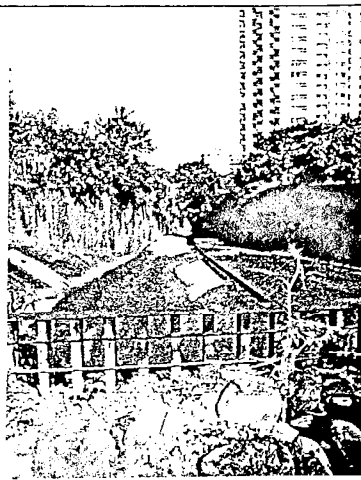
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m3 per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

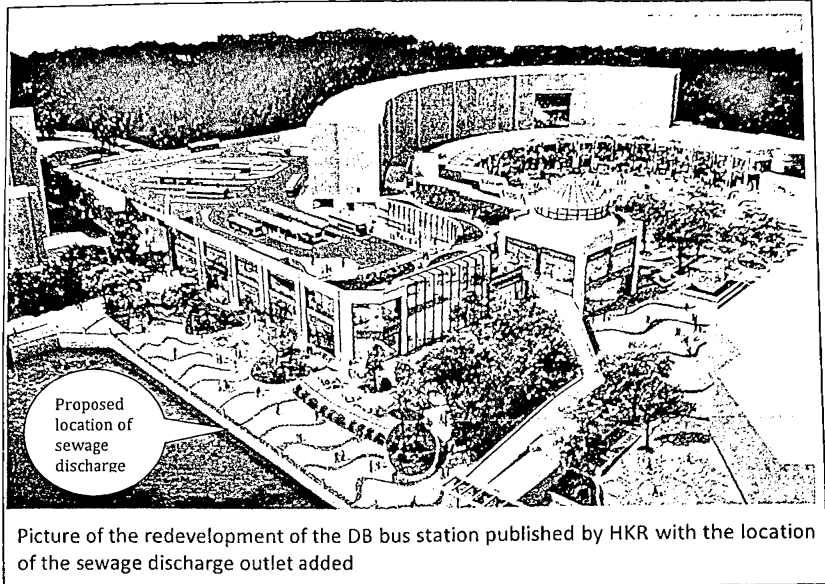
E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. **We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.**
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:

We
sect
A.
B.
C



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.

G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewerage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy”.

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. **Only in its third and fourth submissions was the subject of emergency arrangements addressed.** These include: dual feed power supply for the STW; “suitable backup” of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. **Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.**
4. Also the **only access to Pumping Station No. 1** (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that **this issue of access be addressed by HKR and the Lands Department.**
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? **HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.**

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. **HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.**

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

for info Fw: APPLICATION Y/I-DB/2 Area 6f

29 December 2016 at
08:34

Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/I-DB/2 Area 6f

The Town Planning Board:
Application Y/I-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company

who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry.

Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) .

The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/I-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah,

to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,

6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm-surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water-pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25.000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED

BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN

ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

件
Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



寄件者:
寄件日期:
收件者:
主旨:
附件:

Stephen Pill [REDACTED]
29日12月2016年星期四 17:48
tpbpd@pland.gov.hk

5830

Application No. Y1-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf; APPLICATION Y_1-DB_2 Area 6f.pdf

Dear Sir/Madam

I am an owner of a property in Peninsula Village, Discovery Bay, and have a number of concerns with the bad aspects of the application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I strongly object to this retrograde step and the clear environmental deterioration for DB residents and the marine life that it will have. Being a Father of both a baby and a pre-schooler, I am particularly concerned about small children and babies being exposed to this water in the beach if the development were to take place.

Attached are the following submissions concerning the above, from neighbouring villages, which, as an Owner, I fully endorse, since they express my concerns better than I could myself.

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December.

I OBJECT TO THE ABOVE APPLICATION

Stephen Pill
[REDACTED]

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "*In summary, the Further Information relates to the following issues:*

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m³ per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "*This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32*".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "is considered not an efficient sewage planning strategy".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

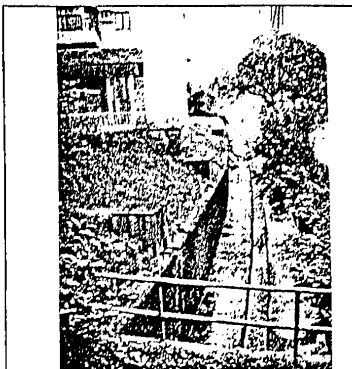
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

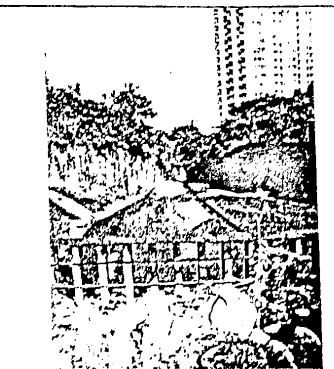
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

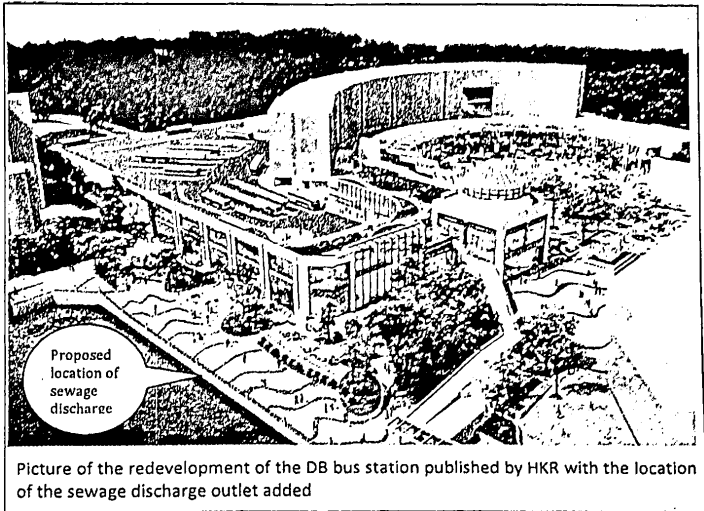
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. **We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.**
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
 5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**
1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. **Only in its third and fourth submissions was the subject of emergency arrangements addressed.** These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
 2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
 3. **Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.**
 4. **Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking.** The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that **this issue of access be addressed by HKR and the Lands Department.**
 5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
 6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.
- 1. SEWAGE FROM WORKFORCE DURING CONSTRUCTION**
1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34Reply-To: [REDACTED]
To: Edwin Rainbow <[REDACTED]>

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6fThe Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company who with thousands of owners are bound together by a Deed of Mutual Covenant.
2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) . The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .
3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.
4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.
5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,
6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

DB
4/4

this effluent is in addition to the already polluted waters in the South of Hongkong.
7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "typographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water -pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement....

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.... THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED. THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



5830

郵件
郵件日期:
收件者:
主旨:
附件:

Edwin Tam [REDACTED]

29日12月2016年星期四 18:42

tpbpd@pland.gov.hk

Application No. Y/L-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf; APPLICATION_Y_1-DB_2 Area 6f.pdf;
APPLICATION_Y_1-DB_3 Area 10b.pdf

5831

I am a Hillgrove Village owner. I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach [B.PVOC for both and pick either 6f or 10b as appropriate] the following excellent submissions concerning the above, from neighbouring villages, which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself.

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December.

I OBJECT TO THE ABOVE APPLICATION

Tam Sin Ming



Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This Information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information, Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

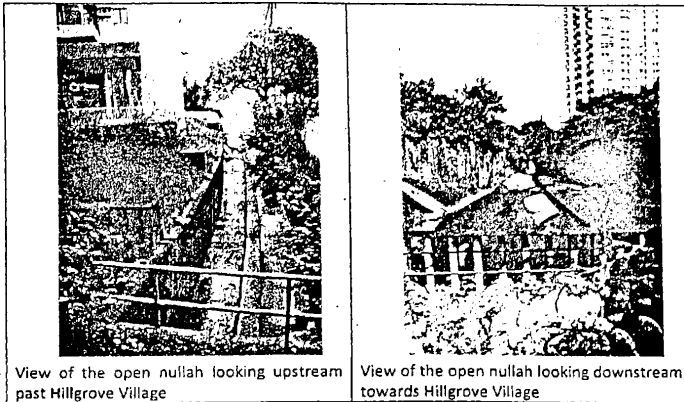
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

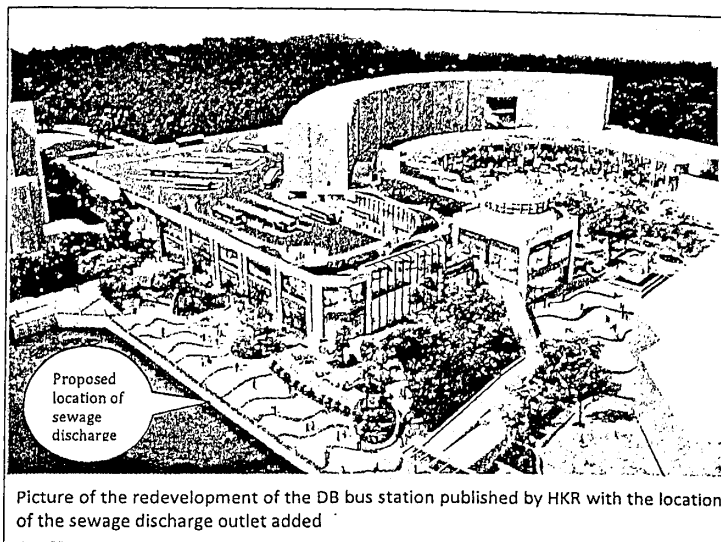
E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:

PVOC Comments on Application number: Y/I-DB/2



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D "CORMIX model output" to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. **INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**
1. in its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

of so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

for info Fw: APPLICATION Y/1-DB/2 Area 6f

[REDACTED]
29 December 2016 at
08:34Reply-To [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6fThe Town Planning Board:
Application Y/1-DB/2 Area 6f

- 1.I strongly object to the planned development as presented by the HongKong Resort Company , who with thousands of owners are bound together by a Deed of Mutual Covenant.
- 2.Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) . The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .
- 3.Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.
- 4.In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.
- 5.We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,
6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.
7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water-pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

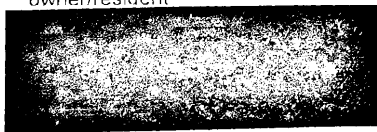
ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Department, nor HKR, appears to have
owners and residents

For info Fw: APPLICATION Y/I-DB/3 Area 10b

29 December 2016 at
08:33Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 16:32
Subject: Fw: APPLICATION Y/I-DB/3 Area 10b

Further comments:

Subject: APPLICATION Y/I-DB/3 Area 10bThe Town Planning Board:
Application Y/I-DB/3 Area 10b

1.
I strongly object to the planned development as presented by the HongKong Resort Company, who with thousands of owners are bound together by a Deed of Mutual Covenant.
2.
Discovery Bay (DB) is a UNIQUE development in HongKong. quasi an enclave, isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC. Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR).
The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR.
3.
Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind; this proposed development as well as the application Y/I-DB/2 Area 6f cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE, besides looking at each application separately the TPB must also look at

both applications of the HKR together to make a good judgement what they ask DB owners and residents to "bear".

4

In area 10b - same as it is proposed in area 6f - to build a sewage treatment plant quasi "on site" in the midst of a residential development and the effluent is planned to be discharged into the WATER BASIN OF NIM SHUE WAN Bay must be considered as highly "sensitive" in the least.

We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a new residential development . (There was an old sewage-treatment plant at this proposed location, however built decades ago when this area was a large service area , bus station, repair shops, waste handling and the likequasi commercial activities) It should be demanded that this application / development as well as Y/I-DB/2 area 6f to be deferred already on the grounds of the sewage-treatment and disposal. For this matter the applicant should wait till the Government Sewage Treatment Facilities of Lantau Island can receive all the sewage from DB.

By no means should affluent be directed into the sea in and around Discovery Bay. The HK Waters cannot take more of this pollution and this does not concern only TIN !

It would be really a great step back for the environment of DB and HK!

5.

The effluent is planned to be discharged through a pipe into the shoreline, the bay of Nim Shue Wan, which should be considered " quasi topographically confined basin with limited dispersive capacity" the planned outfall point will not be far from the housing development, in the vicinity there is also recreational activity from the DB Marina and Club. It is not far from Peng Chau which apparently has received or will receive a *high technology sewage treatment plant* This effluent is in addition to the already polluted waters in the South of Hongkong.

It would be quite self-defeating : Peng Chau with a most modern water treatment plant and then the effluents from DB.

The reference of the applicant regarding Fish Culture Zones , in MaWan and Cheung Sha , VERY FAR away from Nim Shue Wan can only "pull wool over the TPB" .

There are quasi daily fishermen/-boats seen in around DB, mostly from Peng Chau, an examination of the catch in regard to toxics should be highly recommended . Effluent-discharge to the close -by shores , to the sea should not take place !! but also :

6.

To blame pollution of Southern Waters on the Pearl River Delta is not a point to make as facts of the "as is situation " must be clearly addressed. There are more pollutants than TIN . In HK one must get away from the view " it is only little pollution "; beside the pollution of HK-waters and around, we are facing already many types of pollution; in regard to forward-looking planning , it is important to consider " the straw which breaks the camel's back " .

7.

As for the "sensitive receivers " the waters of Nim Shue Wan and those close to Peng Chau effluent must be considered as "potentially polluting" . Not even to mention the matter of storm -surge , back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply : effluent to the sea = generally considered is "water -pollution " .

8

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT, DEFINITELY ON ALL COUNTS THE ENVIRONMENT WILL BE WORSE.

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS (AIR, NOISE, LESS TREES, REDUCED WASTE HANDLING CAPACITY. ALL WRITTEN ALREADY IN PREVIOUS COMMENTS)

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY FOR IMPROVEMENT SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED. IT HAS NO CONNECTION WITH HOUSING SHORTAGE IN HONG KONG , AND AS FOR "OPTIMISING LAND USE " THE APPLICANT , IN CASE HAS LARGE TRACTS OF LAND AVAILABLE IN DB WITHOUT CREATING ADDITIONAL ENVIRONMENTAL PROBLEMS.

IN CASE, THE PLANNED DEVELOPMENT Y/I-DB/3 AREA 10b MUST BE SCALED BACK IN SIZE TO BE SOMEWHAT COMPATIBLE WITH THE CURRENT ENVIRONMENT IN DB . THE DEVELOPMENT IT IS ALSO NOT "COMPATIBLE" AS WITH THE OBVIOUS POLLUTING ACTIVITIES IN THE PODIUM , RIGHT UNDER THE RESIDENTIAL DEVELOPMENT, AND ALSO THE CONNECTED VEHICLE TRAFFIC, PLUS THE SEWAGE TREATMENT PLANT AND THE PETROL-FILLING STATION .

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed DB developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS (THIS ONE AND ALSO Y/I-DB/2 AREA 6F.)

THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB , TRANSFER AND DISPOSAL FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. AS MENTIONED ABOVE AND THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

IT IS DEFINITELY NOT IN THE CATEGORY OF " *SUITABLY SITED ENVIRONMENTAL FACILITIES* "

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE , DB HAS LIMITED CAPACITY TO ACCEPT ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds; DB IS LOCATED IN A SEMICIRCLE OF MOUNTAINS IN THE " BACK " ! BECAUSE OF THIS IMPEDIMENT TO AIR-CIRCULATION WE ALREADY FACE EXTRA AIR-POLLUTION (

MARINE/FERRY -DIESELS, AIRCRAFT, DISNEY DAILY FIREWORKS , LOCAL VEHICLE TRAFFIC)

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.
PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised.

CONTRARY TO WHAT THE APPLICANT CLAIMS : NIM SHUE WATERS ARE CALM , LITTLE TIDAL-STREAM - ACTIVITIES CAN BE SEEN AND THERE IS DEFINITELY LIMITED DISPERSIVE CAPACITY.

POLLUTION FROM THE RESIDENTS IN NIM SHUE WAN VILLAGE MUST ALSO BE KEPT IN MIND AND ADDED TO THE SITUATION.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING , THE APPLICANT'S REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB, IS TOTALLY INADEQUATE FOR THE PRESENT AND MORESO MUST BE FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

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9

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



5831

Thomas Gebauer

寄件者:
寄件日期:
收件者:
主旨:

Alison [REDACTED]
29日12月2016年星期四 20:14
tpbpd@pland.gov.hk
Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

5832

I am a Parkvale Village tenant at Woodbury, and I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself :

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December.

I OBJECT TO THE ABOVE APPLICATION

Alison Price
[REDACTED]

Yours sincerely

Alison Price

tpb
 寄件者: Yovanka Illic [REDACTED]
 寄件日期: 29日12月2016年星期四 23:00
 收件者: tpbpd@pland.gov.hk
 主旨: Comments to 6F Discovery Bay development proposal

5833

Dear Town Planning Board,

I would like to object to the development of area 6F in Discovery Bay for the following reasons:

1. Sewage treatment

- A) The proposed sewage treatment plant right behind 2 large apartment buildings (Coral and Crystal Court) will negatively affect the residents of these buildings by sewage odors, poor hygiene and taking up recreational space.
- B) The sewage will be piped out to the water directly off the beach and pier which will contaminate the water for public beach use, ocean wildlife and tourists/residents along the pier.
- C) During adverse weather the sewage may overflow into the street and pedestrians areas causing diseases outbreaks and contamination.

2. Nature

- A) The building site will shrink the habitat of the unique barking deer and other animals.
- B) The building site will reduce the nature path and trails which tourists and residents alike frequently use.

3. Pollution

- A) Noise pollution will be spread to surrounding neighboring units.
- B) Light pollution will disturb the surrounding units.
- C) Exhaust fumes will spread from a multitude of sources; for example all the extra transport/construction vehicles needed to service these units and A/C units.

4. Transportation Safety

- A) The additional buildings will increase the population and place stress on the already busy transit routes. This in turn increases vehicle traffic and poses a safety threat to pedestrians, especially children, the elderly and those with mobility issues.
- B) Effective Emergency vehicle access will be difficult to provide with the sharp increase in population.

5. Slope Stability

The slope stability of the new site is in question with the construction on a steep hill directly behind current residential buildings. If there is any resettling of the land or structural issues etc. Coral and Crystal Court will be adversely affected.

6. Integrity of project

- A) More than 1 member of the town planning board has purchased property in Discovery Bay. Stakeholders should not be in a position of power over construction decisions as this is a direct conflict of interest and is unethical.
- B) Amy Yung's signature has been forged on multiple documents to (falsely) support the developers. This forgery has not been solved and is still under criminal police investigation.
- C) Multitudes of pro development petitions were traced to the HKR management fax office number. These comments should be voided as they are not genuine submissions from DB owners and stakeholders.

7. Overpopulation

The development does not consider the stress the significantly increased population will bring on the community of Discovery Bay as there are no plans for a commensurate increase in public service structures such as: park space, a permanent library, sport's pitches, widened sidewalks & stairwells for pedestrians, skate parks etc.

Residents and visitors in Discovery Bay appreciate the tranquility and nature DB has to offer. It is a haven from the

fast paced dynamic city life. This is what makes it a special and sought after address. The 6F development p jeopardizes this and must be halted.

Yours Sincerely,

Yovanka Ilic

Long term DB resident, mother and permanent HKID holder.

5833

www.commissio Application number: V11001

tpbpd
附件

寄件者:
寄件日期:
收件者:
主旨:
附件:

Alexandra Collado [REDACTED]
30日12月2016年星期五 1:04
tpbpd@pland.gov.hk
November 2016 - OBJECTION
APPLICATION Y_1-DB_2 Area 6f.pdf

5834

> Dear Sir, Madam,

>
>
> I am a Peninsula Village owner and I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

>
>
> This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

>
> I attach B.PVOC 6f the following excellent submissions concerning the above, from neighbouring villages which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself :

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>
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>
> - Serene Village Owner dated 28th December.

>
> I OBJECT TO THE ABOVE APPLICATION.

>
> BEST REGARDS,

>
>
> COLLADO Aleksandra Emilia
> [REDACTED]
> [REDACTED]
>
>

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6fThe Town Planning Board:
Application Y/1-DB/2 Area 6f

- 1.I strongly object to the planned development as presented by the HongKong Resort Company who with thousands of owners are bound together by a Deed of Mutual Covenant.
- 2.Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) . The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .
- 3.Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.
- 4.In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be "delivered" through a gravity- sewerage -pipe . or even considered to be delivered through a nullah, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.
- 5.We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,
6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "typographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge , back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply : effluent to the sea = generally considered is "water -pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE , ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB , TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE , DB HAS LIMITED CAPACITY TO ACCEPT ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

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In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

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10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



5834

寄件者: [REDACTED]
寄件日期: 30日12月2016年星期五 0:47
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
附件: APPLICATION_Y_1-DB_2 Area 6f.pdf; B. PVOC Fourth Comments on the Section 12A Application further information_final.pdf

5835

I am a Peninsula Village owner concerned by the serious implications of this Application to which I have objected in detail on numerous occasions for the previous consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this measure, with the inevitable environmental deterioration for all DB residents.

I attach the following excellent submissions concerning the above, which as a Peninsula Village Owner I fully endorse, since they express many of own my concerns:

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns with respect to sewerage
- Serene Village Owner dated 28th December.

On these grounds, and on those previously lodged by me during the three previous rounds of consultation, I **STRONGLY OBJECT TO THE ABOVE APPLICATION**

James Fernie
Owner & Resident



Happy New Year

Ed

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34

Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

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To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
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Application Y/1-DB/2 Area 6f

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10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "*In summary, the Further Information relates to the following issues:*

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "*This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32*".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"in addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available; and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal *"is considered not an efficient sewage planning strategy"*.
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

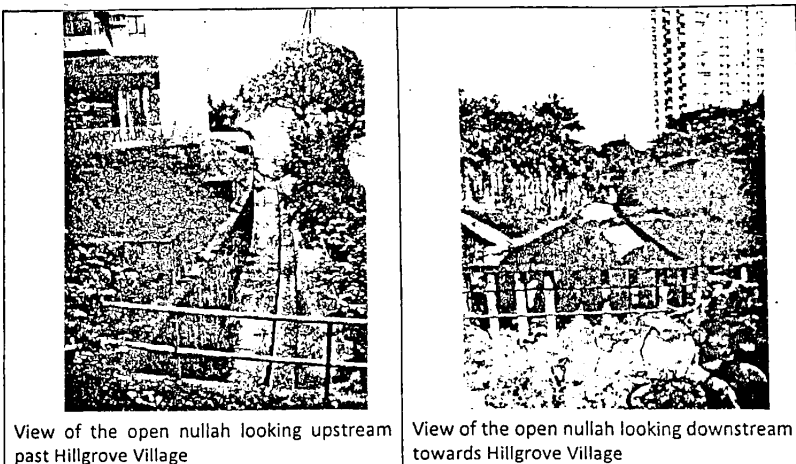
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that *"Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW."* This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



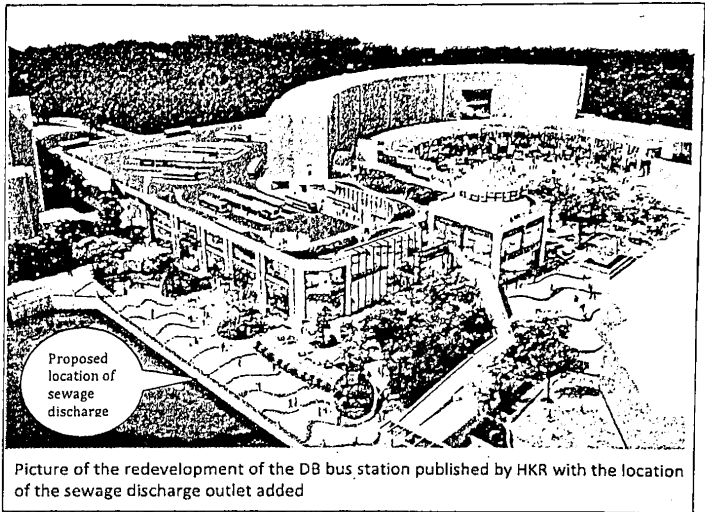
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UJA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that "The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface." This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
 5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**
1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewerage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No. 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

5835

tpb

寄件者: Nigel Reid [REDACTED]
寄件日期: 30日12月2016年星期五 3:55
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/1-DB/2 Area 6f - Amendments dated 29th November 2016 - Objection
附件: 6f 4 submission.pdf

5836

Please find enclosed my further objections to the foregoing.

Nigel J H Reid

Nigel J H Reid



Comments on the Second Further Information Submitted in Support of Section 12A Application Number Y/I-DB/2 (the "Application") to amend Discovery Bay Outline Zoning Plan for rezoning the permissible use from staff quarters to residential flats in Area 6f, behind Parkvale Village ("Parkvale") Discovery Bay ("DB").

SUMMARY

My submission comments on the latest – and continued inadequate – purported "Further Information" (published by the TPB on 9 December 2016) in support of the Application, submitted on behalf of Hong Kong Resorts ("HKR") on 28 November 2016. I continue to object to the Application and request its refusal.

This submission arises from my ownership of properties in both Parkvale, immediately adjacent to the 6f area, and Hillgrove Village which neighbours Parkvale and will also be adversely affected by the proposed construction and especially the lack of proper sewerage treatment proposals.

Regrettably, the immutable fact remains that no changes of any substance have been made by this latest "Further Information", to the second and third Further Information "bites at the cherry" submitted by HKR in June and October 2016. Indeed as HKR's agent MasterPlan admits in this latest submission on behalf of HKR: "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

PREVIOUS SUBMISSIONS BY MYSELF AND OTHERS IDENTIFIED NUMEROUS LEGITIMATE CONCERNS AND REASONS FOR THE TPB REFUSING THE APPLICATION. THESE CONCERNS REMAIN UNANSWERED AND, THEREFORE, THE FAILURE TO ANSWER SUCH APPROPRIATELY IN THE LATEST "FURTHER INFORMATION" - PARTICULARLY THOSE RELATING TO SEWERAGE - WOULD CONTINUE TO OBLIGE THE TPB TO REFUSE THE APPLICATION AND THROW IT OUT.

I strongly urge the TPB to visit DB and work with the various community residents' representatives so as to properly understand the significance and importance of the issues raised. Further detailed comments are set out in Appendix A, below.

Respectfully submitted: Nigel J H Reid

Appendix A

UNANSWERED – OR UNANSWERABLE – OBJECTIONS RAISED

Such concerns and objections include, inter-alia:

Unanswered pedestrian area, Parkvale road and access safety issues

- No detail about the construction of the building site access road through Parkvale is provided. This is a fatal flaw omission.
- The proposed development of 6f raises numerous health and safety issues arising from unsuitable access to the 6f site notably: that part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; the obvious width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; the potential lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public.
- As pointed out in my original submission which contained several photos and videos illustrating the very real dangers, HKR continues to fail to submit, in its Further Information, a Traffic Impact Assessment on Pedestrians and the Parkvale community.

Sewerage discharge health issues

- A sewage treatment works (Works) is to be included in Area 6f with ultimate discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. HKR's submitted comments make it clear that the latter is the intended approach which will (a) result in noxious odours for the Parkvale and Hillgrove Village residents; and (b) increase the probability of more frequent red tide in DB waters which are regrettably already a witnessed feature by myself in the Nim Shu Wan Bay on the South Side of DB. The main bay of DB – where the sewerage will ultimately be discharged – has ever since the creation of DB been used as a beach, swimming and sailing area. To discharge sewerage into this area will likely deprive the DB community of one of its most important features.
- The nullah next to Hillgrove village is part of a water run off system designed to cope with excess rain waters in the DB reservoir and run off waters from the mountainous landscape leading up to the reservoir. Parts of it, particularly around the Hillgrove Village boundary are often used by residents and their pets as a recreation area when safe to do so. When heavy rain falls, particularly in Amber, Red and Black falls it quickly fills up and develops into a raging torrent. Adding sewerage to the throughput in such conditions raises immense health issues. At the moment the infrastructure only has to cope with natural elements e.g., rainwater water and foliage which already block up the system in extreme conditions. Adding sewerage and other liquid discharge will introduce elements it was not designed to deal with, with all the attendant consequences of not being fit for purpose.
- Not suprisingly, in a weak attempt to dodge the fit for purpose and health issues HKR's consultants say that a comprehensive, and more costly sewerage

proposal "is considered not an efficient sewage planning strategy". This totally fails to respect the living conditions and health of the existing residents who will be adversely affected.

Misleading water supply assertions/representations

- HKR misleads the TPB by saying there are two water supply options. Because the Government has confirmed that its facilities at the Siu Ho Wan ("SHW") Water Treatment Works and the SHW Fresh Water Pumping Station are not available, there is only one option, which is a potable water supply to be provided by re-opening the 16 year defunct DB potable water treatment plant and sourcing water from the DB reservoir.
- While this may be feasible, it should be noted that the current DB residents have paid the Government directly for potable water for years now and only contribute to the cost of untreated flushing and cleaning water in the DB water station. Were any approval for 6f to be given, it should be a condition that all incremental costs of providing potable water should be certified independently by the auditors of the DB city accounts and be charged solely to the 6f residents.

Other utilities – impact thereon and safety concerns

- No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale, Hillgrove or other nearby villages such as Beach Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. ***Furthermore, there is no reference to the ageing DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.***

Slope safety issues

- Despite the fact that MAJOR slope safety works have been found necessary behind Hillgrove Village which area neighbours the 6f area, slope safety of the 6f area, has been ignored, notwithstanding that Annex C paragraph 2.1.1.4 states that a key element of the development is site foundation. HKR continues to ignore CEDD's request of HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report.

Access and Ownership issues

- HKR's legal right to use Parkvale Drive as a means of access to a developed 6f Area is disputed. This is a separate issue to the road and traffic safety issues during any proposed construction period, and could result in a landlocked 6f Area post development.

Inaccurate population estimates

- Discovery Bay planning controls of Discovery Bay have been ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC).

- Apart from being incomplete, inaccurate and unreliable, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited. As I have pointed out before, The population data HKR relies on as regards the several flats I own is completely wrong! Furthermore HKR's estimates are flawed and inconsistent with their own website.

Process and transparency

- Inadequate and unreliable Application and Further Information has been submitted. For example HKR has submitted studies and papers and not impact assessments, in a blatant attempt to avoid having to study the impact on the DB community the people most affected by its proposal.
- Inadequate and non-transparent consultation with the DB community and wider community at large. Many submissions that purport approval for the Application are provided by HKR employees and commercial tenants. There is of course the ongoing matter of fraudulent letters of support submitted in the name of the DB District Councillor.
- Inadequate and incomplete consultation with the appropriate Government departments.
- Evasive, incomplete and irrelevant responses by HKR to Government Department Application comments.
- Unacceptable process: It is not acceptable in this consultation exercise for the Applicant to unilaterally decide what is commercially sensitive and to keep that information from public review and comment. All information provided by the Applicant must be placed in the public domain so it can be considered and commented on if appropriate.

end

寄件者:
寄件日期:
收件者:
主旨:
附件:

Dennis Dakin [REDACTED]
30日12月2016年星期五 10:12
tpbpd@pland.gov.hk
Objection to Application Y/I DB-2 Area 6f
APPLICATION Y_1-DB_2 Area 6f.pdf; ATT00040.htm; B. PVOC Fourth Comments on the Section 12A Application further information_fina
Copy.pdf; ATT00043.htm

5837

Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

I am a

Parkvale Village owner I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations. This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach B.PVOC comments on 4th application and Application Y-DB 3 10b PDF the following excellent submission concerning the above, from neighbouring villages, which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects*
- Serene Village Owner dated 28th December. I OBJECT TO THE ABOVE APPLICATION*

Maria Dakin
[REDACTED]
[REDACTED]

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34

Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6f

The Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company who with thousands of owners are bound together by a Deed of Mutual Covenant.
2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) .
- The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .
3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.
4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.
5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,
6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m³ per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"in addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

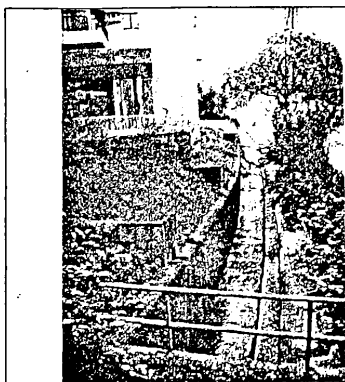
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

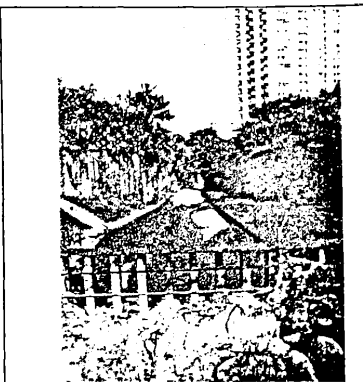
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

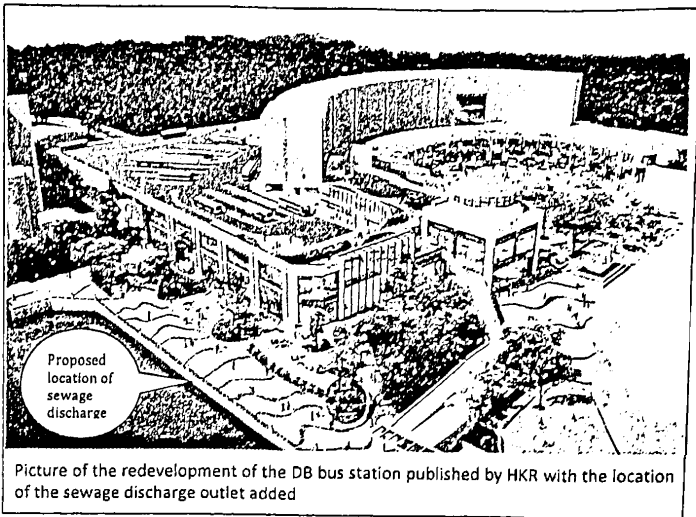
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
 - b. 6.3.1.5 – *“The computed N: P ratio concluded that the possibility of having red tide is still low.”*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the **“occurrence of red tides will be unlikely”**? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *“the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA”* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
 5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewerage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. **Only in its third and fourth submissions was the subject of emergency arrangements addressed.** These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. **Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.**
4. **Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking.** The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that **this issue of access be addressed by HKR and the Lands Department.**
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

5837

tpbpd

寄件人: Dennis Dakin [REDACTED]
寄件日期: 30日12月2016年星期五 10:09
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
附件: APPLICATION_Y_I-DB_2 Area 6f.pdf; ATT00031.htm; B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf; ATT00034.htm

5838

Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

I am a

Parkvale Village owner I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations. This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach B.PVOC comments on 4th application and Application Y-DB 3 10b PDF the following excellent submissions concerning the above, from neighbouring villages, which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December. I OBJECT TO THE ABOVE APPLICATION

Dennis Dakin
[REDACTED]

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6f

The Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company

who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry.

Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) .

The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ...cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah,

to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development .

6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.
7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "typographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm-surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water-pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2



Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING ,- SEPARATING ,- SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.
2. The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road.
3. The modelling scenarios of effluent dispersion.

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number S297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

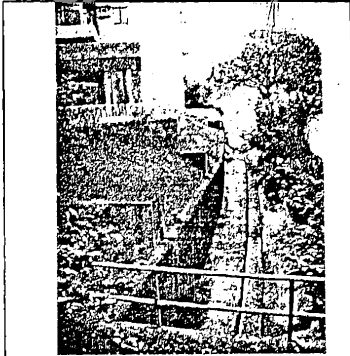
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

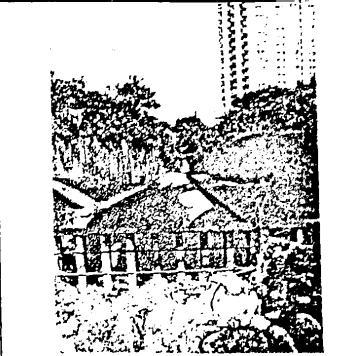
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

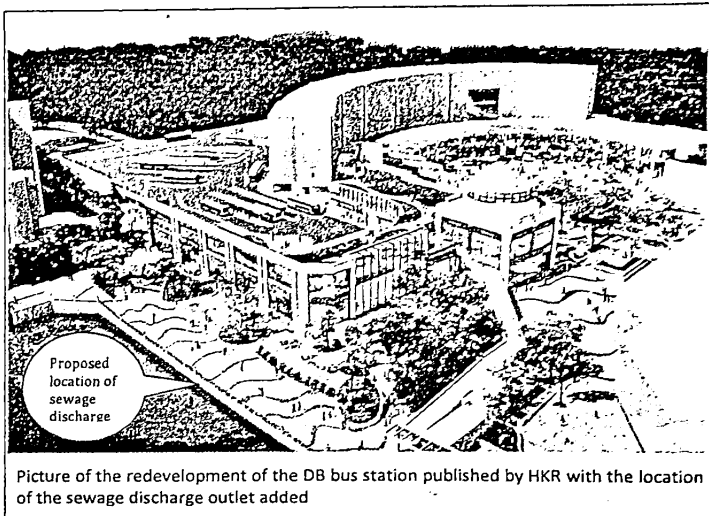
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the **"occurrence of red tides will be unlikely"**? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that **"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"** are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D "*CORMIX model output*" to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the "*REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE*".
5. The full name of the model is "*CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007*". It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. **INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**
 1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G "*Revised Study on Drainage, Sewerage and Water Supply*", paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

PVOC Comments on Application number: Y/1-DB/2

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

5838

tpbd

寄件者:
寄件日期:
收件者:
主旨:
附件:

Carmen Li [REDACTED]
30日12月2016年星期五 12:43
tpbpd@pland.gov.hk
Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
PVOC Fourth Comments on the Section 12A Application further information.pdf

5839

The Secretariat
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
(Via email: tpbpd@pland.gov.hk)

Dear Sirs,

Re; Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016

As I am a Parkvale Village owner, I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I strongly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, which, as a Parkvale Owner, I fully endorse, since they express my concerns better than I could myself :

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

I OBJECT TO THE ABOVE APPLICATION

Date: 30th December 2016

Name: Li Ho Ching Carmen.

Date: [REDACTED]

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number S297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

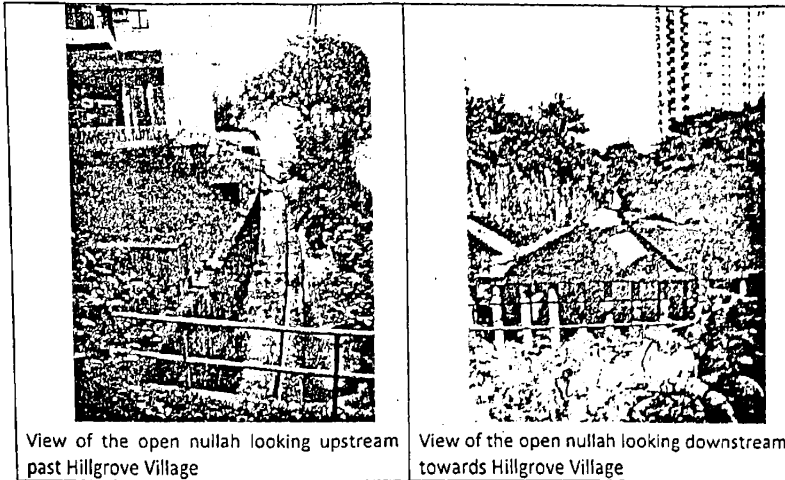
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.

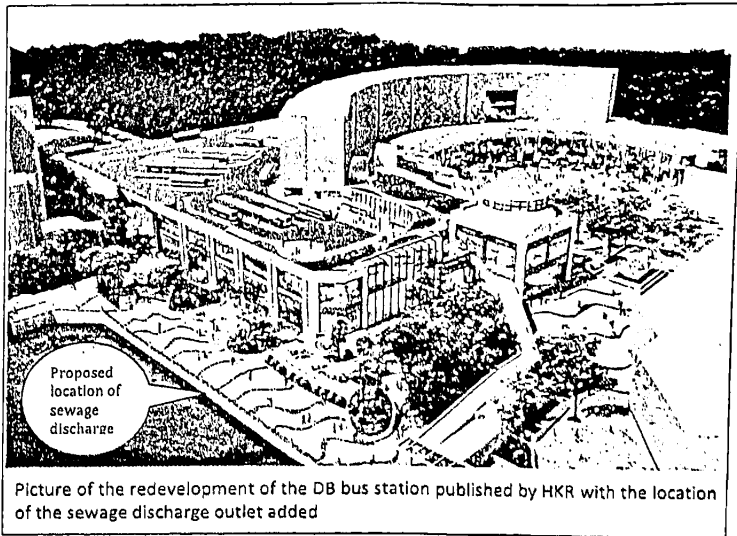


2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.
3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's Intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
 4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
 5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the "occurrence of red tides will be unlikely"? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
 7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and U1A"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula, CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.

G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewerage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy'.

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. **Only in its third and fourth submissions was the subject of emergency arrangements addressed.** These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. **Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.**
4. **Also the only access to Pumping Station No. 1** (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

5839

寄件者:
寄件日期:
收件者:
主旨:

catherine mackinnon
30日12月2016年星期五 13:21
tpbpd@pland.gov.hk
Application No. YI-DB/2 Area 10b - amendments dated 29th November 2016 - OBJECTION

5840

*My husband and I own several properties in Discovery Bay, including a property in Peninsula V
illage.... We are deeply concerned by the numerous bad aspects of this Application which have
been covered by earlier consultations.*

*This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery
Bay and I particularly object to this retrograde step and an inevitable environmental deterioration
for DB residents and the marine life. I also object to the cutting down of mature trees.*

*I attach the following excellent submission concerning the above, from neighbouring villages, which
I fully endorse, since it expresses our concerns better than I could myself.*

Yours
Catherine and Iain Mackinnon



Preview attachment APPLICATION Y 1-DB 3 Area 10b.pdf



APPLICATION Y 1-DB 3 Area 10b.pdf
199 KB

tpb

寄件者: Edwin Rainbow [REDACTED] 5841
寄件日期: 30日12月2016年星期五 13:27
收件者: Town Planning Board
副本: Alice Li; Dominic Ho at Yahoo; Janice Fung; JOHN ANTWEILER & SHIRLEY NG; KIMBERLEY KENG; LAU M.K.; Martin Reynolds; Martyn Keen; MICHAEL McGUIRE; Mr Fok; Mr. Edmund Fan; Mr. Lam Wai Man; Ms. Umehara Yukiko; Nicola Wepener; NIGEL REID; Edwin Tam
主旨: Application No. Y/1-DB/2 Area 6f - Amendments dated 29th November 2016 - Objection

Dear Sirs

I write in my capacity as Chairman of the Hillgrove Village Owners Committee.

On behalf of the VOC, and therefore the Hillgrove Owners, I can speak with confidence that the Hillgrove VOC (copied is completely against the Application No. Y/1-DB/2 Area 6f) and say that we fully endorse the submission by one of our VOC members, Nigel Reid, and restated below.

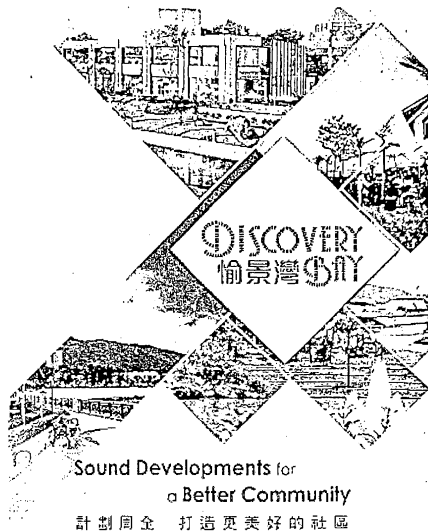
I would also add that the VOC have been circulated with the following submissions from neighbouring villages.

-Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

-Serene Village Owner dated 28th December.

Again I can say with confidence that the Hillgrove members will fully endorse these two submissions also. I trust that the TPB accepts that by offering a consultation between 9 - 29 December, it was impossible for this VOC to convene a meeting, and we were unable to make a joint submission.

I particularly want to stress that HKR has not addressed the highly relevant public comments made in previous rounds. HKR avoids the public comments and their doubts about the sincerity of HKR stated aims:



Many technical objections have been raised and, together with the serious concerns over sewage covered by the current amendment, are enough to deny any evidence that what is on offer supports a Sound Development.

I have not met anyone in DB that agrees that what is proposed will make for a Better Community. There are no reasons why it should.

However, these proposals head towards a very different community, and little different from the other private estates in Hong Kong and AWAY FROM Discovery Bay, recently described by the Assistant Director for City Management, Patrick Ho, in his self-introduction in the December 12th City Management Newsletter circulated to all mail boxes:

Quotes from Patrick Ho's first paragraph :

.... beautiful scenery, idyllic setting and leisure ambience

It is very relaxing and enjoyable to take a stroll on the tree lined promenade along the main road

Final paragraph

.... continually uphold environmental protection

We will endeavour our best to build an even better living environment

I believe that the TPB will not see many of Patrick Ho's

words reflected in the submissions emanating from City Management staff, who ought to

have
remain
ed
neutral anyway.

Nigel Reid's submission is copied below.

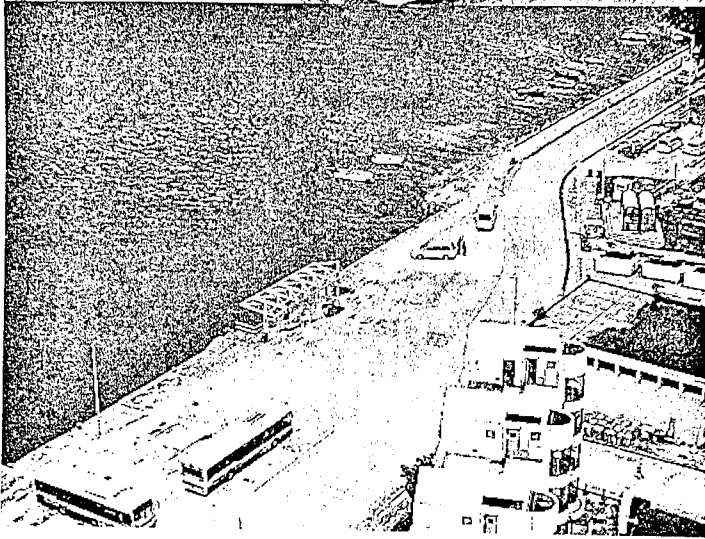
Arising from some of his words in I would like to add my concern about how information is being handled.

The two photos below were taken during the first days of the this Application process from 17C Verdant Court looking down on the 10b site. These were two separate visits to the site, who they are I do not know. What is strange is that, at that time, there was almost no activity in the area, which is not a true representation of reality (I will provide plenty of evidence in a separate submission - in fact I have formed an opinion that the 10b Application is unworkable in practice due to the levels of activity required in the space provided).

I want to put on record that if any judgements on the Application was based on samples from these two visits they would be wrong. The remarks below are so important in order to be sure of a correct assessment.

As pointed out in my original submission which contained several photos and videos illustrating the very real dangers, HKR continues to fail to submit, in its Further information, a Traffic Impact Assessment on Pedestrians and the Parkvale community.

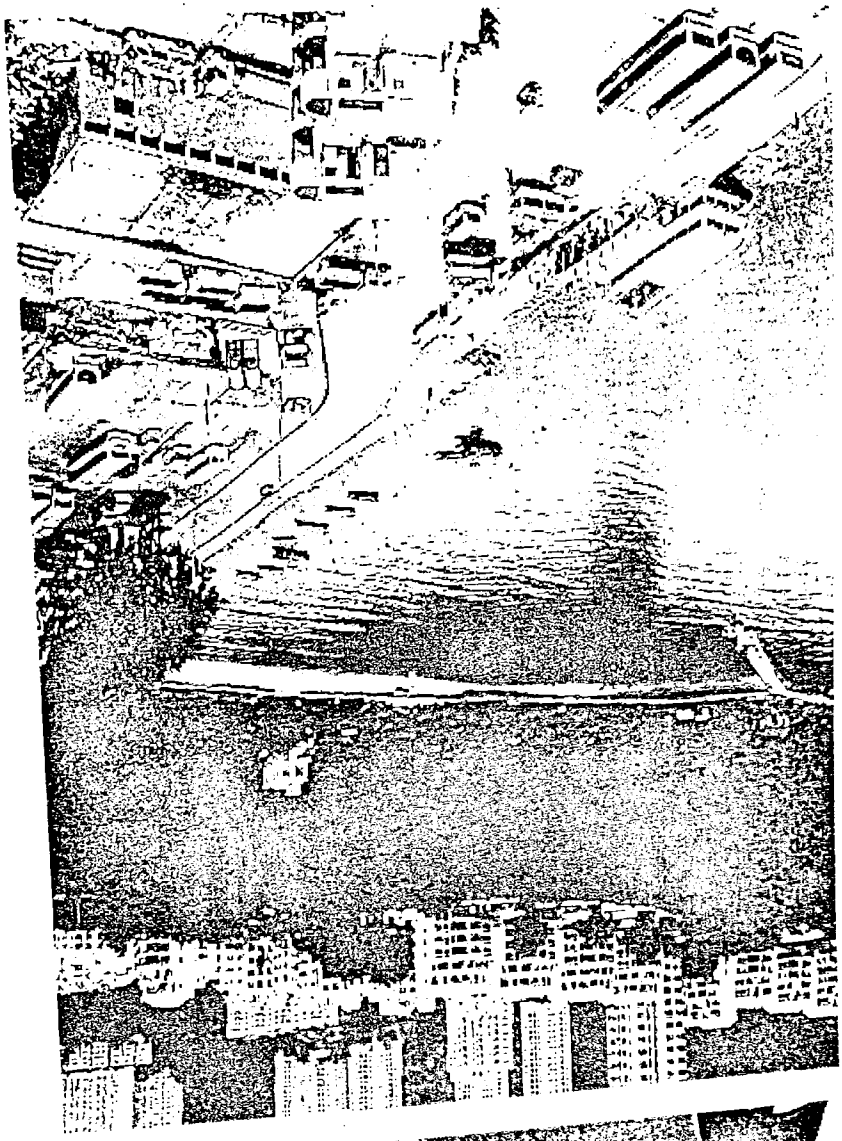
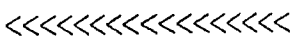
I strongly urge the TPB to visit DB and work with the various community residents' representatives so as to properly understand the significance and importance of the issues raised.



and more traffic and golf carts definitely not the way to go:



Nigel J H Reid



Comments on the Second Further Information Submitted in Support of Section 12A Application Number Y/I-DB/2 (the "Application") to amend Discovery Bay Outline Zoning Plan for rezoning the permissible use from staff quarters to residential flats in Area 6f, behind Parkvale Village ("Parkvale") Discovery Bay ("DB").

SUMMARY

My submission comments on the latest – and continued inadequate – purported "Further Information" (published by the TPB on 9 December 2016) in support of the Application, submitted on behalf of Hong Kong Resorts ("HKR") on 28 November 2016. I continue to object to the Application and request its refusal.

This submission arises from my ownership of properties in both Parkvale, immediately adjacent to the 6f area, and in Hillgrove Village which neighbours

Parkvale and will also be adversely affected by the proposed construction and especially the lack of proper sewerage treatment proposals.

Regrettably, the immutable fact remains that no changes of any substance have been made by this latest "Further Information", to the second and third Further Information "bites at the cherry" submitted by HKR in June and October 2016.

Indeed as HKR's agent MasterPlan admits in this latest submission on behalf of HKR: "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

PREVIOUS SUBMISSIONS BY MYSELF AND OTHERS IDENTIFIED

NUMEROUS LEGITIMATE CONCERNS AND REASONS FOR THE TPB

REFUSING THE APPLICATION. THESE CONCERNS REMAIN

UNANSWERED AND, THEREFORE, THE FAILURE TO ANSWER SUCH

APPROPRIATELY IN THE LATEST "FURTHER INFORMATION" -

PARTICULARLY THOSE RELATING TO SEWERAGE - WOULD CONTINUE

is current

reasons

states in
tent,
xes:

TO OBLIGE THE TPB TO REFUSE THE APPLICATION AND THROW IT OUT.

I strongly urge the TPB to visit DB and work with the various community residents' representatives so as to properly understand the significance and importance of the issues raised. Further detailed comments are set out in Appendix A, below.

Respectfully submitted: Nigel J H Reid

Appendix A

UNANSWERED – OR UNANSWERABLE – OBJECTIONS RAISED

Such concerns and objections include, inter-alia:

Unanswered pedestrian area, Parkvale road and access safety issues

- No detail about the construction of the building site access road through

Parkvale is provided. This is a fatal flaw omission.

- The proposed development of 6f raises numerous health and safety issues arising from unsuitable access to the 6f site notably: that part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; the obvious width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; the potential lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public.

- As pointed out in my original submission which contained several photos and videos illustrating the very real dangers, HKR continues to fail to submit, in its Further Information, a Traffic Impact Assessment on Pedestrians and the Parkvale community.

Sewerage discharge health issues

- A sewage treatment works (Works) is to be included in Area 6f with ultimate discharge directly into the sea next to the ferry pier using either a gravity pipe

or the open nullah which is adjacent to Hillgrove Village. HKR's submitted comments make it clear that the latter is the intended approach which will (a) result in noxious odours for the Parkvale and Hillgrove Village residents; and (b) increase the probability of more frequent red tide in DB waters which are regrettably already a witnessed feature by myself in the Nim Shu Wan Bay on the South Side of DB. The main bay of DB – where the sewerage will ultimately be discharged – has ever since the creation of DB been used as a beach, swimming and sailing area. To discharge sewerage into this area will likely deprive the DB community of one of its most important features.

- The nullah next to Hillgrove village is part of a water run off system designed to cope with excess rain waters in the DB reservoir and run off waters from the mountainous landscape leading up to the reservoir. Parts of it, particularly around the Hillgrove Village boundary are often used by residents and their pets as a recreation area when safe to do so. When heavy rain falls, particularly in Amber, Red and Black falls it quickly fills up and develops into a raging torrent. Adding sewerage to the throughput in such conditions raises immense health issues. At the moment the infrastructure only has to cope with natural elements e.g., rainwater and foliage which already block up the system in extreme conditions. Adding sewerage and other liquid discharge will introduce elements it was not designed to deal with, with all the attendant consequences of not being fit for purpose.

- Not surprisingly, in a weak attempt to dodge the fit for purpose and health issues HKR's consultants say that a comprehensive, and more costly sewerage proposal "is considered not an efficient sewage planning strategy". This totally fails to respect the living conditions and health of the existing residents who will be adversely affected.

Misleading water supply assertions/representations

- HKR misleads the TPB by saying there are two water supply options. Because

the Government has confirmed that its facilities at the Siu Ho Wan ("SHW") Water Treatment Works and the SHW Fresh Water Pumping Station are not available, there is only one option, which is a potable water supply to be provided by re-opening the 16 year defunct DB potable water treatment plant and sourcing water from the DB reservoir.

- While this may be feasible, it should be noted that the current DB residents have paid the Government directly for potable water for years now and only contribute to the cost of untreated flushing and cleaning water in the DB water station. Were any approval for 6f to be given, it should be a condition that all incremental costs of providing potable water should be certified independently by the auditors of the DB city accounts and be charged solely to the 6f residents.

Other utilities – impact thereon and safety concerns

- No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale, Hillgrove or other nearby villages such as Beach Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities.

Furthermore, there is no reference to the ageing DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.

Slope safety issues

- Despite the fact that MAJOR slope safety works have been found necessary behind Hillgrove Village which area neighbours the 6f area, slope safety of the 6f area, has been ignored, notwithstanding that Annex C paragraph 2.1.1.4 states that a key element of the development is site foundation. HKR continues to ignore CEDD's request of HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report.

Access and Ownership issues

• HKR's legal right to use Parkvale Drive as a means of access to a developed 6f Area is disputed. This is a separate issue to the road and traffic safety issues during any proposed construction period, and could result in a landlocked 6f Area post development.

Inaccurate population estimates

• Discovery Bay planning controls of Discovery Bay have been ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC).

• Apart from being incomplete, inaccurate and unreliable, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited. As I have pointed out before, The population data HKR relies on as regards the several flats I own

is completely wrong!

Furthermore HKR's estimates are flawed and inconsistent with their own website.

Process and transparency

• Inadequate and unreliable Application and Further Information has been submitted. For example HKR has submitted studies and papers and not impact assessments, in a blatant attempt to avoid having to study the impact on the DB community the people most affected by its proposal.

• Inadequate and non-transparent consultation with the DB community and wider community at large. Many submissions that purport approval for the Application are provided by HKR employees and commercial tenants. There is of course the ongoing matter of fraudulent letters of support submitted in the name of the DB District Councillor.

• Inadequate and incomplete consultation with the appropriate Government departments.

- Evasive, incomplete and irrelevant responses by HKR to Government

Department Application comments.

- Unacceptable process: It is not acceptable in this consultation exercise for the Applicant to unilaterally decide what is commercially sensitive and to keep that information from public review and comment. All information provided by the Applicant must be placed in the public domain so it can be considered and commented on if appropriate.

5841

end

寄件者:
寄件日期:
收件者:
主旨:
附件:

Suren Safaya [REDACTED]
30日12月2016年星期五 13:40
tpd@d.gov.hk
Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf, APPLICATION Y_1-DB_2 Area 6f.pdf

5842

Dear Sir/Madam,

I am a Peninsula Village owner and I am deeply concerned by the numerous bad aspects of this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, which, as a Peninsula Village Owner, I fully endorse, since they express my concerns better than I could myself.

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects
- Serene Village Owner dated 28th December.

I OBJECT TO THE ABOVE APPLICATION

Regards,
Suren Safaya



(a VOC member)

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.
2. The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).
3. The modelling scenarios of effluent dispersion.

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 15 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

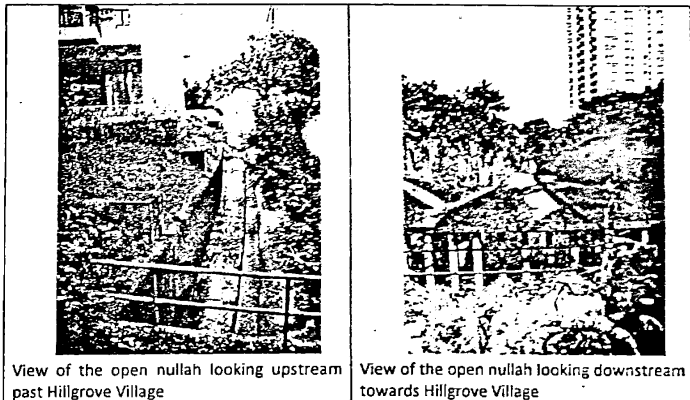
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



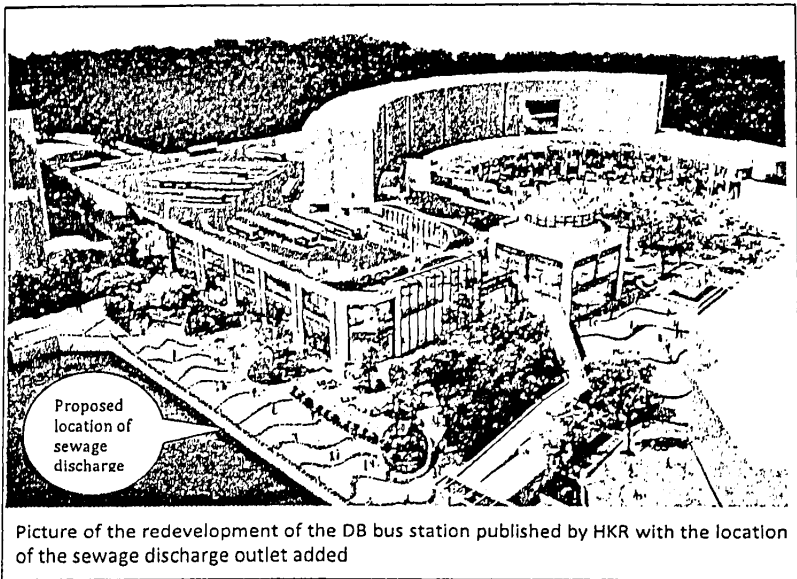
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DS. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coll content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. **INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**
- L. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewerage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

for info Fw: APPLICATION Y/1-DB/2 Area 6f

[REDACTED]
29 December 2016 at
08:34Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6f

The Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company who with thousands of owners are bound together by a Deed of Mutual Covenant.
2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) . The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .
3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.
4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.
5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,
6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge , back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply : effluent to the sea = generally considered is "water -pollution" .

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE , ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB , TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE , DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORESO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

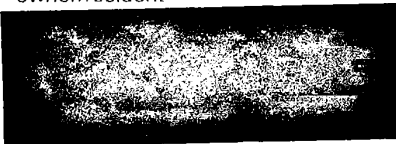
ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Thomas Gebauer

5842

寄件者: Michael John Bishop [REDACTED]
寄件日期: 30日12月2016年星期五 14:17
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y1-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
附件: B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf; ATT00036.txt; APPLICATION Y_1-DB_2 Area 6f.pdf; A1T00039.txt

5843

To whom it may concern:

I am a Peninsula Village owner, who is extremely concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, which, as a Peninsula Village Owner, I fully endorse, since they express my concerns better than I could myself :

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "*In summary, the Further Information relates to the following issues:*

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road.*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "*This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32*".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "is considered not an efficient sewage planning strategy".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

C. APPLICATION FOR DISCHARGE LICENCE

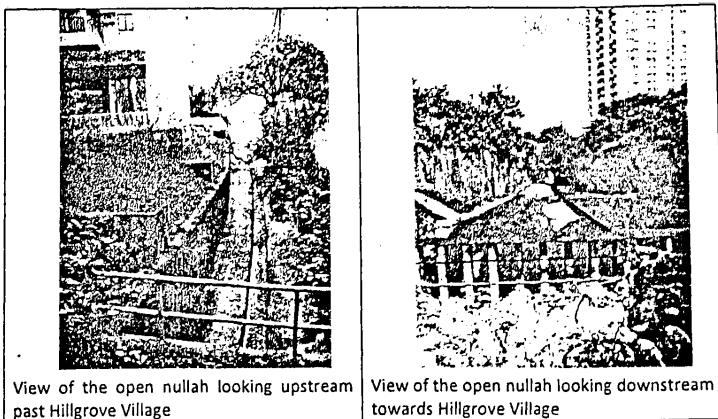
1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that *"Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW."* This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?

2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village

View of the open nullah looking downstream towards Hillgrove Village

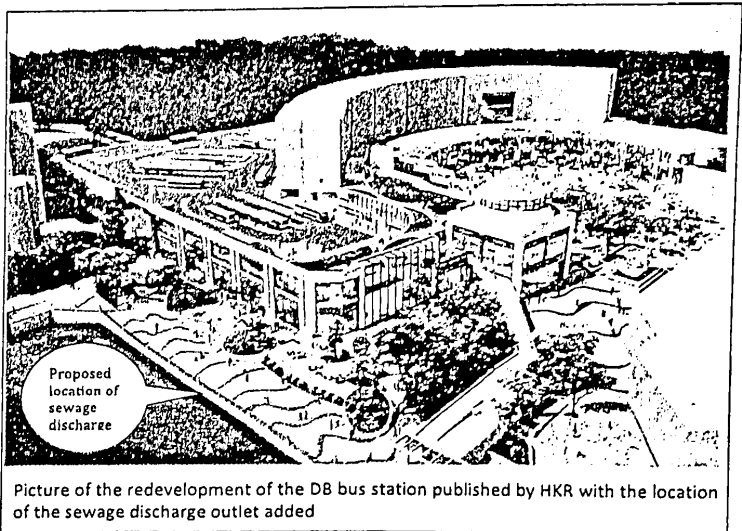
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
 - b. 6.3.1.5 – *“The computed N: P ratio concluded that the possibility of having red tide is still low.”*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *“occurrence of red tides will be unlikely”*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *“the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UJA”* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states *"The exit of the gravity sewage pipe into sea is near surface."* However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.

G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewerage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

for info Fw: APPLICATION Y/I-DB/2 Area 6f

29 December 2016 at 08:34

Reply-To: [Redacted]
To: Edwin Rainbow

Thomas Gebauer

----- Forwarded Message -----

From: [Redacted]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/I-DB/2 Area 6f

The Town Planning Board:
Application Y/I-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company

who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry.

Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) .

The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/I-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to build a sewage treatment plant "on site" and the effluent is planned to be delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah,

to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour .

To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,

6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.
7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water -pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.... THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED. THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED

BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. **AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.**

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

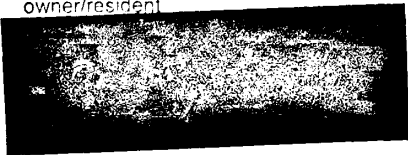
ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Thomas Gebauer

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收件日期:

主頁:

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Application No. V1-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION APPLICATION V.1-DB.2 Area 6f.pdf; B. PVOC Fourth Comments on the Section 12A Application Further information_Final.pdf

5844

I am a Peninsula Village owner concerned by the serious implications of this Application to which I have objected on numerous occasions for the previous consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this measure, with the inevitable environmental deterioration for all DB residents.

I attach the following excellent submissions concerning the above, which as a Peninsula Village Owner I fully endorse, since they express many of own my concerns:

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns with resp to sewerage

- Serene Village Owner dated 28th December.

On these grounds, and on those previously lodged by me during the three previous rounds of consultation, I STRONGLY OBJECT TO THE ABOVE APPLICATION

Susan Fernie
Owner & Resident



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IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "*In summary, the Further Information relates to the following issues:*

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "*This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32*".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"in addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal *"is considered not an efficient sewage planning strategy"*.
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

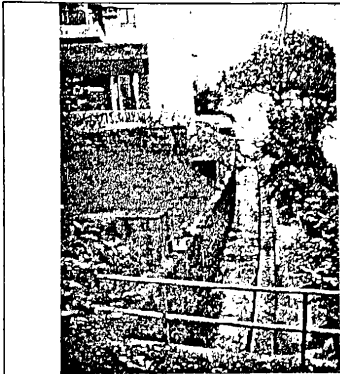
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

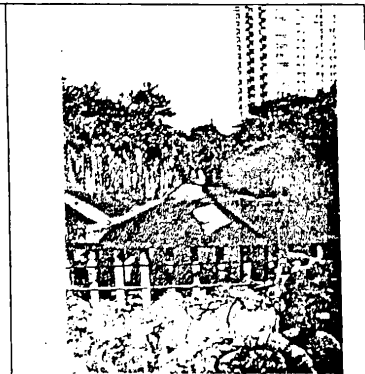
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

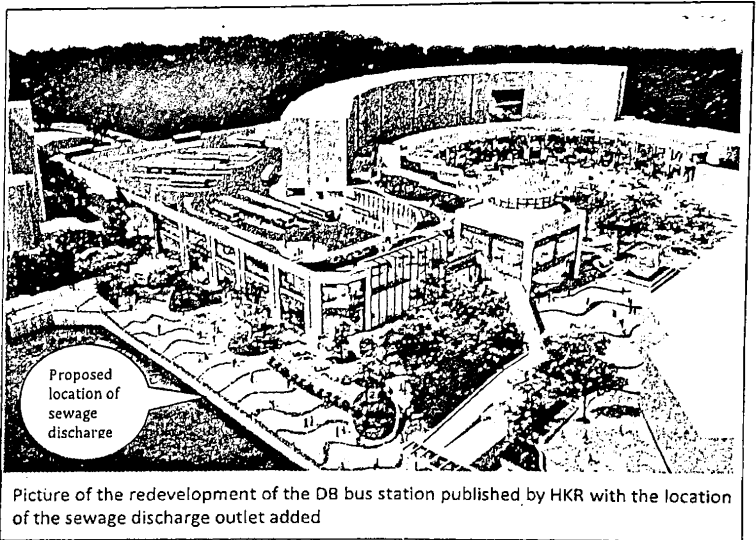
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
 5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewerage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy'.

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that "*In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual*".
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

5844

寄件者:
寄件日期:
收件者:
主旨:
附件:

Stefan Fillip
30日12月2016年星期五 15:01
tpbd@pland.gov.hk
Application No. Y/L-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf; ATT00086.htm

5845

Dear Town Planning Board,

I own two apartments at Peninsula Village ([REDACTED]) and I am deeply concerned by the numerous shortcuts and environmental damages of this Application.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the m life.

To me it is outrageous to even consider in "Asia" s World City " to put nowadays a sewage treatment plant into housing development and to discharge the effluent into the shoreline next to a housing development and to a comm beach which is used by DB residents and others for recreational purposes.

I attach the Parkvale Village Owners' Committee submission dated 29th December, which matches my own conc all respects and which I fully endorse.

I OBJECT TO THE ABOVE APPLICATION

Best regards

Dr. Stefan Fillip
[REDACTED]

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "*In summary, the Further Information relates to the following issues:*

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "*This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32*".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that "*In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government infrastructure would be insignificant*". This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and OSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

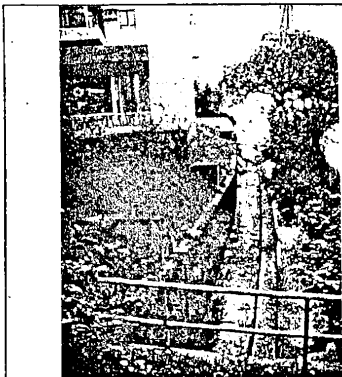
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that *"Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW."* This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
1. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

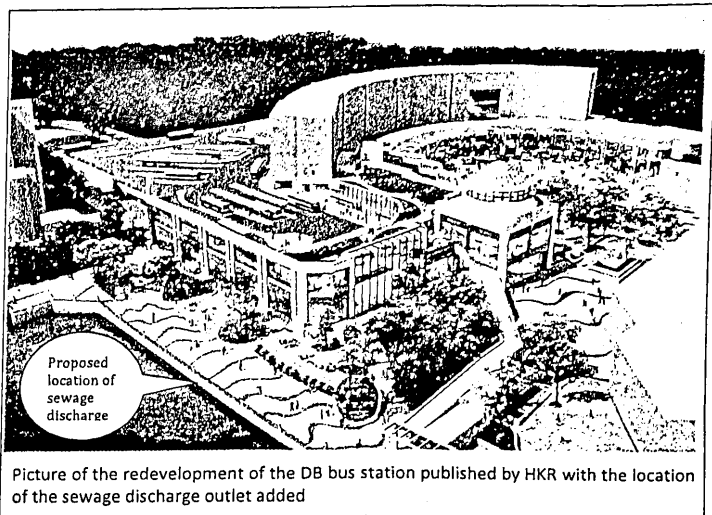
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. **We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.**
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "The exit of the gravity sewage pipe into sea is near surface." However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that "The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface." This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the ***"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"***.
 5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**
1. In its Application and Further Information, of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

PVOC Comments on Application number: Y/1-DB/2

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

5845

寄件者:
寄件日期:
收件者:
主题:

John Brennan [REDACTED]
30/11/2016 年 星期五 16:21
tblpd@pland.gov.hk
Application No. YA-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

5846

Dear Sirs,

As a resident of a block in Peninsula Village, Discovery Bay, I am writing to express my objection to the numerous unsatisfactory and environmentally-damaging aspects of this application.

Most significantly, this latest round of consultation again proposes the reintroduction of sewage treatment within Discovery Bay. If implemented this move would not only have a severely detrimental affect on the environment for Discovery Bay residents, but also for marine life in the waters the treated waste would be discharged into.

Yours faithfully,

John Brennan

Name: John Brennan
[REDACTED]

Tel: [REDACTED]

寄件者: BriGuy [REDACTED]
寄件日期: 30日12月2016年星期五 16:48
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/1-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
附件: APPLICATION_Y_1-DB_2 Area 6f.pdf

5847

Application No. Y/1-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

I am a long term resident of Discovery Bay, currently renting in Parkvale Village. I am very concerned by the many bad ideas in this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, which, I fully endorse, since they express my concerns better than I could myself

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- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December.

I OBJECT TO THE ABOVE APPLICATION

Brian Lowe



for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6f

The Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company

who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry.

Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) .

The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah,

to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,

6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge , back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply : effluent to the sea = generally considered is "water -pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE , ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB , TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE , DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

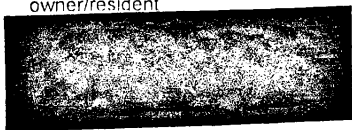
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10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Thomas Gebauer

5847



寄件者:
寄件日期:
收件者:
主旨:

Yasmin Jiwa [REDACTED]
30日12月2016年星期五 10:49
tpbd@pland.gov.hk
Application No. YI-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

5848

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Kind regards

Dr Yasmin Jiwa



寄件者:
寄件日期:
收件者:
主旨:
附件:

Katrina Lowe
30 12 2016 年 星期五 16:55
tpbpd@pland.gov.hk
Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
APPLICATION_Y_1-DB_2 Area 6f.pdf; ATTO0043.htm

5849

Sent from my iPhone

Date: 30 December 2016 at 4:51:06 PM Katrina LOWE <[REDACTED]>
Subject: Fwd: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

Date: 30 December 2016 at 16:47
Subject: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
To: tpbpd@pland.gov.hk

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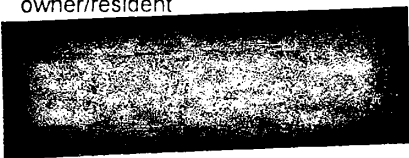
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THOMAS GEBAUER

owner/resident



Thomas Gebauer

5849

tpbpd

寄件者:
寄件日期:
收件者:
主题:

Margaret Chow
30日12月2016年 星期五 17:56
tpbpd@pland.gov.hk
Comments for Area 6F Discovery Bay

5850

Dear Sir/Madam,

I write to seek the TPB members' site visit to the above area to better understand the havoc the proposal will create for existing residents at Woodbury Court, Woodgreen Court and Woodland Court. This is my third submission of comments in demonstrating to the TPB that approval should only be given where quality of living is improved for all concerned. Why destroy the very image of low density, environmentally friendly living that Discovery Bay is known for, when such is not being kept but chipped away incrementally year by year? Do come and see, walk through the area, investigate the proposed extension of the access road and you'll see how it is going to ruin the neighbourhood BIG time!

Margaret Chow
DB resident for over 2 decades

Sent from my iPad

寄件者:
寄件日期:
收件者:
主旨:

Carmen Li [REDACTED]
30日12月2016年星期五 18:01
tpbpd@pland.gov.hk
Section 12A Application No. Y/I-DB/2 Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay

5851

The Secretariat
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
(Via email: tpbpd@pland.gov.hk)

Dear Sir,

Section 12A Application No. Y/I-DB/2
Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay

Objection to the Submission by the Applicant dated 28.11.2016

I refer to the Response to Comments submitted by the consultant of Hong Kong Resort ("HKR"), Masterplan Limited, to address the departmental comments regarding the captioned application on 28.11.2016.

Please kindly note that I strongly object to the submission regarding the proposed development of the Lot. My main reasons of objection on this particular submission are listed as follows:-

1. HKR claims that they are the sole land owner of Area 6f is in doubt, as the lot is now held under the Principal Deed of Mutual Covenant ("PDMC") dated 20.9.1982. Area 6f forms part of either the "City Common Areas" or the "City Retained Areas" as defined in the PDMC. Pursuant to Clause 7 under Section I of the PDMC, every Owner (as defined in the PDMC) has the right and liberty to go pass and repass over and along and use Area 6f for all purposes connected with the proper use and enjoyment of the same subject to the City Rules (as defined in the PDMC). The applicant has failed to consult or seek proper consent from the co-owners of the Lot prior to this unilateral application. The property rights of the existing co-owners, i.e. all property owners of the Lot, should be considered, secured and respected.
2. The disruption, pollution and nuisance caused by the construction to the immediate 25,000 residents and property owners nearby are substantial, and the submission has not been addressed.

5. The proposed felling of 118 nos. mature trees in Area 6f is an ecological disaster, and poses a substantial environmental impact to the immediate natural setting. The proposal is unacceptable and the proposed tree preservation plan or the tree compensatory proposal are unsatisfactory.

6. The revision of development as indicated in the Revised Concept Plan of Annex A is still unsatisfactory in term of its proposed height, massing and disposition in this revision. The two towers are still sitting too close to each other which may create a wall-effect to the existing rural natural setting, and would pose an undesirable visual impact to the immediate surrounding, especially to those existing towers in the vicinity.

Unless and until the applicant is able to provide detailed responses to all the comments for further review and comments, the application for Area 6f should be withdrawn and not approved by the government.

Date: 30th December 2016

Name of Discovery Bay Owner / Resident: Li Ho Ching Carmen

Address: [REDACTED]

Sent from Yahoo Mail on Android

5851

tpbpd

寄件者: O. Gregory
寄件日期: 30日12月2016年星期五 19:06
收件者: tpbpd@pland.gov.hk
主题: Section 12A
附件: Scan 196.jpeg; Scan 195.jpeg

5352

Please see attached documents.

Thank you,

Olivia Gregory

The Secretariat
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
(Via email: tpbinfo@pland.gov.hk or fax: 2877 0245 / 2522 8426)

Dear Sir,

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Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay

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2. The disruption, pollution and nuisance caused by the construction to the immediate residents and property owners nearby are substantial, and the submission has not been addressed.
3. There is major change to the development concept of the Lot and a fundamental deviation to the land use of the original approved Master Plans or the approved Outline Zoning Plan in the application, i.e. from staff quarters into residential area, and approval of it would be an undesirable precedent case from environmental perspective and against the interest of all property owners of the district.
4. The original stipulated DB population of 25,000 should be fully respected as the underlying infrastructure capacity could not afford such substantial increase in population by the submission, and all DB property owners would have to suffer and pay for the cost out of this submission in upgrading the surrounding infrastructure so as to provide adequate supply or support to the proposed development, e.g. all required road network and related utilities improvement

works arised out of this submission including the sewage treatment proposal etc. The proponent should consult and liaise with all property owners being affected and undertake the cost and expense of all infrastructure out of this development. Its disruption during construction to other property owners in the vicinity should be properly mitigated and addressed in the submission. The proposed sewage treatment plant is unacceptable in term of its proposed scale and extent and pose substantial visual and environmental impacts to the immediate surroundings.

5. The proposed felling of 118 nos. mature trees in Area 6f is an ecological disaster, and poses a substantial environmental impact to the immediate natural setting. The proposal is unacceptable and the proposed tree preservation plan or the tree compensatory proposal are unsatisfactory.
6. The revision of development as indicated in the Revised Concept Plan of Annex A is still unsatisfactory in term of its proposed height, massing and disposition in this revision. The two towers are still sitting too close to each other which may create a wall-effect to the existing rural natural setting, and would pose an undesirable visual impact to the immediate surrounding, especially to those existing towers in the vicinity.

Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 6f should be withdrawn.

Signature: _____

Date: _____

20-12-16

Name of Discovery Bay Owner / Resident: _____

Olivia Gregory

Address: _____



tpbpd

寄件者: O. Gregory
寄件日期: 30日12月2016年星期五 19:16
收件者: tpbpd@pland.gov.hk
主旨: Area 6f/Discovery Bay
附件: Scan 198.jpeg; Scan 197.jpeg

5853

Please see attachments.

Thank you,

Olivia Gregory

The Secretariat
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
(Via email: tpbpd@pland.gov.hk or fax: 2877 0245 / 2522 8426)

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Section 12A Application No. Y/J-DB/2
Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay
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Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 6f should be withdrawn.

Signature:



Date:

30-12-16

Name of Discovery Bay Owner / Resident:

Olivia Greggs

Address:



tpbpa

寄件者: Rowland [REDACTED]
寄件日期: 30日12月2016年星期五 20:31
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

5854

To Whom it may concern;

As an owner of a Hillgrove property I am very concerned at the proposed sewage treatment for this new development and feel that further discussion is needed.

I am in support of the Parkvale Village Owners' submission Dated December 29, 2016 which clearly states the concerns for many residents of Discovery Bay.

I OBJECT TO THE ABOVE APPLICATION

Joanne Rowland
[REDACTED]

寄件者: Amy Yung [awsyung@netvigator.com]
寄件日期: 30日12月2016年星期五 21:19
收件者: tpbpd@pland.gov.hk
主旨: Re: Section 12A Application No. Y/I-DB/2 - Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay

The Secretariat
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
(Via email: tpbpd@pland.gov.hk)

Dear Sir,

Section 12A Application No. Y/I-DB/2
Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay

Objection to the Submission by the Applicant

I refer to the additional information submitted by the consultant of Hong Kong Resort ("HKR"), Masterplan Limited recently.

Since no attempts have been made to address Discovery Bay residents' concerns, particularly the water and sewage problems, I maintain my position and strongly object to the application.

Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 6f should be withdrawn.

Yours sincerely,

Amy Yung

Islands District Council Member – Discovery Bay
21st Floor, Fortune House
61 Connaught Road Central
Hong Kong
Direct Line: 2541 5190
Telephone: 2541 5166
Fax: 2541 5660
E-mail: awsyung@netvigator.com

tpbpd

寄件者: BIGA957 [REDACTED] 5856
寄件日期: 30日12月2016年星期五 21:25
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
附件: APPLICATION Y_1-DB_2 Area 6f.pdf; B. PVOC Fourth Comments on the Section 12A Application further informati...pdf

Dear Sirs,

I live in Discovery Bay in Peninsula Village and I am the owner of two apartments.

I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, **which, I fully endorse, since they express EXACTLY my concerns:**

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December.

OBJECT TO THE ABOVE APPLICATION

Name: GIANFRANCO BIGAZZI

Apartment [REDACTED]



This email has been checked for viruses by Avast antivirus software.
www.avast.com

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34Reply-to [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6fThe Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company who with thousands of owners are bound together by a Deed of Mutual Covenant.
2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) . The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .
3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.
4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.
5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,
6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.
7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water -pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A

TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

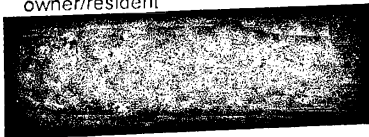
ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Parkvale Village Owners' Committee

Comments on the Second Further Information Submitted in Support of Section 12A Application Number Y/1-DB/2 to amend Discovery Bay Outline Zoning Plan for rezoning the permissible use from staff quarters to flats at Area 6f, Discovery Bay.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.
2. The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).
3. The modelling scenarios of effluent dispersion.

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B *"Guidelines – for submission of comments on various applications under the Town Planning Ordinance"*. The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

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2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).*
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Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

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It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

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- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. **Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.**

3. **Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.**
4. **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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.**

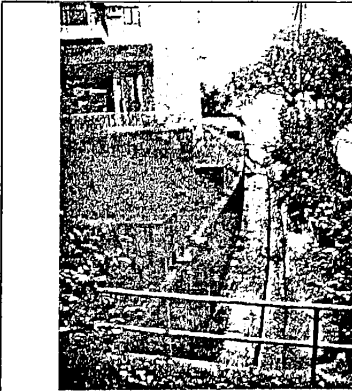
C. APPLICATION FOR DISCHARGE LICENCE

1. **Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?**
2. **This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.**

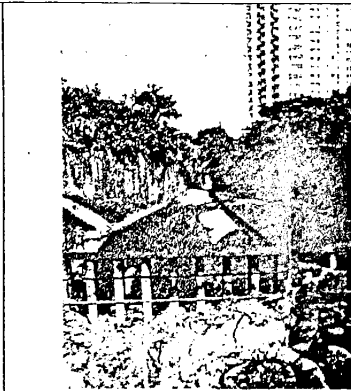
D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. **HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m3 per day of sewage will be flowing**

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village



View of the open nullah looking downstream towards Hillgrove Village

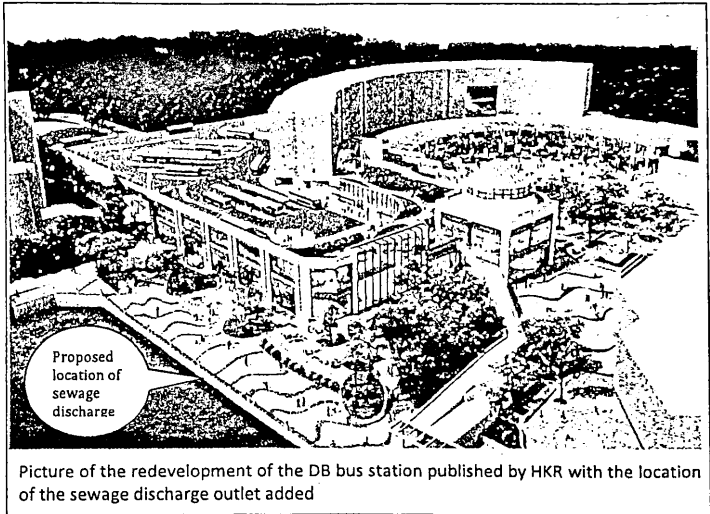
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
 - b. 6.3.1.5 – *“The computed N: P ratio concluded that the possibility of having red tide is still low.”*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *“The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely.”*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *“occurrence of red tides will be unlikely”*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *“the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA”* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Picture of the redevelopment of the DB bus station published by HKR with the location of the sewage discharge outlet added

Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", It is stated that "The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface." This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.

G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT

1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
 2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
 3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
 4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
 5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
 6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.
- 1. SEWAGE FROM WORKFORCE DURING CONSTRUCTION**
1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.
Parkvale Village Owners Committee Chairman

5856

tpbpd

寄件者:
寄件日期:
收件者:
主旨:
附件:

Gianfranco [REDACTED] 代理 [REDACTED]
30日12月2016年星期五 21:32
tpbpd@pland.gov.hk
Application No. Y/L-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
APPLICATION Y_L-DB_2 Area 6f.pdf; B. PVOC Fourth Comments on the Section 12A Application further informati....pdf

5857

Dear Sirs,

I live in Discovery Bay in Peninsula Village and I am the owner of two apartments.

I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, **which, I fully endorse, since they express EXACTLY my concerns:**

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

- Serene Village Owner dated 28th December.

I OBJECT TO THE ABOVE APPLICATION

Name: Mrs. NICOLETTA NUNZIATI
Owner of [REDACTED]



This email has been checked for viruses by Avast antivirus software.
www.avast.com

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34Reply-To: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6fThe Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company

who with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry.

Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) .

The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .

3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to build a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah,

to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,

6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

this effluent is in addition to the already polluted waters in the South of Hongkong.
7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm -surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water -pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning.

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;
DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

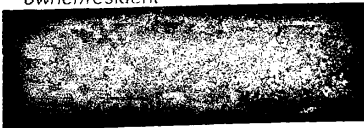
ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident



Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.
2. The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road).
3. The modelling scenarios of effluent dispersion.

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "is considered not an efficient sewage planning strategy".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

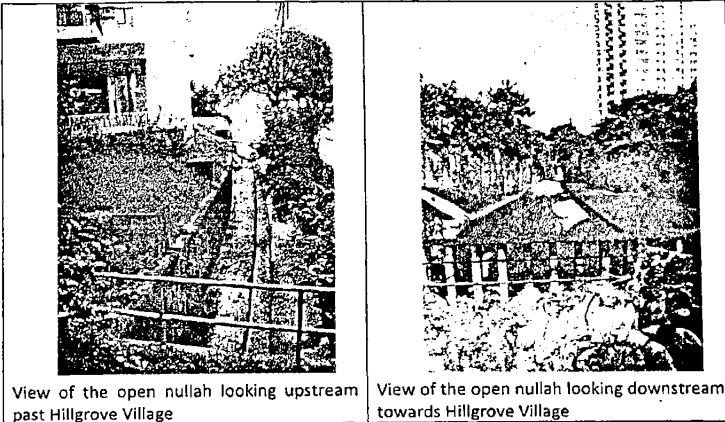
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that "*Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW.*" This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village

View of the open nullah looking downstream towards Hillgrove Village

2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

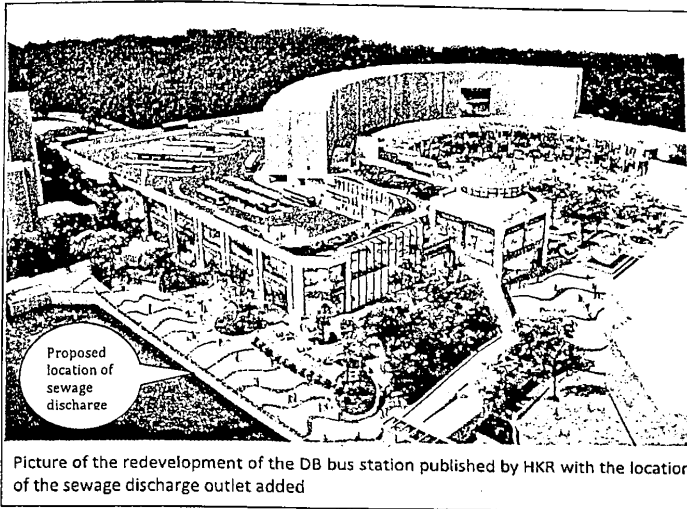
E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:

... again set out and expanded our concerns and comments in the following



Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "The exit of the gravity sewage pipe into sea is near surface." However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that "The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface." This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
 5. The full name of the model is: *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**
1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy".

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. **There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations.** In the DSD guidelines (referred to in section B above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. **Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.**

K. CAPITAL AND OPERATING COSTS

1. **HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.**
2. **Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.**

L. CONSULTATION

1. **The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.**

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.
Parkvale Village Owners Committee Chairman

5857

寄件者:
寄件日期:
收件者:
主旨:

Rob Craig [REDACTED]
30日12月2016年 星期五 21:38
tpbpd@pland.gov.hk
Objection to Y1-DB/2 in Discovery Bay

5858

Dear Sir/Madam,

My name is Robert Craig and I am a resident of Parkvale Village in Discovery Bay. I am writing to formally object to HKRI's poorly conceived plan to have area 6f in Discovery Bay re zoned as residential and then developed.

There are many issues for the TPB to consider in this case however two crucial issues are that HKR has not satisfactorily allayed fears that we have in our Parkvale community with regards to access and water/sewage.

Firstly, access during the construction phase and afterwards is planned to be via the existing road structure which is at present saturated with such narrow access that two bus sized vehicles cannot pass each other on corners with single file traffic on the road beside Woodbury. When emergency vehicles have been required to access any of the three highrise buildings of Woodland, Woodgreen or Woodbury, regular vehicle access ie buses and golf carts is impossible. This would lead to delayed access to our homes in an emergency situation.

Secondly, both sewage treatment options being considered are woefully inadequate and/or inappropriate. Proper studies have not been completed and HKR is very secretive of their plans and will always take the least expensive option. The nulla option which would direct treated sewage into our harbour where we have boat club and a swimming beach will be a direct health hazard to anyone using these facilities not to mention a promenade with al fresco restaurants which would lose out if this option was allowed. I personally do not want a sewage treatment plant in my backyard because no matter how well constructed and efficient the treatment plant would be there will be the inevitable foul odour that would make living here impossible - simply driving by the SHW site located outside the DB tunnel tells that story as the smell there is unbearable. The resulting property price drop with existing properties will not have been considered by HKRI as they are only interested in selling new units, making a fast buck and then moving on to the next project.

As an aside, HKRI claims that this project will enhance living in DB. Currently, rents in DB are so high that our regular shops are having difficulty making a living. In addition, HKRI promote weekend events on a regular basis here in DB which detracts from normal living for residents and any new development will simply make this more acute.

This has to stop.

Sincerely,

Robert Craig
[REDACTED]

Y/I-DB/2

Sent from my iPad

5858



寄件者:
寄件日期:
收件者:
主旨:

che chung francis lam [REDACTED]
30日12月2016年星期五 21:44
tpopa@plaza.gov.hk
Application No. Y11-DB/2 Area 6f-Amendment dated 29/11/2016

5859

I refer to the captioned application, and raise my objection to such proposed development as the amendment submitted on 29/11/2016 do not address and provide adequate and concrete solution to address the sewerage treatment problem created by the proposed new development.

Therefore I consider that the proposed new development proposal should be rejected. Thank you for your attention.

Lam Che Chung Francis
Owner

tpbpd

寄件者:
寄件日期:
收件者:
主旨:

Deborah Wan [REDACTED]
30日12月2016年星期五 22:19
tpbpd@pland.gov.hk
Application No. Y/1-DB/2 Area 10b amendments dated 29/11/2016

5860

Dear Sir,

I raised my objection to the application no. Y/1-DB/2 Area 10b amendments dated 29/11/2016 for the reason that the applicant has not made sufficient solution to the sewage treatment in the said area. Moreover, I object to the change of the land grant to residential development.

Deborah Wan

tpbpd

寄件者:
发件日期:
收件者:
主题:

Deborah Wan [REDACTED]
30日12月2016年星期五 22:24
tpbpd@pland.gov.hk
Application No. Y/1-DB/2 Area 6f amendments dated 29/11/2016

5860

Dear Sir,

I raised my objection to the application No. Y/1-DB/2 Area 6f amendments dated 29/11/2016 for the applicant has not provided solution to the sewage problem raised by the said development.

Therefore, the application should be rejected by the Town Planning Board.

Thank you for your attention.

Deborah Wan

寄件者:
寄件日期:
收件者:
主旨:
附件:

Len Büchi [REDACTED]
30日12月2016年星期五 23:57
tcbpd@pland.gov.hk
Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION
B. PVOC Fourth Comments on the Section 12A Application further information_final - Copy.pdf; APPLICATION Y_1-DB_2 Area 6f.pdf

5861

Dear Sir,

I am a

Peninsula V

illage owner. I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach the following excellent submissions concerning the above, from neighbouring villages, which, as a Peninsula Owner, I fully endorse, since they express my concerns better than I could myself

- Parkvale Village Owners' Committee submission dated 29th December, which matches my own concerns in almost all respects

I OBJECT TO THE ABOVE APPLICATION

Lienhard Buechi
[REDACTED]

Parkvale Village Owners' Committee

Comments on the Second 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.

INTRODUCTION

In April, July and December 2016 we, the Parkvale Village Owner's Committee (PVOC), a body of owners in Parkvale Village in Discovery Bay (DB) 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 numbers 1512 (April), 2787 (July) and 5297 (December) by the Town Planning Board (TPB).

This document includes our comments on the Further Information (made available by the TPB on 9 December 2016) submitted by HKR on 28 November 2016.

FURTHER INFORMATION

The Further Information submitted by HKR comprises:

1. Masterplan Limited's covering letter.
2. Revised Environmental Study (Executive Summary, Chapters 6, 7 and 8).
3. Revised Technical Note on Water Quality.

No substantive change has been made to the Further Information submitted in June and October.

In its covering letter, Masterplan Limited, on behalf of HKR, states that "In summary, the Further Information relates to the following issues:

1. *The receiving water quality of the effluent discharge of the proposed on-site Sewage Treatment Works (STW) to ensure increase in Total Inorganic Nitrogen (TIN) is minimised.*
2. *The contingency measure for the proposed on-site STW, by providing an emergency overflow pipe from the proposed STW at Area 6f to existing sewage pumping station no. 1 (SPS1) located at the junction of Discovery Bay Road and Discovery Valley Road.*
3. *The modelling scenarios of effluent dispersion.*

The additional 440 m3 per day sewage generated by the proposed residential development is now proposed to be catered by on-site sewage treatment facilities."

The reality, however, which the TPB and relevant departments, such as the EPD and DSD, will see when they review this latest submission, is that this Further Information provides no new and substantial Further Information. As Masterplan Limited states, "This information clarifies and supplements the application, and does not constitute a material change identified in the TPB Guideline No. 32".

Furthermore, as we have pointed out, HKR has no alternative but to build a standalone STW in Area 6f as the Siu Ho Wan sewage treatment facilities are not available. So a STW cannot be simply a proposal, it has to be a commitment, one which would be sub optimal, defective in many ways and not acceptable to both government and the DB community.

It is clear that HKR, through the penultimate paragraph of Masterplan Limited's covering letter, is making yet another attempt in its repeated appeal to government not to forget DB when, at some time in the future, government reviews sewage and water infrastructure for Lantau.

It is imperative that the TPB and all government bureaux and departments are not misled by the HKR statement in Masterplan Limited's letter that *"In addition, the proposal for Area 6f is moderate in scale, the demand on the overall Government Infrastructure would be insignificant"*. This is irrelevant as government facilities are not available, and will not be available in the potential timeline of both the Area 6f and Area 10b projects. Public comments have to be submitted in accordance with TPB Guideline No. 30B "Guidelines – for submission of comments on various applications under the Town Planning Ordinance". The PVOC considers that this fourth submission from the PVOC has again properly complied with TPB Guideline No. 30B, whereas the Submission of Further Information from HKR does not.

PRINCIPAL CONCERNS WITH THE APPLICATION

In our previous submission, which was assigned number 5297 (December) by the TPB, we noted the following principal concerns which we have with HKR's 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:

- A. Inadequate and unreliable information has been provided by HKR. E.g. HKR has submitted studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.
- B. Public Consultation is inadequate and non-transparent.
- C. Consultation with all relevant government departments and bureaux has been inadequate and incomplete.
- D. A Risk Assessment has not been undertaken.
- E. HKR's responses to government department comments have been inadequate and evasive. It cannot be acceptable in a public consultation exercise for the applicant alone to decide what is commercially sensitive (re ownership of Passageway and allocation of undivided shares) and to keep that information from being publicly commented upon. All information provided by the applicant must be placed in the public domain so the public can comment on it. The table setting out these responses cannot be considered to be comprehensive.
- F. Despite Annex C of the October Further Information stating in paragraph 2.1.1.4 that a key element of the development is the "access road", there is no information provided as to its construction through Parkvale village. There are many issues arising from unsuitable access to the site such as: the part of Parkvale Drive which is designed as a pedestrian pavement under BD regulations and the effect of additional construction and operational traffic on it; width constraints of Parkvale Drive which limit the ability of larger vehicles, including buses and construction vehicles, to pass one another; potential

lack of emergency access to Parkvale Drive in the event of an accident; safety, as the proposed access to the site is a pedestrian area used by residents and the public; and HKR's lack of consideration of alternative access to the site. As pointed out above, HKR continues to not submit, in its Further Information, a Traffic Impact Assessment on Pedestrians which is listed under the Reports to be submitted.

- G. A sewage treatment works (STW) is to be included in Area 6f with discharge directly into the sea next to the ferry pier using either a gravity pipe or the open nullah which is adjacent to Hillgrove Village. However, it is clear from HKR's comments that the latter is the intended approach. Also, HKT tries to minimise the pollution impact of discharge of sewage into the sea whereas it will increase the TIN and TPs, thereby increasing the probability of, e.g., red tide in Discovery Bay waters. Not surprisingly HKR's consultants say that the sewage proposal "*is considered not an efficient sewage planning strategy*".
- H. HKR is misleading the TPB by saying there are two options re water supply but, as previously pointed out (since government has confirmed that its facilities at the Siu Ho Wan Water Treatment Works (SHWWTW) and the SHW Fresh Water Pumping Station are not available for the foreseeable future), there is only one, which is a potable water supply to be provided by re-opening, after 16 years, the DB water treatment plant and using water from the DB reservoir.
- I. No information is provided regarding the provision of other utilities to Area 6f and how it will affect Parkvale Village, despite the October Further Information Annex C paragraph 2.1.1.4 stating that a key element of the development is the provision of utilities. Furthermore, there is no reference to the DB LPG gas system which has recently suffered an explosion which is the subject of investigations by EMSD and FSD.
- J. Slope safety of the area, where the two proposed 18 story buildings will be built, is ignored, despite Annex C paragraph 2.1.1.4 stating that a key element of the development is site formation. HKR continues to ignore CEDD's request for HKR to assess the geotechnical feasibility of the proposed development and to submit a Geotechnical Planning Review Report (GPRR).
- K. Ownership issues - HKR's right to use Parkvale Drive as access to Area 6f is still disputed.
- L. Planning controls of Discovery Bay are ignored in respect of the Master Plan (MP) and Outline Zone Plan (OZP) relationship, the 25,000 population ceiling and the allocation of undivided shares and management units under the Deed of Mutual Covenant (DMC). Furthermore, HKR has a conflict of interest regarding population data, in that current figures are provided by its wholly owned subsidiary, DB Services Management Limited.
- M. Diagrams and photomontages are often misleading, inaccurate and of poor quality.

We provided further details of these concerns in our previous submission. Readers of this submission should also read our previous submissions if they have not already done so.

In this submission we address concerns arising from HKR's latest submission and from HKR's intention to build a standalone sewage treatment works in Area 6f.

SEWAGE TREATMENT

All the concerns and comments submitted to the TPB in respect of sewage treatment processing and discharge continue to be ignored.

We have, again, set out and expanded our concerns and comments in the following sections:

- A. Sewage Master Plans.
- B. Standalone Sewage Treatment Works.
- C. Application for Discharge Licence.
- D. Discharge of Sewage by Open Nullah.
- E. Effluent to be Discharged into the Sea.
- F. Theoretical Modelling Scenarios of Sewage Processing and Effluent Discharge.
- G. Inefficient Sewage Planning Strategy Confirmed by HKR's Consultants and no Environmental Impact Assessment.
- H. Emergency Arrangements for when the STW Breaks Down Including Access to Pumping Station No 1.
- I. Sewage from the Workforce during Construction.
- J. Management of the STW.
- K. Capital and Operating Costs.
- L. Consultation.

A. SEWAGE MASTER PLANS

1. In 1989, a sewage disposal strategy was formulated by the Government. Since then EPD has produced 16 Sewage Master Plans (SMPs) and DSD has had the role of works agent to implement the recommended projects to cater for the needs of the SMPs. The 16 SMPs have been re-grouped into 8 areas for conducting the SMP Review Studies. 8 SMP Reviews have been completed and these include the "Review of Outlying Islands SMP", which includes DB.
2. All the HKR submissions consistently make no mention of the Outlying Islands SMP, which would appear to be because their sewage strategy for DB, as illustrated by the proposals for both Areas 6f and 10b, is inconsistent with that plan. Therefore EPD and DSD have no alternative but to reject the HKR proposal and advise the TPB accordingly.

B. STANDALONE SEWAGE TREATMENT WORKS

1. Since government facilities are not available in the foreseeable future, HKR has no alternative but to build a separate sewage treatment works (STW) in Area 6f, if the proposed change in use is approved and if the proposed development is in fact built. This means that people living in Parkvale Village would have a STW adjacent to them. HKR is not providing details of the design, its exact location and how it will be managed and maintained. As HKR will want to minimize costs, we are concerned how adequate such a facility will be and the risk of its breaking down. If the TPB approves the change of use of Area 6f, the residents of Parkvale Village, who at no stage have been consulted by HKR, will be forced by HKR to live next door to a STW with all its negative aspects, including strong foul odours. And of course the future 1190 residents of Area 6f will also suffer from the same negative aspects of a STW integrated into their development.
2. It is indicative of the inadequacies of this submission, and all the previous HKR submissions, that there is no reference whatsoever to the DSD "Guidelines for the Design of Small Sewage Treatment Plants" for private developments up to 2,000 population equivalent. In preparing these guidelines DSD placed special emphasis on

the problems usually found with small plants and included appropriate design safety considerations. These guidelines cover: general design considerations; design parameters; practical design and installation; operation and maintenance; and environmental considerations. Following these guidelines would have enabled HKR to provide a design submission in this latest Further Information which could, according to paragraph 2.9 of the guidelines, have included for example: key plan showing location of development and effluent discharge location; plan and section showing the location of STW within the development in relation to residential units and surrounding facilities; process and instrumentation diagrams; hydraulic profile together with supporting calculations; detailed process design calculations; detailed drawings with plan and elevation showing plant room layout including pipe work and equipment; route of access to the plant room and access within the STW; ventilation and lighting details; equipment schedule showing number of duty and standby units, make, model number, capacity etc. (the schedule should be shown on the drawing); equipment catalogues and operation/maintenance manual.

3. Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, HKR has not stated the type or explained the design of STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point so close to a residential area.
4. 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 seems highly likely to be discharged into an open nullah and flow under the balconies of a residential building and, subsequently, into the sea adjacent to an occupied area. In view of the serious inadequacies and shortfall of the STW proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

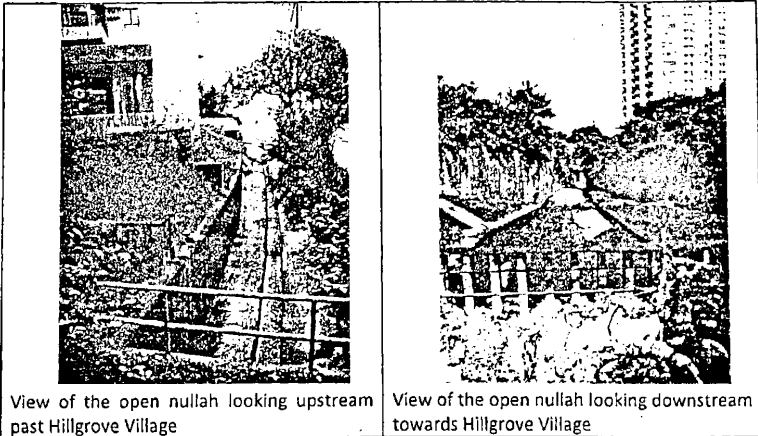
C. APPLICATION FOR DISCHARGE LICENCE

1. Paragraph 6.3.1.6 of the Revised Environmental Study glibly states that *"Moreover, the operation of the STW shall also apply for a discharge licence from the relevant authority before the operation of the STW."* This is a too vague a statement. Are the consultants referring to the submission of Application Form A (EPD 117); who will be responsible for submitting the application; who will pay the licence fee; and what are the consequences if the application is rejected?
2. This aspect of the STW requires comprehensively explaining to the TPB and, of course, the public since this Further Information is supposed to be subject to public consultation.

D. DISCHARGE OF SEWAGE BY OPEN NULLAH

1. HKR is still saying, as it did in its previous submissions, that discharging the treated sewage directly into an open nullah is still an option to be considered at the design stage. This open nullah is parallel to Discovery Valley Road and proceeds directly in front of Hillgrove Village. Therefore, every day 440 m³ per day of sewage will be flowing

alongside approximately 200 metres of footpath/road and directly under the balconies of around 200 apartments in this village. This is illustrated in the following photographs.



View of the open nullah looking upstream past Hillgrove Village

View of the open nullah looking downstream towards Hillgrove Village

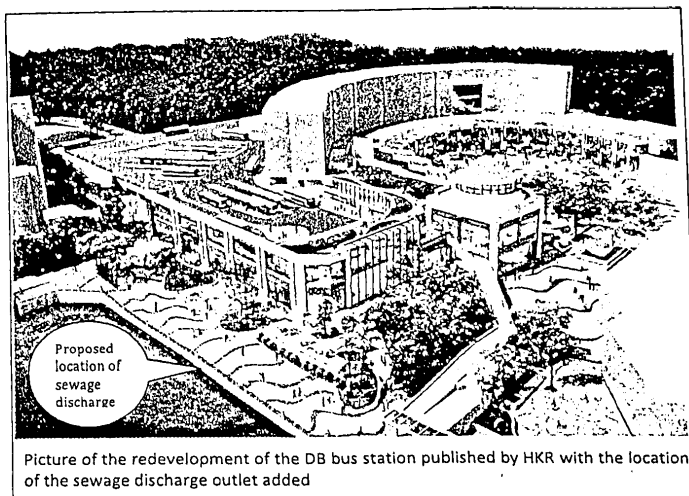
2. The nullah serves the dual purpose of a storm water channel and as an overflow relief for the reservoir at the top of Discovery Valley Road. Normally it is virtually empty, but during periods of rainstorm and/or reservoir discharge this nullah is full to the top. The addition of the sewage effluent to the storm water flow may cause the nullah to overflow or the effluent to back-up into the STW, both with serious health implications. This option would appear to be cheaper than building a gravity sewage pipe and it is considered that HKR will adopt this option whilst giving the impression to the TPB, EPD, etc. that it will build a gravity pipe, which would presumably put the sewage flow underground.

E. EFFLUENT TO BE DISCHARGED INTO THE SEA

1. HKR is proposing to discharge treated sewage from Area 6f into the marine waters adjacent to the ferry pier without the need of a marine outfall. The outlet is adjacent to a pedestrian walkway, residential buildings and a shopping centre, which HKR is about to build, and is located only 280 metres from a public bathing beach. This is an artificially made beach fronting the very shallow and silted Tai Pak Wan. The proposal for the discharge of effluent into a shallow seabed, adjacent to a pedestrian walkway, residential buildings and a shopping centre and 280m from a bathing beach, boardwalk restaurants and ferry pier is environmentally unacceptable and will encourage toxic red tides as well as concentrations of E. coli.
2. We are extremely concerned about the effluent being discharged into the sea in DB. 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 DB, such harmful algae would not dissipate easily.

3. The water quality assessment notes that for the whole of Hong Kong waters adjacent to the Pearl River Delta and including the waters around DB that the Total Inorganic Nitrogen (TIN) already exceeds the WQO. We would not dispute this, but this does not justify HKR's intention to increase the suspended solids and E-Coli content of the sewage plume in the very publicly exposed waters and beaches of Tai Pak Wan.
4. In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.
5. The Further Information submitted by HKR in October included the following:
 - a. Executive Summary – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
 - b. 6.3.1.5 – *"The computed N: P ratio concluded that the possibility of having red tide is still low."*
 - c. 6.4.1.1; 7.3.1.4; 8.1.2.1 – *"The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."*
6. The text in bold does not appear in the latest version of the Environmental Study submitted by HKR on 28 November 2016. Why would HKR delete this text if the *"occurrence of red tides will be unlikely"*? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that we, and government, should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.
7. The conclusions in the Technical Note that *"the water quality in the vicinity of marine-based WSRs would be in compliance with WQOs in SS, E. coli and UIA"* are based on modelled measurements at WSR 07 (Tai Pak Peninsula CPA), 270 metres from the sewage discharge point. This ignores the fact that the area of the sea into which the sewage would be discharged should also be considered to be a WSR. This area is adjacent to a pedestrian walkway, residential buildings and a shopping centre which HKR is about to build, as the following picture demonstrates:



Picture of the redevelopment of the DB bus station published by HKR with the location of the sewage discharge outlet added

Would HKR's conclusions have been the same if it had modelled measurements at the sewage discharge outlet instead of 270 metres from it?

F. THEORETICAL MODELLING SCENARIOS OF SEWAGE PROCESSING AND EFFLUENT DISCHARGE

1. The consultants have not undertaken a sensitivity analysis regarding their various calculations, nor a risk assessment as to environmental aspects, daily operations and emergency arrangements of a STW. In addition, there is no mention of the assumptions and limitations as to their approach to modelling. In a public consultation exercise there should be a layman's guide to the scientific and mathematical acceptability of their approach (and its quality), since, without this, the vast majority of the public are unlikely to understand and to be able to comment on the approach.
2. The modelling scenario is described in section 4.3 of the Revised Technical Note on Water Quality submitted in the latest Further Information. The effluent dispersion scenarios are stimulated by a near-field model, CORMIX. The key inputs to CORMIX include outfall configuration, ambient current speed, vertical density profile and effluent flow rate. As this latest Further Information merely repeats the same scenarios, with the same key inputs and assumptions, as in the October Further Information, the results are naturally the same! (Appendix D CORMIX model is same as in October). However, HKR has deleted references to the likelihood of red tide which was mentioned in the October Further Information, with no explanation as to why. This is unprofessional and misleading. Furthermore, there is no mention by the consultants as to why this type of model was used and its reliability.
3. Paragraph 4.3.1.2 of the Technical Note on Water Quality states "*The exit of the gravity sewage pipe into sea is near surface.*" However, in each of the CORMIX scenarios, under

"Buoyancy assessment", it is stated that *"The effluent density is less than the surrounding ambient water density at the discharge level. Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface."* This means that the sewage effluent will be very visible near and on the sea surface, as illustrated in the above photograph. It is essential that EPD investigates this finding and concludes that it is not acceptable.

4. The results of the modelling scenario are set out in Appendix D *"CORMIX model output"* to the Revised Technical Note on Water Quality and, as mentioned in paragraph F2 above, are exactly the same as in the October Further Information. To the layman, the results are probably difficult to understand. However, what is not difficult to understand is the standard statement at the end of each of the CORMIX reports, which is the *"REMINDER: The user must take note that HYDRODYNAMIC MODELLING by any known technique is NOT AN EXACT SCIENCE"*.
 5. The full name of the model is *"CORMIX MIXING ZONE EXPERT SYSTEM Version 5.0GT HYDRO1: Version-5.0.1.0 December, 2007"*. It is difficult to understand why a 9 year old version of this model was used and this aspect should be investigated by EPD. With modelling science, it is normal for there to be at least some updates, over a period of 9 years, as a result of its usage, empirical testing and improvements of software. In this context it is noted that CORMIX versions 9 and 10 were released in September 2014 and July 2016 respectively. EPD must investigate why the Consultants have not used up to date modelling software which should be a standard requirement for any study.
- G. INEFFICIENT SEWAGE PLANNING STRATEGY CONFIRMED BY HKR'S CONSULTANTS AND NO ENVIRONMENTAL IMPACT ASSESSMENT**
1. In its Application and Further Information of June and October, HKR's consultants have said:
 - a. In paragraph 6.2.iii of its original application, 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"*.
 - b. *"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"*. (June Revised Environmental Study, 6.3.1.3). Furthermore, in the October Further Information there is no reference to a subsequent Environmental Impact Assessment (EIA), which likely means that the subject of an EIA has been dropped. Logically there should be a full scale EIA as part of this Section 12A application.
 - c. Building a STW in Area 6f is still sub-optimum in its October submission. Since the consultant has again in the October Further Information Annex G *"Revised Study on Drainage, Sewage and Water Supply"*, paragraph 5.6.1.4, stated that *"As this new DBSTW will only treat sewage from 2 single residential towers for 476 units at Area*

6f so this decentralized scheme is considered not an efficient sewage planning strategy'.

H. EMERGENCY ARRANGEMENTS FOR WHEN THE STW BREAKS DOWN INCLUDING ACCESS TO PUMPING STATION NO. 1

1. No mention was made in HKR's first and second submissions of what would happen to the sewage in the event that the STW broke down. Only in its third and fourth submissions was the subject of emergency arrangements addressed. These include: dual feed power supply for the STW; "suitable backup" of the STW treatment process (but no information as to what is suitable); and connecting the gravity sewage pipe to the existing sewage system at Pumping Station No 1 (to be only used during emergencies), which would feed the sewage to the existing system (i.e. to Siu Ho Wan STW), and, as backup, the movement of sewage by 36 sewage tanker vehicles per day to the Siu Ho Wan STW.
2. Connection to the existing sewage system is clearly most likely to be used once and then left on permanently, since there is no description of how this action would be managed (hence making unapproved use of the government Siu Ho Wan facilities) as the existing DB Services Management Limited (as illustrated by its day to day performance) is both management and engineering severely challenged.
3. Government cannot allow such a connection since it would be an open invitation to abuse and illegally use the SHWSTW.
4. Also the only access to Pumping Station No. 1 (and especially relevant during emergencies) is currently blocked by the area around the pumping station being illegally used for vehicular parking. The Lands Department has recently requested HKR to stop the parking as this area should only be used for the purposes related to the operation of the pump house. HKR should have advised its consultants about this situation when issuing its instructions. Therefore it is necessary that this issue of access be addressed by HKR and the Lands Department.
5. Movement of sewage by truck is clearly unacceptable in a modern city environment, especially as it would require 36 sewage tanker vehicles a day to remove the sewage to the Siu Ho Wan STW, and is inconsistent with government's efforts to modernise sewage treatment and disposal in Hong Kong. The 36 truck calculation is considered to be more representative than the calculation in paragraph 6.3.2.1 of the latest Further Information which implies that sewage will only be moved on the basis of a quarter of a day's sewage being moved in 6 hours. Furthermore, HKR has been told that it cannot feed the sewage to the Siu Ho Wan STW.
6. In addition, HKR has not mentioned anything about emergency arrangements in the event of the open nullah discharge approach being taken. This would probably involve the 36 trucks per day travelling through Parkvale village and Discovery Bay going to the Siu Ho Wan STW, which HKR does not have approval to use for this sewage.

I. SEWAGE FROM WORKFORCE DURING CONSTRUCTION

1. All of Parkvale Village will be affected by the proposed method of sewage generated from the workforce during the development of Area 6f. Paragraph 6.2.1.3 of the latest Further Information states that portable chemical toilets will be used by the

construction workforce. This is dismissed as a minor issue, but is expected to persist for some two to two and a half years. Those who have experience with construction sites will know that, firstly, never enough portable toilets are provided and that construction workers urinate all over the site and, secondly, and more importantly, that, when pumping the sewage from the toilets into tanker trucks, a substantial release of pollutant fumes and very unpleasant and pervasive odours are released into the local atmosphere. These will create both a health hazard and a serious despoliation of the quality of life of the residents in the adjacent Parkvale Village.

J. MANAGEMENT OF THE STW

1. There is no explanation as to how the STW will be managed in respect of both day to day operations and emergency situations. In the DSD guidelines (referred to in section 8 above) it is stated in paragraphs 5.1/2 that *"In selecting the type of treatment process, the designers should take due consideration of the availability of competent operators. Only competent technicians should be assigned to operate the STP. The operator should be fully conversant with the recommended operating procedures as stipulated in the operation and maintenance manual"*.
2. Would Discovery Bay Services Management Limited, the wholly owned subsidiary of HKR which manages DB, employ additional staff capable of managing a STW or would it use existing staff which have no relevant experience? HKR should be required to state how it will ensure that the STW in Area 6f, and that in Area 10b, would be operated safely and efficiently.

K. CAPITAL AND OPERATING COSTS

1. HKR makes no reference in its Further Information that all the capital and operating costs arising from the proposed STW in Area 6f together with the gravity sewage pipe to the sea at the Plaza will be met by either HKR and/or the undivided shareholders of the Area 6f proposed development. HKR should be required to confirm that all capital and operating costs arising from the proposed STW in Area 6f and the gravity sewage pipe or use of the nullah will be borne by HKR and/or the undivided shareholders of Area 6f proposed development.
2. Also the residents of Parkvale Village and other villages in Discovery Bay should not have to suffer the disturbance of laying the gravity sewage pipe or the connection to the open nullah.

L. CONSULTATION

1. The above approach to sewage treatment and discharge has not been explained by HKR to the wider community of DB. In view of this deficient and sub-optimum approach (and the same approach is to be adopted for Area 10b with sewage to be directly discharged into the sea at Nim Shue Wan), HKR is guilty of abusing the so called public consultation process and displaying a complete disregard for modern sewage treatment and discharge practices and DSD guidelines as developed so diligently over the last 30 years by government, namely EPD, WSD and DSD and their respective policy bureaux.

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) continue to

be 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 unacceptable and sub optimal commitment to build a standalone STW with discharge by open nullah directly past apartments and into the sea. In view of the serious inadequacies and shortfall of the STW and discharge proposal we believe that the DSD and EPD have no alternative but to reject the HKR proposal and advise the TPB to not approve the application.

As clearly demonstrated in not only this submission but in all our submissions, HKR's application continues to be deficient in many ways. So again, 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:

29 December 2016

Mr. Kenneth J. Bradley J.P.

Parkvale Village Owners Committee Chairman

for info Fw: APPLICATION Y/1-DB/2 Area 6f

29 December 2016 at
08:34

Reply-to: [REDACTED]
To: Edwin Rainbow [REDACTED]

Thomas Gebauer

----- Forwarded Message -----

From: [REDACTED]
To: Tpbpd <tpbpd@pland.gov.hk>
Sent: Wednesday, 28 December 2016, 14:52
Subject: APPLICATION Y/1-DB/2 Area 6f

The Town Planning Board:
Application Y/1-DB/2 Area 6f

1. I strongly object to the planned development as presented by the HongKong Resort Company who with thousands of owners are bound together by a Deed of Mutual Covenant.
2. Discovery Bay (DB) is a UNIQUE development in HongKong . quasi an enclave , isolated from HongKong proper and only accessible through one tunnel and by ferry. Special rules apply in/for the area, as laid down in a DMC . Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hongkong Resort Co. Ltd, (HKR) . The TPB must also seriously consider that the small owners in DB (roughly 8.000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR .
3. Due to this unique situation, any changes must be judged by the TPB / PLAND with a holistic view in mind ; this proposed development as well as the application Y/1-DB/3 Area 10b ... cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.
4. In 6f it is proposed to built a sewage treatment plant "on site" and the effluent is planned to be " delivered through a gravity- sewerage -pipe . or even considered to be delivered through a nullah, to the sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.
5. We are living in the 21st century and Town Planning must be a forward looking endeavour . To me it is outrageous to even consider in " Asia's World City " to put nowadays a sewage treatment plant into a housing development ,
6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes

33

this effluent is in addition to the already polluted waters in the South of Hongkong.
7. To blame pollution on the Pearl River Delta is not a point to make as facts of the "as is situation" must be clearly addressed. In HK one must get away from the view "it is only little pollution"

beside the pollution of HK-waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting".

Not even to mention the matter of storm-surge, back-flow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water-pollution".

9

From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1

To achieve a better environment through planning....

NO BETTER ENVIRONMENT

(a)

"to avoid creating new environmental problems....

THERE ARE ADDITIONAL PROBLEMS

(b)

"to seize opportunities for environmental improvement

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a)

proposed land uses in particular development areas are environmentally suitable;

(b) proposed land uses in the same development area are compatible with each other.....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED.

THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c)

adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL.

FACILITIES ARE COMPLETELY INADEQUATE AND ILL-PLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c)

the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals;

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT

ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT.

THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

Air Quality Considerations

2.3.2

Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ON-SITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing north-easterly winds;

DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4

It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND .

2.3.5

Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water-based developments should be located such that bulk water exchange is maximised. AS SAID : DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6

In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities.... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORE SO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE -HANDLING , - SEPARATING , - SORTING FOR RECYCLING AND RE-USE.

10

IN CONCLUSION I STRONGLY OBJECT TO THIS APPLICATION .

THOMAS GEBAUER

owner/resident





寄件者: Andrew Burns [REDACTED]
寄件日期: 30日12月2016年星期五 22:14
收件者: tpbpd@pland.gov.hk
主旨: Application No. Y/I-DB/2. Area 6f, Discovery Bay
附件: TPB YI-DB2 Area 6f R4 Potable Water and Sewage.pdf

5862

To: Secretary, Town Planning Board

Date: 30 December, 2016

Dear Sirs,

Re: Application No. Y/I-DB/2. Area 6f, Discovery Bay -- Potable Water and Sewage Further Information

I take pleasure in forwarding the attached submission to the Town Planning Board in respect of the subject Application.

Yours sincerely,
Andrew Burns

To: Secretary, Town Planning Board
cc: District Lands Office, Islands; LACO
Date: 30 December, 2016

Dear Sirs,

Re: Application No. Y/I-DB/2, Area 6f, Discovery Bay
Further Information dated 30 November, 2016

I note that the comments that I submitted previously in respect of Application No. Y/I-DB/3 have not been addressed by the Applicant, Hong Kong Resort Company Limited (HKR). Many of the points that I raised deal with the fact that the Lot, including the Application Site, is held under a Deed of Mutual Covenant (DMC). The Applicant's rights over the land are strictly limited by the DMC. Meanwhile, all the assigns of the Lot and the Applicant are co-owners of the Lot and have property rights that must be respected.

As part of the public consultation process, the Applicant should address the issues raised by the co-owners of the Lot. The Town Planning Board should then allow the co-owners of the Lot a reasonable time to respond before it considers the Application further. Should the Applicant refuse to engage with the co-owners of the Lot on the substantive issues raised during the course of the public consultation, the Town Planning Board should reject the Application.

Here, I wish to comment on the letter submitted on 30 November, 2016 by Masterplan Limited on behalf of the Applicant. According to the letter:

The Applicant believes that, should WSD and EPD plans for infrastructure expansion, all proposed future developments in the vicinity areas, including those in the Discovery Bay, should be considered on equal and fair basis.

This statement ignores the fact that, under the New Grant for Discovery Bay dated 10 September, 1976 (IS 6122 in the Land Registry), it is specifically stated that the Grantee is responsible for providing all potable water and sewage services to the Lot.

Regarding potable water supply, at Special Condition 36(a) the New Grant states:

Government does not undertake to supply water to the lot.

Regarding sewage treatment, at Special Condition 31 the New Grant states:

The drainage of any building erected on the lot shall be effected as may be required by the said Director and the Grantee shall not discharge or cause or permit or suffer to be discharged into any sewer, storm-water drain, channel, storm-course or sea, any sewage, foul or contaminated water, or noxious or harmful liquids without the prior written consent of the said Director who shall as a condition of granting his consent require the Grantee to provide, operate and maintain throughout the term hereby granted at his own expense and to the satisfaction of the said Director

suitable works at the positions shown on the approved Master Layout Plan for the treatment and disposal of sewage or foul or contaminated water.

On the current Master Plan (the Master Plan is defined at Condition 10 and Special Condition 6 of the New Grant), the Minimum Associated Facilities (as defined in the New Grant) are listed. These still include a Sewage Treatment Plant and a Dam/Reservoir.

Therefore, provision of potable water and sewage services is not a simple matter of considering a request on an "equal and fair basis." Provision of potable water and sewage services will require formal modification of the New Grant and Master Plan, to remove the requirement that the Grantee is responsible for such services.

The Town Planning Board and relevant Government departments should take note that the present arrangements for the supply of potable water and sewage services to the Lot are unsatisfactory. The plans were drawn up and executed in secret and in haste, in a manner that is incompatible with the DMC and the New Grant.

The agreement was negotiated between 1995 and 1997, some 15 years after the DMC was executed. In contravention of the DMC, the Applicant negotiated direct with the Government. According to the DMC, only the Manager, not the Applicant, shall "*represent the Owners in all matters and dealings with Government or any utility or other competent authority or any other person whomsoever in any way touching or concerning the due management of the City.*" This must include supply of all services. The term "Owners" is defined in the DMC to include the Applicant.

Under the deal reached in secret between the Applicant and the Government, and unlike other lots in Hong Kong, services are not provided to the Lot boundary. The Applicant entered into short-term tenancies (STTs) with the Government to connect to the pre-existing facilities of the Water Supplies Department and Drainage Services Department, located several kilometres from the Lot. The STTs were only revealed to the City Owners' Committee six years after the fact. Although the Government sends the invoice for the STTs to the Applicant, the Applicant does not pay – the invoice is passed to the Manager for payment from the Management Funds.

If the Government is to provide potable water and sewage services to the Lot, the injustice perpetrated in 1997 must be addressed. Potable water and sewage services should be provided to the Lot boundary on the same terms and conditions as potable water and sewage services are supplied to all other residential and commercial areas in Hong Kong. Furthermore, the agreement must be negotiated transparently with the Manager, not in secret with the Applicant.

Yours sincerely,

Andrew Burns
Owner and resident, Discovery Bay



寄件者:
寄件日期:
收件者:
主旨:

Vera Lea [REDACTED]
29日12月2016年星期四 15:00
tpbpd@pland.gov.hk
Objection to Application number: Y/L-DB/2

5863

Dear Sir/Madam,

Please accept this email as my objection to the proposed development of Area 6f in Discovery Bay at Parkvale Village. This letter also objects to the proposed development of a Sewage Treatment Facility on the basis that it is an unhealthy proposal and not suitable for being in our environment.

I support the letter being submitted by our President of the Village Owner's Committee of Parkvale Village, and add that even without all the research, it is just completely wrong to have treated sewage being dumped into the bay near operating restaurants and an active beach area. The bacteria and toxins released from sewage discharge will breed an unhealthy environment that exposes us, the community, e-coli as well as other illnesses I'm sure. Not to mention the disgusting smell from the discharge being so close to restaurants and our every day living environment. How is one to enjoy a meal out or a walk along the boardwalk with the stench of discharged sewage? Just go stand at the ferry pier in Central... it smells horrible. It's completely unacceptable and unhealthy and the proposal should be rejected, and TPB should not approve the application.

Contrary to other submissions supporting the project as a positive development for our community, HKR cannot and/or does not maintain and support its current responsibilities. Our grass and gardens are not well kept - often times the reason cited is because of budget restraints. Our internal transportation system is extremely taxed - between the buses being overflowing at times, and the lack of hire car availability, there are times where our transportation needs cannot be met. Earlier this year, there are two occasions where another village had burst pipes and residents were without flushing water for several days. HKR should look after its existing infrastructure problems first before being given permission to build more to add to the current problems we have.

To say that new development will bring in more money to share the costs of maintenance expenses of communal facilities and will benefit all owners is rubbish since the new development will cost an abundance of money, and it will take time before HKR will be in a position to say they now have the funds.

To remove existing mountainside, greenery, bushes, etc. to build not only the towers, but the Sewage Treatment Facility does not benefit the community in any way. To say that the new development will beautify and bring in new leisure facilities is also rubbish since nothing is better than the natural setting that currently exists. There will be NO new park for the barking deer, the birds and butterflies, and for our dogs and children to run freely, or for us to enjoy the natural beauty and nature of NOT HAVING 3 towers in our backyard.

Please reject the proposal and not approve the applications being requested.

Many thanks and kind regards,
Vera Giovannitti



寄件者:
寄件日期:
收件者:
主旨:

Neil Robbins [REDACTED]
29日12月2016年星期四 15:14
tpdpd@pland.gov.hk
Application Y/I-DB/2 Area 6f, Discovery Bay

5864

Dear Sir/Madam

Area 6f

I am writing to highlight my serious concerns over the inaccurate resubmission of the information submitted in support of 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, in Discovery Bay.

As you are aware, this is the second resubmission of additional information to the Town Planning Board, but the content and quality of this submission is shameful as it is full of technical errors, inappropriate assumptions and misleading images and commentary. Such an application should clearly be rejected as the applicant has not invested sufficient time or expertise to justify the change of zoning with this proposed scheme.

The detailed list to justify the complete rejection of this submission has been collated by the Parkvale Village Owner's Committee (PVOC), of which I am a member, but as I am aware of so many errors within this application, and as a Fellow of the Institution of Civil Engineers (FICE), of the Hong Kong Institute of Engineers (HKIE) and a Master Planner, I strongly feel that these mistakes need to be highlighted clearly to the Town Planning Board for their studious review.

In my personal submission I wish to draw the Boards attention to these specific items;

- 1) The Sewerage Treatment Proposal.
- 2) The size of this development on the allotted land.
- 3) The inaccurate Traffic Study and the clear safety implications.

- 1) The Sewerage Treatment Proposal offered under this application is very clearly misleading and is based on unacceptable premise that water may be freely discharges into the Resort's bay which is used by all ages (the old and very young) for swimming and water sports. As I am sure you are aware, the beaches in Discovery Bay have recently been highlighted in the public press for the discovery of large quantities of medical waste (syringes etc) that are washing up on to the shores. Apart from the immediate risk to children and adults alike who could easily be hurt and contract a number of life threatening medical conditions from this criminal situation, this also clearly demonstrates that the tidal conditions within these bays lead to particulate solids being returned to the beaches.

There is no consideration; no technical data; no environmental study provided by the applicant to justify that there will not be an increased risk to the residents of Discovery Bay and visitors who use these popular beaches. HKSAR has taken significant measure over the past decade to improve the environmental quality of Hong Kong waters and this is backward step that poses an immediate health risk to residents and the suffering wildlife. This also goes against current Government environmental policies which have led to the recent development of the Hong Kong sludge treatment facilities.

To date Tai Pak bay has experienced red tides due to the current water quality, and the new proposal will lead to a significant deterioration the water quality to a level which would pose a direct risk to public safety.

In addition to the issue of the sea outfall, the technical data presented to the board on the pretreatment of the sewerage is inaccurate, misleading and inaccurate. For a development designed for 1190 people, (476 units) the sanitary discharge is significant. In this submission the applicant has failed to describe the content of the standalone sewage treatment process, and based on what would be expected in this location, the applicant has;

- a) Not provided answers on the technical criteria for pre-treatment i.e. what type of treatment would be provided.
- b) Not provided answers on the necessary footprint of such equipment and the necessary infrastructure that would be required to support this facility.

- c) Not provided answers to the Town Planning Board on how a vehicle could reach the proposed site for regular maintenance and for emergency conditions. Note that the applicant has stated that 36 sewage tankers would be required on a daily basis to address a failure in their proposed facility - this equates to 1.5 truck movements per hour (including loading times) with absolutely no provisions for parking, safe loading and additional traffic movements in an already oversubscribed minor road system. For issues regarding the road network please see following section.
 - d) Not provided any analysis on the impact of the Sewerage Treatment Plant on adjacent sensitive receivers. The proposed site is at an elevated position, above the Woods. It would be located on land that is currently very steep and has no flat or accessible areas for such a sizable plant. There are no existing or logical roadways for maintenance or emergency provisions. There is no data on the risks associated with smell or toxicity within the submission.
- 2) The size of this development on the allotted land is misleading to the Town Planning Board. The photo montages presented as part of the Gist seem to have been prepared to reflect the minimum impact of this development. The quality of those montages very poor and misleading. The locations of the viewing points are questionable as the positions do not appear to include the most populous locations where the impact would be far more. The PVOC have prepared a new set of montages that seem more representative of the actual conditions faced by residents. It does not seem acceptable to me that the applicant's submission has tabled such mis-representative imagery to the Town Planning Board for their review.

As mentioned in Item 1, the allotment of land for the Sewerage Treatment Plant is not accurate and has no consideration for vehicular access for maintenance or emergency planning.

The profile of the existing landscape in front of the 6F development and at the rear of Crystal and Coral courts is incorrect when based on the data provided by the survey and mapping services of the Lands Department, and quite obvious contradictions for a visual study. As a result, it is clear that the construction of a very large retaining structure would be necessary and that construction would involve an increase in the number of trees that would be required to be felled, and on the construction impact and overall risk of this development. Therefore, the applicant's proposal for retaining the quantities of existing trees on this slope is incorrect and could be misleading to many.

- 3) The Traffic Study that was tabled by HKR contains many inaccuracies and assumptions that cause grave concern to the community of Discovery Bay;
 - a) The Traffic Study fails to recognize the increased safety risks to the whole community due to the unreasonable increase in traffic volumes for both construction and long term operations.

The very real concern is for safety. Discovery Bay is a very young community that is not used to this quantity of heavy construction traffic. The traffic is being forced on to roads that are shared by golf-carts, cyclists (many of whom are school children), pedestrians, buses and the occasional car. This is a clear recipe for a fatality or major traffic incident. This situation exists also at the designated 'access path' into the 6F site. Here the pedestrian pavement is used by children, by cyclists, by hikers, and by elderly - it is an environment that is wholly unsuitable for heavy construction traffic and for increased long term traffic flow to the new project.

- b) The Traffic Study does not assess the current standard or likely damage to the existing road network from the increased volume of traffic. As previously highlighted by both the PVOC and the residents, the existing road system struggles to cope at present. The road surface is cracked and uneven due to existing wear and tear, and the Study has failed to address the concerns of the holistic traffic loading that would result on the road network if 6F, 10C and other construction projects within Discovery Bay overlap. The roads simply cannot take this traffic loading.
- c) The Traffic Study fails to identify the very real possibility that a single breakdown or accident would gridlock the road system.
- d) The Traffic Study does not contain sufficient detail to demonstrate if their proposal for access and logistics is practical. At present there is insufficient room for a bus and a second vehicle to pass each other in front of the Woods pedestrian paved area. There seems very little hope that an articulated lorry or a haulage truck and a bus could negotiate the existing space. At present there is only 11cm clearance from a vehicle to the side of Woodbury Court. This is insufficient for a pedestrian safety reserve for residents accessing their property, and creates a very real safety concern of a significant accident or fatality.

There are so many errors in this Submission, misleading images and incorrect assumptions that it should be rejected immediately. The scheme is ill conceived and inappropriate for the suggested site that was Master Planned for a much smaller staff property. I raise these issues as a concerned resident and professional and trust that the Town Planning Board will recognize that the Submission for rezoning of 6F must be rejected on technical, safety and environmental reasons alone.

Air Quality is affected by...



Yours faithfully

Ir Neil Robbins
RPE, CErg, FICE, FHKIE

5864



寄件者:
寄件日期:
收件者:
主旨:

Vera Giovannitti
29日12月2016年星期四 15:16
tpbpd@pland.gov.hk
Objection to Application number: Y/T-DB/2

5865

Dear Sir/Madam,

Please accept this email as my objection to the proposed development of Area 6f in Discovery Bay at Parkvale Village. This letter also objects to the proposed development of a Sewage Treatment Facility on the basis that it is an unhealthy proposal and not suitable for being in our environment.

I support the letter being submitted by our President of the Village Owner's Committee of Parkvale Village, and add that even without all the research, it is just completely wrong to have treated sewage being dumped into the bay near operating restaurants and an active beach area. The bacteria and toxins released from sewage discharge will breed an unhealthy environment that exposes us, the community, e-coli as well as other illnesses I'm sure. Not to mention the disgusting smell from the discharge being so close to restaurants and our every day living environment. How is one to enjoy a meal out or a walk along the boardwalk with the stench of discharged sewage? Just go stand at the ferry pier in Central... it smells horrible. It's completely unacceptable and unhealthy and the proposal should be rejected, and TPB should not approve the application.

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To say that new development will bring in more money to share the costs of maintenance expenses of communal facilities and will benefit all owners is rubbish since the new development will cost an abundance of money, and it will take time before HKR will be in a position to say they now have the funds.

To remove existing mountainside, greenery, bushes, etc. to build not only the towers, but the Sewage Treatment Facility does not benefit the community in any way. To say that the new development will beautify and bring in new leisure facilities is also rubbish since nothing is better than the natural setting that currently exists. There will be NO new park for the barking deer, the birds and butterflies, and for our dogs to run freely, or for us to enjoy the natural beauty and nature of NOT HAVING 3 towers in our backyard.

Please reject the proposal and not approve the applications being requested.

Many thanks and kind regards,
Vera Giovannitti

收件者: [Redacted]
29日12月2016年星期四 15:19
收件者: upgd@pland.gov.hk
主旨: Application Number Y11-DB2 Area 6f: Discovery Bay

5866

Dear Sir/Madam

Area 6f

I am writing to highlight my serious concerns over the inaccurate resubmission of the information submitted in support of Application Number Y11-DB2/2 to amend Discovery Bay Outline Zoning Plan for rezoning the permissible use from staff quarters to flats at Area 6f, in Discovery Bay.

As you are aware, this is the second resubmission of additional information to the Town Planning Board, but the content and quality of this submission is shameful as it is full of technical errors, inappropriate assumptions and misleading images and commentary. Such an application should clearly be rejected as the applicant has not invested sufficient time or expertise to justify the change of zoning with this proposed scheme.

The detailed list to justify the complete rejection of this submission has been collated by the Parkvale Village Owners' Committee (PVOC), but as I am aware of so many errors within this application, I strongly feel that these mistakes need to be highlighted clearly to the Town Planning Board for their studios review.

In my personal submission I wish to draw the Boards attention to these specific items:

- 1) The Sewerage Treatment Proposal.
- 2) The size of this development on the allotted land.
- 3) The inaccurate Traffic Study and the clear safety implications.

1) The Sewerage Treatment Proposal offered under this application is very clearly misleading and is based on unacceptable premise that water may be freely discharged into the Resort's bay which is used by all ages (the old and very young) for swimming and water sports. As I am sure you are aware, the beaches in Discovery Bay have recently been highlighted in the public press for the discovery of large quantities of medical waste (syringes etc) that are washing up on to the shores. Apart from the immediate risk to children and adults alike who could easily be hurt and contract a number of life threatening medical conditions from this criminal situation, this also clearly demonstrates that the tidal conditions within these bays lead to particulate solids being returned to the beaches.

There is no consideration; no technical data; no environmental study provided by the applicant to justify that there will not be an increased risk to the residents of Discovery Bay and visitors who use these popular beaches. HK SAR has taken significant measure over the past decade to improve the environmental quality of Hong Kong waters and this is backward step that poses an immediate health risk to residents and the suffering wildlife. This also goes against current Government environmental policies which have led to the recent development of the Hong Kong sludge treatment facilities.

To date Tai Pak bay has experienced red tides due to the current water quality, and the new proposal will lead to a significant deterioration the water quality to a level which would pose a direct risk to public safety.

In addition to the issue of the sea outhal, the technical data presented to the board on the pretreatment of the sewerage is inaccurate, misleading and inaccurate. For a development designed for 1190 people, (476 units) the sanitary discharge is

significant. In this submission the applicant has failed to describe the content of the standalone sewage treatment process, and based on what would be expected in this location, the applicant has;

- a) Not provided answers on the technical criteria for pre-treatment i.e. what type of treatment would be provided.
 - b) Not provided answers on the necessary footprint of such equipment and the necessary infrastructure that would be required to support this facility.
 - c) Not provided answers to the Town Planning Board on how a vehicle could reach the proposed site for regular maintenance and for emergency conditions. Note that the applicant has stated that 36 sewage tankers would be required on a daily basis to address a failure in their proposed facility - this equates to 1.5 truck movements per hour (including loading times) with absolutely no provisions for parking, safe loading and additional traffic movements in an already oversubscribed minor road system. For issues regarding the road network please see following section.
 - d) Not provided any analysis on the impact of the Sewerage Treatment Plant on adjacent sensitive receivers. The proposed site is at an elevated position, above the Woods. It would be located on land that is currently very steep and has no flat or accessible areas for such a sizable plant. There are no existing or logical roadways for maintenance or emergency provisions. There is no data on the risks associated with smell or toxicity within the submission.
- 2) The size of this development on the allotted land is misleading to the Town Planning Board. The photo montages presented as part of the Gist seem to have been prepared to reflect the minimum impact of this development. The quality of those montages very poor and misleading. The locations of the viewing points are questionable as the positions do not appear to include the most populous locations where the impact would be far more. The PVOC have prepared a new set of montages that seem more representative of the actual conditions faced by residents. It does not seem acceptable to me that the applicant's submission has tabled such mis-representative imagery to the Town Planning Board for their review.

As mentioned in Item 1, the allotment of land for the Sewerage Treatment Plant is not accurate and has no consideration for vehicular access for maintenance or emergency planning.

The profile of the existing landscape in front of the 6F development and at the rear of Crystal and Coral courts is incorrect when based on the data provided by the survey and mapping services of the Lands Department, and quite obvious contradictions for a visual study. As a result, it is clear that the construction of a very large retaining structure would be necessary and that construction would involve an increase in the number of trees that would be required to be felled, and on the construction impact and overall risk of this development. Therefore, the applicant's proposal for retaining the quantities of existing trees on this slope is incorrect and could be misleading to many.

- 3) The Traffic Study that was tabled by HKR contains many inaccuracies and assumptions that cause grave concern to the community of Discovery Bay;
- a) The Traffic Study fails to recognize the increased safety risks to the whole community due to the unreasonable increase in traffic volumes for both construction and long term operations.

The very real concern is for safety. Discovery Bay is a very young community that is not used to this quantity of heavy construction traffic. The traffic is being forced on to roads that are shared by golf-carts, cyclists (many of whom are school children), pedestrians, buses and the occasional car. This is a clear recipe for a fatality or major traffic incident. This situation exists also at the designated 'access path' into the 6F site. Here the pedestrian pavement is used by children, by cyclists, by hikers, and by elderly - it is an environment that is wholly unsuitable for heavy construction traffic and for increased long term traffic flow to the new project.

- b) The Traffic Study does not assess the current standard or likely damage to the existing road network from the increased volume of traffic. As previously highlighted by both the PVOC and the residents, the existing road system struggles to cope at present. The road surface is cracked and uneven due to existing wear and tear, and the Study has failed to address the concerns of the holistic traffic loading that would result on the road network if 6F, 10C and other construction projects within Discovery Bay overlap. The roads simply cannot take this traffic loading.
- c) The Traffic Study fails to identify the very real possibility that a single breakdown or accident would gridlock the road system.
- d) The Traffic Study does not contain sufficient detail to demonstrate if their proposal for access and logistics is practical. At present there is insufficient room for a bus and a second vehicle to pass each other in front of the Woods pedestrian paved area. There seems very little hope that an articulated lorry or a haulage truck and a bus could negotiate the existing space.

At present there is only 11cm clearance from a vehicle to the side of Woodbury Court. This is insufficient for a pedestrian safety reserve for residents accessing their property, and creates a very real safety concern of a significant accident or fatality.

There are so many errors in this Submission, misleading images and incorrect assumptions that it should be rejected immediately. The scheme is ill conceived and inappropriate for the suggested site that was Master Planned for a much smaller staff property. I raise these issues as a concerned resident and professional and trust that the Town Planning Board will recognize that the Submission for rezoning of 6F must be rejected on technical, safety and environmental reasons alone.

5866

Yours faithfully

Dr Jane Robbins





寄件者: Doris Chan [REDACTED]
寄件日期: 30日12月2016年星期五 20:38
收件者: tpbpd@pland.gov.hk
主旨: Objection to Y/I-DB/2 Area 6f and Y/I-DB/3 Area 10b

5867

Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

Application No. Y/I-DB/3 Area 10b - amendments dated 29th November 2016 - OBJECTION

I am a Hillgrove Village owner of Glamour Court. I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

HKR didn't finish and report all the assessments of sewerage impact, drainage impact, traffic impact on vehicles and pedestrians. Trees protection didn't mention in details as well. Those development will affect Discovery Bay residents directly. DB residents have to supper all air, sound and water pollution.

Once again, I object to the above application.

Your sincerely,
Chan Yin Yat

[REDACTED]



寄件者:
寄件日期:
收件者:
主旨:

tom chan [REDACTED]
30日12月2016年星期五 20:29
tpbd@pland.gov.hk
Objection to Y/I-DB/2 Area 6f and Y/I-DB/3 Area 10b

5868

Application No. Y/I-DB/2 Area 6f - amendments dated 29th November 2016 - OBJECTION

Application No. Y/I-DB/3 Area 10b - amendments dated 29th November 2016 - OBJECTION

I am a Hillgrove Village owner of Glamour Court. I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

HKR didn't finish and report all the assessments of sewerage impact, drainage impact, traffic impact on vehicles and pedestrians. Trees protection didn't mention in details as well. Those development will affect Discovery Bay residents directly. DB residents have to suffer all air, sound and water pollution.

Once again, I object to the above application.

Your sincerely,
Chan Siu Kong

寄件者:
寄件日期:
收件者:
主旨:

Doris Chan [REDACTED]
30日12月2016年星期五 20:24
tpdpd@pland.gov.hk
Objection to Y/I-DB/2, Area 6f and Y/I-DB/3, Area 10b

5869

Application No. Y/I-DB/2 Area 6f - amendments dated 29th November
2016 - OBJECTION

Application No. Y/I-DB/3 Area 10b - amendments dated 29th
November 2016 - OBJECTION

I am a Hillgrove Village owner of Glamour Court. I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

HKR didn't finish and report all the assessments of sewerage impact, drainage impact, traffic impact on vehicles and pedestrians. Trees protection didn't mention in details as well. Those development will affect Discovery Bay residents directly. DB residents have to suffer all air, sound and water pollution.

Once again, I object to the above application.

Your sincerely,
Chan Suk Ching Doris
[REDACTED]

寄件者: Bhavna Shivpuri [REDACTED]
寄件日期: 30日12月2016年星期五 15:36
收件者: tpbpd@pland.gov.hk
副本: Bhavna Shivpuri - personal
主旨: Applications nos Y/I-DB/2 related to Area 6f and Y/I-DB/3 related to Area 10b - feedback on amendments dated 29th November 2016
附件: Area 10b letter 30-Dec.pdf; Area 6f letter 30 Dec.pdf

5870

Dear Sir

Please note my objection to the submission by the Applicant of amendments on 29th November 2016 in relation to the captioned. Attached are two separate letters for Areas 6b and 10f.

Unless and until the applicant is able to provide detailed responses to my comments per the attached for further review and comment, both these applications should be withdrawn.

Sincerely
Bhavna Shivpuri

[REDACTED]

Bhavna S. Shivpuri

30th December, 2016

5870

The Secretariat
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
(Via email: tpbpd@pland.gov.hk)

Dear Sir,

Section 12A Application No. Y/I-DB/2
Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay
Objection to the Amendments dated 29th November 2016

I refer to the above and would like to put forward my concerns as follows regarding the proposed Standalone Sewage Treatment Works (STW) to be built for the proposed expansion by HKR of Area 10b above. My objections and concerns are as follows –

1. The capital and operational costs both current and future for the proposed STW have not been clearly identified which places an unfair burden on owners and residents of DB.
2. The effluents discharged from the STW are not being fully treated as per accepted current global norms. In the current scenario where there is an increased emphasis on pollution control such cavalier disregard isn't acceptable.
3. The effluents are also being transported by open nullah and put directly into the sea waters around DB. This is hazardous to health and also has a very adverse effect on the living environment for residents not just around the STW, but also the nullah and the sea / bay where its eventually being discharged.
4. The proposed expansion also requires that a backup be provided to the STW in case of breakdown or accidents and this has not been included in the plan.

Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 10b should be withdrawn.

Signature: Bhavna Shivpuri Date: 30/12/16

Name of Discovery Bay Owner / Resident: Bhavna Shivpuri
[REDACTED]

The Town Planning Board:

OBJECTIONS TO

- (1) Application Y/T-DB/2 Area 6f - amendments dated 29th November 2016
- (2) Application Y/T-DB/3 Area 10b - amendments dated 29th November 2016

1. I strongly object to the planned development as presented by the Hong Kong Resort Company, who is with thousands of owners are bound together by a Deed of Mutual Covenant.

2. Discovery Bay (DB) is a UNIQUE development in Hong Kong, quasi-enclave, isolated from Hong Kong proper and only accessible through one tunnel and by ferry.

Special rules apply in/for the area, as laid down in a DMC. Owners in Discovery Bay and to a certain extent also residents in DB must therefore get a recognised voice and special attention from the Town Planning Board (TPB) when major changes which will affect the environment and the way of life are proposed for this special enclave/environment as done by the "registered owner" the Hong Kong Resort Co. Ltd, (HKR).

The TPB must also seriously consider that the small owners in DB (roughly 8,000 houses/flats are concerned) are not permitted to form an Owners Corporation which could give a clear voice to the TPB as what are the wishes of the many DB owners, leaving aside the various large, mainly commercial entities and spaces owned by the developer, the HKR.

3. Due to this unique situation, any changes must be judged by the TPB/PLAND with a holistic view in mind: the proposed development as well as the applications Y/T-DB/2 Area 6f and Y/T-DB/3 Area 10b cannot be judged solely on their own but how it also will affect the whole environment in Discovery Bay and whether all the DB service facilities are sufficient to support such developments. So it is IMPERATIVE to look also at both current applications of the HKR together.

4. In 6f it is proposed to build a sewage treatment plant "on site" and the effluent is planned to be delivered through a gravity sewerage pipe, or even considered to be delivered through a nullah, to the

sea, next to the Discovery Ferry Pier and next to the existing housing development of LA COSTA VILLAGE.

5. We are living in the 21st century and Town Planning must be a forward looking endeavour. To me it is outrageous even consider in "Asia's World City" to put nowadays a sewage treatment plant into a housing development.

6. The effluent is planned to be discharged into the shoreline next to a housing development and to a communal beach which is used by DB residents and others for recreational purposes, this effluent is in addition to the already polluted waters in the South of Hong Kong.

7. To blame pollution on the Pearl River Delta is not a point to make as facts as it is situation must be clearly addressed. In HK one must get away from the view "it is only little

pollution" beside the pollution of HK waters and around, we are facing already many types of pollution, it is important to consider "the straw which breaks the camel's back".

8 The "sensitive receivers" the sea at the Discovery Bay would be "topographically confined basin with limited dispersive capacity" thus effluent must be considered as "potentially polluting". Not even to mention the matter of storm surge, backflow and the like.

All of the tables and calculations of the applicant should be taken with a large pinch of salt as simply: effluent to the sea = generally considered is "water pollution".

9. From PLAND AND MY COMMENTS IN REGARD TO THIS APPLICATION:

Aims of Environmental Planning

2.1.1 To achieve a better environment through planning...

NO BETTER ENVIRONMENT

(a) "to avoid creating new environmental problems...

THERE ARE ADDITIONAL PROBLEMS

(b) "to seize opportunities for environmental improvement ...

NO OPPORTUNITY SEIZED IN THIS DEVELOPMENT

Proper land use planning,

(a) proposed land uses in particular development areas are environmentally suitable:

(b) proposed land uses in the same development area are compatible with each other....THERE IS NO NECESSITY FOR THIS DEVELOPMENT AS PLANNED. THE HKR COMPANY HAS OTHER ALTERNATIVES IN DB THAN TO CONVERT GREEN AREAS INTO CONCRETE. IT IS ALSO NOT COMPATIBLE, ALONE FOR THE SEWAGE TREATMENT PLANT.

(c) adequate and suitably sited environmental facilities are provided to ensure proper handling and disposal of all wastes and waste water arising from proposed developments.

THIS IS NOT THE CASE WITH BOTH THE PLANNED DB DEVELOPMENTS AS ALSO THE PLANNED NEW WASTE HANDLING FOR THE WHOLE OF DB, TRANSFER AND DISPOSAL FACILITIES ARE COMPLETELY INADEQUATE AND ILLPLACED UNDER A PODIUM STRUCTURE. THIS WAS ALREADY WRITTEN IN PREVIOUS COMMENTS.

2.2.2

(c) the capacity of the environment to receive additional developments, for example, the capacity of an airshed or water basin to receive and assimilate residuals or the capacity of the environment infrastructure such as sewerage and waste reception facilities to accommodate further residuals:

AS WRITTEN ABOVE, DB HAS LIMITED CAPACITY TO ACCEPT ALREADY THE LIMITS REGARDING 25,000 RESIDENTS INDICATE THAT. THE TPB MUST NOT FORGET THAT SERVICE FACILITIES ARE ALSO STRESSED BECAUSE OF THE OFTEN LARGE INFLUX OF VISITORS AND TOURISTS CREATING ENVIRONMENTAL DEGRADATION TO THIS CONFINED AREA, THE NUMBERS ARE IN ADDITION TO THE RESIDENTS IN THIS PLACE.

2.3.2 Air quality is affected by such factors as the emission rate of air pollutants, the separation distance between emission sources and receptors, topography, height and width of buildings as well as meteorology.

AS FOR AN ONSITE SEWAGE TREATMENT ODOURS OF DIFFERENT KIND MUST BE CONSIDERED ALSO WHEN SLUDGE WILL BE REMOVED.

wherever practicable, major air pollution emitters are sited to the west or southwest of urban areas and new towns to take advantage of the prevailing northeasterly winds;

DB IS ENCLOSED BY MOUNTAINS !

Water Quality Considerations

2.3.4 It should be noted that there is a general shift of estuarine to oceanic conditions in a west to east direction in the coastal waters of Hong Kong. Any major developments which are likely to cause significant disruption to water circulation should be either avoided as far as possible or subjected to water quality modelling tests prior to the finalisation of site selection.

PLEASE TO KEEP IN MIND.

2.3.5 Any development which causes either conflict with the constraints or damage of the resources and amenity areas should be avoided, unless the conflict can be resolved or the imposition of appropriate development controls is practicable. The water based developments should be located such that bulk water exchange is maximised. AS SAID, DB IS A TOPOGRAPHICALLY CONFINED BASIN WITH LIMITED DISPERSIVE CAPACITY.

Waste Management Considerations

2.3.6 In the preparation of land use plans, effort should be made to reserve sufficient sites in suitable locations for municipal waste reception and transfer facilities... As some uses have potential to cause nuisances and to give rise to special requirements for waste disposal and effluent discharge, due consideration should be given to their location and design to minimise the potential impacts.

THE PROPOSED NEW SPACE UNDER A PODIUM STRUCTURE FOR WASTE HANDLING (THE APPLICANT NOW CALLS IT REFUSE RECEIVING STATION PLANNED FOR THE WHOLE OF DB , IS TOTALLY INADEQUATE FOR THE PRESENT AND MUST BE MORESO FOR THE FUTURE. IT WAS WRITTEN ALREADY ABOUT IT.

ALSO THE PLANNED SPACE FOR WASTE HANDLING FACILITIES CANNOT BE COMPATIBLE WITH THE PHILOSOPHY OF WASTE HANDLING ,SEPARATING, SORTING FOR RECYCLING AND REUSE.

IN CONCLUSION I STRONGLY OBJECT TO THE TWO APPLICATIONS.

CHAO, HUI HUA

owner/resident

5871

[REDACTED]

[REDACTED]

email: [REDACTED]

tpbpd

寄件者: Lingyi Zou Berthou [REDACTED]
寄件日期: 29日12月2016年: 星期四 18:30
收件者: tpbpd@pland.gov.hk
主题: Section 12A Application No. Y/1-DB/3
附件: 6f LZ.pdf; 10b LZ.pdf

5872

Y/1-DB/2

>
> Hi,
>
> Kindly find our comments attached. We have same concerns as we previously mentioned. Please let us know if anything is unclear.
>
> Regards,
>
> Lingyi Zou Berthou
>
> Owner & resident of [REDACTED]
>

The Secretariat
Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
(Via email: tpbpd@pland.gov.hk or fax: 2877 0245 / 2522 8426)

Dear Sir,

Section 12A Application No. Y/I-DB/2
Area 6f, Lot 385 RP & Ext (Part) in D.D. 352, Discovery Bay

Objection to the Submission by the Applicant on 27.10.2016

I refer to the Response to Comments submitted by the consultant of Hong Kong Resort ("HKR"), Masterplan Limited, to address the departmental comments regarding the captioned application on 27.10.2016.

Kindly please note that I strongly object to the submission regarding the proposed development of the Lot. My main reasons of objection on this particular submission are listed as follows:-

1. HKR claims that they are the sole land owner of Area 6f is in doubt, as the lot is now held under the Principal Deed of Mutual Covenant ("PDMC") dated 20.9.1982. Area 6f forms part of either the "City Common Areas" or the "City Retained Areas" as defined in the PDMC. Pursuant to Clause 7 under Section I of the PDMC, every Owner (as defined in the PDMC) has the right and liberty to go pass and repass over and along and use Area 6f for all purposes connected with the proper use and enjoyment of the same subject to the City Rules (as defined in the PDMC). The applicant has failed to consult or seek proper consent from the co-owners of the Lot prior to this unilateral application. The property rights of the existing co-owners, i.e. all property owners of the Lot, should be considered, secured and respected.
2. The disruption, pollution and nuisance caused by the construction to the immediate residents and property owners nearby are substantial, and the submission has not been addressed.
3. There is major change to the development concept of the Lot and a fundamental deviation to the land use of the original approved Master Plans or the approved Outline Zoning Plan in the application, i.e. from staff quarters into residential area,

and approval of it would be an undesirable precedent case from environmental perspective and against the interest of all property owners of the district.

4. The original stipulated DB population of 25,000 should be fully respected as the underlying infrastructure capacity could not afford such substantial increase in population by the submission, and all DB property owners would have to suffer and pay for the cost out of this submission in upgrading the surrounding infrastructure so as to provide adequate supply or support to the proposed development, e.g. all required road network and related utilities improvement works arised out of this submission etc. The proponent should consult and liaise with all property owners being affected and undertake the cost and expense of all infrastructure out of this development. Its disruption during construction to other property owners in the vicinity should be properly mitigated and addressed in the submission.
5. The proposed felling of 118 nos. mature trees in Area 6f is an ecological disaster, and poses a substantial environmental impact to the immediate natural setting. The proposal is unacceptable and the proposed tree preservation plan or the tree compensatory proposal are unsatisfactory.
6. The revision of development as indicated in the Revised Concept Plan of Annex A is still unsatisfactory in term of its proposed height, massing and disposition in this revision. The two towers are still sitting too close to each other which may create a wall-effect to the existing rural natural setting, and would pose an undesirable visual impact to the immediate surrounding, especially to those existing towers in the vicinity.

Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 6f should be withdrawn.

Signature: _____

Date: _____

Name of Discovery Bay Owner / Resident: _____

Address: _____

寄件者:
寄件日期:
收件者:
主旨:

Ruby Woo [REDACTED]
29日12月2016年星期四 17:07
tpbpd@pland.gov.hk
objection

Y/1-DB/2

5873

Dear Sir

I am a Hillgrove Village owner ms Mei Chun Woo [REDACTED] I am deeply concerned by the numerous bad aspects of the this Application which have been covered by earlier consultations.

This 4th round consultation confirms the reintroduction of local sewage treatment within Discovery Bay and I particularly object to this retrograde step and an inevitable environmental deterioration for DB residents and the marine life.

I attach [B.PVOC for both and pick either 6f or 10b as appropriate] the following excellent submissions concerning the above, from neighbouring villages, which, as a Hillgrove Owner, I fully endorse, since they express my concerns better than I could myself.

I OBJECT TO THE ABOVE APPLICATION

Regards
Mei Chun Woo

[REDACTED]

件者:
件日期:
件者:
頁:

Janice Fung
30日12月2016年星期五 18:33
tpbd@pland.gov.hk
Applications No Y/I-DB/2 Area 6f and No. Y/I-DB/3 Area 10b

5874

Dear Sir,

I am writing to raise our concern that numerous City Management (CM) staff who work for the Hong Kong Resort International Company, not owning or residing in Discovery Bay, giving their written supports to the subject applications of land development. They have serious conflicts of interest. Could you please look into this matter and advise what measures could be applied to tackle the problem.

Look forward to hearing from you.

Best regards,
King Ka Po
Owner

Note. Someone with the same name as our CM Manager, supported the HKR application in round 3.

In my view City Management staff not owning, or residing, in DB should remain neutral to avoid any question of conflict of interest).

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161120-225619-23380

提交限期

Deadline for submission:

09/12/2016

提交日期及時間

Date and time of submission:

20/11/2016 22:56:19

有關的規劃申請編號

The application no. to which the comment relates:

Y/I-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. G H Koo

意見詳情

Details of the Comment :

New developments in Discovery Bay surely create employment opportunity in property industry. Fully support.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

4479

參考編號

Reference Number:

161120-225830-70563

提交限期

Deadline for submission:

09/12/2016

提交日期及時間

Date and time of submission:

20/11/2016 22:58:30

有關的規劃申請編號

The application no. to which the comment relates:

Y1-DB/3

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. G H Koo

意見詳情

Details of the Comment:

New developments in Discovery Bay surely create employment opportunity in property industry. Fully support.

5874

✓

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

161230-141016-04094

提交限期**Deadline for submission:**

30/12/2016

提交日期及時間**Date and time of submission:**

30/12/2016 14:10:16

有關的規劃申請編號**The application no. to which the comment relates:**

Y/I-DB/2

「提意見人」姓名/名稱**Name of person making this comment:**

女士 Ms. Winnie Leung

意見詳情**Details of the Comment :**

It is good to have proper development for more residential and recreational area for a better Hong Kong.

Proper use of lands should be adapted to Hong Kong to a better future

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-141032-25717

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 14:10:32

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

夫人 Mrs. Barry Halpenny

Name of person making this comment:

意見詳情

Details of the Comment :

On behalf of myself and my infant daughter I object strongly to the development at 6f referred to in this application. The main objections are around environmental impact to the existing trees and wildlife in the area. The road to the site is too small and children regularly play there so there is a safety concern if the development goes ahead. I am also concerned about the water and sewage treatment proposals, introducing further toxic pollution to the neighbourhood and putting excessive pressure on the services to the area. I have heard that a local water - sewage treatment plant will be required due to the inability to draw sewerage away from the area. I think this would be very dangerous to the environment and the people including many families living in the neighbourhood. I support other development plans under consideration by Hong Kong resorts but most definitely NOT this one. Thank you.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-141159-07521

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 14:11:59

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

小姐 Miss Ms Leung

Name of person making this comment:

意見詳情

Details of the Comment :

增加土地,改善房屋供應

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-171429-26487

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 17:14:29

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Yau Wing

Name of person making this comment:

意見詳情

Details of the Comment :

As realized from the additional information provided, the impact of the new development to the existing utilities and surrounding area is minimal, if not none. The development can bring more residential units to Hong Kong people and it is desirable. I support the development definitely.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-172614-39117

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 17:26:14

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Andrew Lam

Name of person making this comment:

意見詳情

Details of the Comment :

I support the plan as it will improve the community leisure spaces, facilities and services through suitable developments on private plots of land with well thought out planning consultation and impact assessments.

Regarding the water supply and sewage treatment option, though HKR demonstrated the feasibility of his proposal, I opine that the government should, base on equal and fair principle, expand the capacity of Siu Ho Wan water and sewerage treatment plants taking care of the needs of Discovery Bay.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

161230-174852-86886

提交限期

Deadline for submission:

30/12/2016

提交日期及時間

Date and time of submission:

30/12/2016 17:48:52

有關的規劃申請編號

The application no. to which the comment relates:

Y1-DB/2

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Sophia Lau-Duehri
ng

意見詳情

Details of the Comment :

Dear Sirs

The development of 6f with using Parkvale Drive is still disputed . There is no information with the development of 6f and its effect on Parkvale Village e.g Traffic, Safety, Hygiene and Security. The slope safety of the area where the proposed building will be built is a big safety issue and it is n

ignored.Parkvale Drive is a private road and is designed as a pedestrian pavement under BD regulations.

The sewage treatment works which will discharge directly into the sea next to the ferry pier will affect the restaurants, the water sports participants who would be residents and visitors, and will increase the probability of RIDE TIDE in Discovery Bay waters and thus affect hygiene, pollution, health hazard for all residents in Discovery Bay and nearby islands such as Peng Chau, Discoveryland etc.

Due to the proximity of our village in Parkvale, it is not appropriate to have the sewage system in area 6f.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-180917-26624

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 18:09:17

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

女士 Ms. Sophia Duehring

Name of person making this comment:

意見詳情

Details of the Comment :

The demolition of over 100 trees in area 6f is absolutely bad for the environment as we have millions of hikers from all over Hong Kong passing by the area. The area 6f has been a recreational area for thousands of DB residents doing hiking and recreational activities on a daily basis.

The development of 6f will cause noise, air pollution,

Safety, health hazards for all residents in Parkvale and nearby Hillgrove and Midvale residents.

The private road in Parkvale does not accommodate bulldozers and trucks. We have a small road.. with our daily buses, delivery vans, golf carts..it is already full..let alone when we have emergencies ..with the

Presence of ambulance, fire engines and police cars.

We consider the Town Planning Board is in no other position than to reject HKR's application to develop area 6f.

We would like to invite you The Town Planning Board to meet the residents and visit the site. The many issues will be more evident.

Yours sincerely

Sophia Lau-Duehring

Owner and resident since November 1991.

practicable to ensure that the increase in TIN and TP are minimized. With the discharge standard, the N to P ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."

The text in bold and underlined does not appear in the latest version of the Environmental Study. Why would HKR delete this text if the "occurrence of red tides will be unlikely"? Thus the previous version tried to downplay the likely occurrence of red tides, whilst the omission of the references to red tides in the latest version implies that what was stated in the previous version was incorrect, and that residents of Discovery Bay, the TPB and government should be concerned about the discharge of the sewage into the sea increasing the likelihood of red tides occurring.

HKR states that it proposes to discharge the treated sewage into the marine waters adjacent to Discovery Bay Plaza via a gravity sewage pipe. However, it also states that during the subsequent detailed design, it will determine the feasibility of discharging the treated effluent into the nullah and box culvert directly. Given the cost of laying a gravity sewage pipe, which would have to be underground much of the way, all the way from Area 6f to the sea, it is probable that HKR will use the nullah to discharge the treated sewage, even though it states that it will use a gravity sewage pipe, even though the nullah flows under the balconies of a residential building.

Although it did not do so in its earlier submissions, in its third submission, HKR proposed alternative means of disposing of the untreated sewage in the event of the STW breaking down. However, both of the alternative methods include using the Siu Ho Wan sewage treatment facilities, which government has already told HKR it cannot use due to lack of available capacity. Consequently, these alternatives methods are not viable. So how would HKR dispose of the untreated sewage in the event of the STW breaking down?

Although the DSD has built and operates a number of small sewage treatment facilities on Lantau Island and Outlying Islands, these facilities serve small isolated communities, whereas Area 6f is part of a large development housing 20,000 to 25,000 residents. Furthermore, HKR has not stated the type or explained the design of the STW it proposes to build in Area 6f, nor has it demonstrated that any of the three sewage treatment processes commonly adopted by the DSD on Lantau Island is suitable for a site located on a steep slope and far from the sea, with a discharge point adjacent to a residential area.

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". HKR should be required to confirm that the capital and operating costs of the sewage disposal works should 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, whose sewage is disposed of through the government STW in Siu Ho Wan.

It is hard to believe that HKR is serious in proposing to build a standalone sewage treatment works in the midst of built up Discovery Bay to meet the needs of two proposed high rise buildings, with no viable alternative in the event the works break down, which will likely discharge the treated sewage through an open nullah, which passes under the balconies of a residential building, and which will discharge the treated sewage into the sea adjacent to a pier, residential buildings, a shopping centre, a bus station and a promenade and near to a bathing beach.

In view of the serious inadequacies of the STW proposal, the DSD and the EPD have no alternative but to reject HKR's proposed STW and to advise the TPB to not approve the application.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-150651-89464

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 15:06:51

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

夫人 Mrs. Simon MINSHA
LL

Name of person making this comment:

意見詳情

Details of the Comment :

I am an owner of a residential flat in Parkvale Village, Discovery Bay, the village adjacent to Area 6f, through which HKR proposes to access Area 6f. I have lived in Discovery Bay for more than 30 years and seen its considerable growth and the benefits which have arisen from this growth. Although I think it is appropriate to further develop Discovery Bay, I believe that HKR's plans to build two 18 storey buildings, including 476 flats, of 21,600 m² GFA on a platform created to accommodate a 170m² GFA three storey building are very ill judged and that the Town Planning Board should reject HKR's application to rezone Area 6f.

I have submitted the reasons for my objection to the proposed change in use previously in responses to HKR's application and its submissions of Further Information in June 2016 and in October 2016. This objection is in response to HKR's latest submission of Further Information which was made available to the public on 9 December 2016. As this latest submission relates to HKR's proposed method of sewage disposal, I do not repeat the reasons for my objection to the proposed change of use here and only comment on the proposed method of sewage disposal.

As HKR has been told by government that it cannot use the Siu Ho Wan sewage treatment facilities for the sewage which would be generated from the proposed development at Area 6f, HKR is proposing build a standalone sewage treatments works (STW) adjacent to or in Area 6f.

Despite submitting a 50 page document, the only change of note HKR has made in its latest submission is the removal of the reference to red tides, although it does not highlight this in its covering letter.

In previous submissions, HKR tried to downplay the occurrence of red tides despite the discharge of more TINs and TPs which will increase the probability of more red tides. The latest Further Information has omitted references in the previous version to TP (referred to as Total Particulates in the Executive Summary of the Environmental Study and as Total Phosphorous in the Technical Note) and to red tides.

The Further Information submitted by HKR in October included the following:

1. Executive Summary – "The discharge concentration has therefore been reduced as much as practicable to ensure that the increase in TIN and Total Particulates (TP) are minimized. With the discharge standard, the Nitrogen (N) to Phosphorus (P) ratio is maintained greater than 18.1. Hence the occurrence of red tides will be unlikely."

2. 6.3.1.5 – "The computed N: P ratio concluded that the possibility of having red tide is still low."

3. 6.4.1.1; 7.3.1.4; 8.1.2.1 – "The discharge concentration has therefore been reduced as much as

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-170709-87015

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 17:07:09

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Ken Bradley

Name of person making this comment:

意見詳情

Details of the Comment :

- A. INADEQUATE AND UNRELIABLE INFORMATION HAS BEEN PROVIDED BY HKR
1. It can be seen from the latest Further Information that the consultants have not visited Area 6f since April – June 2014. In view of the many comments made previously and the intense concern over the proposal, it is very surprising and negligent that the consultants have not revisited the site to see the physical nature of the comments (e.g. over traffic issues) and the current condition of the area.
 2. In the latest Gist published by the TPB there is a list of Plans, Drawings and Reports Submitted by HKR in its latest submission of Further Information. The planning process by now, 19 years since the Handover, should be bi-lingual. The current situation means that only residents who can read English will be able to read the application and submit comments, thereby excluding many residents from a so called public consultation exercise.
 3. Many Plans, Drawings and Reports are missing. The TPB should request HKR to provide the missing items so that there is a full and up to date picture of Area 6f and to make sure that the public are fully informed about the project. Without this information there is the distinct possibility that HKR is guilty of misrepresentation.
 4. The following Plans, Diagrams and Reports have never been provided:
 - a. Floor plans
 - b. Elevations
 - c. Traffic impact assessment on pedestrians
 - d. Geotechnical impact assessment
 - e. Drainage impact assessment
 - f. Sewage impact assessment
 - g. Risk assessment
 5. The following Plans, Diagrams and Reports have not been provided since HKR first submitted its application which, in view of the many public and government comments, is a serious omission:
 - a. Block plan
 - b. Visual impact assessment
 - c. Landscape impact assessment
 - d. Tree survey
 6. HKR submits studies and papers and not impact assessments, thereby avoiding having to study the impact on the community and people most affected by its proposal.

7. The consultant's reports provided by HKR are not considered reliable for a public consultation exercise. This is because the key consultant, Ove Arup, has stated in respect of its reports the following: "This report takes into account the particular instructions and requirements of our client. It is not intended for, and should not, be relied upon by any third party and no responsibility is undertaken to any third party".

8. Based on the above, the process of public consultation is distorted, not transparent and patently unfair, since it is only possible to see the correct and full picture by bringing together the instructions/requirements given to Ove Arup with the response, i.e. the reports. Furthermore, how can anyone, including the government and the public, rely on the reports in view of the statement about liability!

9. The TPB is requested to obtain from HKR its full and detailed instructions/requirements provided to all their consultants involved in this Section 12A application and to confirm one way or the other that the reports can be relied upon.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-144945-97759

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 14:49:45

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Stuart Farr

Name of person making this comment:

意見詳情

Details of the Comment :

I still strongly object to the submission in the same way I have every single time the developer has proposed it. I feel that the developer is acting in a deceitful and underhand manner by repeatedly submitting and re-proposing these plans in the hope that opposition will dwindle due to the effort required to keep resubmitting repeatedly. This is particularly egregious this time as response period is over the Christmas holiday when many DB residents will be away on holiday.

My main reasons of objection on this particular submission are listed as follows:-

1. HKR claims that they are the sole land owner of Area 6f is in doubt, as the lot is now held under the Principal Deed of Mutual Covenant ("PDMC") dated 20.9.1982. Area 6f forms part of either the "City Common Areas" or the "City Retained Areas" as defined in the PDMC. Pursuant to Clause 7 under Section I of the PDMC, every Owner (as defined in the PDMC) has the right and liberty to go pass and repass over and along and use Area 6f for all purposes connected with the proper use and enjoyment of the same subject to the City Rules (as defined in the PDMC). The applicant has failed to consult or seek proper consent from the co-owners of the Lot prior to this unilateral application. The property rights of the existing co-owners, i.e. all property owners of the Lot, should be considered, secured and respected.
2. The disruption, pollution and nuisance caused by the construction to the immediate residents and property owners nearby are substantial, and the submission has not been addressed.
3. There is major change to the development concept of the Lot and a fundamental deviation to the land use of the original approved Master Plans or the approved Outline Zoning Plan in the application, i.e. from staff quarters into residential area, and approval of it would be an undesirable precedent case from environmental perspective and against the interest of all property owners of the district.
4. The original stipulated DB population of 25,000 should be fully respected as the underlying infrastructure capacity could not afford such substantial increase in population by the submission, and all DB property owners would have to suffer and pay for the cost out of this submission in upgrading the surrounding infrastructure so as to provide adequate supply or support to the proposed development, e.g. all required road network and related utilities improvement works arising

ut of this submission etc. The proponent should consult and liaise with all property owners being affected and undertake the cost and expense of all infrastructure out of this development. Its disruption during construction to other property owners in the vicinity should be properly mitigated and addressed in the submission.

5. The proposed felling of 118 nos. mature trees in Area 6f is an ecological disaster, and poses a substantial environmental impact to the immediate natural setting. The proposal is unacceptable and the proposed tree preservation plan or the tree compensatory proposal are unsatisfactory.

6. The revision of development as indicated in the Revised Concept Plan of Annex A is still unsatisfactory in term of its proposed height, massing and disposition in this revision. The two towers are still sitting too close to each other which may create a wall-effect to the existing rural natural setting, and would pose an undesirable visual impact to the immediate surrounding, especially to those existing towers in the vicinity.

Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 6f should be withdrawn.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-183932-99908

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 18:39:32

Date and time of submission:

有關的規劃申請編號

Y/I-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

夫人 Mrs. Veronique Clara
mbaux

Name of person making this comment:

意見詳情

Details of the Comment :

Kindly please note that I strongly object to the submission regarding the proposed development of the Lot. My main reasons of objection on this particular submission are listed as follows:-

1. HKR claims that they are the sole land owner of Area 6f is in doubt, as the lot is now held under the Principal Deed of Mutual Covenant ("PDMC") dated 20.9.1982. Area 6f forms part of either the "City Common Areas" or the "City Retained Areas" as defined in the PDMC. Pursuant to Clause 7 under Section I of the PDMC, every Owner (as defined in the PDMC) has the right and liberty to go pass and repass over and along and use Area 6f for all purposes connected with the proper use and enjoyment of the same subject to the City Rules (as defined in the PDMC). The applicant has failed to consult or seek proper consent from the co-owners of the Lot prior to this unilateral application. The property rights of the existing co-owners, i.e. all property owners of the Lot, should be considered, secured and respected.
2. The disruption, pollution and nuisance caused by the construction to the immediate residents and property owners nearby are substantial, and the submission has not been addressed.
3. There is major change to the development concept of the Lot and a fundamental deviation to the land use of the original approved Master Plans or the approved Outline Zoning Plan in the application, i.e. from staff quarters into residential area, and approval of it would be an undesirable precedent case from environmental perspective and against the interest of all property owners of the district.
4. The original stipulated DB population of 25,000 should be fully respected as the underlying infrastructure capacity could not afford such substantial increase in population by the submission, and all DB property owners would have to suffer and pay for the cost out of this submission in upgrading the surrounding infrastructure so as to provide adequate supply or support to the proposed development, e.g. all required road network and related utilities improvement works arising out of this submission including the sewage treatment proposal etc. The proponent should consult and liaise with all property owners being affected and undertake the cost and expense of all infrastructure out of this development. Its disruption during construction to other property owners in the vicinity should be properly mitigated and addressed in the submission. The proposed sewage treatment plant is unacceptable in term of its proposed scale and extent and pose substantial visual

al and environmental impacts to the immediate surroundings.

5. The proposed felling of 118 nos. mature trees in Area 6f is an ecological disaster, and poses a substantial environmental impact to the immediate natural setting. The proposal is unacceptable and the proposed tree preservation plan or the tree compensatory proposal are unsatisfactory.

6. The revision of development as indicated in the Revised Concept Plan of Annex A is still unsatisfactory in term of its proposed height, massing and disposition in this revision. The two towers are still sitting too close to each other which may create a wall-effect to the existing rural natural setting, and would pose an undesirable visual impact to the immediate surrounding, especially to those existing towers in the vicinity.

Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 6f should be withdrawn.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

161230-183735-17902

Reference Number:

提交限期

30/12/2016

Deadline for submission:

提交日期及時間

30/12/2016 18:37:35

Date and time of submission:

有關的規劃申請編號

Y1-DB/2

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. Thomas Alderwei
reld

Name of person making this comment:

意見詳情

Details of the Comment :

Kindly please note that I strongly object to the submission regarding the proposed development of the Lot. My main reasons of objection on this particular submission are listed as follows:-

1. HKR claims that they are the sole land owner of Area 6f is in doubt, as the lot is now held under the Principal Deed of Mutual Covenant ("PDMC") dated 20.9.1982. Area 6f forms part of either the "City Common Areas" or the "City Retained Areas" as defined in the PDMC. Pursuant to Clause 7 under Section I of the PDMC, every Owner (as defined in the PDMC) has the right and liberty to go pass and repass over and along and use Area 6f for all purposes connected with the proper use and enjoyment of the same subject to the City Rules (as defined in the PDMC). The applicant has failed to consult or seek proper consent from the co-owners of the Lot prior to this unilateral application. The property rights of the existing co-owners, i.e. all property owners of the Lot, should be considered, secured and respected.

2. The disruption, pollution and nuisance caused by the construction to the immediate residents and property owners nearby are substantial, and the submission has not been addressed.

3. There is major change to the development concept of the Lot and a fundamental deviation to the land use of the original approved Master Plans or the approved Outline Zoning Plan in the application, i.e. from staff quarters into residential area, and approval of it would be an undesirable precedent case from environmental perspective and against the interest of all property owners of the district.

4. The original stipulated DB population of 25,000 should be fully respected as the underlying infrastructure capacity could not afford such substantial increase in population by the submission, and all DB property owners would have to suffer and pay for the cost out of this submission in upgrading the surrounding infrastructure so as to provide adequate supply or support to the proposed development, e.g. all required road network and related utilities improvement works arising out of this submission including the sewage treatment proposal etc. The proponent should consult and liaise with all property owners being affected and undertake the cost and expense of all infrastructure out of this development. Its disruption during construction to other property owners in the vicinity should be properly mitigated and addressed in the submission. The proposed sewage treatment plant is unacceptable in term of its proposed scale and extent and pose substantial visu

al and environmental impacts to the immediate surroundings.

5. The proposed felling of 118 nos. mature trees in Area 6f is an ecological disaster, and poses a substantial environmental impact to the immediate natural setting. The proposal is unacceptable and the proposed tree preservation plan or the tree compensatory proposal are unsatisfactory.

6. The revision of development as indicated in the Revised Concept Plan of Annex A is still unsatisfactory in term of its proposed height, massing and disposition in this revision. The two towers are still sitting too close to each other which may create a wall-effect to the existing rural natural setting, and would pose an undesirable visual impact to the immediate surrounding, especially to those existing towers in the vicinity.

Unless and until the applicant is able to provide detailed responses to the comments for further review and comment, the application for Area 6f should be withdrawn.