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To: tpbpd/PLAND <tpbpd@pland.gov.hk>  
Subject: PROPOSED AMENDMENTS TO LAM TEI AND YICK YUEN OZP  
NO. S/TM-LTYT/12

Submission Number:  
TPB/R/S/TM-LTYT/13-S001

## PROPOSED AMENDMENTS TO LAM TEI AND YICK YUEN OZP NO. S/TM-LTYT/12

Dear TPB Members,

Object to both items as they are exploitive in nature. They are multiple times the original approved plans. The mantra is that development in NT will improve the quality of life for the community providing larger homes and more recreational opportunities. But the reality is ever smaller units in high rise towers built on limited footprints with noise pollution issues are essentially retrograde in nature and certainly the source of many mental health issues related to a lack of community due to limited access to outdoor spaces, reduced social interaction, and potential feelings of isolation among residents.

The potential for escape from claustrophobia is far greater in a more low rise environment with a community within easy proximity.

**Item A** – about 0.2ha. Y/TM-LTYT/10 Approved 14 July 2023

Lots 220 RP and 221 in D.D.130, San Hing Road, San Hing Tsuen, Tuen Mun

Site area: About 2,255sq.m

Zoning: "Res (Group E)" and "VTD"

Rezone to "Res (Group A) 1 – 2 Towers / 288 Units (16 Units) / PR 5 (1) / 100mPD (26mPD) / OS 788sq.m / 93 Vehicle Parking

The Site was a subject of a previous section 16 application (No.A/TM-LTYT/291) approved upon review in 2016 for proposed flat development with **two blocks of five-storey buildings providing 16 flats.**

*The development intensity adopted for the proposed development was to ensure a development scale compatible with the surroundings and to create a stepped BH profile.*

*To the immediate north and east of the Site was a **large piece of "V" zone mainly occupied by three-storey village houses** of San Hing Tsuen, Tuen Tsz Wai and Tsing Chuen Wai.*

Strong objections. The height of the proposed development is completely out of context with the character of the surrounding area, village houses and villas. Any new development should be compatible with the prevailing panorama.

The reference to stepped height is inappropriate as the surrounding village houses are 9mts high so a development 11 times higher cannot be justified.

The ridge line of Castle Peak would be completely obstructed from the San Hing Tsuen Children's Playground. Ridgelines in NT should be protected in the same way as those of HK Island and Kowloon to ensure that the community continues to enjoy familiar land marks and views.

The reflected heat will in no way be mitigated by the sparse OS that is nothing more than a few potted plants on the periphery.

*To mitigate traffic noise impact, residential floors would be placed on the 6.1m high podium and acoustic balconies with sound absorptive materials would be applied. **The applicant also proposed two air paths (about 8.5m and 10m in width) at podium level, building setback along SHR, a possible pedestrian connection and a piazza along SHR to enhance air ventilation, connectivity, streetscape and visual amenity of the area.***

Indication that the inappropriately high wall will pose ventilation and other issues once the PH estates are developed. 9mts to 100mts to 160mts is certainly stretching the definition of stepped height. Any development on this site should be medium not high rise in order to conform to a stepped height concept and avoid unacceptable visual and ventilation impact on existing communities.

In addition to the inappropriate height and obstruction, that the EVA takes up almost 50% of the site is a serious waste of precious land resources.

**Item B** – about 0.99ha. Rezoning of a site near LRT Lam Tei Station for Residential Development.

Y/TM-LTYY/9 Approved Sept 2021

Lots 523 RP, 714 RP, 718 RP, 719 RP, 721 RP, 722 RP, 723 RP, 724 RP and 725 in D.D. 130 and adjoining Government Land, Lam Tei

Site area: About 8,165sq.m (Includes Government Land of about 1,164 sq.m)

Zoning: "Res (Group B) 1"

Proposed Amendment(s): Rezone to "Res (Group B) 4"

9 Blocks / 307 Units / PR 2.5 / 35mPD / SC 33% / OS 839sq.m / 76 Vehicle Parking *The applicant reviewed the planned public and private residential developments nearby as well as the capacity of the major infrastructure and considered feasible to **further increase the PR** so as to better utilise scarce land resources and to boost housing supply. Therefore, the applicant submitted another section 12A application No. Y/TM-LTYY/11 in early 2024, covering a slightly larger site area with higher development intensity*

Indeed, So, the number of units increased 4 times. **However, note that the size of the units is halved so essentially no more than NANO units with an average size of around a mere 350sq.ft.**

This is certainly not in line with the government's PR about these developments providing better living conditions.

Y/TM-LTYT/11 Approved 10 Jan 2025

Site area: About 9,261sq.m (Includes Government Land of about 2,928sq.m)

Zoning: "Res (Group B) 1"

Proposed Amendment(s): Rezone to "Res (Group B) 4"

5 Blocks / 1,385 Units / PR 5 / 110mPD / SC 33% / OS 3,740sq.m / 252 Vehicle Parking

This is a very audacious plan as the OZP stipulates:

*9.3.3 There are 3 sub-areas within this zone. (a) Residential (Group B) 1 ("R(B)1"): Total Area: 4.04 ha The parcel of land located between the Nullah and Castle Peak Road near San Hing Tsuen is zoned for "R(B)1". Residential developments within this zone are restricted to a maximum plot ratio of 1.0, a maximum site coverage of 40% and a maximum building height of 4 storeys over single - storey car park (15m). Two and a half times PR and height.*

It is obvious that the planning intention is for a low rise 'island' near the MTR station to provide some relief from the dense developments to come. This would provide a backdrop to the pedestrian path along the nullah. It is clear from the plans that with this development the path would be nothing more than a passage alongside a concrete wall with a line of small trees acting as a buffer. It is not clear which part of the site is government land that has increased from 15% to almost 32% of the site.

While the nullah at the moment may not be very attractive and have odour issues, the goal should be to improve the quality of the water as has been achieved in Kwun Tong and Kowloon City. It is essential that the new communities have breathing and recreational space.

**The district is severely deficient in DOS, 90%,** and this could be alleviated somewhat with a designated OS along the waterfront. With 30+% of the site GL this could be achieved by juggling the land ownership to provide a buffer between the development and the public footpath and a bike lane that could link up with that on the other side creating a loop that provides exercise opportunities for cyclists who want to avoid open roads. Instead, a mere 7mt is proposed. This displays a complete lack of vision for the district. The site is close to public transport so the potential for a waterfront promenade should be a consideration for the long term.

Note also that the OS provision is still based on the 2sq.m per person formula. This is not in line with pledges to increase the provision to 3.5sq.m. While this may be difficult to achieve in older urban districts, it should be the target for all the new town developments in NT. Moreover most of the LOS for the district is 'planned' but not implemented so is certainly insufficient.

*To mitigate noise impact from LRT and Tuen Ma Line, the applicant proposed to adopt acoustic windows/balconies and single aspect design.*

So much for any improvement in living conditions. Members should question the layout that places so many units to face the rail lines.

**No provision of GIC facilities:**

The number of proposed residents is increased to almost 4,000 but the development provides zero GIC facilities. This is unacceptable as the additional residents will place a burden on existing services. Members can see from HKPSG data that there are shortfalls in many facilities.

What is being ignored is that the facility with which much cheaper land in NT can have its development potential increased multiple times is deterring developers from investing the time and resources required in acquiring ageing properties in mature urban districts. There are thousands of older buildings in poor condition in districts with a full range of community services that could be redeveloped.

**Amendments to the Notes of the Plan**

(d) Incorporation of 'Government Refuse Collection Point' and 'Public Convenience' under Col 1 of the Notes for "V" zone; and corresponding deletion of 'Government Refuse Collection Point' and 'Public Convenience' under Col of the Notes for "V" zone.

OBJECT. COL 2 ENSURES THAT THE UTILITY IS SUBJECT TO PUBLIC SCRUTINY AND THAT LOCATION AND DESIGN ARE NOT INTRUSIVE, TOO BULKY OR AN EYE SORE

(e) Incorporation of 'Field Study/Education/Visitor Centre' and 'Flat' under Col 2 of the Notes for "V" zone.

OBJECT. THE PLANNING INTENTION OF "V" ZONE IS TO PROVIDE FAMILY HOMES FOR INDIGENOUS VILLAGERS. THE PROPOSED AMENDMENTS ENCOURAGE THE ALREADY RAMPANT ABUSE OF THE NTEH POLICY THAT HAS RESULTED IN MOST OF THE RECENT DEVELOPMENTS BEING ACTUALLY UNITS FOR SALE TO OUTSIDERS

(f) Revision to the Planning Intention as well as the Remarks of the Notes for "Coastal Protection Area" zone on filling of land or excavation of land clause in accordance with the Master Schedule of Notes to Statutory Plans.

STRONGEST OBJECTIONS. THIS GIVES THE GOVERNMENT UNFETTERED AND UNACCOUNTABLE POWER TO BASICALLY DO WHATEVER IT WANTS AND MAKES A MOCKERY OF THE ENTIRE PLANNING PROCESS AS THERE IS NO POINT IN PROPOSING CONSERVATION PROJECTS WHEN THE LOTS CONCERNED CAN BE FILLED IN BY HKSAR WHENEVER IT PLEASES WITHOUT BEING SUBJECT TO EVEN MINIMAL SUPERVISION. THE INTERESTS OF THE COMMUNITY WILL BE ENTIRELY ELIMINATED FROM THE PROCESS

(g) Revision to the Remarks of the Notes for "Commercial", "Comprehensive Development Area", "R(A)", "R(B)", "Residential (Group C)", "Residential

(Group D)", "Residential (Group E)" and "GIC" zones on minor relaxation clauses.

CANNOT FIND REF TO THESE REMARKS IN THE PAPER?

Mary Mulvihill

