

Representation Number:

TPB/R/S/H5/32 -R1

Submission Number:

TPB/R/S/H5/32 -S025

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	Date Received 收到日期	

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

1. Person Making this Representation (known as "Representer" hereafter) 提出此宗申述的人士（下稱「申述人」）

Full Name 姓名 / 名稱 (~~Mr./Ms./Company/Organization~~ 先生/女士/公司/機構*)

Great Kinetic Limited
Full Glory Development Limited
Ever Genius Limited

(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)
(注意：若個人提交，須填上與香港身份證／護照所載的全名)

2. Authorized Agent (if applicable) 獲授權代理人(如適用)

Full Name 姓名 / 名稱 (~~Mr./Ms./Company/Organization~~ 先生/女士/公司/機構*)

KTA Planning Limited

(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)
(注意：若個人提交，須填上與香港身份證／護照所載的全名)

* Delete as appropriate 請刪去不適用者

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

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

The plan to which the representation relates (please specify the name and number of the plan) 與申述相關的圖則 (請註明圖則名稱及編號)	Draft Wan Chai Outline Zoning Plan No. S/H5/32
Nature of and reasons for the representation 申述的性質及理由	
Subject matters 有關事項 [@]	Are you supporting or opposing the subject matter? 你支持還是反對有關事項? Reasons 理由 [^]
<u>Amendments to Matters shown on the Plan</u> Item A - Rezoning of a site at 31-36 Sau Wa Fong and 8-12 St. Francis Street from "Residential (Group A)", Residential (Group C)", and an area shown as 'Road' to "Residential (Group A)9" with designation of 31-36 Sau Wa Fong as sub-area (a) and 8-12 St. Francis Street as sub-area (b) and the land in the north-eastern portion as non-building area.	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對 Please refer to the Written Representation.
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對
Any proposed amendments to the plan? If yes, please specify the details. 對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。 N/A	

[#] If the representation contains more than 20 pages, or any page larger than A4 size, 4 hard copies and 1 soft copy are required to be provided for the submission. Provision of email address is also required.

若申述超過 20 頁或有任何一頁大小超過 A4, 則須提交硬複本一式四份和一份軟複本。另須提供電郵地址。

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

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

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

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

Written Representation in relation to Amendment Item A of
Draft Wan Chai Outline Zoning Plan No. S/H5/32
on Rezoning Part of the “Residential (Group A)”, “Residential (Group
C)” Zones and Area Shown as ‘Road’ to “Residential (Group A)9” Zone
at 31-36 Sau Wa Fong and 8-12 St. Francis Street, Wan Chai, Hong Kong

WRITTEN REPRESENTATION

August 2025

Representer:

Great Kinetic Limited
Full Glory Development Limited
Ever Genius Limited

Consultancy Team:

KTA Planning Limited



PLANNING LIMITED
規劃顧問有限公司

Executive Summary

This Written Representation is prepared and submitted on behalf of Great Kinetic Limited, Full Glory Development Limited and Ever Genius Limited ("the Representer"), under Section 6(1) of the Town Planning Ordinance in relation to the Draft Wan Chai Outline Zoning Plan ("the Draft OZP") No. S/H5/31 gazetted on 27 June 2025.

This Written Representation is made in respect to Amendment Item A of the Draft OZP, which covers a site at 31-36 Sau Wa Fong and 8-12 St. Francis Street ("the Representation Site").

The Representer, which is the applicants of the s12A Application No. Y/H5/7, **fully supports** Amendment Item A. The Representer's view on Amendment Item A are summarised as follows:

- Amendment Item A encourages the amalgamation of small lots. A more comprehensive and efficient layout could be achieved and bring about improvements to townscape, amenity of the locality, air ventilation and visual permeability;
- Amendment Item A improves the accessibility of Sau Wa Fong by requesting the provision of a public barrier-free passageway having the characteristics of a street of not less than 4.5m wide connecting St. Francis Street and Sau Wa Fong upon redeveloping the Representation Site;
- Amendment Item A reduces on-street vehicle pick-up/drop-off and loading/unloading activities by requesting the provision of internal loading/unloading facilities fronting St. Francis Street upon redeveloping the Representation Site;
- Amendment Item A improves visual permeability and air ventilation by requesting the provision of a minimum setback of 10m from the lot boundary fronting St. Francis Street upon redeveloping the Representation Site;
- Amendment Item A has respected the original planning intention and the local character of Sau Wa Fong;
- The development restrictions of the new "R(A)9" sub-zone are appropriate considering its compatibility with the surrounding land uses and building heights;
- Amendment Item A is in line with the Government's on-going policy on optimising land utilisation and increasing housing supply to meet the pressing demand;
- Amendment Item A will not bring insurmountable/unacceptable landscape, air ventilation, traffic, drainage, sewerage, environmental and geotechnical impacts; and
- Amendment Item A is in-line with the Town Planning Board's decision.

The Representer appreciates the recognition from the Town Planning Board ("TPB") on the redevelopment proposal submitted under the approved s12A application. The Representer kindly request the TPB to complete the hearing procedures for all representations to enable the timely implementation of the approved redevelopment of the Representation Site.

行政摘要

(內文如有差異，應以英文版本為準)

本申述書是代表申述人堅雄有限公司、滿盈發展有限公司及仲堅有限公司 (下稱「申述人」) 就《城市規劃條例》第 6(1) 條有關於 2025 年 6 月 27 日刊憲的灣仔分區計劃大綱草圖編號 S/H5/32 (下稱「大綱草圖」) 擬備及遞交的。

本申述書謹就大綱草圖上包括秀華坊 31-36 號及聖佛蘭士街 8-12 號 (下稱「申述地盤」) 的修訂項目 A 項作出申述。

申述人作為第 12 條申請編號 Y/H5/7 的申請人全力支持修訂項目 A 項。申述人對修訂項目 A 項的意見如下：

- 修訂項目 A 項鼓勵整合較小的地段以作全盤規劃及高效布局，從而改善城市面貌、區內環境、空氣流通及景觀滲透度；
- 修訂項目 A 項要求申述地盤內闢設一條闊度不少於 4.5 米、具有街道特質的公共無障礙通道連接聖佛蘭士街與秀華坊，能提升秀華坊的暢達度；
- 修訂項目 A 項要求申述地盤內設置面向聖佛蘭士街的內部上落客貨設施，能減少路旁上落客貨的活動；
- 修訂項目 A 項要求申述地盤內的單一發展或重建將從面向聖佛蘭士街的地段界線後移至少 10 米，能提升景觀滲透度及通風；
- 修訂項目 A 項尊重原有的規劃意向，並保留秀華坊的現有特色；
- 新的「住宅 (甲類) 9」支區發展限制恰當，與周圍的土地用途和建築高度相若；
- 修訂項目 A 項符合政府現時的政策，優化土地利用及增加房屋供應，以滿足房屋需求；
- 修訂項目 A 項不會帶來無法克服或不可接受的景觀、空氣流通、交通、排水、排污、環境及土力等影響；及
- 修訂項目 A 項符合城市規劃委員會的決定。

申述人感謝城市規劃委員會認同獲批申請內的重建方案。懇請城市規劃委員會盡快完成聆聽所有就大綱草圖作出的申述，讓申述地盤的重建方案能早日落實。

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Written Representation in relation to Amendment Item A of
Draft Wan Chai Outline Zoning Plan No. S/H5/32
on Rezoning Part of the "Residential (Group A)", "Residential (Group C)"
Zones and Area Shown as 'Road' to "Residential (Group A)9" Zone
at 31-36 Sau Wa Fong and 8-12 St. Francis Street, Wan Chai, Hong Kong

Written Representation

1 INTRODUCTION

1.1 Purpose

- 1.1.1 This Written Representation is prepared and submitted on behalf of Great Kinetic Limited, Full Glory Development Limited and Ever Genius Limited ("the Representer"), under Section 6(1) of the Town Planning Ordinance in relation to the Draft Wan Chai Outline Zoning Plan ("the Draft OZP") No. S/H5/32 gazetted on 27 June 2025. The Representation Site covers 31-36 Sau Wa Fong and 8-12 St. Francis Street, Wan Chai ("the Representation Site").

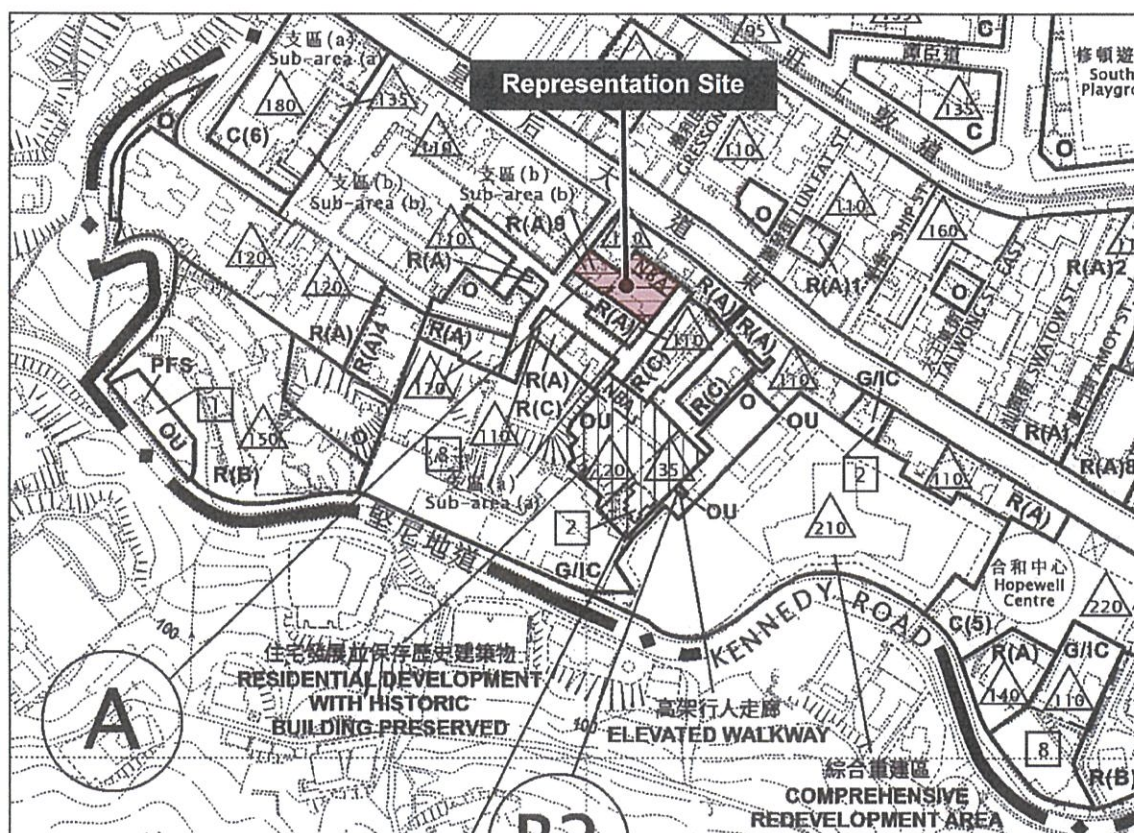


Figure 1.1 Extract of Draft Wan Chai OZP No. S/H5/32

1.2 Particular Matters to which this Representation Relate

1.2.1 This Written Representation is made in respect to the following:

Amendments to the Matters shown on the Draft OZP

Item A – Rezoning of a site at 31-36 Sau Wa Fong and 8-12 St. Francis Street ("the Representation") from "Residential (Group A)" ("R(A)"), "Residential (Group C)" ("R(C)"), and an area shown as 'Road' to "Residential (Group A)9" ("R(A)9") with designation of 31-36 Sau Wa Fong as sub-area (a) and 8-12 St. Francis Street as sub-area (b) and the land in the north-eastern portion as non-building area;

Amendments to the Notes of the Draft OZP

(b) Revision to the Remarks of the Notes for the "R(A)" zone to incorporate "R(A)9" sub-zone with development restrictions and requirements for its sub-area (a), sub-area (b), and a single development or redevelopment covering both sub-areas (a) and (b).

(c) Incorporation of a plot ratio exemption clause for any floor space constructed or intended for use solely as car park, loading/unloading bay, plant room, caretaker's office and caretaker's quarters, or recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, for sub-area (a) of the "R(A)9" sub-zone.

(d) Revision to the Remarks of the Notes for the "R(A)" zone on minor relaxation clauses.

1.2.2 The Representer, which is the applicants of the s12A Application No. Y/H5/7, **fully supports** Amendment Item A.

1.3 Report Structure

1.3.1 Following this introductory section, the site context and planning history of the Representation Site will be briefly set out in **Section 2**. The background of Section 12A Application No. Y/H5/7 will be provided in **Section 3**. The merits and justifications in relation to Amendment Item A on the Draft OZP will be presented in **Section 4**. **Section 5** summarises and concludes this Written Representation.

2 SITE AND PLANNING CONTEXT

2.1 Site Location and Existing Condition

- 2.1.1 The Representation Site covers 31-36 Sau Wa Fong and 8-12 St. Francis Street, Wan Chai (**Figure 2.1** refers), is currently occupied by three 3-storey residential buildings with commercial/eating places on the ground floor at the western portion abutting St. Francis Street (at a level of about +12mPD) previously zoned "R(A)", and a 8-storey residential building previously zoned "R(C)" and a pedestrian right of way designated as area shown as 'Road' situated on a terraced area inaccessible by vehicular traffic at the eastern portion (at a level of about +19.5mPD), known as Sau Wa Fong (**Figure 2.2** refers).

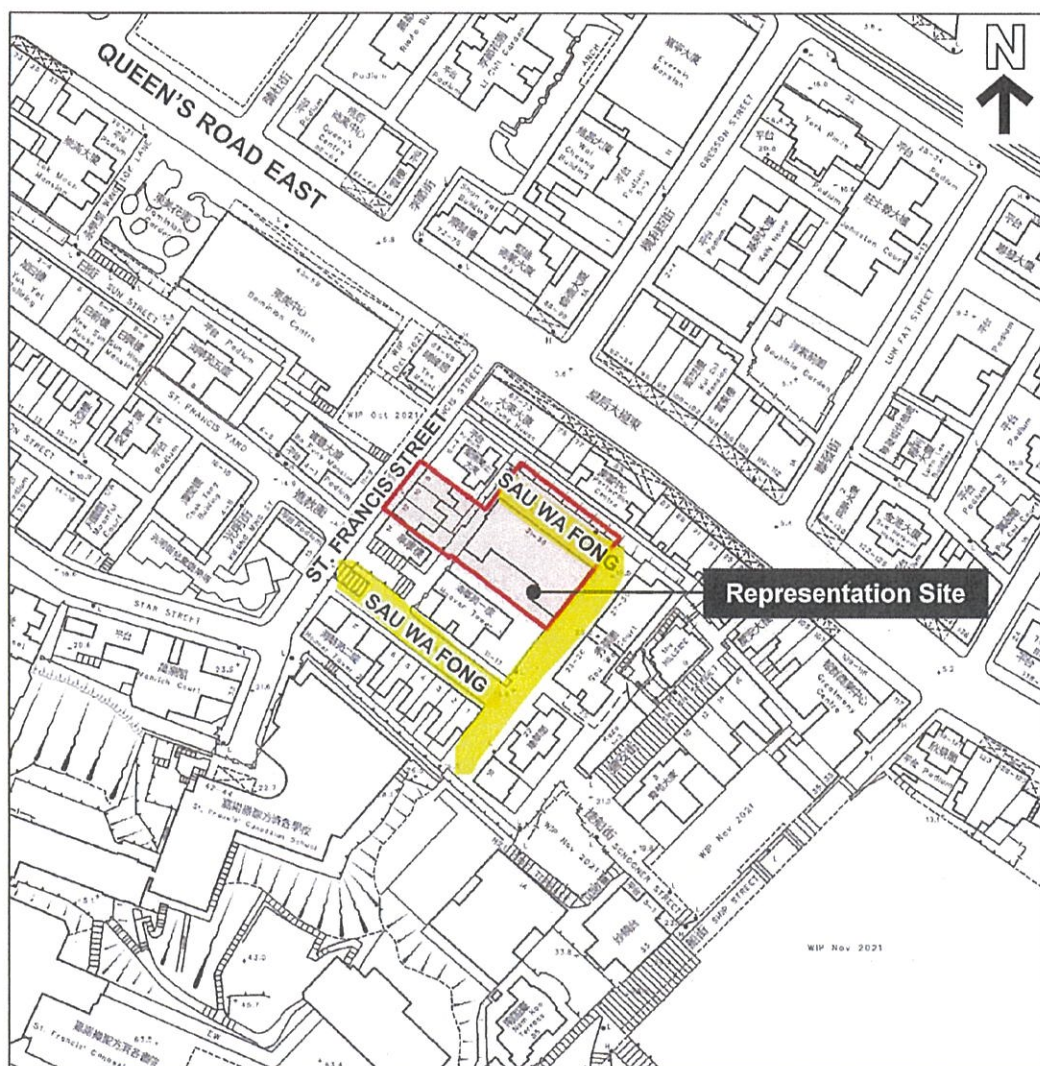


Figure 2.1 Site Location Plan

Written Representation in relation to Amendment Item A of Draft Wan Chai Outline Zoning Plan No. S/H5/32 on Rezoning Part of the "Residential (Group A)", "Residential (Group C)" Zones and Area Shown as 'Road' to "Residential (Group A)9" Zone at 31-36 Sau Wa Fong and 8-12 St. Francis Street, Wan Chai, Hong Kong

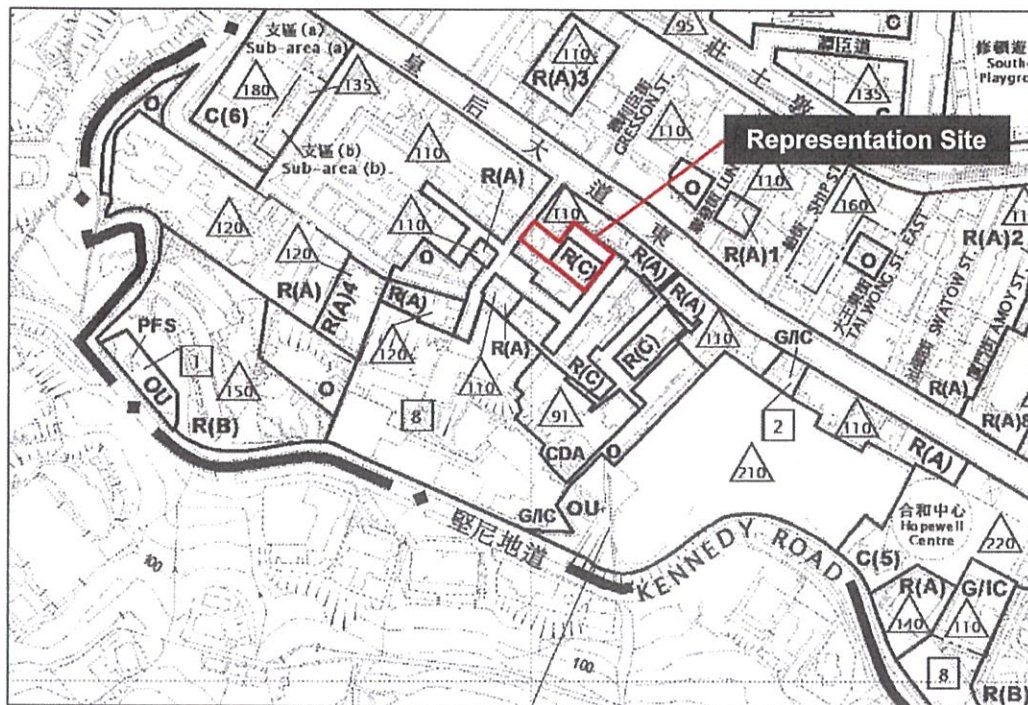


Figure 2.2 Extract of Approved Wan Chai OZP No. S/H5/31

2.2 Land Ownership

- 2.2.1 The Representation Site comprises seven private lots, namely Inland Lot Nos. 199 S.A ss.2 RP, S.B ss.1, S.B ss.2, S.B ss.3, S.C ss.4 and S.D ss.2 and S.E RP (Figure 2.3 refers). The Representer owned vast majority of the lots and will soon become the sole owner subject to the completion of the legal documents.

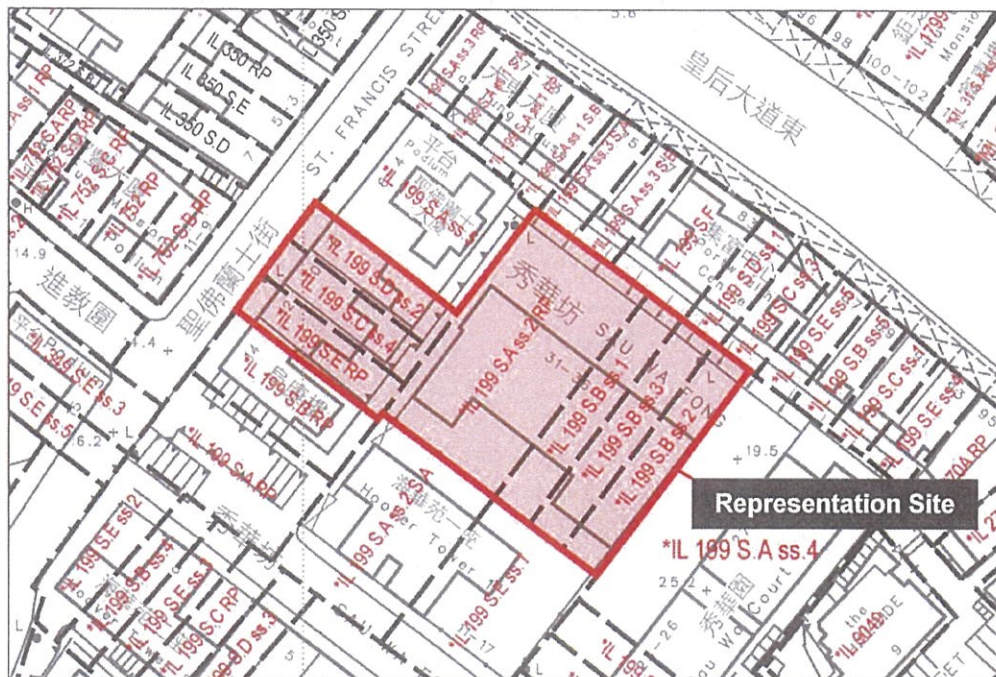


Figure 2.3 Lot Index Plan

3 APPROVED S12A APPLICATION NO. Y/H5/7

3.1 The Redevelopment Proposal under the S12A Application

3.1.1 The Representer submitted a section 12A Application to TPB in November 2022. Under s12A Application No. Y/H5/7, the Representer proposed to redevelop the Representation Site into a single 28-storey building with a maximum building height (BH) of 110mPD, accommodating residential units on the upper floors, and commercial and arts facilities and other supporting facilities on the lower floors. Under the indicative scheme, a setback area (up to 10m wide) from the lot boundary fronting St. Francis Street was proposed to promote the passage of air and daylight and to provide visual relief. Within the setback area, the applicants proposed a lift and stairs along the northern boundary to form a barrier-free public passageway having the characteristics of a street (not less than 4.5m wide and open to the public on a 24-hour basis) linking St. Francis Street and Sau Wa Fong. The setback area would also cover the majority of the transport area, including a turntable for pick-up/drop-off and L/UL activities. No new building structure was proposed within the setback area, except for a lift, stairs and other ancillary facilities (such as a covered walkway) located along the northern boundary to facilitate accessibility.

3.1.2 Various technical assessments covering visual, landscape, traffic, sewerage, environmental, air ventilation, and geotechnical aspects had been conducted. It is confirmed that the redevelopment proposal will not cause insurmountable impacts.

3.2 Approval of the S12A Application

3.2.1 On 22.9.2023, the Metro Planning Committee ("MPC") of the TPB partially agreed to the section 12A application No. Y/H5/7 to rezone the Representation Site for the proposed redevelopment.

3.2.2 While MPC Members generally had no objection to rezone the Representation Site, some expressed concerns regarding the planning control over the provision of a setback from St. Francis Street and the proposed 24-hour public passageway. There were also concerns that piecemeal/standalone development with a higher intensity at the Sau Wa Fong portion without direct vehicular access should not be precluded.

3.2.3 To take forward the decision/ address concerns of the MPC, the Representation Site is rezoned from "R(A)", "R(C)", and area shown as 'Road' to "R(A)9", which is the subject of this Written Representation, i.e. Amendment Item A of the Draft OZP.

4 REPRESENTER'S VIEW ON AMENDMENT ITEM A

4.1 Encourage the Amalgamation of Small Lots to Achieve a Comprehensive and Efficient Layout

- 4.1.1 The Site is currently occupied by three 72-year-old and one 58-year-old residential buildings on seven private lots with an average lot area of about 141m². The current site boundary is the amalgamation of seven small lots to achieve a comprehensive redevelopment.
- 4.1.2 Amendment Item A rezoned the whole Representation Site, including the Sau Wa Fong portion [sub-area(a)] and the St. Francis Street portion [sub-area(b)], into the new "R(A)9" zone. This encourages the amalgamation of the seven small lots [in both sub-areas (a) and (b)] to fully achieve the comprehensive and efficient layout under the redevelopment proposal.
- 4.1.3 On the other hand, development intensity for development or redevelopment covering sub-area (a) only is restricted to a maximum PR of 5 and a maximum BH of 12 storey to avoid piecemeal high-intensity development in Sau Wa Fong area.

4.2 Improve the Accessibility of Sau Wa Fong by Requesting the Provision of a Public Barrier-free Passageway Connecting St. Francis Street and Sau Wa Fong

- 4.2.1 The three 3-storey residential buildings with commercial/eating places on the ground floor at 8-12 St. Francis Street is located at about +12mPD and the 8-storey residential building at 31-36 Sau Wa Fong, at about +19.5mPD, i.e. with a level difference of around 7.5m. At present, pedestrians access Sau Wa Fong using: (i) 3 staircases with some 20-24 steps, which are located in-between Fulcan Mansion at 14 St. Francis Street and Hoover Tower Block 2 at 8 Sau Wa Fong (**Figure 4.1** refers), or (ii) a narrow and steep passage provided along the western side of Hoover Tower 2 (**Figure 4.2** refers), which is within private lot.

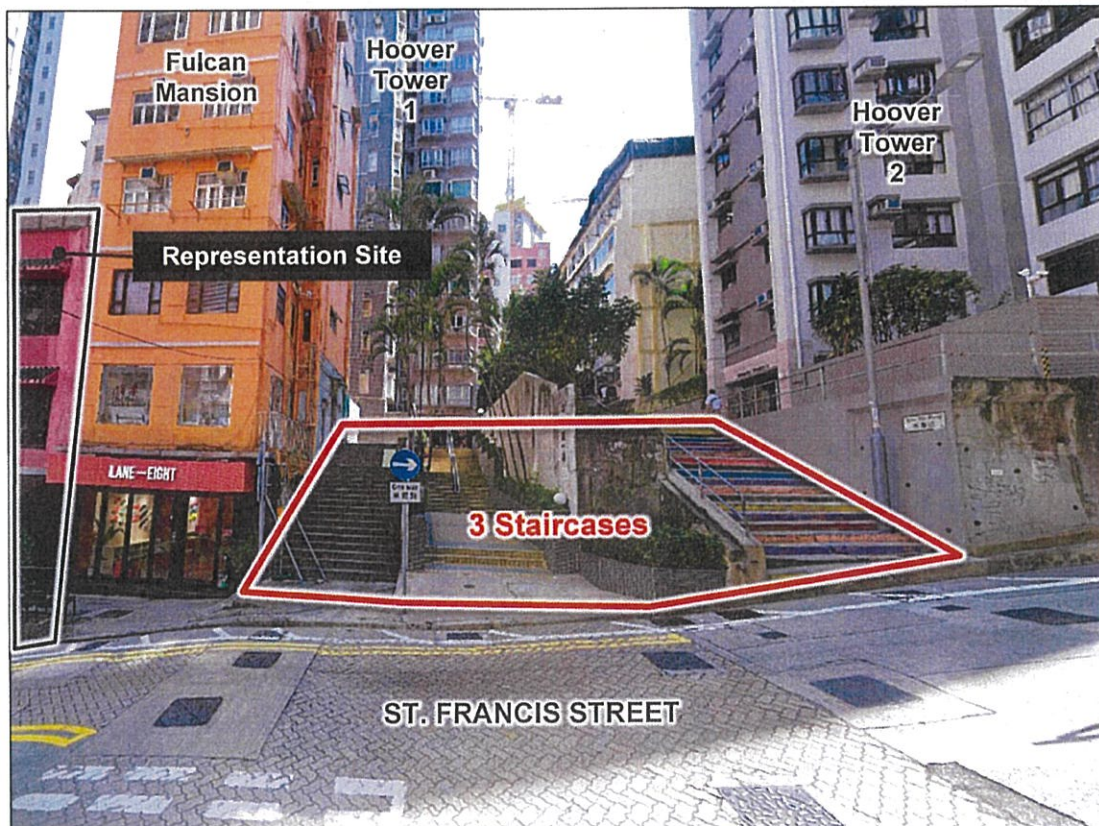


Figure 4.1 Access to Sau Wa Fong (i)

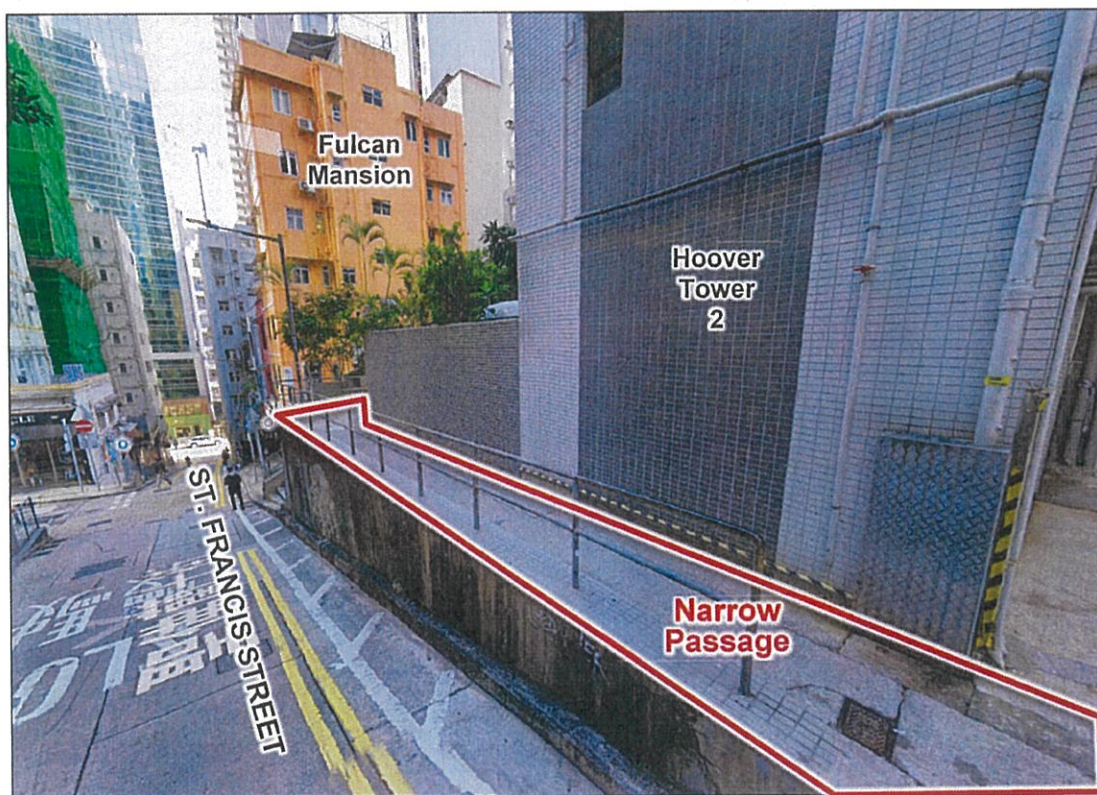


Figure 4.2 Access to Sau Wa Fong (ii)

- 4.2.2 Amendment Item A requests the provision of *"a public barrier-free passageway of not less than 4.5m wide connecting St. Francis Street and Sau Wa Fong"* for a single development covering both sub-areas (a) and (b). Within such area, a lift and stairs can be provided along the northern boundary according to the indicative scheme in the approved s12A Application. The Representer is prepared to surrender or dedicate the barrier-free passageway of not less than 4.5m wide for public use, subject to the agreement by the Government. The surrender or dedication is necessary and essential to ensure proper implementation of the proposed scheme and facilitate the pedestrian circulation between Sau Wa Fong and St. Francis Street.
- 4.2.3 Member of the public, including the elderly, persons with disabilities or those who are physically challenged, could use the barrier-free public passageway instead of the 3 staircases or the narrow and steep passage provided along the western side of Hoover Tower 2, to access Sau Wa Fong.
- 4.3 Reduce On-street Vehicle Pick-up/Drop-off and Loading/Unloading Activities by Requesting the Provision of Internal Loading/Unloading Facilities**
- 4.3.1 Currently, the three 3-storey residential buildings with commercial/eating places on the ground floor at 8-12 St. Francis Street, and the 8-storey residential building at 31-36 Sau Wa Fong, are inaccessible by vehicular traffic. Hence, these buildings do not have internal transport facilities.
- 4.3.2 In addition, the portion of St. Francis Street fronting 8-12 St. Francis Street is one-way one-lane southbound with a steep ascending gradient of 1:6. Hence, most residents and visitors to the Representation Site at the moment are picked-up/drop-off from vehicles at the less steep sections of St Francis Street near St. Francis Yard (**Figure 4.3** refers) or Star Street (**Figure 4.4** refers). These activities affect the flow of traffic along St. Francis Street.
- 4.3.3 At present, L/UL activities which are mostly related to move-in and move-out of the Representation Site are conducted at the public layby at Star Street, which is shared with other nearby residential buildings or commercial/eating places.
- 4.3.4 Amendment Item A requires *"a minimum setback of 10m from the lot boundary fronting St. Francis Street"* and *"internal loading/unloading facilities fronting St. Francis Street"* for a single development or redevelopment covering both sub-areas (a) and (b).
- 4.3.5 When the redevelopment proposal has been implemented due to the effect of Amendment Item A, there will be a direct vehicular access from St. Francis Street to the Representation Site, where L/UL area can be provided. Provision of these internal transport facilities will result in a reduction of on-street pick-up/drop-off and L/UL activities at the public layby.

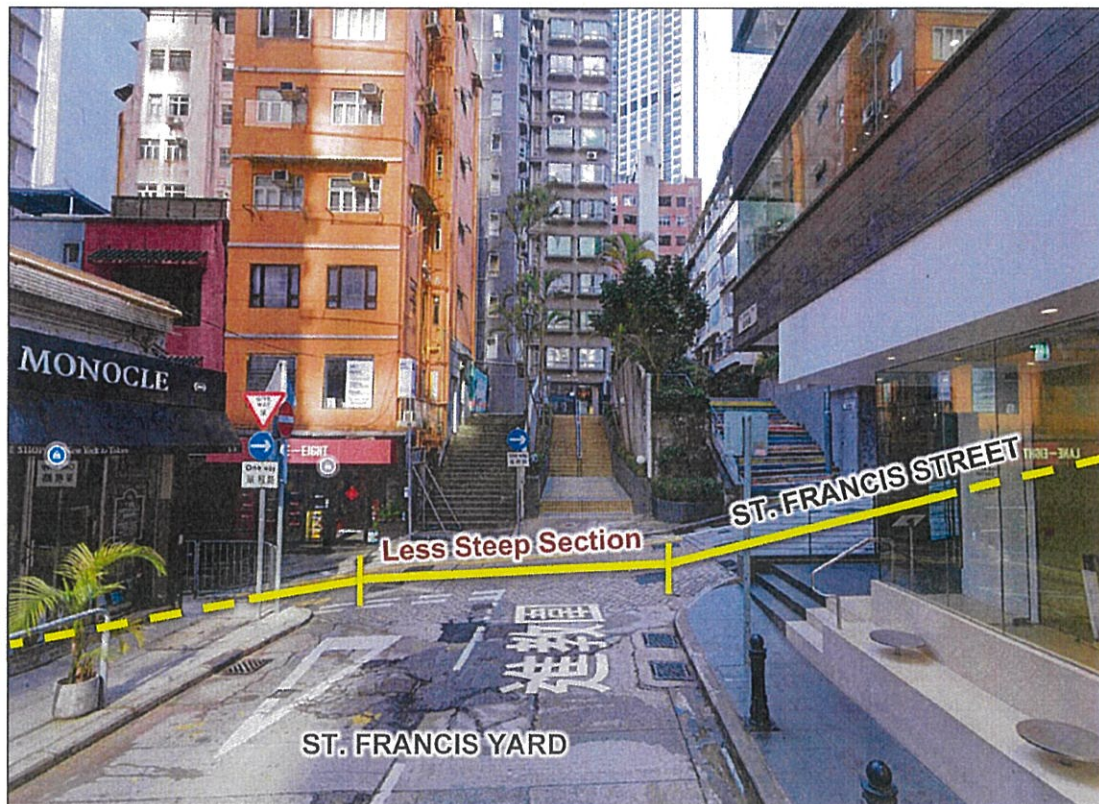


Figure 4.3 Less Steep Section of St. Francis Street near St. Francis Yard



Figure 4.4 Star Street

4.4 Improve Visual Permeability and Air Ventilation by Requesting the Provision of a Minimum setback of 10m from St. Francis Street

- 4.4.1 St. Francis Street is a narrow one-way single lane access road. Any new medium-to high-rise building dispositioned to the street canyon may create a sense of pressure to the pedestrian and make St. Francis Street darker due to blocking sunlight.
- 4.4.2 The Amendment Item A encourages the amalgamation of small lots and requested the provision of a minimum setback of 10m from the lot boundary fronting St. Francis Street for a single development or redevelopment covering both sub-areas (a) and (b) to promote air ventilation and visual permeability.

4.5 Respect the Original Planning Intention and the Local Character of Sau Wa Fong

- 4.5.1 To preserve the unique character of Sau Wa Fong, particularly its terrace ambience, Amendment Item A designated a NBA at Sau Wa Fong to control the development intensity and avoid the terrace of Sau Wa Fong from being built over upon redevelopment. PR and BH restrictions are also stipulated for single development or redevelopment confined to sub-area (a) on par with the permissible PR in the then "R(C)" zone under the OZP before amendment. As such, the original planning intension and the local character of Sau Wa Fong have been resepcted.

4.6 Compatible with the Surrounding Land Uses and Building Heights

- 4.6.1 The Represenation Site is surrounded by residential and commercial uses with maximum BH restrictions up to +120mPD. The maximum BH of +110mPD for sub-area (b) or single development or redevelopment covering both sub-areas (a) and (b) are same as the adjoining "R(A)" zone which has the maximum BH restriction of +110mPD. No out of context development is anticipated. The Proposed Redevelopment would be compatible at a right scale and maintain the characteristics of the existing neighbourhood ambience without generating adverse visual impact.

4.7 In-line with the Government's On-going Policy on Optimising Land Utilisation and Increasing Housing Supply

- 4.7.1 The need to increase land supply to meet the strong demand on residential flats is widely recognised. It has been widely publicised that the top priority of the Government is to tackle the housing problem; and this can be seen from many of the prevailing policies and revisions to OZPs at various locations to boost housing supply. The Government has been actively increasing land supply by conducting land use reviews and other measures. Amendment Item A, which make way for more housing units, is in line with the Government's policy and helps to meet the imminent housing need.

4.8 No Insurmountable Landscape, Air Ventilation, Traffic, Drainage, Sewerage, Environmental and Geotechnical Impacts

- 4.8.1 As mentioned in Section 3, Amendment Item A has been put forward based on the feasibility of the redevelopment proposal submitted under S12A Application No. Y/H5/7. Technical assessments accepted by Government departments demonstrated that no insurmountable landscape, air ventilation, traffic, drainage, sewerage, environmental, and geotechnical impacts will be anticipated.

4.9 In-line with the Town Planning Board's Decision

- 4.9.1 According to the minutes of the MPC meeting on 22.9.2023, members of the MPC in general had no objection to rezone the Representation Site for proposed redevelopment. Appropriate controls and requirements have been stipulated in the Amendment Item A to address the members concerns. The proposed amendment is in-line with the TPB's decision.

5 SUMMARY AND CONCLUSION

5.1.1 The Representer **fully supports** Amendment Item A. The Representer's view are summarised as follows:

- Amendment Item A encourages the amalgamation of small lots. A more comprehensive and efficient layout could be achieved and bring about improvements to townscape, amenity of the locality, air ventilation and visual permeability;
- Amendment Item A improves the accessibility of Sau Wa Fong by requesting the provision of a public barrier-free passageway having the characteristics of a street of not less than 4.5m wide connecting St. Francis Street and Sau Wa Fong upon redeveloping the Representation Site;
- Amendment Item A reduces on-street vehicle pick-up/drop-off and loading/unloading activities by requesting the provision of internal loading/unloading facilities fronting St. Francis Street upon redeveloping the Representation Site;
- Amendment Item A improves visual permeability and air ventilation by requesting the provision of a minimum setback of 10m from the lot boundary fronting St. Francis Street upon redeveloping the Representation Site;
- Amendment Item A has respected the original planning intention and the local character of Sau Wa Fong;
- The development restrictions of the new "R(A)9" sub-zone are appropriate considering its compatibility with the surrounding land uses and building heights;
- Amendment Item A is in line with the Government's on-going policy on optimising land utilisation and increasing housing supply to meet the pressing demand;
- Amendment Item A will not bring insurmountable/unacceptable landscape, air ventilation, traffic, drainage, sewerage, environmental and geotechnical impacts; and
- Amendment Item A is in-line with the Town Planning Board's decision.

5.1.2 The Representer kindly request the TPB to complete the hearing procedures for all representations to enable the approved redevelopment of the Representation Site without delay.

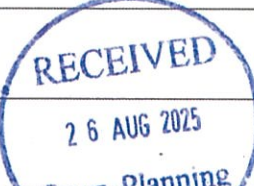
Representation Number:

TPB/R/S/H5/32 -R2

Submission Number:

TPB/R/S/H5/32 -S024

Form No. S6 表格第 S6 號

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

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

1. Person Making this Representation (known as "Representer" hereafter)
提出此宗申述的人士（下稱「申述人」）

Full Name 姓名 / 名稱 (Mr./Ms./Company/Organization* 先生/女士/公司/機構*)

Yuba Company Limited

(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)
(注意：若個人提交，須填上與香港身份證／護照所載的全名)

2. Authorized Agent (if applicable) 獲授權代理人(如適用)

Full Name 姓名 / 名稱 (Mr./Ms./Company/Organization* 先生/女士/公司/機構*)

Townland Consultants Limited

(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)
(注意：若個人提交，須填上與香港身份證／護照所載的全名)

* Delete as appropriate 請刪去不適用者

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

3. Details of the Representation (use separate sheet if necessary)[#] 申述詳情(如有需要, 請另頁說明)[#]		
The plan to which the representation relates (please specify the name and number of the plan) 與申述相關的圖則 (請註明圖則名稱及編號)		Draft Wan Chai Outline Zoning Plan No. S/H5/32
Nature of and reasons for the representation 申述的性質及理由		
Subject matters 有關事項 [@]	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由 [^]
Amendment Items B1 and B2	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	Please see attached letter.
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the plan? If yes, please specify the details. 對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。		
Please see attached letter.		

[#] If the representation contains more than 20 pages, or any page larger than A4 size, 4 hard copies and 1 soft copy are required to be provided for the submission. Provision of email address is also required.

若申述超過 20 頁或有任何一頁大小超過 A4, 則須提交硬複本一式四份和一份軟複本。另須提供電郵地址。

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

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

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

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



TOWNLAND CONSULTANTS LTD.

URBAN AND REGIONAL PLANNING DEVELOPMENT CONSULTANCY MASTER PLANNING URBAN DESIGN ARCHITECTURE
LANDSCAPE ARCHITECTURE PROJECT MANAGEMENT AND SOCIAL DEVELOPMENT

Reference: KRSS/5/DEL/42

Date: 26 August 2025

The Secretary, Town Planning Board
c/o Planning Department
15/F North Point Government Offices
333 Java Road, North Point, HONG KONG

Dear Sir / Madam,

**SECTION 6(1) REPRESENTATION
TOWN PLANNING ORDINANCE (CHAPTER 131)**

**REPRESENTATION TO AMENDMENT ITEMS B1 and B2 OF
THE DRAFT WAN CHAI OUTLINE ZONING PLAN NO. S/H5/32**

We are instructed by Yuba Company Limited (the "**Representer**"), who is a subsidiary of Hopewell Holdings Limited ("**Hopewell**"), to submit this Representation to Amendment Items B1 and B2 of Draft Wan Chai Outline Zoning Plan No. S/H5/32 ("**Draft OZP**") under Section 6(1) of the Town Planning Ordinance (the "**TPO**" / "**Ordinance**").

Background on the Amendment Items B1 and B2

The Draft OZP takes forward the Town Planning Board ("**TPB**" / "**BOARD**")'s decision on the Section 12A Planning Application No. Y/H5/8 ("**S12A Planning Application**"), submitted by the Representer, to rezone a site at Nos. 1, 1A, 2 and 3 Hillside Terrace ("**HST**"), No. 55 Ship Street [a.k.a. Nam Koo Terrace ("**NKT**")], Nos. 1-5 Schooner Street, No. 53 Ship Street, No. 18 Sau Wa Fong, Inland Lot 9048 ("**IL 9048**") and adjoining Government Land, Wan Chai (collectively, the "**Representation Site**") from "Comprehensive Development Area" ("**CDA**"), "Residential (Group C)" ("**R(C)**") and an area shown as 'Road' to "Other Specified Uses (Residential Development with Historical Building Preserved)" ("**OU(RDHBP)**") with stipulation of building height ("**BH**") restrictions and designation of land at the northern corner as non-building area (**Amendment Item B1**) and to rezone a strip of government land on the stairs of Ship Street from "Open Space" ("**O**") to "OU(Elevated Walkway)" ("**OU(EW)**") (**Amendment Item B2**).

Under Amendment Items B1 and B2, the Representer will be able to take forth a comprehensive redevelopment proposal that addresses the planning blight for the Representation Site and revitalises NKT, a privately-owned Grade 1 historical building for public's appreciation. The removal of plot ratio ("**PR**") restriction and stipulation of appropriate BH restrictions would enable the Representer to fully optimise the scarce land resource in the urban area for substantial quality housing supply. The community would also be benefited from the implementation of Open Space and a series of pedestrian connection enhancement measures.

MAIN HONG KONG OFFICE

2801, 28th Floor, 148 Electric Road, North Point, Hong Kong
Telephone : (852) 2521 2911 Facsimile : (852) 2521 6631
E-mail address : tcld@townland.com Website : www.townland.com

CHINA OFFICE

Room 1111, Building 1, Yagang Industry and Trade Building, No. 18 Fuan Avenue,
Heshua Community, Pinghu Street, Longgang District, Shenzhen, P.R.C. Postal Code 518111
Telephone : (86) 181 2417 9366
E-mail address : tcld@townland.com

INDIA OFFICE

Coworking Space Ministry of New, 3rd Floor, Kitab Mahal,
192 Dr Dadabhai Naoroji Road, Azad Maidan, Fort, Mumbai, India
Telephone : (91) 9819919804
E-mail address : tcpl@townland.com

INDONESIA OFFICE

Gedung Menara Anugrah, Lantai 21
Kantor Taman E 3.3, Jl. DR. Ide Anak Agung Gde Agung Lot 8.6.8.7
Kawasan Mega Kuningan, Jakarta Selatan 12950, Indonesia
Telephone : (62 21) 2941 0621
E-mail address : tcjkt@townland.com

ASSOCIATED COMPANIES

TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)

TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)

TOWNLAND CONSULTANTS PVT. LIMITED (India)

PT TOWNLAND INTERNATIONAL (Indonesia)

HOWARD & SEDDON PARTNERSHIP (United Kingdom)



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Reference: KRSS/5/DEL/42
Date: 26 August 2025

The Secretary, Town Planning Board

The Representer wishes to reaffirm their SUPPORT to Amendment Items B1 and B2 based on the justifications as set out below:

Appropriate Zoning to Facilitate Urban Renewal

The "OU(RDHBP)" zone under Amendment Item B1 allows development within the zone to attain the maximum development intensity permitted under Building (Planning) Regulation ("B(P)R") as well as facilitate urban renewal. Under the previous "CDA" and "R(C)" zone, the BH and PR restrictions were considered overly restrictive leading to the underutilisation of scarce land resources in urban areas. Located in proximity to the core of Hong Kong Island, the Representation Site is well-connected to the Wan Chai MTR station and other modes of public transport. Under the concept of high-density compact city, it is imperative to capitalise on the proximity to the railway stations for high density residential development which aligns with the Government's objectives for transport-oriented development and green mobility. The Representation Site presents a rare opportunity in the urban area of Hong Kong Island for a sizeable residential development which is considered inefficient to develop under the maximum PR of 5. Moreover, apart from uplifting the PR restriction enabling the Representer to maximise the development potential at the Representation Site, the Representer will continue to be responsible for the restoration costs required to renovate NKT and expedite the conservation works to facilitate urban renewal.

In Line with Government Policy Initiatives

The Proposed "OU(RDHBP)" zone allows for a substantial increase in domestic gross floor area ("GFA") which addresses Hong Kong's acute shortage of housing through delivering rare new housing supply in the core business district. This also aligns with the Government's objectives to promote living and working in the same district and bringing jobs closer to homes and helps address the imbalanced spatial distribution of homes and jobs.

In addition to enhancing housing supply in the urban area, the Representer also aspires to improve the quality of housing by providing larger home space and expanding the range of housing options to relieve public concerns arising from the inadequate living space per person with nano flats became prevalent in the past decade. This echoes with the Government's policy objectives and assumptions in promoting child-raising, family-building and "ageing in place" and attracting talents.

Ensuring Compatibility with the Surrounding Environment through Proper Development Controls

In comparison with the existing "CDA" zone at part of the Representation Site, the "OU(RDHBP)" zone will no longer require the submission of a Master Layout Plan ("MLP") which could greatly expedite the development process. Whilst it appears that TPB's subsequent control over the development under the MLP submission is no longer exercised, the Proposed "OU(RDHBP)" zone incorporates various development controls. These include separate BH restrictions, imposition of setbacks and non-building area ("NBA"), specific schedule of uses for NKT and inclusion of remarks to safeguard the intention of conserving the NKT and provision of multi-level Open Space open to public. All these measures ensure the scale and design of the development are harmonious with the local character, as well as, to preserve the NKT - the Grade 1 historic building. In particular, the proposed BH restrictions will highly constrain the disposition and layout of the residential tower ensuring the design merits can be realised. Additional restriction is also imposed to safeguard the developments within the Proposed "OU(RDHBP)" zone and are developed in a

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comprehensive manner by requiring planning approval for any piecemeal development and / or redevelopment on part of the land within the zone. As demonstrated in the Visual Impact Assessment ("VIA") and Urban Design Proposal ("UDP") submitted as part of the Partially Agreed S12A Planning Application, high-density residential development is not considered incompatible with the planning intention to preserve the local character.

Furthermore, the "OU(EW)" zone under Amendment B2 also reflect the Representer's intention to enhance the connectivity within the area through the construction of an elevated walkway over the Ship Street steps to interconnect the multi-level local open space system with the Ship Street Garden and Hopewell Garden at different level creating a sense of place.

Conserving NKT in a Sustainable Manner

The Proposed "OU(RDHBP)" zone incorporates relevant clause to protect NKT by requiring planning permission to demolish, add, alter or modify (except minor alteration and/ or modification works) or redevelop the existing historic building. While the grading boundary does not include the associated architectural features (i.e. the pavilion, water fountain and hexagonal planter), the Representer has indicated at the Metro Planning Committee meeting on 10 January 2025 their commitment to revisit the preservation or relocation of the associated architectural features. In this regard, a statement has been incorporated in the Explanatory Statement ("ES") attached to the Draft OZP to reflect the intention of the Representer to preserve those associated architectural features as far as practical. Currently, the Representer is actively exploring the relocation option within the Site with Antiquities and Monuments Office ("AMO"). The Representer wishes to highlight that the Commissioner of Heritage Office ("CHO") has previously given support to the Representer's intention for the in-situ preservation of NKT which is privately owned, while AMO have indicated their support to the relaxation of PR for the preservation of NKT as an economic incentive. Although there is no PR restriction under the Draft OZP, a relaxation of the PR for the preservation of NKT under B(P)R will be submitted by the Representer to Buildings Department ("BD") at the building plans submission stage.

On the other hand, the Representer supports the Proposed "OU(RDHBP)" zone which allows flexibility in accommodating certain types of non-domestic uses as Column 1 uses. While the objectives of preservation of NKT is for adaptive reuse of the interior floor space and to make available for public appreciation, the Representer wishes to emphasise that it is equally important to ensure the conservation project is financially self-sustainable in the long term. Therefore, commercial elements within the historical building are proposed to generate incomes to sustain the maintenance and management of NKT. It is also the Representer's intention to minimise the reliance on Government subsidy in conserving NKT by proposing the commercial elements (e.g. Eating Place and Event Rental etc). All proceeds will be used exclusively for the upkeep of NKT and associated expenses, including utilities, landscaping, Government rates and property tax and other related costs. To this end, the Representer intends to set a self-financing model that integrates appropriate commercial uses while preserving the building's cultural integrity. A dedicated non-profit-making organisation named NKT Foundation Limited (to be formed and managed by the subsidiary company of the Hopewell) to manage NKT and oversee its daily operations. The subsidiary company will assume full responsibility for the initial capital outlay and restoration costs, underscoring its commitment to the conservation and revitalisation of this heritage landmark. Additionally, in the event that the income generated from the commercial elements in NKT is insufficient to cover the operation and maintenance expenses, the Representer has no alternative but to stipulate under the Deed of Mutual Covenant ("DMC") that individual owners of the residential portion of the comprehensive development shall be responsible for the shortfall to ensure the operation and maintenance of NKT will be sustained. This mirrors

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established practices in Hong Kong, where private lot owners are typically responsible for maintaining adjacent slopes and retaining structures, in addition to their own apartment. For example, the development at No. 80 Robinson Road, Mid-Level West ("**80RR**") include the London Mission Building ("**LMB**") (Grade 2 Historic Building). Under the DMC of 80RR, the owners of the residential units shall at their own expenses conserve, maintain and keep in good condition and repair the LMB to the satisfaction of the Secretary for Broadcasting, Culture and Sport (formerly known as Secretary for Recreation and Culture) or the TPB. The cost and expenses of which is included in management expenses.

Harmonious with the Character of the Locality

The Sau Wa Fong area is an enclosed and tranquil terraced residential area. The proposed NBA at the northern corner of the Representation Site connecting the Sau Wa Fong area and Schooner Street with a 24-hour public passageway for public convenience and removing the unpleasant and narrow right of way ("**ROW**"). Both the provision of minimum 3m setback from the lot boundary and open space open 24-hour to the public at street level of Schooner Street will help enhance the pedestrian environment and circulation to improve their journey in the locality. The existing character of Sau Wa Fong is therefore respected by enhancing passive surveillance amid the quiet neighbourhood.

No Adverse Infrastructural and Traffic Impacts

Under the Partially Agreed S12A Planning Application, the Representer has prepared a series of technical assessments for the Comprehensive Residential Redevelopment, including Traffic Impact Assessment ("**TIA**"), Sewage Impact Assessment ("**SIA**"), Drainage Impact Assessment ("**DIA**"), Air Ventilation Assessment ("**AVA**"), Visual Impact Assessment ("**VIA**"), Environmental Assessment ("**EA**") and Geotechnical Planning Review Report ("**GPRR**"). No adverse impacts were identified in the technical assessments. In particular, the Representer understands that the community has concern on the potential traffic impact to St Francis' Street affecting the local residents and students. The Representer wishes to clarify that the net increase in number of units is only about 57 as a larger unit size has been put forth with. As a result, the cumulative traffic impact is not unacceptable and no in-principle objection was obtained from Transport Department ("**TD**") during the S12A Planning Application. The TIA has comprehensively assessed both the vehicular and pedestrian traffic flows and concluded that generated traffic would not induce any adverse impact to the local road and footpath networks. The TIA also assessed the potential impact arising from on-street loading/ unloading activities. With the opening of Hopewell Hotel, it will further support and assists the loading/ unloading activities by the Comprehensive Residential Redevelopment to be carried within Hopewell Hotel, thus loading / unloading demand on public roads will be minimised.

Representer's Track Record

Hopewell, the Parent Company of the Representer, is a highly committed and dedicated Property Developer in the Wan Chai area. As a pioneer in private sector urban renewal in Wan Chai South, they have successfully completed various redevelopment projects that are of major significance to the image of the district. Other than their urban renewal efforts, Hopewell has substantial contributions to heritage preservation and also committed to improve and enhance the quality of the Public Realm in Wan Chai South through implementation of open spaces and improvements to the pedestrian environment (see Hopewell's track record in **Attachment 1**).

Reference: KRSS/5/DEL/42
Date: 26 August 2025

The Secretary, Town Planning Board

Hopewell has demonstrated a genuine intention to develop the Representation Site in a comprehensive manner and to revitalise NKT. Although for years, Hopewell have held their rights to develop the individual lots within the Representation Site since their acquisition and possession, they had the vision to develop the sites in a holistic approach. The demolition of NKT was approved as part of the Hopewell Centre II ("HCII") development in the early 1990s, Hopewell acted in good-faith and consulted with the local community and the Government and ultimately decided to preserve the historic building. Hopewell's track record is backed by the support from the local community, including their immediate neighbours - St. Francis Canossian College and St. Francis Canossian School who have provided written support to the Proposed Redevelopment at NKT. Their support letters are attached in **Attachment 2**.

Conclusion

Hopewell's intention is to preserve NKT while improving the local environment through a series of public planning gains including the implementation of open spaces at various levels; provision of more convenient, user-friendly and barrier-free pedestrian systems that can be realised through the Proposed "OU(RDHBP)" and "OU(EW)" zones. Hopewell is sincere in its efforts to revitalise Wan Chai South for Hong Kong as proven by its achievements over the past decades. Their contributions to extend their revitalisation initiatives to the Representation Site, including the preservation of NKT, should be supported.

Other than the efforts to preserve NKT and to provide public planning gains within the Representation Site, the Representers have put genuine efforts in enhancing the living quality of Wan Chai South including the pedestrian connectivity, implementation of Hopewell Garden, revamp and upgrade the Ship Street Playground, improvement works to nearby road and the public stormwater drain serving the area to the south of Kennedy Road, provision of facilities for nearby schools and support of the local charity and community initiatives etc. Hopewell has an established track record of contributing to the community and respectfully appeals to the Board / public to acknowledge and recognise these efforts.

We shall be grateful if the TPB note our representation and continue to give SUPPORT to Amendment Items B1 and B2. Should there be any queries, please do not hesitate to contact the undersigned or Mr Eric Chan.

Yours faithfully,
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED


Delius Wong
Associate / Project & Quality Manager

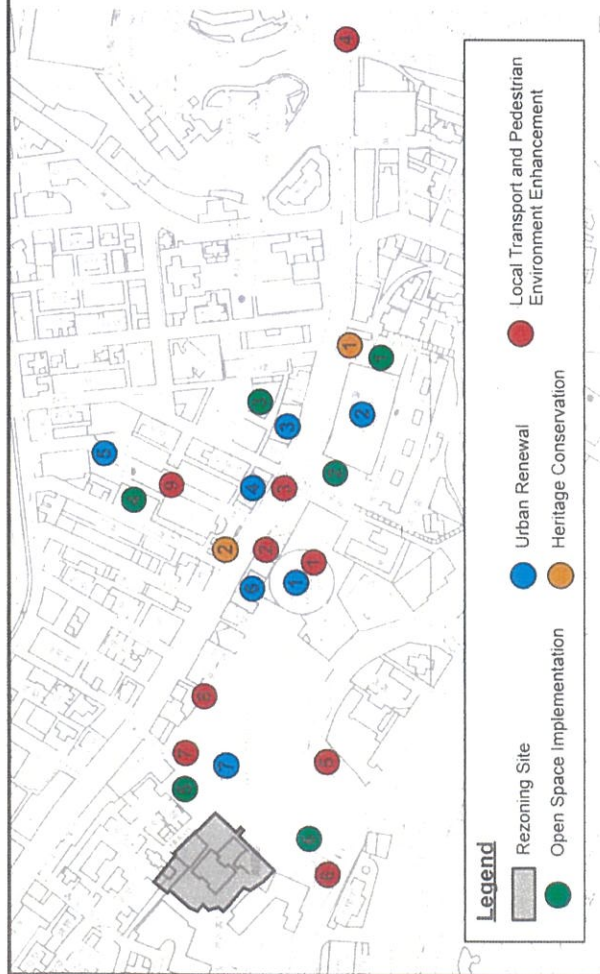
DEL/EC

Enc Attachment 1 – Hopewell's Track Record
Attachment 2 – Support Letters from St. Francis Canossian College and St. Francis Canossian School

cc Client

Attachment 1

HOPEWELL'S TRACK RECORD



1. Sitting-out area at Wu Chung House (Yen Wa Steps)



2. Sitting-out area at Wu Chung House (Spring Garden Lane)



3. Sitting-out area at GARDENEast



4. Public Open Space at The Avenue abutting Amoy Street



5. Ship Street Garden



6. Hopewell Park



1. Old Wan Chai Post Office



2. Historical tenement houses at The Avenue



1. Lifts at Hopewell Centre opening to the public



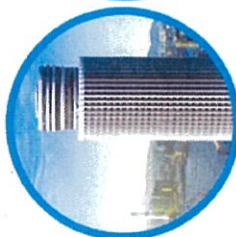
2. Lay-bys at Hopewell Centre and 163 QRE



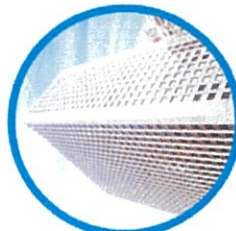
3. Elevated Walkway between Hopewell Centre and QRE Plaza



4. Junction Improvement Works at Kennedy Road / Queen's Road East (Construction of footbridge included)



1. Hopewell Centre



2. Wu Chung House



3. GARDENEast



4. QRE Plaza



5. Road widening and continuous pavement on both sides of Kennedy Road



6. Modification of Ship Street steps to Highways Department's Standard



7. Public lift at Ship Street Garden



8. Beautification of QRE Backlane



9. Walking Street at The Avenue



5. The Avenue



6. 163 QRE



7. Hopewell Hotel

Attachment 2

SUPPORTING LETTERS FROM ST. FRANCIS
CANOSSIAN COLLEGE AND ST. FRANCIS
CANOSSIAN SCHOOL

ST. FRANCIS' CANOSSIAN COLLEGE

9-13, Kennedy Road, Wanchai
Hong Kong
Tel: 2587 2700
Fax: 2529 1758
Email: office@sfcc.edu.hk



1869

嘉 諾 撒 聖 方 濟 各 書 院

香港灣仔堅尼地道九至十三號

電話: 二五八七二七〇〇

傳真: 二五二九一七五八

電郵地址: office@sfcc.edu.hk

14 July 2025

Town Planning Board
15th Floor, North Point Government Offices
333 Java Road, North Point, Hong Kong

Dear Sir / Madam,

Support for the Redevelopment of Nam Koo Terrace
(Amendment Item B1)

On behalf of St. Francis' Canossian College, I would like to express our sincere appreciation for Hopewell Holdings' continued efforts in enhancing the urban environment of Wan Chai South. We are particularly pleased with the significant improvements made to the pedestrian environment along Kennedy Road, as well as the newly established connection between Kennedy Road and Queen's Road East via the Hopewell Hotel and the Park at Ship Street. These enhancements have greatly benefited our staff, parents and students, complementing the long-standing arrangement that allows us to use the lifts at Hopewell Centre.

We understand that Hopewell intends to redevelop Nam Koo Terrace and the adjacent lands. As always, the safety and well-being of our students remain our top priority. We trust that Hopewell will continue to uphold high standards of site management to ensure the safety of pedestrians and to minimise any potential impact on our school during the construction period.

We also recognise that the proposed redevelopment presents a valuable opportunity to improve the surrounding environment, particularly in the areas of Ship Street and Schooner Street. Our school premises interface with Government-owned slopes that are currently overgrown and poorly maintained. These conditions have unfortunately contributed to mosquito breeding and have negatively affected the health and comfort of our school community. We believe that Hopewell's latest development proposal for Nam Koo Terrace will help address these issues by enhancing environmental hygiene and improving accessibility around Schooner Street and Sau Wa Fong. The proposed improvements will also provide our students with a safer and more convenient route to nearby areas, especially towards Admiralty.

We are grateful for Hopewell's ongoing commitment to revitalising Wan Chai South and, in view of the benefits to our school community, we express our general support for the proposed redevelopment of Nam Koo Terrace.

Yours sincerely,

Kenneth Law
Principal



嘉諾撒聖方濟各學校

香港灣仔聖佛蘭士街 42 & 44 號

電話：2528 1763 傳真：2865 7681

電郵地址：sfcs@sfcs.edu.hk



ST. FRANCIS' CANOSSIAN SCHOOL

42 & 44 ST. FRANCIS STREET, WANCHAI, HK

Tel : 2528 1763 Fax : 2865 7681

Email address : sfcs@sfcs.edu.hk

16th July, 2025

Town Planning Board

15th Floor, North Point Government Offices

333 Java Road, North Point, Hong Kong

Dear Sir / Madam,

Support for the Redevelopment of Nam Koo Terrace
(Amendment Item B1)

We understand that Nam Koo Terrace and the surrounding area will be redeveloped for a Proposed Comprehensive Development by Hopewell Holdings. We appreciate Hopewell's ongoing consultation with our school regarding the Redevelopment.

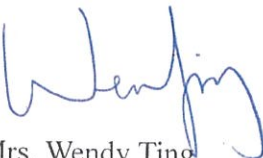
We are pleased to learn of the thoughtful design features included in the proposal, particularly the widening of Schooner Street and the removal of the narrow alley adjacent to No. 18 Sau Wa Fong to introduce new amenity features. The planned construction of a covered staircase within the Site to connect Schooner Street and our School is especially welcomed. These enhancements will significantly improve the pedestrian environment and ensure greater safety and convenience for our students and staff. The improved connectivity to both Admiralty and Wan Chai MTR Stations will also be of great benefit to our school community.

We would also like to highlight the long-standing environmental concerns posed by the government slopes along our eastern boundary. The overgrown vegetation has become a breeding ground for mosquitoes, posing health risks to our students. We are encouraged to see that Hopewell's proposal includes the removal of these vegetations and the introduction of new and well-maintained platform. This will greatly enhance the hygiene and overall environment of the area.

Importantly, we appreciate that the project will preserve the Nam Koo Terrace in-situ, reviving its cultural and historic significance. This thoughtful approach will provide our students with a valuable opportunity to engage with and appreciate Chinese heritage and traditional values.

We are grateful for Hopewell's efforts in engaging with our school and sharing their plans. We offer our support for the redevelopment proposal in principle and look forward to the positive contributions it will bring to the community.

Yours Sincerely,
For and on behalf of
St. Francis' Canossian School


Mrs. Wendy Ting
Principal



ST. FRANCIS' CANOSSIAN COLLEGE

9-13, Kennedy Road, Wanchai
Hong Kong
Tel: 2587 2700
Fax: 2529 1758
Email: office@sfcc.edu.hk



1869

嘉 諾 撒 聖 方 濟 各 書 院

香港灣仔堅尼地道九至十三號

電話: 二五八七二七〇〇

傳真: 二五二九一七五八

電郵地址: office@sfcc.edu.hk

Representation Number:

TPB/R/S/H5/32 -R3

Submission Number:

TPB/R/S/H5/32 -S002

14 July 2025

Town Planning Board
15th Floor, North Point Government Offices
333 Java Road, North Point, Hong Kong

Dear Sir / Madam,

Support for the Redevelopment of Nam Koo Terrace
(Amendment Item B1)

On behalf of St. Francis' Canossian College, I would like to express our sincere appreciation for Hopewell Holdings' continued efforts in enhancing the urban environment of Wan Chai South. We are particularly pleased with the significant improvements made to the pedestrian environment along Kennedy Road, as well as the newly established connection between Kennedy Road and Queen's Road East via the Hopewell Hotel and the Park at Ship Street. These enhancements have greatly benefited our staff, parents and students, complementing the long-standing arrangement that allows us to use the lifts at Hopewell Centre.

We understand that Hopewell intends to redevelop Nam Koo Terrace and the adjacent lands. As always, the safety and well-being of our students remain our top priority. We trust that Hopewell will continue to uphold high standards of site management to ensure the safety of pedestrians and to minimise any potential impact on our school during the construction period.

We also recognise that the proposed redevelopment presents a valuable opportunity to improve the surrounding environment, particularly in the areas of Ship Street and Schooner Street. Our school premises interface with Government-owned slopes that are currently overgrown and poorly maintained. These conditions have unfortunately contributed to mosquito breeding and have negatively affected the health and comfort of our school community. We believe that Hopewell's latest development proposal for Nam Koo Terrace will help address these issues by enhancing environmental hygiene and improving accessibility around Schooner Street and Sau Wa Fong. The proposed improvements will also provide our students with a safer and more convenient route to nearby areas, especially towards Admiralty.

We are grateful for Hopewell's ongoing commitment to revitalising Wan Chai South and, in view of the benefits to our school community, we express our general support for the proposed redevelopment of Nam Koo Terrace.

Yours sincerely,

Kenneth Law
Principal



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電郵地址: office@sfcc.edu.hk

14 July 2025

Town Planning Board
15th Floor, North Point Government Offices
333 Java Road, North Point, Hong Kong

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Support for the Redevelopment of Nam Koo Terrace
(Amendment Item B1)

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Yours sincerely,

Kenneth Law
Principal



(LAW KAN CHUNG, KENNETH. [REDACTED])

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 250827-084630-70242

Submission Number:
TPB/R/S/H5/32 -S032

提交限期
Deadline for submission: 27/08/2025

Representation Number:
TPB/R/S/H5/32 -R4

提交日期及時間
Date and time of submission: 27/08/2025 08:46:30

「申述人」全名
Full Name of "Representer": 先生 Mr. CHU HING MAN LEO

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

與申述相關的圖則
Plan to which the representation relates: S/H5/32

申述詳情
Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
B1 項 - 船街 55 號 (南固臺)	支持 Support	保存歷史建築物

對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。

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

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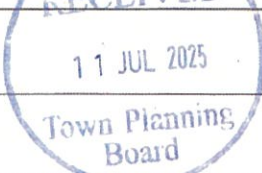
Representation Number:

TPB/R/S/H5/32 -R5

Submission Number:

TPB/R/S/H5/32 -S001

Form No. S6 表格第S6號

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

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

1. Person Making this Representation (known as "Representer" hereafter)

提出此宗申述的人士(下稱「申述人」)

Full Name 姓名 / 名稱 (Mr./Ms./Company/Organization* 先生/女士/公司/機構*)

Luk Kee Yan Kelvin

(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)
(注意: 若個人提交, 須填上與香港身份證/護照所載的全名)

2. Authorized Agent (if applicable) 獲授權代理人(如適用)

Full Name 姓名 / 名稱 (Mr./ Ms./Company/Organization* 先生/女士/公司/機構*)

(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided)
(注意: 若個人提交, 須填上與香港身份證/護照所載的全名)

* Delete as appropriate 請刪去不適用者

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

3. Details of the Representation (use separate sheet if necessary)[#]		
申述詳情(如有需要，請另頁說明)[#]		
The plan to which the representation relates (please specify the name and number of the plan) 與申述相關的圖則 (請註明圖則名稱及編號)		S-45-32 plan
Nature of and reasons for the representation 申述的性質及理由		
Subject matters 有關事項 [@]	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由 [^]
	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the plan? If yes, please specify the details. 對圖則是否有任何擬議修訂? 如有的話，請註明詳情。		

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

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

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

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

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

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

Representation Number:
TPB/R/S/H5/32 -R6

From:

Sent:

To:

Subject:

Attachment:

2025-08-26 星期二 14:58:05

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

反對 S/H5/32 項目申述書

LCT-2508-BL017_反對 S/H5/32 項目申述書.pdf

Submission Number:

TPB/R/S/H5/32 -S023

城市規劃委員會秘書

敬啟者：

反對 S/H5/32 項目申述書

我們就《灣仔分區計劃大綱草圖編號 S/H5/32》修訂項目提出反對，認為相關規修訂未能充分考慮區域內之**通用設計和無障礙需求**，並要求重新考慮相關決定。

發展商申請就秀華坊 31 至 36 號及聖佛蘭士街 8 至 12 號的項目，地積比由 5 倍增加至 9 倍，興建包括一座 28 層住宅大廈，預計住戶數將以倍數增長，增至 216 戶。

然而，現場勘察發現聖佛蘭士街行人路相當狹窄，僅容 1-2 人並行，更有行人路中斷現象。加上參考現有資料，聖佛蘭士街現有坡度達 1:6，有肉眼可見之危險，對輪椅使用者構成絕對障礙，更對使用助行器、持拐杖的長者、推嬰兒車的家長、以及孕婦等構成實質困難和危險。在濕滑天氣下，即使健全人士亦面臨跌倒風險，更何況是以上有需要人士。站在他們的角度，我們相當憂慮聖佛蘭士街的**結構性障礙**。參考香港房屋協會指引，建築物入口的斜度不應大於 1:12、世界衛生組織亦有明確提出無障礙坡道最大縱坡度為 1:12。

此項目長遠而言，隨著住戶數量以倍數增加，無可避免有長者、孕婦、輪椅使用者等特殊需要人士入住。現有道路之狹窄和斜度對有關人士極不友善，甚至迫使他們「借用」車道通行，存在明顯安全隱患。

聯合國《殘疾人權利公約》自 2008 年起，在中華人民共和國生效（包括香港特別行政區）。在香港的城市規劃及公共建設中，理應融合**無障礙**概念、確保設計滿足**通用設計**要求，應讓所有人都能**安全、平等、獨立**地使用資源。在聖佛蘭士街如此地理條件下進行該項目發展明顯違背此承諾，忽視特殊需要人士。項目設計違反「**通用設計**」原則，造成社會矛盾及資源浪費。

項目實質上反映了一種社會削權現象，根據聯合國《新城市議程》，殘疾或特殊需要人士，應於「**城市權**」中被考慮，以確保規劃符合**通用設計**，邁向無障礙的平等城市。現時項目未有充分考慮輪椅使用者、長者、孕婦等群體的需要時，實際上剝奪了他們平等參與城市生活的權利。


再參考香港《殘疾歧視條例》第 84 條，建築事務監督在批准有關建築圖則時，有責任確保除非會為殘疾人士提供合理的通道，這項法定要求不僅適用於個別建築物，更應在規劃階段予以考慮。作為負責香港整體規劃的政府部門，有關當局在城市重建和新發展項目中**責無旁貸**；我們認為，發展不應僅僅追求土地或經濟效益最大化，更應評估項目發展對社會持份者及一眾

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弱勢群體的影響，確保城市發展不會加劇社會排斥、威脅可持續發展；以承擔起保障市民、創建包容性城市的社會責任。

如上述所言，S/H5/32 之修訂項目有相當不足之處，我們反對此項目。

狄志遠立法會議員辦事處

（代表）彭意婷女士 

二零二五年八月二十六日





狄志遠立法會議員辦事處
Office of Dr. Tik Chi Yuen,
Legislative Councillor



本處檔案編號：LCT-2508-BL017

貴處檔案編號：

電郵：tpbpd@pland.gov.hk

城市規劃委員會秘書

敬啟者：

反對 S/H5/32 項目申述書

我們就《灣仔分區計劃大綱草圖編號 S/H5/32》修訂項目提出反對，認為相關規
修訂未能充分考慮區域內之**通用設計和無障礙需求**，並要求重新考慮相關決定。

發展商申請就秀華坊 31 至 36 號及聖佛蘭士街 8 至 12 號的項目，地積比由 5 倍
增加至 9 倍，興建包括一座 28 層住宅大廈，預計住戶數將以倍數增長，增至 216
戶。

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中斷現象。加上參考現有資料，聖佛蘭士街現有坡度達 1:6，有肉眼可見之危險，對輪
椅使用者構成絕對障礙，更對使用助行器、持拐杖的長者、推嬰兒車的家長、以及孕
婦等構成實質困難和危險。在濕滑天氣下，即使健全人士亦面臨跌倒風險，更何況是
以上有需要人士。站在他們的角度，我們相當憂慮聖佛蘭士街的**結構性障礙**。參考香
港房屋協會指引，建築物入口的斜度不應大於 1:12，世界衛生組織亦有明確提出無障
礙坡道最大縱坡度為 1:12。

此項目長遠而言，隨著住戶數量以倍數增加，無可避免有長者、孕婦、輪椅使用
者等**特殊需要人士**入住。現有道路之**狹窄和斜度**對有關人士**極不友善**，甚至迫使他們
「借用」車道通行，存在明顯安全隱患。

聯合國《殘疾人權利公約》自 2008 年起，在中華人民共和國生效（包括香港特
別行政區）。在香港的城市規劃及公共建設中，理應融合**無障礙**概念、確保設計滿足**通
用設計**要求，應讓所有人都能**安全、平等、獨立**地使用資源。在聖佛蘭士街如此地理
條件下進行該項目發展明顯違背此承諾，忽視特殊需要人士。項目設計違反「**通用設
計**」原則，造成社會矛盾及資源浪費。

項目實質上反映了一種**社會削權**現象，根據聯合國《新城市議程》，殘疾或特殊
需要人士，應於「**城市權**」中被考慮，以確保規劃符合**通用設計**，邁向無障礙的平等
城市。現時項目未有充分考慮輪椅使用者、長者、孕婦等群體的需要時，實際上剝奪
了他們平等參與城市生活的權利。

+852 6660-4080

2152-0848

legco@ts.org.hk

狄志遠

立法會辦事處

香港中區立法會道1號立法會綜合大樓13樓1319室

Room 1319, 13/F, Legislative Council Complex, 1 Legislative Council Road, Central, Hong Kong

將軍澳辦事處

香港新界西貢寶琳北路38號將軍澳景林邨景林樓地下2A室

2A, G/F, King Lui House, King Lam Estate, 38 Po Lam Road North, Tseung Kwan O, Sai Kung, New Territories, Hong Kong

九龍辦事處(通訊地址)Correspondence Address)

香港九龍彌敦道574-576號和富商業大廈11樓1102A

1102A, 11/F, Wofoo Commercial Building, 574-576 Nathan Road, Kowloon, Hong Kong



狄志遠立法會議員辦事處
Office of Dr. Tik Chi Yuen,
Legislative Councillor



再參考香港《殘疾歧視條例》第 84 條，建築事務監督在批准有關建築圖則時，有責任確保除非會為殘疾人士提供合理的通道，這項法定要求不僅適用於個別建築物，更應在規劃階段予以考慮。作為負責香港整體規劃的政府部門，有關當局在城市重建和新發展項目中責無旁貸；我們認為，發展不應僅僅追求土地或經濟效益最大化，更應評估項目發展對社會持份者及一眾弱勢群體的影響，確保城市發展不會加劇社會排斥、威脅可持續發展；以承擔起保障市民、創建包容性城市的社會責任。

如上述所言，S/H5/32 之修訂項目有相當不足之處，我們反對此項目。

狄志遠立法會議員辦事處

(代表) 彭意婷女士

二零二五年八月二十六日

+852 6660-4080

2152-0848

legco@ts.org.hk

狄志遠

立法會辦事處

香港中區立法會道1號立法會綜合大樓13樓1319室
Room 1319, 13/F, Legislative Council Complex, 1 Legislative Council Road, Central, Hong Kong

將軍澳辦事處

香港新界西貢寶琳北路38號將軍澳景林邨景楓樓地下2A室
2A, G/F, King Lui House, King Lam Estate, 38 Po Lam Road North, Tseung Kwan O, Sai Kung, New Territories, Hong Kong

九龍辦事處(通訊地址)Correspondence Address)

香港九龍彌敦道574-576號和富商業大廈11樓1102A
1102A, 11/F, Wofoo Commercial Building, 574-576 Nathan Road, Kowloon, Hong Kong

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

參考編號
Reference Number: 250826-170443-54303

Representation Number:

TPB/R/S/H5/32 -R7

提交限期
Deadline for submission: 27/08/2025

Submission Number:

TPB/R/S/H5/32 -S030

提交日期及時間
Date and time of submission: 26/08/2025 17:04:43

「申述人」全名
Full Name of "Representer": 先生 Mr. Ho Wai Leung

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

與申述相關的圖則
Plan to which the representation relates: S/H5/32

申述詳情
Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
第A項 - 把位於秀華坊31至36號及聖佛蘭士街8至12號的一幅用地由「住宅(甲類)」地帶、「住宅(丙類)」地帶及顯示為「道路」的地方改劃為「住宅(甲類)9」地帶，並指定秀華坊31至36號為支區(a)和聖佛蘭士街8至12號為支區(b)，以及用地的東北部作非建築用地。	反對 Oppose	St Francis Street is a one way sloop with single way traffic up to Star Street which has a school and several residential building with dense population. Changing the residential density and usage will further increase the danger of the road and the travel condition will get worse. Queen's Road is already very jammed when cars are awaiting to turn into st francis road.

對圖則是否有任何擬議修訂? 如有的話，請註明詳情。

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

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

參考編號

Reference Number:

250826-165548-65330

Submission Number:

TPB/R/S/H5/32-S031

提交限期

Deadline for submission:

27/08/2025

Representation Number:

TPB/R/S/H5/32-R8

提交日期及時間

Date and time of submission:

26/08/2025 16:55:48

「申述人」全名

Full Name of "Representer":

先生 Mr. Kwok King Yiu

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates: S/H5/32

申述詳情

Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
第A項 - 把位於秀華坊31至36號及聖佛蘭士街8至12號的一幅用地由「住宅(甲類)」地帶、「住宅(丙類)」地帶及顯示為「道路」的地方改劃為「住宅(甲類)9」地帶, 並指定秀華坊31至36號為支區(a)和聖佛蘭士街8至12號為支區(b), 以及用地的東北部作非建築用地。	反對 Oppose	The area is a steep slop with narrow footpath and one way car road. Increasing the residential density with further increase the danger of the pedestrian using the footpath.

對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。

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

--

就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 250826-184957-81802

Representation Number:
TPB/R/S/H5/32 -R9

提交限期
Deadline for submission: 27/08/2025

Submission Number:
TPB/R/S/H5/32 -S033

提交日期及時間
Date and time of submission: 26/08/2025 18:49:57

「申述人」全名
Full Name of "Representer": 先生 Mr. 無障礙關注平台

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

與申述相關的圖則
Plan to which the representation relates: S/H5/32

申述詳情
Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
A	反對 Oppose	<p>本平台得悉新提交的方案擴大了發展規模，同時考慮了通行路線無障礙的元素，其中包括由船街往皇后大道東連接船街公園處設立升降機一部以分流由灣仔站經合和中心前往南固台的客量，令行動不便及輪椅使用者有多一個方式無障礙前往南固台一帶。平台對確立此「替代無障礙路線」歡迎，但平台認為在整個方案上，預期人流上升與預期所需無障礙提升程度的比例仍未能達到一致增加，從而擔心現有規劃方案的無障礙程度仍未能有效疏導人流或滿足廣大行動不便及輪椅使用者的需要，祈盼城規會等能夠與申請方繼續積極跟進及規劃措施以提升方案無障礙通達的程度。現析述如下：</p> <p>一：「方案未能根據旅運鍊概念提升無障礙水平」</p> <p>旅運鍊大意是指由出發點至目的地期間所經歷的每一程序（如出門、上落交通工具、到達活動場所等），一般是指人流最常行經及最便捷的路線。</p>

撤除以港鐵灣仔站前往南固台一帶的主要人流通道，現時船街作為灣仔區一條較普通的內街，經此前往南固台的無障礙通道可推算日後難以構成人流充份進出的通道，其人流分流作用存疑；反之，由於在南固台西端的日街、月街、星街以至金鐘站F出口的太古廣場各期一帶具有覆蓋面廣的酒店住宿、餐飲及文化旅遊發展區域，如能發展從該處無障礙地連接到聖佛蘭士街至南固台，其預期人流及經濟效益將會更大，同時提供另一個旅遊體驗方式，讓各地旅客無障礙地遊走金鐘站至灣仔站南部一帶的歷史及旅遊設施。

二：「現有無障礙通道及設施或未能處理龐大旅客流量」

前車可鑑，參照近年港島區的歷史文化活化旅遊建築，通往大館現時也是輪椅使用者及行動不便人士的考驗，這是由於最主要的通道的無障礙程度不足所致(即:中環至半山扶手電梯)，其他通往的通道也是斜路，有礙殘疾社群旅遊參與。

考慮到現時斜度較平坦的灣仔站連接南固台通道需要經過多個商店區及商場，例如利東街及合和中心，當中需要依靠多方協調多重清晰的方向標示才能較無障礙地前往南固台，變相所花時間亦長，亦較難找路。至於船街花園的升降機載客量有限，一旦升降機維修則令只能依靠灣仔站路線，加上上段提及的船街預期能分流人流的程度有限，當要應對保育及發展項目完成後廣大旅客(當中包括輪椅使用者及殘疾/行動不便社群)的流量或未能負荷。整體而言，平台認為通行無障礙路線的單一及障礙會阻礙本地以至海外行動不便社群前往活化後的南固台參觀的便捷度，有需要提升整體區域的無障礙連貫性。

對圖則是否有任何擬議修訂？如有的話，請註明詳情。

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

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就圖則作出申述
Representation Relating to Plan

參考編號
Reference Number: 250827-143623-51157

提交限期
Deadline for submission: 27/08/2025

提交日期及時間
Date and time of submission: 27/08/2025 14:36:23

「申述人」全名
Full Name of "Representer": 機構 Organization 無障礙關注平台

「獲授權代理人」全名
Full Name of "Authorized Agent": 先生 Mr. 麥耀強先生

與申述相關的圖則
Plan to which the representation relates: S/H5/32

申述詳情
Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
較早前已提交, 這次補充無障礙關注平台的獲授權代理人的另一位同行者	反對 Oppose	較早前已提交, 這次補充無障礙關注平台的獲授權代理人的另一位同行者

對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。
Any proposed amendments to the plan? If yes, please specify the details.

--

就圖則作出申述

Representation Relating to Plan

Submission Number:

TPB/R/S/H5/32 -S026

參考編號

Reference Number:

250825-222451-23925

Representation Number:

TPB/R/S/H5/32 -R10

提交限期

Deadline for submission:

27/08/2025

提交日期及時間

Date and time of submission:

25/08/2025 22:24:51

「申述人」全名

Full Name of "Representer":

機構 Organization 香港復康會

「獲授權代理人」全名

Full Name of "Authorized Agent":

與申述相關的圖則

Plan to which the representation relates:

S/H5/32

申述詳情

Details of the Representation:

有關事項 Subject Matters	你支持還是反對有關事項? Are you supporting or opposing the subject matter?	理由 Reason
A	反對 Oppose	<p>本會支持南固台保育及重建計劃，因其可提升區內無障礙設施，便利居民、殘疾人士及行動不便人士前往南固台及周邊地區。然而，本會關注現時船街平台花園與地面僅設一部升降機。B1及B2項目落成後將提供312伙，按2024年第四季平均家庭人數2.6計算，將新增約800名居民；加上開放後吸引本地及外地遊客（包括輪椅、拐杖及嬰兒車使用者），升降機使用需求勢必大增。根據2021年人口普查，區內60歲或以上和0至4歲人口共佔29%，即約230名居民將主要依賴升降機。由於升降機同時服務居民及遊客，存在輪候過長和惡劣天氣下使用不便的風險。</p> <p>目前替代路線需經合和中心二期，往返約10分鐘，指示不清楚，且不符合</p>

		<p>「無障礙設計應提供最直接便利通道」的原則；一旦唯一升降機停用，行動不便人士須使用這段繞路。至於修訂後在聖佛蘭士街設置的24小時公共通道，坡度達1:6，行人路狹窄、間有樓梯及平台，長者和輪椅使用者存在明顯安全風險，未能形成真正連貫安全的替代路線。</p>
A	反對 Oppose	<p>南固台重建項目的無障礙不足正反映現行城市規劃制度在無障礙及通達性評估上的缺口。根據規定，申請方須提交涵蓋環境、交通、視覺景觀等7項範疇的「技術評估報告」，卻未包含「無障礙及通達程度」的專項評估；而最相關的「社會影響評估報告」亦屬非強制及補充性文件。與渠務署有明確指引的排水項目不同，社會影響評估既無標準化指引，亦未訂明涉及殘疾人士或行動不便人士的評估要求和指標，導致相關群體常被排除於研究與持份者諮詢之外。</p> <p>因此，即使申請方有提出無障礙路線，城規會亦曾建議改善，但因缺乏制度化的評估框架，相關方案仍缺乏具體標準支持，未能全面反映對殘疾人士的實際影響與使用體驗。聖佛蘭士街過大坡度卻仍被規劃為無障礙通道，正是現行制度不足的例子。</p>

對圖則是否有任何擬議修訂？如有的話，請註明詳情。

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

鑑於現時僅設一部升降機，容易出現容量限制、使用衝突及單點故障風險，而聖佛蘭士街所規劃的替代通道因坡度過大及環境不安全，並非真正的無障礙通道，本會建議城規會及申請者檢視現有規劃，積極考慮增設直接連接地面的無障礙通道，以確保區內在居民及遊客增多後，仍能維持安全、便利及具韌性的無障礙交通網絡。

另外，本會建議城規會檢視制度，於「技術評估報告」中增設「無障礙及通達程度」專項，或在「社會影響評估報告」內加入明確準則及指標（如安全性、連貫性、適切性），並在審批過程中主動諮詢殘疾人士代表及相關組織，確保重建規劃能更全面回應實際出行需求，提升包容性與通達性。

Representation Number:

TPB/R/S/H5/32 -R11

Submission Number:

TPB/R/S/H5/32 -S027

Form No. S6 表格第 S6 號

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

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

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

2. Authorized Agent (if applicable) 獲授權代理人(如適用)
Full Name 姓名 / 名稱 (Mr./Ms./Company/Organization * 先生/女士/公司/機構*) Masterplan Limited
(Note: for submission by person, full name shown on Hong Kong Identity card/Passport must be provided) (注意: 若個人提交, 須填上與香港身份證/護照所載的全名)

* Delete as appropriate 請刪去不適用者

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

3. Details of the Representation (use separate sheet if necessary)[#] 申述詳情(如有需要, 請另頁說明)[#]		
The plan to which the representation relates (please specify the name and number of the plan) 與申述相關的圖則 (請註明圖則名稱及編號)		Wan Chai Outline Zoning Plan No.S/H5/32
Nature of and reasons for the representation 申述的性質及理由		
Subject matters 有關事項 [@]	Are you supporting or opposing the subject matter? 你支持還是反對有關事項?	Reasons 理由 [^]
Amendment Items A and B1	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please refer to the enclosed Representation Statement
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the plan? If yes, please specify the details. 對圖則是否有任何擬議修訂? 如有的話, 請註明詳情。 Please refer to the enclosed Representation Statement		

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

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

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

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

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

Representation
to
Draft Wan Chai Outline Zoning Plan No.S/H5/32

Submitted by
Hostford Development Company Limited

Representation Statement

Prepared by
Masterplan Limited

August 2025

1. Introduction

- 1.1 This Representation is made pursuant to Section 6 of the Town Planning Ordinance. It relates to the Draft Wan Chai Outline Zoning Plan No. S/H5/32 ("OZP") gazetted on 27 June 2025. It is prepared by Masterplan Limited, on behalf of Hostford Development Company Limited.

2. The Particular Matters in the Draft Plan to which the Representation Relates

- 2.1 This Representation relates to Amendment Items A and B1 of the Draft OZP which reads as follows, and also their pertinent Notes and Explanatory Statement:

"Item A – Rezoning of a site at 31-36 Sau Wa Fong and 8-12 St. Francis Street from "Residential (Group A)", "Residential (Group C)", and an area shown as 'Road' to "Residential (Group A)9" with designation of 31-36 Sau Wa Fong as sub-area (a) and 8-12 St. Francis Street as sub-area (b) and the land in the north-eastern portion as non-building area."

"Item B1 – Rezoning of a site at 1, 1A, 2 and 3 Hillside Terrace, 55 Ship Street, 1-5 Schooner Street, 53 Ship Street, 18 Sau Wa Fong, Inland Lot 9048 and adjoining Government land from "Comprehensive Development Area", "Residential (Group C)" and an area shown as 'Road' to "Other Specified Uses" annotated "Residential Development with Historic Building Preserved" with stipulation of building height restrictions and designation of the land at the northern corner as non-building area."

- 2.2 A Location Plan indicating the sites of the two Amendment Items ("Amendment Sites") on an extract of the Draft OZP is provided in **Figure 1**.

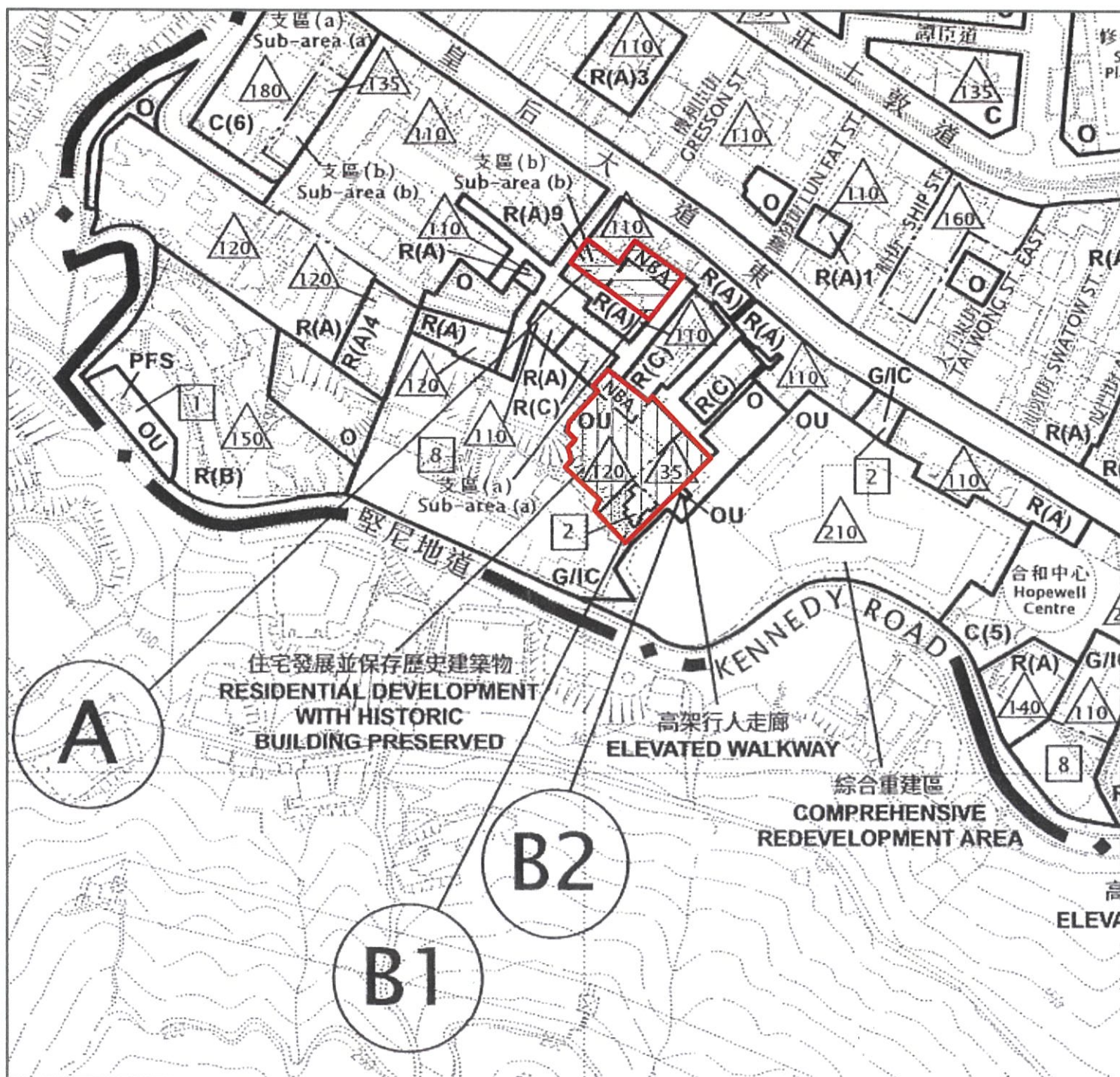


Figure 1. Location Plan indicating the Sites of Amendment Items A and B1, on an extract of the Draft Wan Chai Outline Zoning Plan No.S/H5/32

Legend

- C Commercial
- G/IC Government, Institution or Community
- O Open Space
- OU Other Specified Uses
- R(A) Residential (Group A)
- R(B) Residential (Group B)
- R(C) Residential (Group C)
- [5] Building Height Restriction (In Number of Storeys)
- △120 Building Height Restriction (In mPD)
- Amendment Sites A and B1

3. The Representer

- 3.1 The Representer, Hostford Development Company Limited, is the owner of the property at No. 3, 5, 7 St. Francis Street and 61 Queen's Road East. The proprietor is a longtime patron of the neighbourhood of the Amendment Sites. He is a day-to-day user of St. Francis Street, witnessing pedestrians including elderly and disabled persons, travelling on the steep and narrow street. This is inconvenient and dangerous, having to negotiate between the crowded pedestrian and vehicular traffic dangerously at times. This Representation, raising concerns on traffic safety and universal access, is made in the interests of the general public.
- 3.2 The Representer has previously also raised concerns on traffic safety and universal access pertinent to the future development of the two Amendment Sites. This was in the form of three rounds of public comment to the Town Planning Board ("TPB") on S12A Application No.Y/H5/7 for rezoning Amendment Site A, a Judicial Review Application to the Court of First Instance against the TPB's decision on the rezoning application, and a submission to the Planning Department and Transport Department on S12A Application No.Y/H5/8 for rezoning Amendment Site B1.

4. The Nature of the Representation

- 4.1 This Representation objects to Amendment Items A and B1. They will affect the tranquil environment of Sau Wa Fong which is protected in the Explanatory Statement of the OZP for the "Residential (Group C)" ("R(C)") zone, this is especially the case as the protection has been confirmed as recently as 2023. The magnitude of the development intensification is not supported by proportional planning/ public gain. Specifically, the provisions of the facilities for the pedestrians, elderly and disabled persons in the vicinity of St. Francis Street are inadequate to cater for the significantly increased residents and visitors as a result of the future development of the Amendment Sites, resulting in traffic hazards but this has not been properly resolved.

5. The Reasons for the Representation

- 5.1 The reasons for this Representation are summarised below, and each is elaborated for Amendment Items A and B1 respectively in the paragraphs that follow:
- i. Affect the tranquil environment of Sau Wa Fong which is protected in the "R(C)" zoning, this is especially the case as the protection has been confirmed as recently as 2023.
 - ii. Excessive intensification of development density contrary to the Hong Kong Planning Standards and Guidelines ("HKPSG") with respect to building height profile, urban design and heritage preservation.

- iii. The induced traffic to St. Francis Street is underestimated, and will worsen the existing dire transport constraints which is yet to be resolved.
- iv. The 10 metres setback area and the internal transport facilities at Amendment Site A are inadequate and impractical.
- v. No improvement to the barrier-free access leading to St. Francis Street that is disproportionate to the magnitude of the development intensification at Amendment Site B1.
- vi. Contrary to the HKSAR Government's commitment and policy to make the city accessible for all, under the United Nations Convention on the Rights of Persons with Disability, the Disability Discrimination Ordinance and the HKPSG.
- vii. Intrinsic limitations to provide the necessary mitigation measures that would result in cumulative adverse impact on the neighbourhood.

Amendment Item A

- 5.2 Affect the tranquil environment of Sau Wa Fong which is protected in the "R(C)" zoning, this is especially the case as the protection has been confirmed as recently as 2023
- 5.2.1 Sau Wa Fong is described in the Explanatory Statement of the OZP as follows, with emphasis bolded:

*"8.4.1 This zone is intended for low to medium-rise residential developments subject to specific plot ratio and building height restrictions **to preserve the local character and to avoid adverse visual, air ventilation and traffic impacts from more intensive development.** The "R(C)" zone covers sites in the Sau Wa Fong area which is a large and well-preserved terraced area located to the south of Queen's Road East. **It is an enclosed and tranquil residential area. The streetscape and low to medium-rise residential developments in the area possess a human scale and create a different urban form in contrast with the high-rise mixed development to the north along Queen's Road East.** The generally low-rise character of the area also facilitates southerly downhill wind penetrating into Wan Chai."*

*"8.4.2 The area is inaccessible by vehicular traffic and is connected to Queen's Road East via St. Francis Street and two stepped streets including Sik On Street and Ship Street. The Wan Chai MTR station could be accessed within about 10 minutes' walk. The only vehicular access to the area is via St. Francis Street which is a narrow one-way single lane access road. **Cumulative effect of more intensive developments would aggravate the existing traffic problems.**"*

- 5.2.2 Accordingly, there is reasonable expectation for a preservation of the tranquil environment of Sau Wa Fong. The "R(C)" zoning at sub-area (a) of Amendment Site A has been in place since 1994, and has persisted as recent as the latest amendment of the Wan Chai OZP in May 2023. In the short period of about four months since the last approval of the OZP, the TPB Metro Planning Committee (MPC) has subsequently approved S12A Application No.Y/H5/7 upzoning Amendment Site A in September 2023. This does not give confidence and certainty to the citizens of Hong Kong in the role of strategic and long-term planning.
- 5.2.3 The future 24 hour public passage of not less than 4.5 metres wide with barrier-free facilities through the Site, offering a more direct, convenient and barrier-free route for the public, will promote access from St. Francis Street to Sau Wa Fong. The increased patronage will adversely affect the tranquil environment of Sau Wa Fong.
- 5.2.4 In addition to the Explanatory Statement of the OZP, there are also the similar considerations in "The Study on Redevelopment along Stepped Streets 1991" and "The Review of Stepped Street Site 2012". These identify the factors for capping the stepped street sites around Sau Wa Fong as "R(C)" to preserve its unique character and terrace ambience, and avoid out-of-scale development. In MPC Paper No.5/25 for the proposed amendments to the OZP, the Planning Department's assessment was that the increased development intensity is considered not unacceptable by relevant Government departments, provided that there would be a direct vehicular access from St. Francis Street and loading/ unloading facilities within the Site. In MPC Paper No.Y/H5/7, the assessment with reference to two studies of stepped street site had considered vehicular access and fire safety. Therefore, it appears that the amendment is predominantly made on the basis of the traffic access, part of the factors for consideration under the two studies. The considerations on the special local character have not been carefully scrutinised, as supplemented in the discussion on urban design considerations in the following **para 5.3**.
- 5.2.5 While the barrier-free access through the Site is a substantial element, its maintenance and management is uncertain. It is common practice that the developer would close the development company after obtaining an Occupation Permit from the Buildings Authority, such that the onus of the future maintenance and management of the barrier-free access would be dependent on the goodwill of the future owners of the flats. There is no enforcement mechanism, by way of land lease condition given the lease is virtually unrestricted or under the authority of the Planning Department.

5.3 Excessive intensification of development density contrary to the HKPSG with respect to building height profile and urban design

- 5.3.1 The "R(A)9" zone is an up-zoning, if the entire Site was to be developed as a whole. Specifically its sub-area (a), rezoned from "R(C)", would result in an increase of about 5.18 plot ratio (+103%) and about 16 storeys/ 53 meters building height (+133%) (with reference to the indicative development scheme of the approved S12A Application No.Y/H5/7). This more than doubled plot ratio and building height increase of the amendment is excessive, adversely affecting the characteristics of the neighbourhood. There is a lack of efforts to address the interface between the future 110mPD development at the Site and the existing low-rise low density Sau Wa Fong planned for 12 storeys or about 55mPD, with regard to the urban design provisions in Chapter 11 of the HKPSG in the manner discussed in **Table 1**.

Table 1. Urban design considerations for Sau Wa Fong with reference to the HKPSG, with emphasis bolded

Urban design provisions in Chapter 11 of the HKPSG	Considerations for Sau Wa Fong
<p><i>"For other parts of Hong Kong Island, development height should enhance the district character of specific localities, retain characteristic mountain backdrop and respect the character of neighbourhood. The sectional profile should echo the natural topographical profile. Gradation of height profile should be created in relation to topography. Relief and diversity in height and massing of developments should be provided in different localities. Low rise and low density areas should be preserved to enhance diversity in the urban core."</i> (Para 6.2.8)</p> <p><i>"Building heights and spaces should bear a certain relationship to human proportion and to facilitate easy usage, interaction and perception by the users. Lack of land in Hong Kong makes it difficult to respect human scale but improvements could be made through better transitional space, landscaping and streetscape etc. Better design in public and private residential estates using human dimension as the yardstick will help to ease these tension."</i> (Para 6.2.21)</p>	<p>The difference in the permitted plot ratio and building height between the new "R(A)9" and the existing "R(C)" is drastic. There is no provision for transition in form of setback or step down at the southeastern part of the Site, to enhance or respect the character of the low-rise low density Sau Wa Fong, which should be preserved to enhance diversity in the urban core. It does not relate to the human scale of the existing residents of the 6 storeys Sau Wa Court and the future visitors to the area. This is especially the case for Sau Wa Fong which is small in area, where the surrounding high-rises already overlook and dominate it, depriving it from a sense of openness.</p>

5.3.2 While MPC Paper No.5/25 considers that the non-building area ("NBA") would preserve the unique character, ambience and environment of Sau Wa Fong, this Representation considers it to be inadequate for the following reasons and as illustrated in **Figure 2**:

- i. The NBA is in place of an existing terrace, maintaining a status quo of the terrace in the area, at best preserving the existing terrace from being built over.
- ii. The NBA is at the northeastern part of the Site fronting the rear of the buildings along Queen's Road East and does not serve to alleviate the negative impact of the future development, which is in place of an existing low rise development, on the terrace and Sau Wa Court located to the southeast.
- iii. The future 110mPD development abuts one of the very few remnant terraces in the area, and is only separated from the 6 storeys Sau Wa Court across this about 8.3 metres wide terrace. There is a minimal front setback in the S12A Application, about 1 metre for the entire height of the building with the exception of the refuge floor/ podium garden on the third floor. There will be overlooking and dominating with a detrimental impact on a sense of openness or human scale of the existing residents and future visitors at Sau Wa Fong.

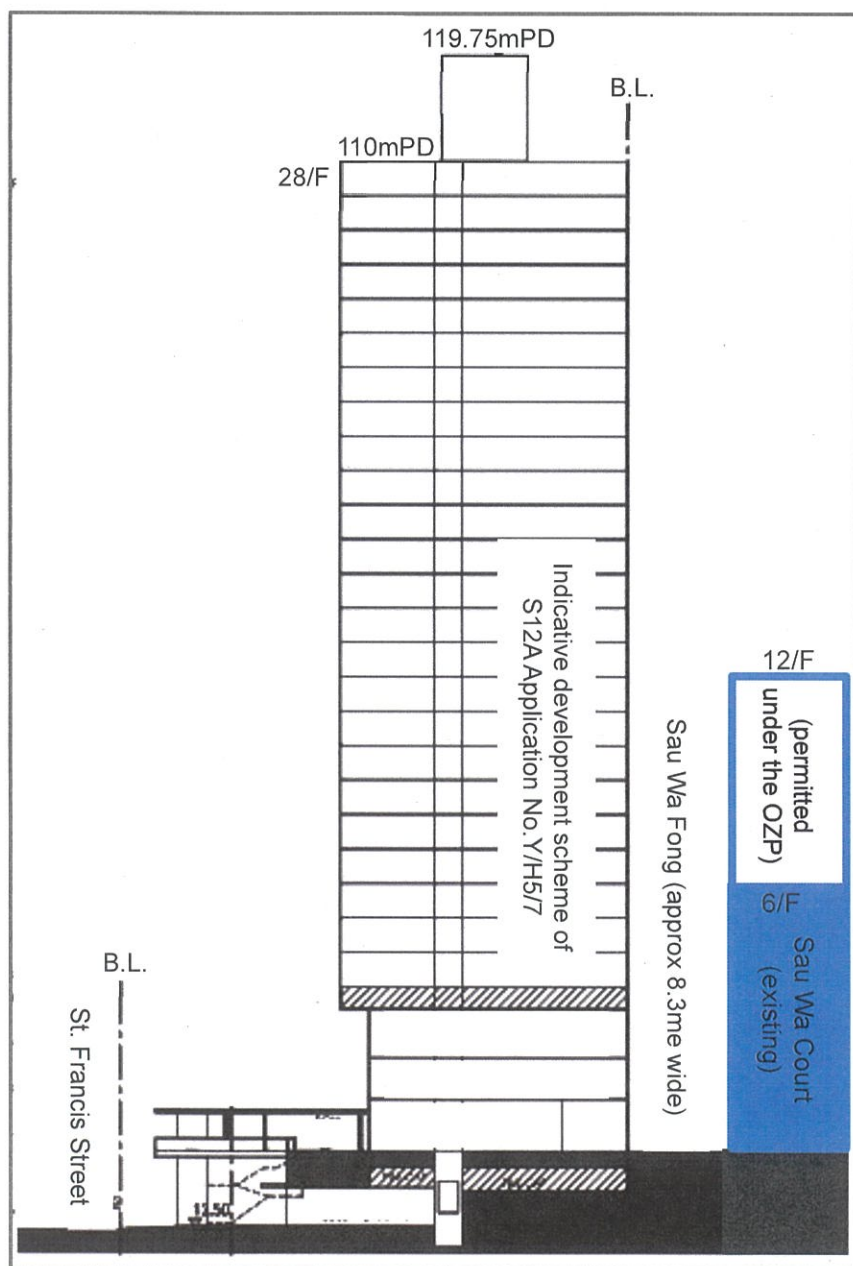
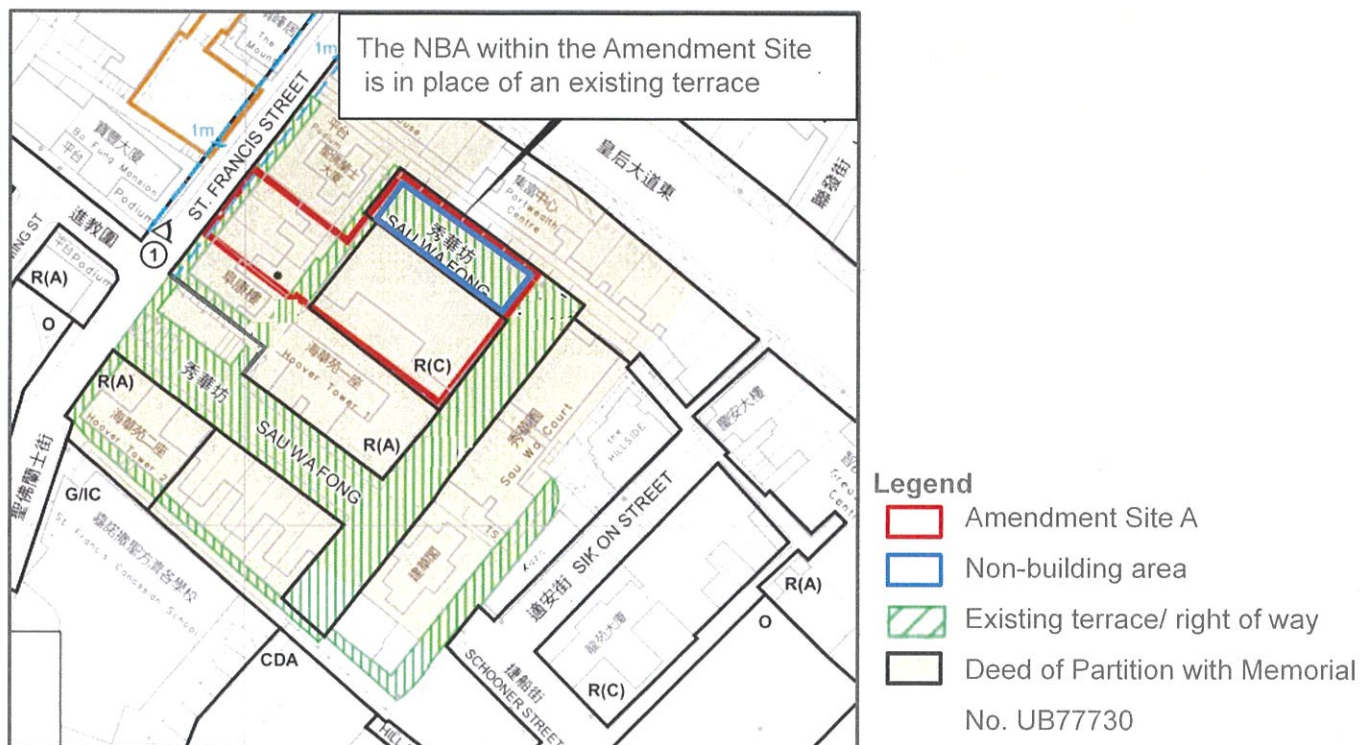


Figure 2. Illustrations showing the NBA as inadequate urban design alleviations at Amendment Site A. Top: plan showing the NBA in place of an existing terrace. Bottom: section plan showing the dominating and overlooking effect of the future development on Sau Wa Court across Sau Wa Fong.

- 5.3.3 In the minutes of the MPC meeting for consideration of S12A Application No.Y/H5/7 for the Site, the members appeared to have given more emphasis on sub-area (b) fronting St. Francis Street than sub-area (a) fronting Sau Wa Fong. Members were concerned about the low-rise structure and building setback to improve pedestrian wind environmental and visual permeability, inviting design and open view for the public on St. Francis Street. There were comparably less similar urban design considerations given to the potential impact of the high-rise block disposition and elevation for the public on Sau Wa Fong. Sau Wa Fong is designated as a road on the OZP, even though it is under private ownership and not accessible to vehicles.
- 5.3.4 In the MPC Paper No.Y/H5/7, the Urban Design and Landscape Section of the Planning Department commented that the future development could integrate with the low to medium-rise urban form streetscape and local character of the Sau Wa Fong area; and the multi-level greenery at the lower levels and the rooftop of the proposed block could help enhancing the visual permeability and quality of the proposed development. This is considered to be an inadequate elaboration on the integration with Sau Wa Fong, given the edge planting is shrubs and trailing plants on a balustrade at a small section of the Sau Wa Fong street level frontage, and those on the refuge floor/ podium garden and rooftop are above the Sau Wa Fong street level. Also, there is no requirement or guarantee for the planting shown in the S12A application to actually be implemented in the new development.
- 5.3.5 In the same MPC Paper, the Architectural Services Department commented that the future development is comparable with the surrounding setting and the adjacent "R(A)" area with building height restriction of 110mPD permitted in the OZP. Again, there is no mention of the relationship with the existing low-rise cluster at Sau Wa Fong, which is the special local character to be protected in the OZP.
- 5.3.6 The "R(A)9" zoning with a new delineation of the site boundary with three street frontages will mean that the Site is defined as a "Class C" site under the Building (Planning) Regulations. This will in effect generally gain an additional plot ratio of 2, a plot ratio greater than that of the surrounding properties. Additionally, the stipulated plot ratio and building height restrictions and the NBA restriction and setback requirement benefit from the Notes of the OZP which allow for a possible minor relaxation upon a S16 Application for consideration of the TPB. The permitted development intensity of the Site is already considered to be excessive. The possibility for a further minor relaxation of these controls is not acceptable.

- 5.3.7 The existing interface between "R(A)" and "R(C)" which the new "R(A)9" is in place of is not considered to be a relevant precedent for the amendment. The amendment expands the boundary of the "R(A)" at the expense of "R(C)" should give special treatment to this realigned interface. Sau Wa Fong remains land locked and elevated without vehicular access that is likely to continue its character in the future. It is considered that a gradation in development density and building height is necessary to be provided at the Site. This is considered necessary for maintaining the tranquil environment of Sau Wa Fong, and for the urban design and the amenity of the existing residents and future visitors to the area.
- 5.4 The induced traffic to St. Francis Street has been underestimated, and will worsen the existing dire transport constraints which is yet to be resolved.
- 5.4.1 St. Francis Street is a local distributor road serving one-way vehicular traffic ascending from Queen's Road East to Star Street, and suffers from the following dire transport constraints:
- i. Substandard width and steepness, not meeting the provisions in Chapter 8 of the HKPSG. The carriageway is 4.5 metres wide or 3.3 meters wide discounting the hatch marking along the southeastern edge and ~16% gradient that is substandard. On the southeastern side, the same side as the Site, the kerbside is not equipped with street furniture, landscaping or weather protection.
 - ii. Saturated pedestrian and vehicular capacity during school peaks of St. Francis' Canossian School located at the top of the street, as shown in **Figure 3**.
 - iii. The kerbs consist of sections of steps and are incontinuous that are incapable of serving barrier-free access. Pedestrians walk on the narrow strip marked hatch on the carriageway alongside moving vehicles. These are shown in **Figure 4**.

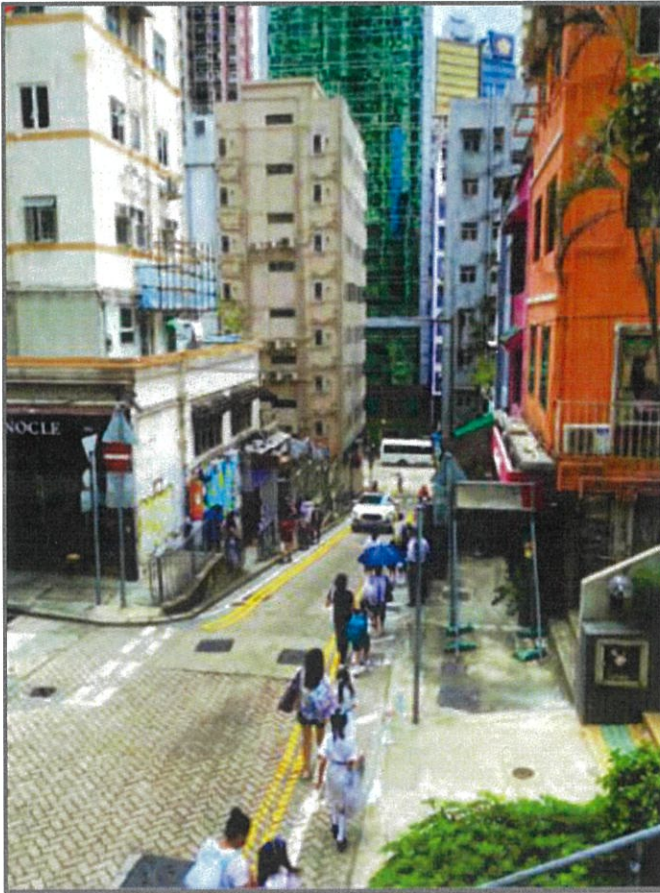


Figure 3. Photos showing St. Francis Street during the school peaks of St. Francis Canossian School. Top left and top right: pedestrians walking on the narrow strip marked hatch alongside moving vehicles. Bottom left: school temporary traffic control at the junction with Star Street. Bottom right: illegal on-street parking, waiting, drop-off/pick-up and tailback back that is not uncommon.

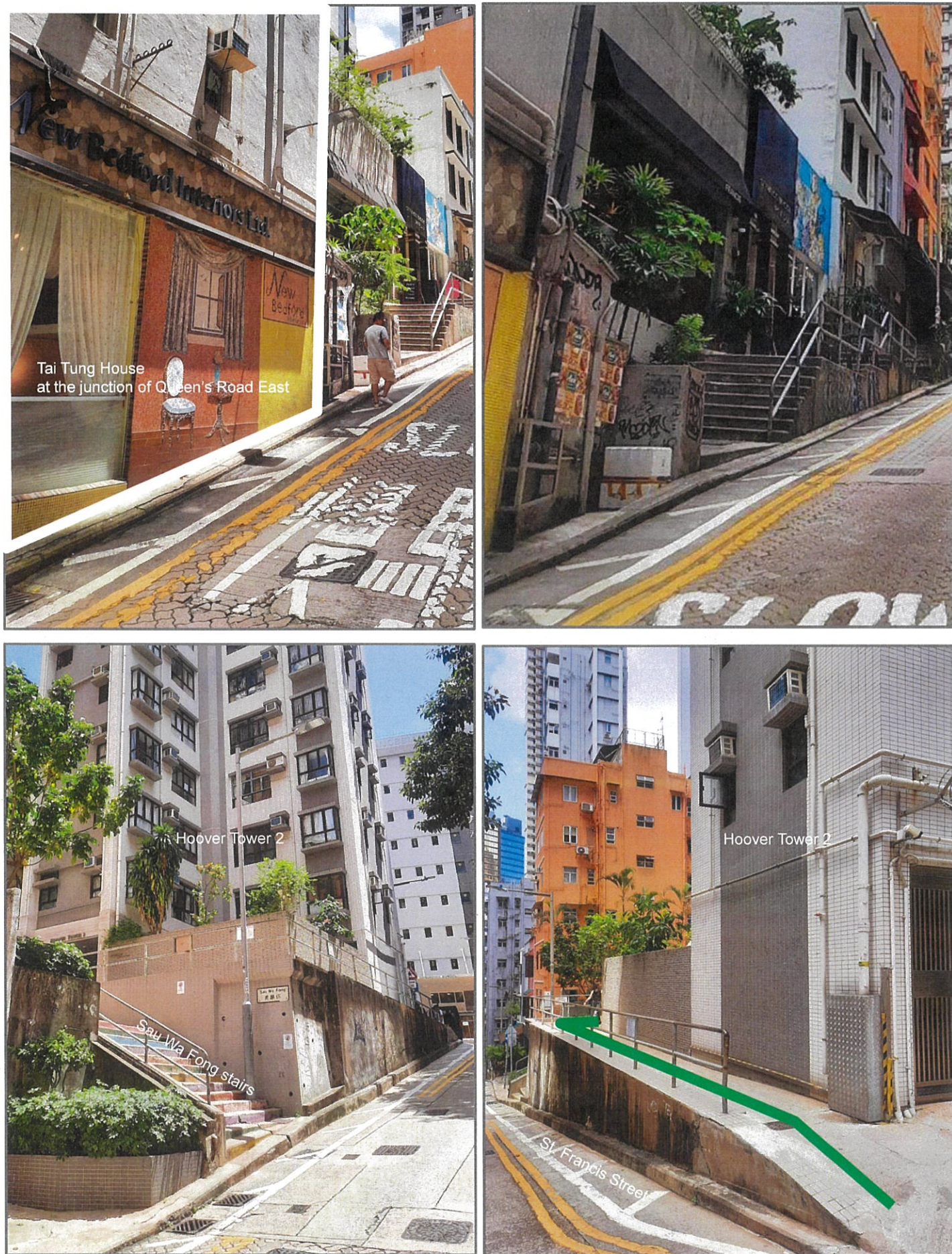


Figure 4. Photos showing the existing pedestrian facilities on the southeastern side of St. Francis Street. Top left: absence of kerb in front of Tai Tung House. Top right: kerb consist of section of steps and is discontinuous. Bottom left: absence of kerb around the Sau Wa Fong stairs and the retaining wall of an elevated barrier-free access at Hoover Tower 2. Bottom right: the barrier-free access between St. Francis Street and Sau Wa Fong, indicated in green.

5.4.2 These dire transport constraints on St. Francis Street have not been given adequate consideration in the supporting Traffic Impact Assessment of S12A Application No.Y/H5/7 for rezoning Amendment Site A, in terms of the following aspects:

- i. No junction operational performance for St. Francis Street/ Star Street. This is notwithstanding the private land ownership status or the "Open Space" and "R(A)" zonings, which are nevertheless designated as road on the OZP and being an existing carriageway for public road users.
- ii. No pedestrian traffic impact assessment. This is unacceptable for the future development on St. Francis Street which is suffering from dire transport constraints and inadequate pedestrian facilities.
- iii. The description of the pedestrian facilities in the vicinity of the Site is brief, and does not refer to their shortcomings on St. Francis Street.
- iv. No construction traffic impact assessment, notwithstanding its requirement at detailed design stage.

5.4.3 As such, the increased pedestrian and vehicular traffic as a result of the future development with 216 no. units alongside visitors to the commercial podium with art facilities would aggravate the already dire transport constraints on St. Francis Street, creating additional traffic hazards to the road users. Accordingly, it is considered also necessary to restrict the maximum number of units at the Site, in consideration of the potential traffic impact on St. Francis Street.

5.5 The 10 metres setback area is inadequate and is in contrary to the HKSAR Government's commitment and policy, under the United Nations Convention on the Rights of Persons with Disability, the Disability Discrimination Ordinance and Chapter 8 or the HKPSG

5.5.1 The future 10 metres setback area partly accommodating a turntable may contribute to the pedestrian environment at St. Francis Street, but only locally at the frontage of the Site. Tai Tung House downhill on the corner of Queen's Road East is only subject to 1metre setback upon a redevelopment, and the Sau Wa Fong stairs and the retaining wall of an elevated path at Hoover Tower 2 uphill prevent the provision of a kerb around St. Francis Yard junction. There will be incontinuous kerbs and inconsistent front building setback line across the sites addressing St. Francis Street. While the pedestrian facilities at the Site may serve the future residents and visitors of the development of the Site, there is no levelled walkway to and from Queen's Road East nor Star Street which connects with an Admiralty MTR Station exit.

5.5.2 By not addressing the need for a comprehensive network of barrier-free pedestrian access and universal access in the locality is disproportional to the future development at the Site with more than doubled the originally permissible development intensity. This is contrary to the HKSAR Government's commitment and policy, under the United Nations Convention on the Rights of Persons with Disability, the Disability Discrimination Ordinance and Chapter 8 or the HKPSG.

5.5.3 The Commissioner for Transport, the Commissioner of Police, the Buildings Department and the Equal Opportunity Commission may not have objection, reservation or adverse comment on the amendment, considering that individual developments would comply with the relevant regulations and requirements. However, this Representation is made in the interest of the public and especially for elderly and disabled persons. In this respect, the TPB must give consideration to the impact of the significantly intensified development density and changing characteristics of the locality. This is an atypical amendment, and represents a quintessential opportunity to provide a focus on improving pedestrian access to the neighbourhood, including barrier-free access arrangement and universal access for the public.

5.6 The internal transport facilities are impractical

5.6.1 The internal transport facilities under the indicative development scheme of S12A Application No.Y/H5/7 is considered to be inadequate and impractical, for the following reasons:

- i. The limited capacity for a private car drop-off/ pick-up or a light goods vehicle loading/ unloading is unlikely to meet the demand of the future development with 216 no. of units and 3 storeys of retail and art facilities, and by the Sau Wa Fong users given the barrier-free access linkage through the Site.
- ii. Absence of waiting space. The subsequent arriving vehicles would queue on St. Francis Street and its kerb, creating traffic delay and blockage for vehicles and traffic hazards for pedestrians on the steep and narrow street.
- iii. The likely increase of its usage and thereby traffic on St. Francis Street, by the vehicles serving passengers to and from the neighbouring buildings on St. Francis Street and St. Francis Yard that currently board/ alight at Queen's Road East. This is an issue subject to enforcement, but these uses should nevertheless be properly accounted and addressed.
- iv. The management of the use of the turntable may not be practical. Vehicles may not drive in and instead illegally drop-off/ pick-up or load/ unload on the street, or may depart without using the turntable and instead reverse onto the street, creating traffic conflict with the road users.

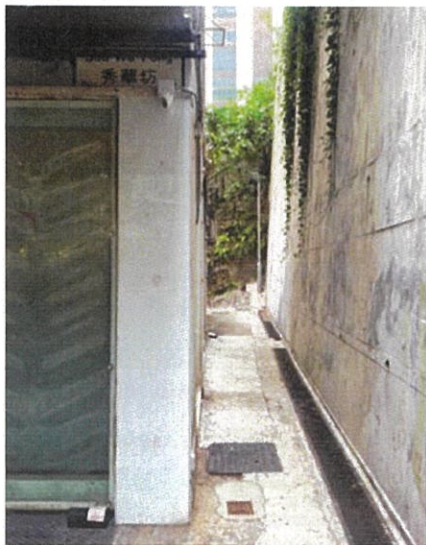
- v. There is a historic water well dated 1950s at the southwestern corner of the site. It is a unique remnant in the urban area and should be preserved. The turntable is in conflict with the water well.
 - vi. The provision and implementation of a turntable at the Site is uncertain. First, its requirement for provision is not stipulated in the Draft OZP. Second, it is common practice that the developer would close the development company after obtaining an Occupation Permit from the Buildings Authority, such that the onus of the future maintenance and management of the turntable would be borne by the future owners and occupants. There is no enforcement mechanism, by way of a land lease condition as the lease is virtually unrestricted or under the authority of the Planning Department.
- 5.6.2 The Representer wishes to highlight that a very cautious approach should be given to the traffic impact of Amendment Item A. This is notwithstanding the Transport Department having approved other developments without on-site transport facilities in the vicinity of the Site. Those developments are not similar to this amendment for significantly increased density. The future developer may not be required to propose and implement traffic management measures, and which the Representer has serious doubts on the adequacy and practicality.
- 5.7 Intrinsic limitations to provide the necessary mitigation measures that would result in cumulative adverse impact on the neighbourhood.
- 5.7.1 The affected "R(C)" site in conjunction with that under Amendment Item B1 represent about a third of the existing "R(C)" low-rise low density development stock in Sau Wa Fong. The amendment with the public passage and barrier-free access leading to Sau Wa Fong through the Site would be detrimental to the tranquil environment of the area. It is more than double the building height and density, and this would inevitably adversely change the urban design characteristics of the area.
- 5.7.2 St. Francis Street is intrinsically restricted in its capacity and potential for improvement to provide suitable pedestrian facilities, vehicular capacity and universal access. This indicates that Amendment Item A is not appropriate.

Amendment Item B1

- 5.8 Affect the tranquil environment of Sau Wa Fong which is protected in the "R(C)" zoning, this is especially the case as the protection has been confirmed as recently as 2023
- 5.8.1 According to the Explanatory Statement of the OZP as elaborated in **para 5.2**, Sau Wa Fong has been originally zoned "R(C)" *"to preserve the local character and to avoid adverse visual, air ventilation and traffic impacts from more intensive development It is an enclosed and tranquil residential area. The streetscape and low to medium-rise residential developments in the area possess a human scale and create a*

different urban form in contrast with the high-rise mixed development to the north along Queen's Road East while cumulative effect of more intensive developments would aggravate the existing traffic problems". The "R(C)" zoning has been in place since 1994, and has persisted as recent as the latest amendment of the Wan Chai OZP in May 2023. Accordingly, there is reasonable expectation for a preservation of the tranquil environment of Sau Wa Fong.

- 5.8.2 The designated NBA for incorporation of an Open Space open to public at the northern corner of the Site in place of No.18 Sau Wa Fong ("Proposed Open Space") will facilitate pedestrian circulation in the east-west direction among Wan Chai MTR station, Hopewell Centre, Hopewell Centre II, Star Street and Kennedy Road, as confirmed in MPC Paper No.Y/H5/8. It will serve as a ~9.3m wide public passageway between Schooner Street and Sau Wa Fong, replacing the existing ~1.4m wide path, and will be an alternative to an existing ~0.9m wide path in parallel, as illustrated in **Figure 5**. The increased pedestrian usage will affect the tranquil environment of Sau Wa Fong.



(a) The ~1.4m wide path between No.18 Sau Wa Fong and a retaining wall to be demolished and replaced by the Proposed Open Space.



(b) The existing ~0.9m wide path in parallel and alternative to the Proposed Open Space.

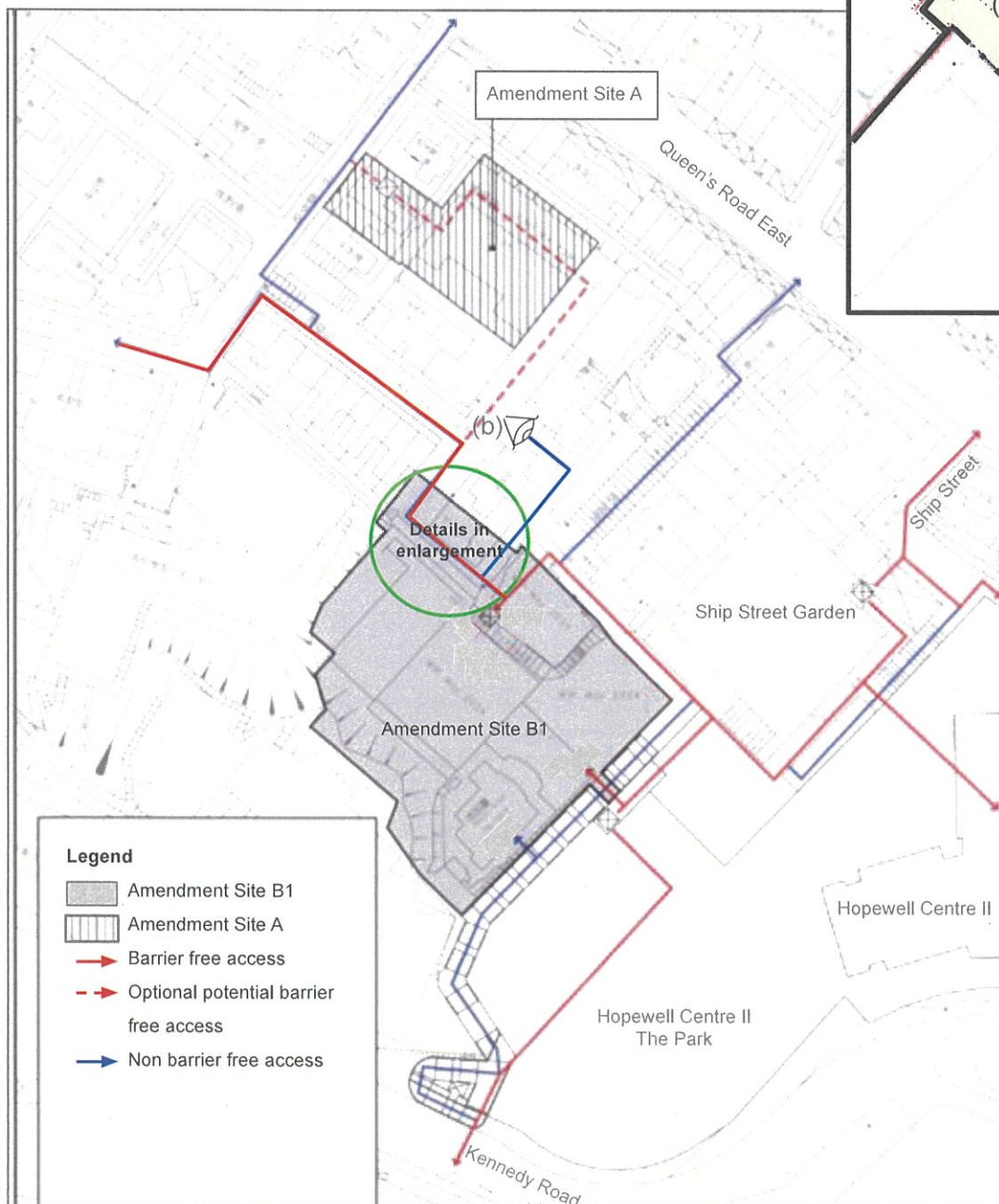
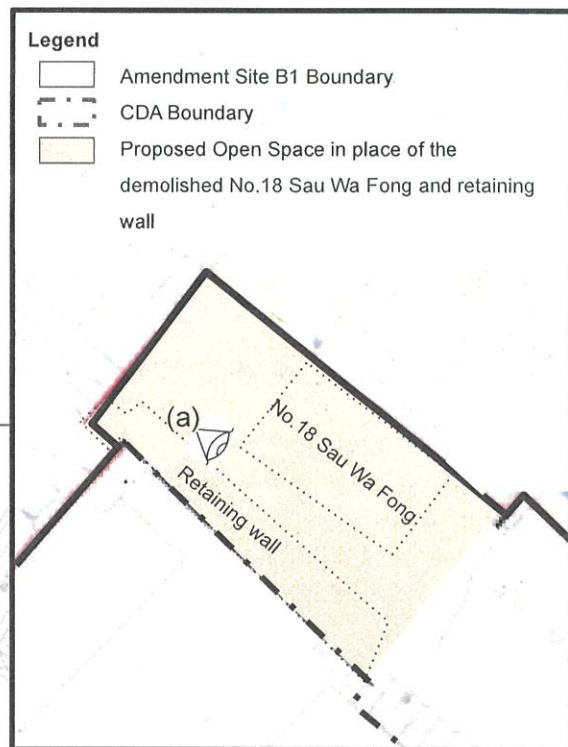


Figure 5. Plan indicating the Proposed Open Space at Amendment Site B1, replacing the narrow paths in Photo (a) and (b), will promote ample and convenient accesses between Hopewell Centre I and II and St. Francis Street.

5.9 Excessive intensification of development density contrary to the HKPSG, with respect to building height profile, urban design and heritage preservation

- 5.9.1 The new "Other Specified Uses" annotated "Residential Development with Historic Building Preserved" ("OU ("Residential Development with Historic Building Preserved")) zone is an up-zoning, resulting in an increase of about 4.197 plot ratio (+84%) and about 16 storeys (+133%) in relation to "R(C)" or about 29 meters building height (+32%) in relation to the Comprehensive Development Area ("CDA") (with reference to the indicative development scheme of the approved S12A Application No.Y/H5/8). While alteration to the local character and setting, and massing of the neighbourhood of Sau Wa Fong and Nam Koo Terrace under the approved S16 development scheme for the CDA is appreciated, the about doubled plot ratio and building height increase of the amendment is excessive. There is a lack of consideration given to the interface between the future development at the Site and the Grade 1 historical building at Nam Koo Terrace. Consideration of the heritage constraints for Nam Koo Terrace with reference to Chapter 11 of the HKPSG is discussed in **Table 2.** and illustrated in **Figure 6.**

Table 2. Heritage consideration for Nam Koo Terrace with reference to Chapter 11 of the HKPSG

Heritage preservation provisions in the HKPSG	Considerations for Nam Koo Terrace
<p><i>"Effort should be made to create a suitable setting to make a design response to those heritage features." (Para 6.2.49)</i></p> <p><i>"Context or setting of these heritage features should be responded. Suitable settings for heritage features should be preserved or created. Building heights of new neighbouring developments should generally respect and if necessary be lowered towards the heritage features." (Para 6.2.51)</i></p> <p><i>"Local districts have their own unique cultural activities, and physical and historical characters. In redevelopment, these activities and characters should be retained and enhanced as much as possible." (Para 6.2.53)</i></p>	<p>The relationship of the residential tower above shops is of similar arrangement to the approved development scheme for the CDA. There is no demonstrated effort to enhance a suitable setting or stepped building height or measures with respect to the heritage features, as a result of the about doubled development intensity under the amendment. The increased building height and the intensified development density will further predominate and be out of scale with Nam Koo Terrace.</p>



Figure 6. Photomontage showing the dominating and overlooking effect of the future residential tower on Nam Koo Terrace. Left: the already large building bulk in the approved S16 application of the CDA. Right: the excessive building bulk in Amendment Item B1.

- 5.9.2 It is considered that the development potential of the Site has already been maximised in the CDA zoning which garners the plot ratio entitlement from the previous low-rise low density Miu Kang Terrace and Hillside Terrace, and the S16 approval, to incentivise the conservation work.
- 5.9.3 In MPC Paper No. No.Y/H5/8, the Urban Design and Landscape Section of the Planning Department acknowledged that the more bulky building mass of the amendment may reduce visual openness when viewed from Sik On Street, Schooner Street and the Ship Street Garden, but does not refer to any mitigation measure. It merely referred to the HKPSG Chapter 11 for measures to reduce the potential impact on Nam Koo Terrace.
- 5.9.4 In the same MPC Paper, the Planning Department's assessment explained that the Site is situated on a higher platform than the "R(A)" sites along Queen's Road East, next to Sau Wa Fong which is a small neighbourhood, in the predominant residential neighbourhood in Wan Chai South that is zoned "R(A)", with the surrounding very tall Hopewell Centre and Hopewell Centre II. The explanation relates to the larger and taller context, but does not discuss with respect to Nam Koo Terrace.
- 5.9.5 The NBA located at the northern corner does not have any frontage to Nam Koo Terrace to the east, and is not an alleviation measure for the significantly increased development density and building height in relation to the historic building. Furthermore, the NBA induces pedestrian increase on Sau Wa Fong that is contrary to the Explanatory Statement as discussed in **para 5.8** above, and St. Francis Street that has not been suitably accounted or addressed as discussed in the following **para 5.10**.
- 5.9.6 Similar to the issue raised in **para 5.3** above the "R(A)" zoning with a new delineation of the site boundary with two street frontages "Class B" site under the Building (Planning) Regulations, will in effect generally gain an additional plot ratio of 1, benefit from a plot ratio greater than that of the surrounding properties. Additionally, the stipulated plot ratio and building height restrictions and the NBA restriction and setback requirement benefit from possible minor relaxation under the Notes of the OZP that would result in an even more substantial development at the site, and is inappropriate.
- 5.10 The Proposed Open Space at the Site will promote the usage of St. Francis Street that is underestimated and would worsen the existing dire transport constraints on St. Francis Street that have not been addressed
- 5.10.1 The dire transport constraints on St. Francis Street as a result of the Proposed Open Space at the Site promoting its usage have not been given due consideration in the supporting Traffic Impact Assessment of S12A Application No.Y/H5/8 for rezoning Amendment Site B1 in terms of the following aspects:

Pedestrian traffic

- i. The assessment assumes that there will be no pedestrian increase on St. Francis Street as a result of the future development at the Site, on the basis that *"pedestrian will use alternative routing for access to Queen's Road East because the walking environment of St. Francis Street is undesirable i.e. steep and substandard footpath"*. The acknowledgment of the problematic pedestrian facilities on St. Francis is not mitigated with any improvement proposal.
- ii. The assumption that 5% of the future pedestrian generation and attraction will be distributed to Star Street is considered to have been underestimated. Star Street connects with an Admiralty MTR Station exit, which is an interchange station to the Tsuen Wan Line, South Island Line and Sha Tin to Central Link; closer than a Wan Chai MTR Station exit. It also offers a different walking experience with weather protection and less hustle bustle. These factors should contribute to a greater choice of the Star Street route.
- iii. The Level of Service for the kerbs in the vicinity of St. Francis Street in 2031 shows no difference under the scenario without the future development at the Site and that also without the planned developments in the vicinity. This cannot be true, given the indicative development scheme of Amendment Site A with a completion year of 2026.
- iv. The flow rate for the southern kerb of Star Street and Sau Wa Fong adjacent to Hoover Tower 2 will increase in 2031. The southern kerb of Star Street is estimated to have a deterioration in its Level of Service from B to C. Increase of pedestrian usage worsening the existing traffic constraints on St. Francis Street is not acceptable.

Vehicular traffic

- v. There is no quantitative assessment of the existing or resultant condition of St. Francis Street, or Star Street which is where the two lay-bys supporting the future loading/ unloading activities are located. The observations that the local road network adjoining the Site was not heavily trafficked during AM and PM peak hours are not adequate, especially in support of the significantly increased development intensity of this amendment.
- vi. The assumption that the generated traffic will be travelling in the local road network in the same proportions as the existing traffic demands is inappropriate. There is less level change between the Site and St. Francis Street, in comparison with other carriageways, this is an important factor contributing to a greater choice of St. Francis Street usage. Therefore the forecasted traffic generation on St. Francis is considered to have been underestimated.
- vii. The assessment on the two lay-bys for loading/ unloading facilities on Star Street is based on the current availability that has not taken into account of the future development of Amendment Item A. While there are the supplementary facilities at Hopewell Hotel,

it is considered necessary to also assess their usage as which would have implications on the traffic condition on St. Francis Street.

Barrier-free access

- viii. The barrier-free access between Sau Wa Fong and St. Francis Street is around Hoover Tower 2. It is narrow and obscured with a 90 degree turn (as illustrated in the bottom right photo in **Figure 4**). The resultant increased usage of this path is not supported by any improvement to its width, quality or universality. (This barrier-free access is a right of way under the Deed of Partition with Memorial No. UB77730 applicable to the cluster of developments at Sau Wa Fong, including part of the right of ways falling into Amendment Site B1.)
- ix. Regarding the use of the barrier-free access connecting Sau Wa Fong with St. Francis Street through Amendment Site A, first its implementation is subjected to a separate private initiative in the future that is uncertain, second its capacity in serving the pedestrians generated by this amendment in addition to the planned patronage has not been demonstrated. In any case, the problematic provisions for pedestrians, vehicular capacity and universal access on St. Francis Street is yet to be fully addressed,

Other issues

- x. The proposed refuse collection for the Site is by way of the management office collecting and transferring to the Star Street Refuse Collection Point by trolley, once per day normally off peak. This will be via the existing barrier-free access around Hoover Tower 2, likely to result in conflict with the pedestrians, and especially elderly and disabled persons in terms of negotiating the use of this narrow and obscured route, with poor hygiene and odour. This is notwithstanding the Food and Environmental Hygiene Department's no comment on the proposed method provided that no environmental nuisance should be generated to the surroundings.
- xi. The assumption of the 68 no. residents additional to the approved development at the Site is on the basis of the significantly increased unit size (from about 54.5m² to 89.2m²) and decreased average household size (from 2.3 to 2.1), despite of the significantly increased domestic GFA by about 100%. Accordingly, it is considered necessary to restrict the maximum number of units at the Site, in consideration of the potential traffic impact on St. Francis Street.

5.10.2 Therefore Amendment Item B1 has not proactively provided more barrier-free access or enhanced the universal design for the convenience of the public of different age and ability or disability at the western part of Sau Wa Fong. Also it has not included any mitigation measures in response to the existing or future traffic problems on St. Francis Street. This is disproportionate to the about doubled development intensity of the amendment. This is also contrary to the HKSAR Government's commitment and policy to providing access for all, under the United Nations Convention on the Rights of Persons with Disability, Disability Discrimination Ordinance and Chapter 8 of the HKPSG.

5.11 The intrinsic limitations to provide the necessary mitigation measures that would result in cumulative adverse impact on the neighbourhood

5.11.1 The affected "R(C)" site in conjunction with that under Amendment Item A represent about a third of the existing "R(C)" low-rise low density development stock in Sau Wa Fong. The amendment with the Proposed Open Space connecting with Sau Wa Fong to the west would be detrimental to the tranquil environment of the area.

5.11.2 St. Francis Street, which the Proposed Open Space connects with through Sau Wa Fong, is intrinsically restricted in its pedestrian and vehicular facilities and universal access. This amendment about doubled the development intensity at the Site but without improvements to the barrier-free access or enhancement to the universal access at the western part of Sau Wa Fong falls short in its planning /public gain. This is especially the case for the future development of the Site with the vision to become the district node in Wan Chai South, and an exemplar of compact high density sustainable development with improved livability.

6. The Amendment Proposed to the Draft Plan

6.1 Outline of the proposed amendments

6.1.1 The amendments proposed to the Draft Plan include the following, and each is elaborated in the paragraphs that follow:

- i. Reversion to the original respective zonings.
- ii. Reduction of the permitted plot ratio and building height for the respective Amendment Items.
- iii. Deferment of the new zonings taking effect, until the problematic pedestrian and vehicular facilities and the universal access on St. Francis Street are resolved given that improvement works is considered to be feasible.

6.2 Reversion to the original respective zonings

- 6.2.1 The zonings at the respective Amendment Sites A and B1 and their pertinent Notes and Explanatory Statement are proposed to be reverted to that included in the original OZP No.S/H5/31, to protect the tranquil environment of Sau Wa Fong in accordance with the Explanatory Statement of the OZP.

6.3 Reduction of the permitted plot ratio and building height for the respective Amendment Items

- 6.3.1 Should the proposed amendment to revert to the original zoning discussed in **para 6.2** not be supported by the TPB, the permitted plot ratio and building height of the respective Amendment Items are proposed to be reduced. The objective is to protect the tranquil environment of Sau Wa Fong and form a gradation with Nam Koo Terrace. The proposed amendments facilitating a notional increase generally pro rata to the plot ratio change, are summarised in **Table 3**, and shown on an extract of the Draft OZP and the relevant clauses in the Notes in **Figure 7**. (The Explanatory Statement of the Draft OZP is also to be amended as appropriate.)

Table 3 The proposed amendments to the development parameters for the respective Amendment Items

	Amendment Item A	Amendment Item B1
Plot ratio restriction	Sub-area (a): from B(P)R to 6 Sub-area (b): no change	From B(P)R to 6
Building height restriction	Sub-area (a): from 110mPD to 70mPD Sub-area (b): no change	Residential tower: from 120mPD to 100mPD Nam Koo Terrace: no change
Unit number restriction	130	205

- 6.3.2 The clauses for possible minor relaxation of the plot ratio, building height restriction, NBA and setback are proposed to exclude their applications on both the "R(A)9" and "OU (Residential Development with Historic Building Preserved)" zonings.
- 6.3.3 A new clause to restrict the maximum number of units is proposed to be included for the respective "R(A)9" and "OU (Residential Development with Historic Building Preserved)" zonings.

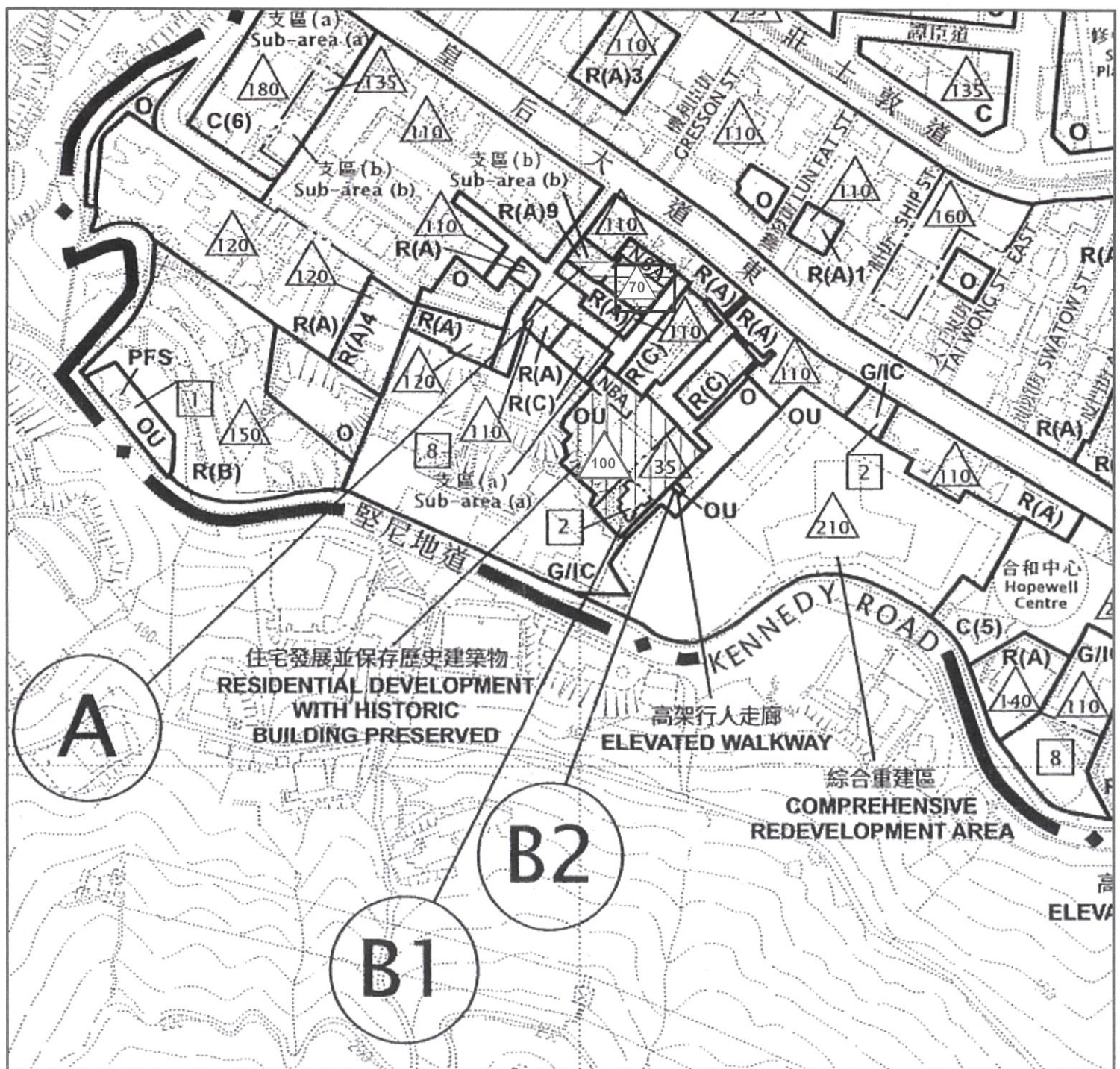


Figure 7a. Proposed amendments of the Representation, shown on an extract of the Draft Wan Chai OZP No.S/H5/32

Legend

- C Commercial
- G/IC Government, Institution or Community
- O Open Space
- OU Other Specified Uses
- R(A) Residential (Group A)
- R(B) Residential (Group B)
- R(C) Residential (Group C)
- 5 Building Height Restriction (In Number of Storeys)
- 120 Building Height Restriction (In mPD)

RESIDENTIAL (GROUP A)

Remarks

- (9) On land designated “Residential (Group A)9”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of the maximum plot ratio and/or building heights specified below, or the plot ratio and height of the existing building, whichever is the greater:

<u>Sub-area</u>	<u>Development Restriction(s)</u>
Sub-area (a)	a maximum plot ratio of 5.0 and a maximum building height of 12 storeys
Sub-area (b)	a maximum building height of 110 metres above Principal Datum
Single development or redevelopment covering both sub-areas (a) and (b)	<i>a maximum plot ratio of 6.0 and</i> a maximum building height of 110-70 metres above Principal Datum

- (13) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the building height restrictions stated in paragraphs (1) and ~~(9)~~ (8) above, ~~plot ratio restriction stated in paragraph (9) above~~, and any reduction in the gross floor area provided for Government, institution or community facilities stated in paragraphs (4) to (7) above, may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.
- (14) Under exceptional circumstances, for a development or redevelopment proposal, minor relaxation of the non-building area restriction as stipulated on the Plan and the setback requirements stated in paragraphs (11) and (12) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance. *This is with the exception of and does not apply to “Residential (Group A)9”*
- (15) *On land designated “Residential (Group A)9”, no new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of 130 number of units.*

OTHER SPECIFIED USES

For “Residential Development with Historic Building Preserved” Only

- (7) *No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum pot ratio of 6 or the plot ratio of the existing building, whichever is greater.*
- (8) *No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of 205 number of units.*
- ~~(7) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the building height restrictions stated in paragraph (2) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.~~
- ~~(8) Under exceptional circumstances, for a development or redevelopment proposal, minor relaxation of the non-building area restriction as stipulated on the Plan and the setback requirement stated in paragraph (5) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.~~

6.4 Deferment of the new zonings taking effect

- 6.4.1 Upon the TPB agreement to the abovementioned reduced plot ratio and building height for the respective Amendment Items in **para 6.3**, the new zonings will only take effect when the existing inadequate pedestrian and vehicular facilities and the universal access at St. Francis Street are improved. The proposed pre-conditions for the respective developers are outlined in **Table 4**. This is given improvement works are considered to be feasible.

Table 4 The proposed pre-conditions for the respective developers prior to the new zonings taking effect, and their considerations

	Amendment Item A	Amendment Item B1
Pre-conditions for developers	<ul style="list-style-type: none"> i. Proposal to resolve the pedestrian and vehicular facilities and the universal access at St. Francis Street between Amendment Site A and Queens Road East, to the satisfaction of relevant Government departments. ii. The proposal is to be accompanied by an undertaking to construct, and complete the construction works to the satisfaction of relevant Government departments no later than the occupation of the future development at Amendment Site A. iii. Undertaking to construct the turntable at the front setback area. iv. Undertaking to include suitable clauses in the future Deeds of Mutual Covenant, to provide for ongoing maintenance and management of the barrier-free access and turntable. 	<ul style="list-style-type: none"> i. Proposal to enhance the barrier-free access for universal access between Sau Wa Fong and St. Francis Street around Hoover Tower 2 and the Sau Wa Fong stairs. ii. Proposal to resolve the pedestrian and vehicular facilities and the universal access at St. Francis Street between the Sau Wa Fong stairs and Star Street, to the satisfaction of relevant Government departments. iii. The proposals are to be accompanied by an undertaking to construct, and complete the construction works no later than the occupation of the future development at Amendment Site B1.

Consideration	Improvement works in form of a footbridge over St. Francis Street is considered to be feasible as discussed in para 6.4.2 and 6.4.3.	Improvement works is considered to be feasible. There is ample space available, and the entitlement to the right of way under the Deed of Partition with Memorial No. UB77730 shared with the right of way falling into Amendment Site B1.
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Footbridge over St. Francis Street at Amendment Site A

- 6.4.2 At the Representer's property at No. 3, 5, 7 St. Francis Street and 61 Queen's Road East, the construction works are at the final stages for completion. At the non-domestic podium, the lower two floors will be dedicated to the establishment of a digital art museum, the "Queen's Museum", for the public on free admission, to promote arts and culture in Hong Kong.
- 6.4.3 The Representer has a genuine good faith intention of linking the development projects in the vicinity for wider public benefit, including through promotion of cultural heritage and arts, as well as barrier-free access to a greater extent. This is by way of a footbridge over St Francis Street, connecting the Queen's Museum at the Representer's property with the art facilities in the indicative development scheme at Amendment Site A. This will complete the currently incontinuous pedestrian linkage on St. Francis Street, and provide a universal access between Queen's Road East and Sau Wa Fong. This footbridge solution is illustrated in a diagrammatic plan in **Figure 8**, and a walkthrough video available by scanning the QR code below. (The applicants of S12A Application No.Y/H5/7 have not engaged in discussions relating to the footbridge solution previously proposed in the public comment to the S12A Application.)

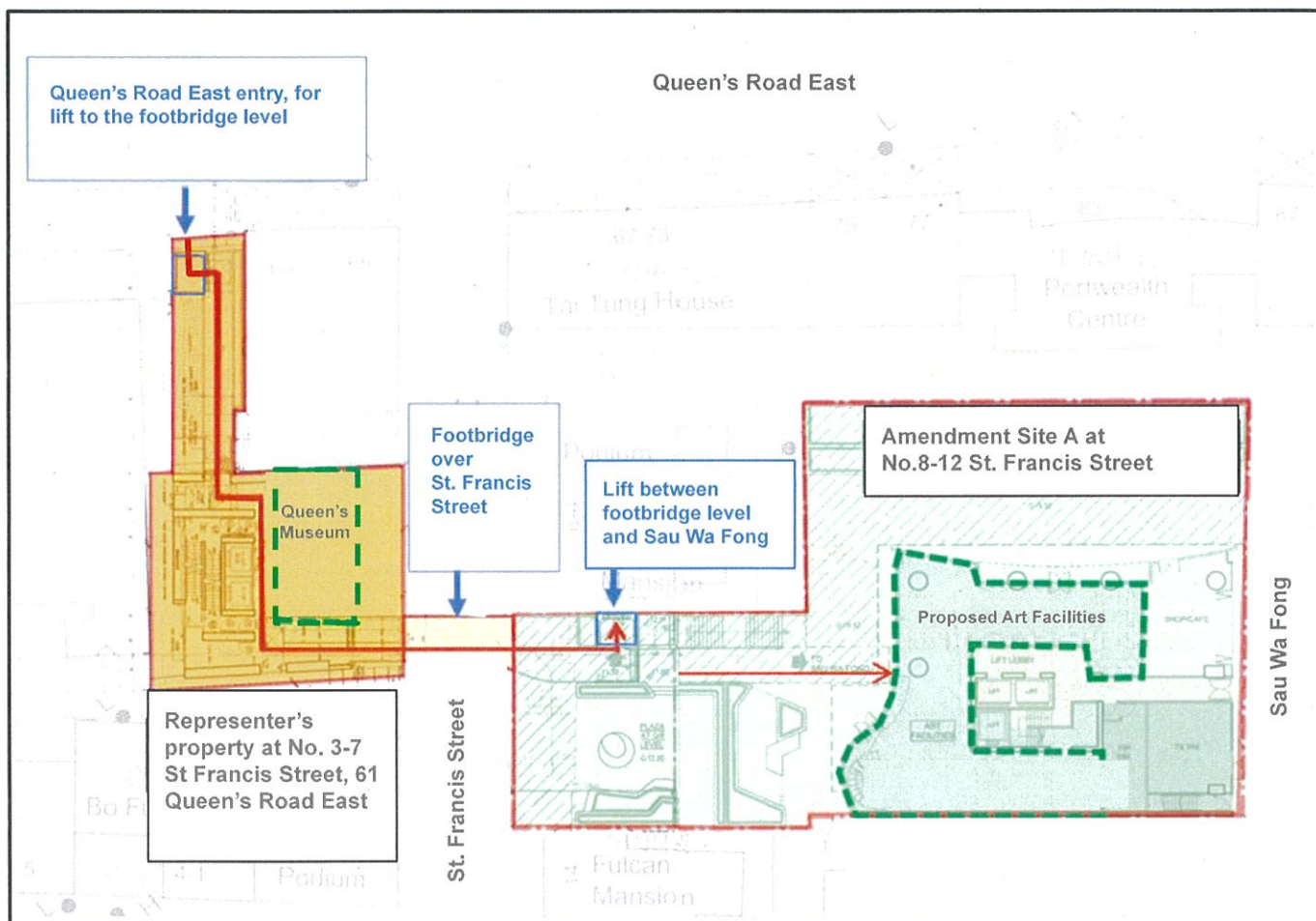


Figure 8. Diagrammatic plan indicating the envisaged footbridge over St. Francis Street, completing a comprehensive barrier-free and extensive pedestrian network between Queen's Road East and Sau Wa Fong.



QR Code for scanning : A walkthrough video of the footbridge, from the Queen's Road East entry of the Representer's property to the envisaged footbridge over St. Francis Street for connection to Amendment Site A.

7. Conclusion

- 7.1 The Amendment Items, specifically their respective barrier-free access and Proposed Open Space, will change the tranquil environment of Sau Wa Fong that is considered important for preservation under the Explanatory Statement for the "R(C)" zoning of the OZP. The intensified development density is considered excessive, also in terms of urban design considerations in the relationship with the low-rise low density "R(C)" cluster and Nam Koo Terrace.
- 7.2 At the same time, the barrier-free access and Proposed Open Space will induce additional traffic on St. Francis Street. The existing street facilities for the pedestrians, elderly and disabled persons are inadequate to cater for the significant increase in residents and visitors.
- 7.3 The magnitude of the development intensification is not supported by proportional planning/ public gain in form of transport mitigation and/ or improvement measures, resulting in traffic hazards that have not been properly resolved, especially for persons with disability. The MPC did not address any of the pedestrian safety issues which were not thought to be of any prime importance and were given little weight. It is irresponsible for the TPB in carrying out its functions in accordance with S3 of the Town Planning Ordinance, to promote an increase in development density while the potential traffic impact, public safety issues and general public amenity on the surrounding road networks will all be adversely affected as a result of the future development at the Amendment Sites.
- 7.4 The TPB's favourable consideration of this Representation is sought, in accepting the reasons for the concern on Amendment Items A and B1 of the Draft OZP and the proposed amendments.



林健忠曉陽慈善基金會
LAM KIN CHUNG MORNING SUN
CHARITY FUND
Found 1992

Representation Number:
TPB/R/S/H5/32 -R12

Submission Number:
TPB/R/S/H5/32 -S020

林健忠曉陽慈善基金會

啓功題

林健忠曉陽慈善基金會

還中題

林健忠曉陽慈善基金會

元應題

林健忠曉陽慈善基金會反對秀華坊及

南固台地積比率由五倍增加至九倍 25.8.2025

RECEIVED

25 AUG 2025

Town Planning Board

1. 城規會於 2023 年 5 月 OZP 闡明秀華坊需要維持一個有特色的寧靜環境，維持秀華坊地積比率 5 倍，但是四個月後，九月又通過秀華坊發展商的申請由 5 倍增加至 9 倍(或 10.18 倍)。為什麼四個月會有這樣重大的改變？城規會應該有一個合理的解釋。
2. 秀華坊的發展商建議中的 24 小時通道及電梯只是將龐大數量的居民推往危險的馬路。根據秀華坊發展商呈交的申請書，重建後將會有 587 人居住；南固臺 312 個單位，每個單位 960 方呎。我估計最少住 4 個人，即是南固臺總居住人口大約在 3840 人左右。由於金鐘站是 4 線交匯，我估計大概有三分之二人每會選擇往聖佛蘭士街方向返工放工或返學放學，即是有 2560 人。2560 人一半從聖佛蘭士街上(即星街)前往金鐘站，一半經秀華坊 24 小時通道及電梯 1280 人往聖佛蘭士街下(近皇后大道東)。即是返工放工或返學放學會 587+1280=1867 人使用 24 小時通道及電梯。以電梯上落每次需要一分鐘運送 18 個人，需時 100 分鐘，即是 1.67 小時才能完成運送，當然大部份秀華坊南固臺的住客不會等電梯，仍然會選擇用石級步出馬路(老人家及坐輪椅殘疾人怎樣呢?)，再加上原本居住在秀華坊的住客，交通極其混亂的情況可以想像！
3. 秀華坊的發展商建議把聖佛蘭士街 10 及 12 號作為避車處，我認為會增加危險性及交通意外。搬運傢俬或上落貨都會利用這個位不用抄牌霸住不走，有管理員亦奈何唔何！這些都是 common sense
4. 我看到贊成意見有嘉諾撒聖方濟各書院 College，請留意：這是中學，地址是位於堅尼地道 9 至 13 號。但是我要指出有危險的是嘉諾撒聖方濟各小學 School，學校地址是聖佛蘭士街 44 至 46 號，返學放學的時段學生都是利用聖佛蘭士街或星街，提高地地積比率必然引來更多汽車同時從東西兩個方向駛上聖佛蘭士街，險象橫生！

1992年根據香港稅務局第88條成立之認可公共性質慈善團體 Charitable organization established in 1992 under section 88 Rules and Regulations of Inland Revenue Hong Kong

捐贈項目：香港中文大學林健忠電腦中心、逸仙樓 美國哈佛大學林健忠演講室等

Donation Items: Kin-Chung Lam Room, South Building, Harvard University etc...

郵寄地址：香港灣仔摩利臣山郵局47174號郵箱 Mailing address: P. O. Box 47174, Morrison Hill Post Office, Wan Chai, Hong Kong

Website瀏覽網址www.lamkinchung.com/ www.林健忠.com 電郵 email: lamkc79@gmail.com

5. 我和我的慈善基金會自從 1992 年成立以來捐款已逾億元，配合十四.五規劃中打造香港成為“中外文化藝術交流中心”，也是聖佛蘭士街 3.5.7 號皇后大道東 61 號地下至二樓的全世界第一個 8K 數碼博物館“皇者仁風”承辦單位，落成後必定引來大很多香港、內地及外國遊客參觀，港人及遊客也會有老人家及坐輪椅的殘疾人士，所以我非常關注增加秀華坊及南固臺兩個地盤地積比率之後的交通情況。
6. 世界知名拍賣行 Sotheby' s and Bonhams 就在 “皇者仁風”的斜對面太古廣場第六期，15 分鐘步行就到 Christie 也在 Henderson。這個區域已經形成一個世界級的 Art Hub，城規會在規劃時應該有宏觀的計劃，不能頭痛醫頭、腳痛醫腳(實情是否如此也未能確定)，浪費了這個區域的藝術發展。
7. 2023 年 9 月城規會同意秀華坊增加地積比率，秀華坊發展商的代表也認為不會成為先例。但是話口未完言猶在耳，南固臺發展商已經利用秀華坊 24 小時通道作為增加地積比率的理由之一。地產建設商會副會長梁榮江先生曾經去信城規會表示有這個顧慮是有道理的，我相信秀華坊尚有三個大地盤舊樓都會以此為例，相繼申請增加地積比率由 5 倍至 9 倍。
8. 我隨函附上以前收集的反對意見，希望各位城區會的委員不能掉以輕心，認真審閱。

林健忠曉陽慈善基金會

林健忠,



林健忠

关于创建“敦煌（香港）数码艺术馆”的倡议

致城市规划会：

敦煌文化是丝绸之路中外文化交流的结晶，是中华文化千百年来不断吸收外来文化加以创新的典范。2019年8月19日，习近平总书记视察敦煌研究院，并主持召开座谈会，强调敦煌文化在传承中华优秀传统文化，树立文化自信，以及助力“一带一路”方面的重要意义。以敦煌石窟和藏经洞数万件出土文物为研究对象的敦煌学经过了一百多年，作为国际显学，至今仍然方兴未艾。世界上有二十多个国家都有学者研究敦煌学，敦煌研究院数十年来不断推动着国际敦煌学的发展，并通过敦煌学建立了与世界各国学者的学术交流的平台。特别是近年来，敦煌研究院对外学术交流、对外敦煌艺术展览等活动已成为我国对外文化交流的重要方面，受到中宣部和外交部、文化和旅游部等部委的高度重视。

香港特区是中国对外经济文化交流的重要都市，多年来形成了中外文化交融荟萃的特色，对于推动“一带一路”中外文化交流具有不可替代的作用。今天的香港对于国家的意义正与古代敦煌在丝绸之路上的意义相似。自2016年以来，敦煌研究院与香港文化博物馆合作已举办了三次大规模的敦煌艺术展览，深受香港民众的喜爱，产生了良好的社会影响。如果在香港建立一个平





台，长期展示敦煌文化，既可以使香港民众特别是青年人感受到中华传统文化的独特魅力，更可吸取古人的智慧，借鉴古代敦煌文化对中外文化的强大融合力，助力“一带一路”建设。

最近纪文凤女士传来有关香港城市规划申请编号 Y/H5/7 其中一份公众意见，有开发商将会建设第一个 8K 数码博物馆，可喜可贺！该开发商林健忠博士曾主编“一带一路与香港”中、英文版，也于多年前赞助两个敦煌石窟数码化的工程费用。因此，我建议香港特区政府支持该项倡议，建立“敦煌（香港）数码艺术馆”，长期在香港这个中西文化交流中心展示敦煌文化艺术，并借助敦煌研究院学术研究、文物保护科技以及对外学术交流等方面的力量，推动广泛的国际文化合作与交流，既可取得传承中华文化、凝聚民心的社会效应，又可开创香港特区在大湾区国际文化交流方面的新局面，并逐渐形成本地的文化特色和优势。敦煌研究院将全力支持香港政府在弘扬中华文化、助力“一带一路”方面的举措。

敦煌研究院党委书记

赵声良

2023 年 5 月 18 日



地址：中国甘肃省敦煌市莫高窟, Mogao Grottoes, Dunhuang, Gansu Province, P.R. China
电话 Tel: 0937-8869090 传真 Fax: 0937-8869028 邮编 Pc: 736200
电子邮箱 E-mail: dhyjy@dha.ac.cn 网址 <http://public.dha.ac.cn>

致城市規劃會

有關規劃申請編號 Y/H5/7

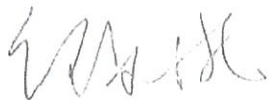
支持公眾意見由皇后大道東 61 號、聖佛蘭士街 7 號接駁行人天橋至秀華坊 36 號→南固臺→香港敦煌數碼博物館(於合和中心二期商場內)

最近我從城市規劃會有關上述申請的公眾意見中，留意到現時皇后大道東 61 號聖佛蘭士街 3 至 7 號正在興建的地盤，該發展商計劃將皇后大道東地舖及聖佛蘭士街一樓二樓的商業部分打造成世界第一個 8K 數碼博物館，讓市民免費參觀；並且建議從聖佛蘭士街 7 號興建一條行人天橋接駁至對面聖佛蘭士街 8 號伸延至秀華坊 36 號地盤，我認為這是值得支持的建議。

由秀華坊 36 號到南固臺~妙鏡台及合和中心第二期咫尺之近。假如能夠優化附近環境，鼓勵合和二期發展商在其 35 萬呎商場中撥出樓面，給予願意承擔的 NGO，成立「香港敦煌數碼博物館」，將敦煌石窟數碼化的成果在香港長期展示，提高港人愛我中華意識、加強國民教育、培養文化自信，同時向外國遊客說好香港故事，一舉數得。只要皇后大道東、秀華坊、合和中心二期 3 個不同的發展商齊心協力，事半功倍，三年可見成效，打造世界文化藝術地標。

行政長官在二〇二二年《施政報告》中宣布成立文化委員會，負責制訂「文藝創意產業發展藍圖」、鼓勵私營市場參與推動文化藝術及創意產業發展的策略，以及推動香港與內地及外地文化藝術交流，實踐成為中外文化藝術交流中心的願景。我的建議，也是落實行政長官成立文化委員會的初衷，希望能得到文化旅遊體育局及發展局的支持。

香港特別行政區文化委員會成員
香港文聯顧問
香港天籟敦煌樂團創辦人及榮譽團長
團結香港基金委員



紀文鳳 GBS, SBS, JP
2023 年 5 月 17 日



香港大學
饒宗頤學術館
Jao Tsung-I Petite Ecole
The University of Hong Kong

致：城市規劃會主席及各位委員：

敬啟者：

近日知悉在 貴會規劃申請編號 Y/H5/7 中，有建議由灣仔聖佛蘭士街 7 號接駁行人天橋至秀華坊 31 號，同時打造一個數碼博物館，免費開放讓公眾欣賞藝術品。本人對此非常贊成。同時，秀華坊與合和中心第二期商場相隔只數分鐘的步行距離。假如合和中心 2 期商場 35 萬平方呎能夠有 5,000 平方呎作為饒宗頤教授書畫藝術數碼展示基地，讓更多市民大眾能夠觀賞，實屬幸事！同時還可以展示數碼化的敦煌壁畫，這對中港藝術交流及國民教育均有莫大裨益。



最近我亦在運輸及物流局的網站看到，運輸及物流局建議在銅鑼灣恩平道和啟超道行人道興建上蓋及興建恩平道、新寧道和禮頓道的有蓋行人天橋 HKM10893，旨在把行人從現有的繁忙路面道路網絡分流，並為行人提供無障礙的通道。這個建議與聖佛蘭士街 7 號接駁天橋到秀華坊作用相若，同時能為秀華坊的傷殘人士提供無障礙通道。

這個構想涵蓋了皇后大道東的 8K 數碼博物館，中間經過南固臺及妙鏡台的文化保育項目，向上伸延至堅尼地道合和中心第二期的展覽館。構想亦配合中央十四五規劃中將香港打造成為中外文化藝術交流中心的願景，祈願建設後的「金鐘·灣仔藝術文化走廊」將會成為一個新的文化地標。

饒宗頤學術館館長

李焯芬 GBS, JP

2023 年 5 月 15 日

香港薄扶林道香港大學鄧志昂樓
Tang Chi Ngong Building, HKU,
Pokfulam Road, Hong Kong
TEL: (852) 3917-5598
FAX: (852) 2559-2562
E-MAIL: jaotlpe@hku.hk



本人、梁榮江，為香港地產建設商會副會長、原華懋集團執行董事及資深顧問、第四屆及第五屆香港特別行政區行政長官選舉委員會委員、從事地產發展 50 年。

最近知悉聖佛蘭士街 8 至 12 號及秀華坊 31 至 36 號地盤發展商申請 rezoning，地積比率由 5 倍增加至 10 倍，本人有下列意見：

1. 我認為善用土地資源無可厚非，但是、在車流的問題上，申請人建議將聖佛蘭士街 8 至 12 號騰空為汽車上落客區，將會吸引更多汽車例如的士及 uber 駛入聖佛蘭士街，令原本已經狹窄的道路更加險象橫生。運輸署現時將聖佛蘭士街劃為雙黃線，用意就是不希望有汽車在聖佛蘭士街上落客或者停泊。申請人建議設立汽車上落客區是相反的做法，任何指示牌對疏導車流都沒有作用。聖佛蘭士街再上就是星街，現時星街已經很多 double parking 情況，這樣星街也會出現嚴重擠塞。
2. 申請人的文件中未能提出解決如何疏導因發展項目突然增加 600 多人口的人流問題。更嚴重的是秀華坊現在有三組物業(見附件)，將會援引先例，紛紛申請以 8 倍至 10 倍的大地積比率重建！這三組物業現時受限制於城市規劃的 outline zoning plan，沒有任何利益誘因重建。但是假如申請人申請獲得批准，這三組物業將有例可援，秀華坊的人口結構便會有巨大的改變。這樣秀華坊 1 至 6 號可重建為樓面面積約 36100 呎左右、秀華坊 18 至 12 號可重建為約 31084 呎左右、秀華坊 23 至 30 號可重建為約 33117 呎左右，總共會有約 100301 呎樓面面積，減去 10000 呎樓面的商業樓面面積，餘下住宅部分以 85% 的實用面積率計算，住宅實用面積為 76756 呎左右，以每伙實用面積 300 呎計算，將會產生 256 伙住戶，以每伙平均 3 人居住，便會有 768 名住客。增加的 1368 (600+768) 名居民的人流問題如何處理，申請人都沒有提及。
3. 基於上述兩個原因，我反對 Y/H5/7 rezoning 的申請。

簽名



梁榮江

香港地產建設商會副會長

原華懋集團執行董事及資深顧問

第四屆及第五屆香港特別行政區行政長官選舉委員會委員

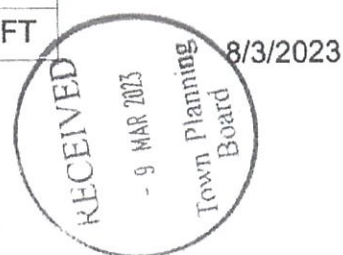


2023 年 3 月 9 日





	AREA	
秀華坊1至6號	353 SM	~3800 SFT
秀華坊18至22號	304 SM	~3272 SFT
秀華坊23至30號	293 SM	~3154 SFT



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☐ Urgent ☐ Return Receipt Requested ☐ Sign ☐ Encrypt ☐ Mark Subject Restricted ☐ Expand personal & public



Public Comment - Broad Development Parameters of the Indicative Development at St Francis Street
16/05/2023 13:58

Y/H/7

Public Comment - Broad Development Parameters of the Indicative Development at St Francis Street

1 attachment



Broad Development Parameters of the Indicative Development at St Francis Street.pdf

Dear Sir/madam,

Please find the supplementary PDF version with diagrams of public comments submitted through website.

With regards

Louis Hou
Chief Executive Officer
Dialogue In The Dark (HK) Foundation Limited

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Broad Development Parameters of the Indicative Development Proposal in Respect of Allocation No. Y/H5/7
Public Comments

Identity: Dialogue In The Dark (HK) Foundation Limited

Focus: Disability Inclusion and accessibility

Name of responsible person: Louis HOU Chung Ming, CEO, of Dialogue In The Dark (HK) Foundation Limited; CHONG Chan-yau, Board Director, Dialogue in the Dark (HK) Foundation Limited

Matter of concern: Accessibility problem for People with Disabilities to the site and a proposed footbridge connecting the subject site to the opposite development (i.e. Queen's Museum at No. 3,5,7 St. Francis Street as Solution)

It is noted a development proposal in respect of allocation No. Y/H5/7 is inviting public comments. As an NGO focusing on promoting inclusion and accessibility for People with Disabilities (PWDs), we are submitting opinions specifically regarding accessibility for PWDs.

Current status

The following points of concerns are based on onsite inspection and reference to the Design Manual: Barrier Free Access 2008 (2021 Edition) and physical site visit of St Francis Street.

1. The Site proposes an elevator to reach St. Francis Street as entrance and exit. The St. Francis Street is not a disability friendly slope (see Diagram 1). According to best practices, the slope ratio between 1:20 (5%) to 1:15 (6.7%) is recommended in the Design Manual. Steep inclines can put a wheelchair in danger of tipping backwards or forwards. By simple observation we are sure that the slope of St. Francis Street is far steeper, which means wheelchair users are basically prohibited to access to the site.



Diagram 1 - St. Francis Street

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2. There is no proper road-crossing facility along St. Francis Street. We would like to specifically point out that at the east side of the street, where the elevator opens, there is even no direct path to Queen's Road East as Tai Tung House has blocked the pathway. (see Diagram 2 and 3) Pedestrians are forced to walk across the street to the west side. There are staircases on the pavement which is a very narrow walkway. Wheelchair access is impossible. There is no audible traffic light signals to assist people with visual impairment. Wheelchair users may be tempted to down to Queen's Road East by the roadside which is dangerous as cars may come up.

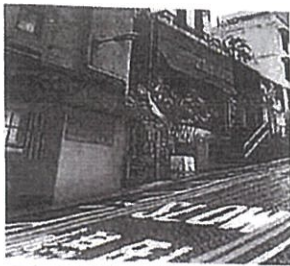


Diagram 2 - East side of St. Francis Street blocked by Tai Tung House

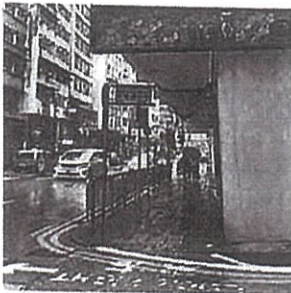


Diagram 3 - No proper path from St. Francis Street to Queen's Road East

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Comments

As a world city, Hong Kong government has a commitment and policy to make the city accessible for all. Both the Convention on the Rights of persons with Disability (CRPD) which China signed and made applicable to Hong Kong, and Hong Kong's Disability Discrimination Ordinance guarantee PWDs' rights of access to physical facilities. The Design Manual has clear guidelines. With reference to the current accessibility problems of the design, we should consider the following solution.

1. Provide An accessible footbridge from Queen's Road East to the upper part of Wanchai including Sau Wa Fong;
2. Avoid the use of St. Francis Street for PWDs' access to a new development

Conclusion

From the perspective of social inclusion and universal accessibility, the proposal of building a footbridge from Sau Wa Fong to Queen's Road East is a feasible solution for access to the new development. It will be equally convenient to people with trolleys, strollers, elderly and young children alike. Hong Kong is entering into an aged community, buildings should be required to maximize accessibility.

END

56.

☐ Urgent ☐ Return Receipt Requested ☐ Sign ☐ Encrypt ☐ Mark Subject Restricted ☐ Expand personal&publi



Y/H5/7意見, 參考號:230519-232636-04403 的附加圖
19/05/2023 23:31

From:

To:

File Ref:

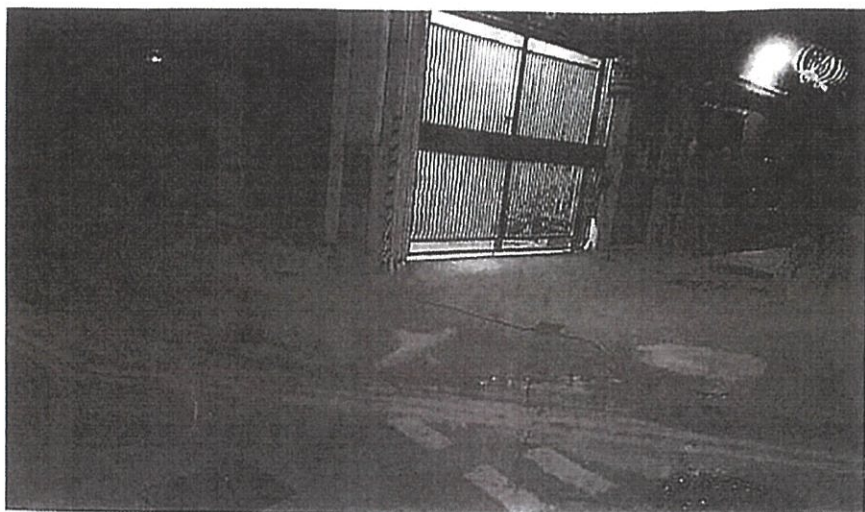
ipbpd@pland.gov.hk

1 attachment



WhatsApp Image 2023-05-19 at 22:50:23.jpeg

發展商用疫情時的數據作報告實在不公, 解除口罩令和通關後的秀華坊實在旺了很多, 用這些舊數據是低估了工和對社區的沖擊。
報告中Pedestrian assessment 5.2 提到的“Pedestrian ramp”其實得到街坊棄用。發展商批評它的GRADIENT 1:7 只是最邊的那個位, 說它最窄1m, 其實只是一小部份。發展商不是又是計劃起條1m闊的新路嗎? 真是雞蛋挑骨頭(圖已EMAIL到貴處)。如想平坦一點, 只要向北行前一點才走出聖佛蘭士街便可, 無須加在斜路中間加多個LIFT。





香港汽車高級駕駛協會
INSTITUTE OF ADVANCED MOTORISTS HONG KONG

道路安全議會委員	MEMBER OF THE ROAD SAFETY COUNCIL (H.K.)
道路速度檢討工作小組組員	MEMBER OF SPEED LIMIT REVIEW WORKING GROUP (H.K.)
道路安全研究委員會委員	MEMBER OF THE ROAD SAFETY RESEARCH COMMITTEE (H.K.)
道路安全宣傳運動委員會委員	MEMBER OF THE ROAD SAFETY CAMPAIGN COMMITTEE (H.K.)
英國皇家防止意外協會會員	MEMBER OF ROYAL SOCIETY FOR PREVENTION OF ACCIDENTS (U.K.)



致：城市規劃委員會
香港北角渣華道 333 號
北角政府合署 15 樓

有關：規劃申請編號 - Y/H5/7
香港灣仔秀華坊 31-36 號及聖佛蘭士街 8-12 號

本人在城市規劃委員會網頁留意到以上規劃申請，並特別留意到在行政摘要第二項“在聖佛蘭士街提供一個公共落客處”的建議，從交通安全角度發表本人意見。

1. 聖佛蘭士街路況如下：

- 聖佛蘭士街是通往星街及萬茂里的主要通道
- 單程單線車道，路面狹窄
- 路面兩旁刷以雙黃線，24 小時不準停車
- 路面陡斜(1:5)
- 5.5 公噸以上不可進入

(請參閱附圖 1-3)

在這特殊道路情況下，如果在 8-12 號路邊設立“公共落客處”，將會有以下潛在危險：

2.1 隨著區內(包括星街、秀華坊)多項重建項目，未來區內人口將大幅上升。而通往皇后大道東的行人通道沒有增加，估計聖佛蘭士街將日益繁忙，人車爭路的情況會越加嚴重。

2.2 在此情況車輛駛進或駛離“公共落客處”，車輛與行人容易因人車爭路，如果互不忍讓，容易發生意外。



香港汽車高級駕駛協會
INSTITUTE OF ADVANCED MOTORISTS HONG KONG

道路安全議會委員	MEMBER OF THE ROAD SAFETY COUNCIL (H.K.)
道路速度檢討工作小組組員	MEMBER OF SPEED LIMIT REVIEW WORKING GROUP (H.K.)
道路安全研究委員會委員	MEMBER OF THE ROAD SAFETY RESEARCH COMMITTEE (H.K.)
道路安全宣傳運動委員會委員	MEMBER OF THE ROAD SAFETY CAMPAIGN COMMITTEE (H.K.)
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- 2.3 “公共落客處”設在斗斜路段，車輛在“公共落客處”停車或起動時容易發生“溜後”現象，由以棍波輕型貨VAN及輕型貨車為甚。容易對路造成驚嚇或意外。
- 2.4 規劃中的“公共落客處”連駛入駛出路段只有11米長，以現時私家車平均5米長度（輕型貨車更達7米長），“公共落客處”太短了，車輛駛入駛出將相當困難。
- 2.5 如在“公共落客處”已有車輛停放，從後而來車輛欲進入該處須停車等候，因車尾部份佔據聖佛蘭士街而造成交通阻塞。（請參閱附圖4）
- 2.6 當車輛從“公共落客處”駛出聖佛蘭士街，駕駛人後方視野容易墮入“視野盲點”容易與後來車發生碰撞。（請參閱附圖5）
- 2.7 當車輛（A車）從“公共落客處”駛出而剛好有車輛（B車）駛上聖佛蘭士街，駛上的車輛（B車）要讓路甚至急停。如當時有其他車跟貼B車駛上（注意：由於路斜，駕駛人士須加大油門上斜）容易碰撞前車。

總括而言，由於聖佛蘭士街路面斗斜，狹窄，未來路人大量增加，並不適宜在8-12號路旁加設“公共落客處”，對公眾造成意外風險。只有11米長的“公共落客處”也太短，駛入駛出相當困難。車輛可能不完全駛進“公共落客處”而對後來車輛造成阻塞。本人反對此建議。



江日雄
香港汽車高級駕駛協會主席

2022年12月8日



香港汽車高級駕駛協會
INSTITUTE OF ADVANCED MOTORISTS HONG KONG

道路安全議會委員	MEMBER OF THE ROAD SAFETY COUNCIL (H.K.)
道路速度檢討工作小組組員	MEMBER OF SPEED LIMIT REVIEW WORKING GROUP (H.K.)
道路安全研究委員會委員	MEMBER OF THE ROAD SAFETY RESEARCH COMMITTEE (H.K.)
道路安全宣傳運動委員會委員	MEMBER OF THE ROAD SAFETY CAMPAIGN COMMITTEE (H.K.)
英國皇家防止意外協會會員	MEMBER OF ROYAL SOCIETY FOR PREVENTION OF ACCIDENTS (U.K.)



致：城市規劃委員會
香港北角渣華道333號
北角政府合署15樓

有關：規劃申請編號- Y/H5/7
香港灣仔秀華坊 31-36 號及聖佛蘭士街8-12號

本人於2022年12月8日及2023年3月8日分別致函貴會，有關以上規劃其中“在聖佛蘭士街提供一個公共落客處”的建議，提出本人意見。

最近在貴會網頁留意到申請人於2023年6月27日提交回應文件，提出在“落客處”設置一個車輛旋轉台(Turntable)，估計是供車輛掉頭之用，本人欲提出以下意見：

1. 估計車輛駛進入口，上旋轉台，上/落客，旋轉台轉動180度，車輛駛出入口所需時間約1分鐘(如客貨車上/落貨，或使用輪椅人士更不止此數)，過程中如果有第2部車欲進入時，只可暫時停泊在入口處(附圖②車位置)的行人路上，對原本已非常狹窄的行人路完全封閉，造成阻塞。
2. 車輛進入或離開旋轉台都會橫越行人路，造成人車爭路，易生意外。

一般而言，車輛旋轉台只適用於以升降機上落的小型停車場，交通流量少亦不影響行人。設置在規劃中的聖佛蘭士街物業內並不適合，容易造成人車爭路，易生意外。本人反對該項建議。

江日雄
香港汽車高級駕駛協會主席
電話：
2023年7月7日

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

參考編號

Reference Number:

230721-101622-01985

提交限期

Deadline for submission:

21/07/2023

提交日期及時間

Date and time of submission:

21/07/2023 10:16:22

有關的規劃申請編號

The application no. to which the comment relates:

Y/H5/7

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Dominic Wong

意見詳情

Details of the Comment :

Objection to this application. Trying to use the turnaround circle to solve the potential traffic problems arose from this application is totally unreasonable at all.

Reasons of objection.

1. Huge potential increase in working class peoples in future, especially in peak hours.
2. No any effective way or plans of release traffic and pedestrian. They all will heavily rely on the use of St Francis Street. They did nothing to plan the bridge across the St Francis Street. Even no immature compromise or discussion with other neighbour stake holder or other developers at all. Seems just making a dream story for the said "footbridge" which the applicant mention in the application papers. Integrity issue from applicant because she never start to plan for the footbridge. Never ask for cooperation from other stake holders.
3. More and more similar application over there will be coming if this application approved. Damage to the low density planning intention to "Sau WA Fong".
4. It is a common knowledge that no effective new ways from applicant for the future great increase of working peoples in peak hours. Even some traffic consultants may manipulate the traffic figures, which cannot replace a common sense that there will be significant overflows of pedestrian.

In sum, this application totally ignore its negative impact and social costs to the public at all. Applicant just abuse the town planning procedures by repeatedly amend the application in order to mislead the board that less and less objections from coming amendments. In order to hope that the public are losing their patience in this long "battle". On the contrary, the reality is that there are more and more objections of this applications.

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

230714-125844-60960

提交限期**Deadline for submission:**

21/07/2023

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

14/07/2023 12:58:44

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

Y/H5/7

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

先生 Mr. Dominic wong

意見詳情**Details of the Comment :**

The round table is totally useless and it take long time to turn one car which result in creating traffic jam in st Francis street. Unrealistic solution at all.

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

參考編號

Reference Number:

230721-094100-66472

提交限期

Deadline for submission:

21/07/2023

提交日期及時間

Date and time of submission:

21/07/2023 09:41:00

有關的規劃申請編號

The application no. to which the comment relates:

Y/H5/7

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Jason Peng

意見詳情

Details of the Comment :

It is non-sense to use such a turnaround circle, in order to improve the traffic flow because the estimated time for each turnaround may be more than one minute and will results in long waiting line behind. It can not help to release the traffic jam at all. It is foresee that the once this application approved, the future significance increase of working class residents will be inevitable using St Francis street to go to Queens Road East for convenience purpose.

Besides, in case this application approved, there will be more coming similar applications at the said site surrounding area, I see no reasons the later similar applications can be rejected if this application approved. There will be disaster situation at Sau Wa Fong area afterwards. The planning department's and public's "low density vision" of Sau Wa Fong will no longer existed anymore.

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

230721-105813-63189

提交限期**Deadline for submission:**

21/07/2023

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

21/07/2023 10:58:13

有關的規劃申請編號**The application no. to which the comment relates:** Y/H5/7**「提意見人」姓名/名稱****Name of person making this comment:**

夫人 Mrs. pang man ki

意見詳情**Details of the Comment :**

係好有特式一個地方, 好CHILL 好舒服同relex, 可否香港唔好全部一樣, 比返小小空間透氣

65

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

參考編號

Reference Number:

230721-110504-29834

提交限期

Deadline for submission:

21/07/2023

提交日期及時間

Date and time of submission:

21/07/2023 11:05:04

有關的規劃申請編號

The application no. to which the comment relates: Y/H5/7

「提意見人」姓名/名稱

Name of person making this comment:

小姐 Miss Lai Yan Yi

意見詳情

Details of the Comment :

強烈反對

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

參考編號

Reference Number:

230721-124714-71894

提交限期

Deadline for submission:

21/07/2023

提交日期及時間

Date and time of submission:

21/07/2023 12:47:14

有關的規劃申請編號

The application no. to which the comment relates:

Y/H5/7

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Ho Wai Leung

意見詳情

Details of the Comment:

我是一位關心香港發展的市民，我希望向您提出反對清拆聖佛蘭士街10-12號的舊樓的意見。

聖佛蘭士街10-12號的舊樓是一座有著悠久歷史和獨特風格的建築，擁有超過50年歷史，建築風格為中西合璧的洋樓，在12號的店舖入邊更加有唯一一口在灣仔的古井，是香港的歷史文化遺產。這座建築物所代表的歷史價值和文化意義，不僅僅是一個建築物那麼簡單，更代表了香港人民的集體記憶和文化認同。

然而，現在有計劃將這座建築物拆除，以興建新的商業樓宇。我們認為這樣的行為是不負責任的，將會對香港的文化和歷史產生負面影響。如果這座建築物被拆除，將會失去一個重要的文化遺產，這是無法彌補的損失。

此外，現在這座建築物也是一個文化藝術的聚集地，在近年這裏不僅舉辦有復古懷舊的藝術展，也有很多藝術文化人聚集於此，這些活動不僅讓市民有機會欣賞藝術，更是讓這座建築物重新燃起了生命力，成為一個社區文化的重要象徵。

聖佛蘭士街10-12號的舊樓也是一座具有社區意義的建築物，它不僅僅是一個建築，更是一個社區的文化中心。這座建築物一直是周圍社區的一部分，也是社區文化的一部分。如果這座建築物被拆除，將會破壞社區的文化和歷史，對居民的情感和生活方式產生不良影響。

我們認為，保護聖佛蘭士街10-12號的舊樓不僅僅是保護一座建築物，更是保護香港的文化和歷史遺產，保護居民的權益和情感。如果這座建築物能夠得到保護，不僅能夠保留香港的歷史和文化，也能夠成為一個新的文化中心，繼續為社區服務，成為團結社區的重要支柱。

在現代社會，文化和歷史遺產的保護越來越受到重視。這不僅僅是對歷史和文化的尊重，更是對未來的負責任。保護聖佛蘭士街10-12號的舊樓不僅僅是保護一座建築物，更是保護香港的文化和歷史遺產，保護社區的文化和歷史，保護居民的權益和情感。

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

230721-011933-92179

提交限期**Deadline for submission:**

21/07/2023

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

21/07/2023 01:19:33

有關的規劃申請編號**The application no. to which the comment relates:** Y/H5/7**「提意見人」姓名/名稱****Name of person making this comment:**

先生 Mr. 盧偉力

意見詳情**Details of the Comment :**

有關秀華坊發展商去年提出rezoning的方案中，提及將會有一個art hub由 Asia Art Archive 管理。但是到現在為止看不到發展商給城規會有任何具體方案。例如發展商會每年會提供AAA 管理營運基金多少？秀華坊申請人至今也沒有一個AAA詳細的營運計劃提供給城規會及公眾知悉。在上述這兩個模糊的要項上未能加以詳細釐清之前，我反對秀華坊發展商rezoning的申請。

盧偉力

前香港藝術發展局藝術評論組主席

香港浸會大學電影學院榮休副教授

2023年7月20日

城市規劃委員會各位成員：

大家好，本人徐沛之，從事水墨國畫及書法創作多年，知悉有關香港灣仔秀華坊 31 至 36 號及聖佛蘭士街 8 至 12 號的規劃申請(編號-Y/H5/7)，其中有一項公眾意見是用天橋連接聖佛蘭士街兩個不同的地盤，我是非常贊成的，同時如果區內發展商能夠齊心協力，將秀華坊至合和中心第二期商場之間的通道美優化，合和中心第二期 40 萬商場能夠撥出一萬呎給本地藝術家作為長期展覽的地方，支援本地創作，解決現時本地藝術家苦無場地可以提供長期展覽，西九以及會展的租金亦並非本地藝術家可以負擔。貫通金鐘皇后大道東的數碼博物館至灣仔堅尼地道，將這個區分既蛻變成新蘇豪區。

徐沛之

敬啟

香港當代藝術獎 2012 青年藝術家獎

中國美術學院書法系博士

曾任香港中文大學專業進修學院藝術及設計課程統籌

香港中文大學、科技大學兼任講師

電郵: [REDACTED]

2023 年 5 月 9 日

16 MAY

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

參考編號

Reference Number:

230721-124714-71894

提交限期

Deadline for submission:

21/07/2023

提交日期及時間

Date and time of submission:

21/07/2023 12:47:14

有關的規劃申請編號

The application no. to which the comment relates:

Y/H5/7

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Ho Wai Leung

意見詳情

Details of the Comment:

我是一位關心香港發展的市民，我希望向您提出反對清拆聖佛蘭士街10-12號的舊樓的意見。

聖佛蘭士街10-12號的舊樓是一座有著悠久歷史和獨特風格的建築，擁有超過50年歷史，建築風格為中西合璧的洋樓，在12號的店舖入邊更加有唯一一口在灣仔的古井，是香港的歷史文化遺產。這座建築物所代表的歷史價值和文化意義，不僅僅是一個建築物那麼簡單，更代表了香港人民的集體記憶和文化認同。

然而，現在有計劃將這座建築物拆除，以興建新的商業樓宇。我們認為這樣的行為是不負責任的，將會對香港的文化和歷史產生負面影響。如果這座建築物被拆除，將會失去一個重要的文化遺產，這是無法彌補的損失。

此外，現在這座建築物也是一個文化藝術的聚集地，在近年這裏不僅舉辦有復古懷舊的藝術展，也有很多藝術文化人聚集於此，這些活動不僅讓市民有機會欣賞藝術，更是讓這座建築物重新燃起了生命力，成為一個社區文化的重要象徵。

聖佛蘭士街10-12號的舊樓也是一座具有社區意義的建築物，它不僅僅是一個建築，更是一個社區的文化中心。這座建築物一直是周圍社區的一部分，也是社區文化的一部分。如果這座建築物被拆除，將會破壞社區的文化和歷史，對居民的情感和生活方式產生不良影響。

我們認為，保護聖佛蘭士街10-12號的舊樓不僅僅是保護一座建築物，更是保護香港的文化和歷史遺產，保護居民的權益和情感。如果這座建築物能夠得到保護，不僅能夠保留香港的歷史和文化，也能夠成為一個新的文化中心，繼續為社區服務，成為團結社區的重要支柱。

在現代社會，文化和歷史遺產的保護越來越受到重視。這不僅僅是對歷史和文化的尊重，更是對未來的負責任。保護聖佛蘭士街10-12號的舊樓不僅僅是保護一座建築物，更是保護香港的文化和歷史遺產，保護社區的文化和歷史，保護居民的權益和情感。

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

參考編號

Reference Number:

230721-164929-06324

提交限期

Deadline for submission:

21/07/2023

提交日期及時間

Date and time of submission:

21/07/2023 16:49:29

有關的規劃申請編號

The application no. to which the comment relates:

Y/H5/7

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Ken

意見詳情

Details of the Comment :

As a concerned resident of our beloved community, I wish to express my strong objections to the proposed development of our historic area.

Preserving the history and character of our neighborhoods is crucial for our sense of identity and continuity. The area is a living testament to our shared past and a cultural asset that should be valued and protected.

Firstly, the unique architectural heritage in 秀華坊 serves as an irreplaceable connection to our past and is a source of pride for our community. Each building, with its distinctive style and story, contributes to the area's character. The proposed development risks destroying these heritage sites, leaving a void that cannot be filled by modern structures.

Secondly, the potential increase in traffic and noise levels due to the proposed development could disturb the tranquility of our community. The charm of our neighborhood lies in its quiet streets and relaxed pace of life, which would inevitably be disrupted by the influx of new residents and business activities.

Finally, the proposed development could lead to a rise in property prices, potentially driving out long-time residents who may be unable to afford the increased cost of living. This would not only result in a loss of community spirit, but also contribute to the growing problem of gentrification.

In conclusion, while development and progress are often beneficial, they should not come at the expense of our cultural heritage and community fabric. I strongly urge the relevant authorities to reconsider the proposed development and to seek alternative solutions that respect and preserve the unique character of our historic area.

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

參考編號

Reference Number:

230721-234846-90866

提交限期

Deadline for submission:

21/07/2023

提交日期及時間

Date and time of submission:

21/07/2023 23:48:46

有關的規劃申請編號

The application no. to which the comment relates:

Y/H5/7

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Shuda

意見詳情

Details of the Comment :

In regard o this amendment, The applicant did nothing to communicate to the public or stake holders surrounding the site. The applicant did not care at all the influence of this application upon t he neighbor. We are a little bit upset on the attitude of the applicant.

Representation Number:
TPB/R/S/H5/32 -R13

Submission Number:
TPB/R/S/H5/32 -S019

RECEIVED

25 AUG 2025

Town Planning
Board

致城規會：

我是香港天籟敦煌樂團的藝術總監甘聖希，我反對城規會在未有充分考慮皇后大道東 61 號及聖佛蘭士街 3 至 7 號 Queen's Museum 提出接駁行人天橋到秀華坊 36 號的建議的大前提下，增加秀華坊及南固臺的地積比率。

行政長官在 2022 年施政報告中宣佈成立文化委員會，鼓勵私營市場參與推動文化藝術及創意產業發展的策略。然而，秀華坊及南固臺的發展商業主在無需補地價的情況下，獲得地積比率從 5 倍提升至 9 倍的優惠，而這樣的安排未能充分考慮該區的文化潛力及長遠發展方向。城規會應該以國家「十四五規劃」的政策為指導，將灣仔南區打造成香港中外文化藝術交流的地標，而非採取碎片化的規劃方式。

目前秀華坊發展商的藝術合作夥伴——亞洲藝術文獻庫，只是將辦公地點由荷李活道搬到秀華坊，這並未帶來真正的創新或突破。作為一名深耕文化藝術領域的從業者，我對該區的文化發展提出以下建議：

以敦煌文化為主題，打造香港中外文化藝術地標

敦煌是香港的重要文化參照，兩地同為中外文化交流的中心，匯聚不同國籍、文化、信仰及背景的人。敦煌以其包容性和多元性，成為一個全面的中華文化教育基地，其範疇涵蓋美術、宗教、經濟、政治和人民生活等多方面。敦煌不僅是古代唐朝絲綢之路的重要節點，更是中外文化交流的熔爐，這與現今香港的角色十分相似。

而香港多年來，無論是政府營運的博物館，還是其他機構舉辦的展覽，雖然都曾以不同形式展示過敦煌文化，但始終未能設立一個長駐的文化基地。相比之下，國內外近年越來越多敦煌主題館成立，充分顯示敦煌在推廣中華文化及彰顯人類文明價值方面的重要性。如果此次能促成以敦煌為主題的文化項目，不僅是私營企業對文化發展的重大支持，更是對香港文化及中華傳統文化傳承的一次重要實踐，具有示範意義。

具體建議

1. 舉辦敦煌主題展覽

在區內設立常設或巡迴性的敦煌文化展覽，展示敦煌在藝術、歷史及文化上的成就，讓市民及遊客深入了解其中的價值。

2. 舉辦敦煌主題音樂會

舉行敦煌主題音樂會，並在樓宇間的行人天橋設置巨型屏幕，進行現場直播，讓灣仔區的市民能夠近距離感受敦煌藝術文化的魅力。

3. 多面向的文化活動

舉辦專家講座、文化工作坊等多元文化活動，讓灣仔區居民及不同年齡、階層的市民透過敦煌文化，深化對中華文化的認識。

4. 建立敦煌長駐文化基地

在灣仔設立一個長駐的敦煌文化及藝術基地，讓香港成為中華文化與國際交流的樞紐。這將是一次創新的嘗試，讓香港的文化地標不僅僅是展示，更能成為市民及遊客學習和體驗中華文化的中心。

總結

敦煌文化兼具教育性與藝術價值，是香港推動中外文化交流的最佳象徵。透過以敦煌為主題的文化地標建設，不僅能夠傳承中華文化的優秀傳統，更能讓人們重新審視香港的角色與價值。我呼籲城規會以更宏觀的視野審視灣仔南區的發展規劃，結合文化與創意產業，創造一個充滿活力與意義的文化藝術交流平台。

此致

香港天籟敦煌樂團藝術總監

甘聖希



身份證頭四個字

電郵地址