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Reference No.

檔案編號

Date Received

收到日期

Form

Representation Number:
TPB/R/S/YL-SK/10-R1

Submission Number:
TPB/R/S/YL-SK/10-S120



1. 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），必須遞交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書處。
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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*)

Tenox Development 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

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* 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 Shek Kong Outline Zoning Plan No. S/YL-SK/10
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 an area to the south of Kam Sheung Road and west of Lai Uk Tsuen from "Residential (Group D)" ("R(D)") to "Residential (Group C)" ("R(C)").	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	Please refer to the attached written representation.
<u>Amendments to the Notes of the Plan</u> (a) - Incorporation of a set of Notes for "R(C)" zone with development restrictions.	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	Please refer to the attached written representation.
	<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 attached written representation.		

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.

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@ 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被提出。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」

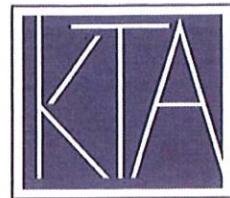
at the appropriate box 請在適當的方格內加上 號

By Hand

Our Ref: S3046a/DD112_LFT_YL/25/001Lg

17 December 2025

Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road
North Point
Hong Kong



PLANNING LIMITED

規劃顧問有限公司

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KOWLOON, HONG KONG

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萬光豐中心16樓K室

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傳真FAX (852) 3426 9737
電郵EMAIL kta@klaplanning.com

Dear Sir/Madam,

**Submission of Written Representation in respect of
Draft Shek Kong Outline Zoning Plan No. S/YL-SK/10**

This Written Representation is prepared and submitted on behalf of Tenox Development Limited (the "Representer"), under Section 6(1) of the Town Planning Ordinance ("TPO") in relation to the Draft Shek Kong Outline Zoning Plan ("Draft OZP") No. S/YL-SK/10 gazetted by the Town Planning Board ("TPB") on 17 October 2025. This Written Representation is made in respect of Amendment Item A and Amendment (a) to the Notes of the Draft OZP:

- Rezoning of an area (about 81,250m²) to the south of Kam Sheung Road and west of Lai Uk Tsuen for residential development, from "Residential (Group D)" ("R(D)") to "R(C)" which is subject to max. PR of 0.8 and max. BH of 6 storeys and 45mPD (together with the Explanatory Statement (ES) related to the new "R(C)" zone)

Details of Representation

(A) Fully Support the Proposed Rezoning of the entire "R(D)" zone to "R(C)" zone

1. As reviewed from Paras. 3.5 to 3.6 of the RNTPC Paper No. 11/25 for consideration by the RNTPC on 19.9.2025, we understand PlanD had conducted a review of the entire "R(D)" zone and considered rezoning the entire "R(D)" zone (the Site) would provide incentives for comprehensive development of the Site and avoid fragmented development.
2. The Representer fully supports the proposed rezoning, which would incentivize land assembly and unlock the development potential of the residual scattered land parcels currently zoned "R(D)" (outside the Application Site of the approved S12A Application No. Y/YL-SK/1). In turn, this would enable a more planned, coordinated and comprehensive development scheme, avoiding piecemeal and fragmented development. Further land consolidation would facilitate more rational site planning, building disposition, open space provision, and well considered pedestrian connectivity, contributing to a better overall living environment. On the contrary, retaining residual "R(D)" pockets may



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make it more difficult to coordinate local area-wide improvements in a comprehensive and coordinated manner.

(B) Views on Imposing the Requirement of planting “Not Less Than 200 New Trees” within Site in the ES

3. It is noted that the following wordings have been incorporated in Para. 9.1.4 of the ES related to the new “R(C)” zone attached to the Notes of the OZP:

“... retaining of five existing trees and planting of not less than 200 new trees of heavy standard within the application site ...”, whereas the application site refers to the Application Site of the approved S12A Application No. Y/YL-SK/1.

4. According to the Landscape Master Plan (LMP) and Tree Preservation and Removal Proposal (TPRP) in the S12A Application, it is revealed that there are 34 nos. of existing trees within the Application Site, of which 5 nos. are proposed to be retained, 28 nos. to be felled and 1 no. to be transplanted. There is also 1 no. of tree on the adjoining Government land (outside the site) proposed to be felled. It is proposed to plant not less than 200 nos. of new trees within site. Having regard to a total 29 nos. of trees to be felled, the ratio of felled trees to newly planted trees (i.e. “tree compensation ratio”) is not less than 1:6.7.
5. The Representer supports the landscape design concept to provide a high-quality living environment for the future residents whilst preserving and enhancing the existing landscape context. The proposed “tree compensation ratio” of 1:6.7 is relatively much higher than 1:1. The Representer considers it unnecessary to specify a fixed minimum number of compensatory trees in the ES for the following reasons:
 - (i) The ultimate site area may change following rezoning and potential land assembly of adjoining lots. In this context, specifying a fixed minimum number of compensatory trees in the ES is unnecessary, as tree compensation is appropriately addressed through a TPRP imposed under lease conditions to the satisfaction of the relevant authorities.
 - (ii) The development will be implemented over time, during which the number, condition, and status of existing trees may differ from those recorded in the 2022 tree survey.
 - (iii) At the General Building Plan (GBP) submission stage, detailed design refinements to the indicative scheme under the Section 12A Application may be required to comply with fire services requirements, building services provisions, and the Buildings Ordinance (BO).
 - (iv) By reviewing the ES of the current 151 nos. of OZPs relating to the residential zone, it is revealed that specifying the minimum numbers of new trees to be planted for a development site is uncommon in the ES. Instead, the ES only cover content relating to the preservation of existing valuable mature trees as far as possible.



(C) Views on the Specific Requirement of Retaining five existing Trees within Site in the ES

6. In the TPRP of the approved S12A Application, it confirms that there are no registered OVTs within Site, but 3 nos. of existing trees meet the requirements for potentially registrable in accordance with the criteria for OVTs set out in TC(W) No. 5/2020, including one *Ficus virens* 大葉榕, one *Ficus microcarpa* 細葉榕 and one *Ficus rumphii* 心葉榕, with DBH over 1m. The other two trees proposed to be retained are also *Ficus microcarpa* 細葉榕, though having DBH 40cm to 70cm.
7. While the Representer endeavours to retain the concerned five trees in the layout, some of them have already been identified to have poor health, structure or form, leaning, or sign of foliage pest. The Representer is concerned whether these trees could be healthily retained at the time of implementation of the proposed development; and whether there are other appropriate alternative measures such as transplanting within site to improve the landscape quality of the proposed development.

(D) Development Restrictions to be Stipulated on the OZP

8. The ES is intended to set out the broad planning intention while key development parameters are to be stipulated on the OZP. It is not the appropriate vehicle to impose a quantitative and scheme-specific landscaping requirements (as proposed under the S12A indicative scheme) in the ES as that can be addressed through the next stage of detailed design, lease conditions and/or the GBP process with updated tree survey and detailed landscape submissions. This is especially the case as and where more land consolidation is anticipated.
9. Specifying an absolute number of trees without making reference to the final site configuration, existing tree conditions and design constraints does not necessarily enhance landscape quality. Planning Department should adopt a more flexible approach, and relevant authorities should take the aforementioned factors into account when considering the TPRP in the coming stages.

(E) Views on the Setback Requirement of at least 50m from Kam Sheung Road

10. Apart from the requirements related to new tree planting and retaining of existing trees, it is also noted that the wording of "setting back of building blocks for at least 50m from Kam Sheung Road" has also been incorporated in Para. 9.1.4 of the ES related to the new "R(C)" zone. According to the Environmental Noise Impact Assessment submitted under the approved S12A Application, it is revealed that with the provision of 50m setback, no noise mitigation measures to the residential blocks are required. However, if the residential blocks are located within 50m from Kam Sheung Road, compliance may still be achieved through other suitable noise mitigation measures (i.e. acoustic windows, façade treatment, building orientation, etc.). This indicates that a 50m setback is not the only means of noise mitigation measures or solutions. The 50m setback requirement is considered overly prescriptive if the residential blocks could be in compliance with noise standards with other suitable mitigation measures. Besides, alternative layout(s) should



be considered by relevant authorities in the detailed design stage, provided that appropriate measures are proposed in compliance with the noise requirements.

(F) Lease Control on the Technical Requirements would be Applicable

11. Subsequent to plan-making process, the landowner has to proceed with the land exchange application and to liaise with LandsD on the formulation of special conditions in the lease. Notwithstanding the above measures proposed under the indicative scheme and technical assessments of the approved S12A Application, **relevant technical requirements could be appropriately imposed through LEASE CONDITIONS**, including but not limited to the preservation of trees, submission of landscape plan and submission of updated/revised noise impact assessment to the satisfaction of the relevant authorities.
12. Through this established mechanism it can be ensured that the **ULTIMATE CONTROL BY RELEVANT AUTHORITIES on the future treatment of trees and noise mitigation measures can be properly addressed at the detailed design stage**, based on the most up-to-date site conditions and technical assessments.

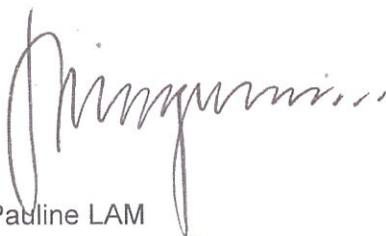
Concluding Remarks

13. The Representer fully support the amendments to the OZP by rezoning the entire "R(D)" zone to "R(C)" zone which is subject to max. PR of 0.8 and max. BH of 6 storeys and 45mPD. Nevertheless, the Representer would like to express that higher design flexibility shall be allowed in the detailed design stage by the relevant authorities, in particular those related to the treatment of trees and 50m setback from Kam Sheung Road, based on the considerations detailed above.

Attached please find the completed Form No. S6 and signed Authorization Letter for consideration by the TPB. Should you have any queries in relation to the above and attached, please do not hesitate to contact the undersigned at 3426 8451.

Thank you for your kind attention.

Yours faithfully
For and on behalf of
KTA PLANNING LTD



Pauline LAM

Encl.: Completed Form No. S6 and Authorization Letter
cc. the Representer

KT/PL/CL/vy

Form

Representation Number:

TPB/R/S/YL-SK/10-R2

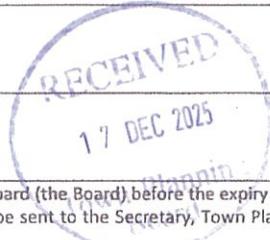
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陳淑梅

(Note: for submission by person, full name shown on Hong Kong Identity card / Passport must be provided)
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Y/YL-SK/1, S/YL-SK/10	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	但是發展商必須妥善做好以下數項工程：1)水喉二級的支路，道路狹窄，需要擴闊道路，使大貨車或其他緊急車輛順利通過，否則可能釀成
Y/YL-SK/1 S/YL-SK/10	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	大災難，因為項目建成後，將會增加數千人口入住，衛生設施，項目周邊沒有中央污水系統，發展商必須處理污水或糞水等，如
Y/YL-SK/1 S/YL-SK/10	<input checked="" type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	處理不當，將會導致細菌散播，嚴重危害居民健康。 3)每逢大雨，項目周邊有水患，幸好我們的家，從設

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。

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[^] 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被提出。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

有過水浸，如項目完成後，因承建商沒有
妥善做好排水設施，因此導致我們的
家水浸，如我們有財物損失等，發展商或
承建商理應負責我們的一切損失。

懇請發展商或承建商顧自己及人，做好
一切設施，造福我們的居民。

Representation Number:

TPB/R/S/YL-SK/10-R3

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tpbpd/PLAND

Submission Number:

TPB/R/S/YL-SK/10-S1

寄件者: Yip Pang LEUNG
寄件日期: 2025年12月11日星期四 17:48
收件者: tpbpd/PLAND
主旨: Re: 石崗分區計劃大綱核准圖編號S/YL-SK/9的修訂
附件: 251211@反對八鄉SYLSK10.pdf; 梁業鵬@S6x1x_new.pdf
類別: Internet Email

敬啟者：

反對《石崗分區計劃大綱草圖編號 S/YL-SK/10》修訂項目（將錦上路以南用地由「住宅（丁類）」改劃為「住宅（丙類）」）

本人梁業鵬，為元朗區議員，現就貴委員會對《石崗分區計劃大綱核准圖編號 S/YL-SK/9》所提出之修訂（主要涉及將錦上路以南、黎屋村以西一幅用地由「住宅（丁類）」地帶改劃為「住宅（丙類）」地帶），代表區內居民及持份者，正式表達強烈反對，理由如下：

一、錦上路交通已長期超出負荷，新增發展勢必加劇擠塞問題

錦上路為八鄉及石崗一帶唯一主要幹道，承擔連接元朗、錦田、大埔及北區之交通功能。然而，該路段於繁忙時段長期出現嚴重擠塞，尤以錦上路與錦田公路交界、蓮花地及黎屋村一帶為交通瓶頸。任何新增住宅發展（如修訂後容許興建約 850 個住宅單位）將帶來大量新增車流，進一步超出道路承載力，對現有居民出行造成不可接受之影響。

二、交通改善承諾未能確保落實，且缺乏整體規劃視野

儘管申請人承諾進行局部交通改善工程（如擴闊行人路及優化路口），惟該等措施並未對錦上路整體路段進行系統性擴容或分流研究，亦無具約束力之落實時間表與發展項目入夥期銜接。若交通工程未能同步完成，新增居民入住後將立即導致區內交通癱瘓，規劃之前瞻性與責任感顯有不足。

三、未充分諮詢八鄉鄉事委員會及當區居民，漠視社區參與原則

是次修訂影響深遠，涉及交通、環境、社區設施等多方面，理應在規劃初期即進行全面諮詢。然而，八鄉鄉事委員會及周邊居民至今未獲貴委員會正式、系統性諮詢，其意見未能反映於修訂方案中。此舉既違反社區參與之規劃原則，亦忽略鄉事委員會作為地區代表的重要角色。

四、區內基礎設施本已短缺，新增人口將加劇社區服務壓力

元朗區多項社區設施（如醫院床位、安老服務、幼兒照顧等）早已供不應求。修訂方案並未提出相應配套或承擔機制，新增人口勢必進一步加重醫療、福利及教育設施負擔，規劃明顯缺乏社會責任考量。

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基於上述理由，本人懇請貴委員會：

1. 否決或暫緩是次修訂項目，直至對錦上路及周邊道路網絡進行全面交通評估，並制定具約束力之整體改善方案；
2. 充分聽取八鄉鄉事委員會、當區居民及相關持份者之意見；
3. 如仍欲推進修訂，須要求發展項目分階段實施，並確保所有交通及基礎設施改善工程完成後，方允許居民入住；
4. 申請人承擔更全面之社會責任，包括為區內短缺之社區設施提供配套或資金支援。

規劃之事，關乎民生福祉與社區可持續發展。在錦上路已不勝負荷、社區設施不足之情況下，強行推動高密度住宅發展，只會加重居民負擔，造成長遠社會問題。本人促請貴委員會慎思民情，以民為本，否決是次不負責任之規劃修訂。

如有任何查詢，歡迎致電 3480 1099 聯絡本人。

tpbpd/PLAND <tpbpd@pland.gov.hk> 於 2025 年 10 月 17 日週五上午 11:17 寫道：

梁業鵬議員

梁議員：

石崗分區計劃大綱核准圖編號 S/YL-SK/9 的修訂

請參閱隨函夾附由城市規劃委員會(下稱「城規會」)發出的通知。一如通知所述，城規會現邀請公眾就標題所述分區計劃大綱核准圖的修訂作出申述，你可於通知內載列的地點及 https://www.tpb.gov.hk/tc/plan_making/S_YL-SK_10.html 查閱該份圖則。

如欲提交申述，可填寫 https://www.tpb.gov.hk/tc/forms/Forms/S6x1x_new.pdf 的表格。請注意，你須在提交的申述中提供全名(與香港身份證／護照所示名稱相同)及香港身份證／護照號碼的首四個字母數字字符，並於二零二五年十二月十七日或之前以書面方式直接向城規會提出。根據《城市規劃條例》，任何在法定期限屆滿後提出的申述將不獲接納。

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城市規劃委員會秘書

(梁靜思代行)

二零二五年十月十七日

[See attachment "S_YL-SK_10_plan_gn_and_soa_chi.pdf"]



敬啟者：

反對《石崗分區計劃大綱草圖編號 S/YL-SK/10》修訂項目（將錦上路以南用地由「住宅（丁類）」改劃為「住宅（丙類）」）

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中華人民共和國香港特別行政區
梁業鵬議員辦事處



基於上述理由，本人懇請貴委員會：

1. 否決或暫緩是次修訂項目，直至對錦上路及周邊道路網絡進行全面交通評估，並制定具約束力之整體改善方案；
2. 充分聽取八鄉鄉事委員會、當區居民及相關持份者之意見；
3. 如仍欲推進修訂，須要求發展項目分階段實施，並確保所有交通及基礎設施改善工程完成後，方允許居民入住；
4. 申請人承擔更全面之社會責任，包括為區內短缺之社區設施提供配套或資金支援。

規劃之事，關乎民生福祉與社區可持續發展。在錦上路已不勝負荷、社區設施不足之情況下，強行推動高密度住宅發展，只會加重居民負擔，造成長遠社會問題。本人促請貴委員會慎思民情，以民為本，否決是次不負責任之規劃修訂。

如有任何查詢，歡迎致電 3480 1099 聯絡本人。

此致

城市規劃委員會



梁業鵬

梁業鵬
元朗區議員
日期：2025年12月10日

**REPRESENTATION IN RESPECT OF
PLAN UNDER SECTION 6(1) OF
THE TOWN PLANNING ORDINANCE (CAP. 131)**

根 據 《 城 市 規 劃 條 例 》 (第 131 章)
第 6(1) 條 就 圖 則 作 出 申 述

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

1. 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。
2. 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 樓及新界沙田上禾嶺路 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/>）。
3. 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。
4. 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*)

梁業鵬先生/元朗區議員

(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/YL-SK/10
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^
住宅(丙類)	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	錦上路已經超出負荷，若然加多850戶的住戶出入，而錦上路行車路未有擴闊計劃時，將會加劇擠塞情況。
	<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。		

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被提出。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



八鄉鄉事委員會

PAT HEUNG RURAL COMMITTEE

新界元朗八鄉上村4號V 電話：2488 6633 2488 6409 傳真：2488 8056 電郵：office@patheung.com
4V, SHEUNG TSUEN, PAT HEUNG, YUEN LONG, N.T. TEL: 2488 6633 2488 6409 FAX: 2488 8056 E-mail: office@pathcung.com

本會檔號：132/PHRC/2025/27/02

城市規劃委員會秘書
香港北角渣華道 333 號北角政府合署 15 樓

(傳真：2877 0245 及 郵寄)

Representation Number:
TPB/R/S/YL-SK/10-R4

就《石崗分區計劃大綱核准圖編號 S/YL-SK/9 的修訂》及
《石崗分區計劃大綱圖編號 S/YL-SK/10》提交強烈反對意見

Submission Number:
TPB/R/S/YL-NSW/11-S33

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黎永添

2025年12月12日



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本會檔號：132/PHRC/2025/27/02

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2. 未能體現規劃的民主與公眾參與原則：

城市規劃並非單純的技術圖則修改，其本質是關乎社區未來的公共決策。缺乏真誠的公眾參與，此修訂便無法反映八鄉社區的真實意願與發展訴求，與可持續發展中「社會共融」的原則背道而馳。

二、對八鄉整體發展的深遠負面影響

撇除程序不公，單就規劃內容而言，此修訂亦將對八鄉帶來不可逆轉的傷害。

1. 破壞鄉郊特色與社區結構：

將低密度、鄉村式的「住宅（丁類）」地帶，改為允許高密度、高容積的「住宅（丙類）」，將引入大量人口，徹底改變該區乃至整個八鄉的鄉郊風貌、低密度居住環境及既



八鄉鄉事委員會



PAT HEUNG RURAL COMMITTEE

新界元朗八鄉上村4號V 電話：2488 6633 2488 6409 傳真：2488 8056 電郵：office@patheung.com
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有社區網絡。此舉無異於將市區的高密度發展模式強加於鄉郊，破壞了八鄉珍貴的社區特色和生活質素。

2. 超出社區承載能力：

八鄉現有的道路網絡（尤其是錦上路一帶）、排污系統、醫療及教育設施，均以現時的鄉郊人口規模規劃。突然加入高密度住宅發展，將對區內本已繁縝的基礎設施造成難以負荷的壓力，導致交通擠塞、公共服務質素下降等問題，現有居民將首當其衝承受惡果。

3. 缺乏全面的可持續發展評估：

此修訂看似著眼於增加房屋供應，但完全忽略了對環境、社會及經濟的綜合影響。委員會未見有任何公開的獨立評估報告，說明此發展如何平衡「經濟需要」、「社會影響」及「環境保育」這三大可持續發展支柱，其規劃基礎令人高度質疑。

三、我們的具體要求

基於以上理據，八鄉鄉事委員會嚴正要求城市規劃委員會：

否決《石崗分區計劃大綱核准圖編號 S/YL-SK/9 的修訂》及《石崗分區計劃大綱圖編號 S/YL-SK/10》。

若 貴會認為有改劃需要，必須即時擱置現行程序，並展開一場由下而上、真誠全面的公眾諮詢，包括但不限於舉辦由本會協辦的社區諮詢大會，讓所有持份者能在充分知情下發表意見。

並要求 貴會就本次修訂對八鄉社區的交通、環境、公共設施及社會影響，進行全面的可持續發展影響評估，並將報告公開予公眾審閱。

在可行的情況下，安排人員到本會進行諮詢會議，讓本會代表能就反對理據向委員會作出口頭陳述。

本會在此聲明，代表八鄉社區的堅定立場。我們期望 貴會嚴肅處理我們的申述，恪守規劃程序公義，保障鄉郊社區的合法權益與可持續未來。

此致

城市規劃委員會主席



八鄉鄉事委員會主席

鄧志光 謹啟

2025年12月12日

強烈反對石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂及
石崗分區計劃大綱草圖編號 S/YL-SK/10 (石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂)

執事先生/女士：

Submission Number:

TPB/R/S/YL-SK/10-S29

本人是元朗八鄉 竹坑 村村代表，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建 19 棟樓高 6 層的住宅及 4 棟非住用途的建築物，地盤面積超過 4 萬平方米，住宅單位 850 個，停車位達 322 個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

項目規模與面積十分龐大，申請地段接連兩條村落部分的村屋，與黎屋村的法定古蹟植桂書室及二級法定建築黎氏大宅距離不足 80 米，六層高的大型建築，阻礙村民及村屋的視野，對村民及鄉郊環境造成無可挽救的破壞！

此外，蓮花地村以至黎屋村一帶（包括申請地段），經常出現嚴重水浸。兩村村民極度憂慮申請項目將加劇村民在過去十數年飽受困擾的水浸情況，對村民生命財產構成嚴重威脅！相關項目將帶來超過 3 千人入住，大量人口定必帶來交通及排污的問題。八鄉南主要幹線近年已嚴重擠塞，而政府亦致力發展八鄉及錦田南一帶，政府的交通基建和配套完全未能滿足八鄉居民的訴求，居民怨聲載道！申請項目帶來的人流及車輛勢必加劇八鄉交通擠塞的情況，令八鄉居民生活在水深火熱之中！

另一方面，八鄉是沒有中央排污系統，村民的家居污水都流經村內人工修建或天然渠道排放。大量人口排放的污水，對周邊地區的環境衛生造成破壞，同時亦增加渠道的負擔，減弱排洪的能力，增加水浸的風險！

本人懇請城市規劃委員會重視八鄉蓮花地村居民的意見，聆聽和接納我們的訴求，否決上標申請，避免我們在水深火熱的環境下生活，造福八鄉蓮花地村及錦上路一帶居民！

八鄉 竹坑 村村代表簽署：鄧志光

姓名：鄧志光

2025 年 12 月 12 日

通訊地址：

聯絡電話：

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真：2877 0245 及 郵寄)

強烈反對石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂及
石崗分區計劃大綱草圖編號 S/YL-SK/10 (石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂)

執事先生/女士：

Submission Number:

TPB/R/S/YL-NSW/11-S35

本人是元朗八鄉 竹坑 村村代表，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建 19 棟樓高 6 層的住宅及 4 棟非住用途的建築物，地盤面積超過 4 萬平方米，住宅單位 850 個，停車位達 322 個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

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本人懇請城市規劃委員會重視八鄉蓮花地村居民的意見，聆聽和接納我們的訴求，否決上標申請，避免我們在水深火熱的環境下生活，造福八鄉蓮花地村及錦上路一帶居民！

八鄉 竹坑 村村代表簽署：邓志光

姓名：鄧志光

2025 年 12 月 12 日

通訊地址

聯絡電話





八鄉鄉事委員會

PAT HEUNG RURAL COMMITTEE

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本會檔號：132/PHRC/2025/27/02

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真：2877 0245 及 郵寄)

Representation Number:

TPB/R/S/YL-SK/10-R5

Submission Number:

TPB/R/S/YL-NSW/11-S33

執事先生/女士：

本鄉事會收到八鄉各村村代表投訴，現根據《城市規劃條例》第 5 條，就上述規劃修訂正式提交書面申述，表達強烈的反對立場，並要求 賞會駁回有關修訂。

一、核心反對理由：

嚴重缺失的公眾諮詢程序

本次將錦上路以南及黎屋村以西的大片地塊由「住宅（丁類）」改劃為「住宅（丙類）」，實質上是對八鄉未來發展格局具有深遠影響的重大土地用途變更。然而，整個修訂過程完全缺乏一場正式、深入、透明及具包容性的公眾諮詢。

1. 諮詢不足，漠視持份者權利：

此等重大改劃，理應預留充足時間，並透過多元渠道（如公眾論壇、深入解說會、書面諮詢文件等），主動諮詢受直接影響的鄉民、居民組織、商戶及地區重要持份者。現行倉促的展示程序，無法讓公眾充分理解高密度發展對交通、環境、社區配套所造成的長期負面影響，實質上剝奪了居民知情與參與的法定權利，程序上有嚴重缺陷。

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城市規劃並非單純的技術圖則修改，其本質是關乎社區未來的公共決策。缺乏真誠的公眾參與，此修訂便無法反映八鄉社區的真實意願與發展訴求，與可持續發展中「社會共融」的原則背道而馳。

二、對八鄉整體發展的深遠負面影響

撤除程序不公，單就規劃內容而言，此修訂亦將對八鄉帶來不可逆轉的傷害。

1. 破壞鄉郊特色與社區結構：

將低密度、鄉村式的「住宅（丁類）」地帶，改為允許高密度、高容積的「住宅（丙類）」，將引入大量人口，徹底改變該區乃至整個八鄉的鄉郊風貌、低密度居住環境及既



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有社區網絡。此舉無異於將市區的高密度發展模式強加於鄉郊，破壞了八鄉珍貴的社區特色和生活質素。

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此修訂看似著眼於增加房屋供應，但完全忽略了對環境、社會及經濟的綜合影響。委員會未見有任何公開的獨立評估報告，說明此發展如何平衡「經濟需要」、「社會影響」及「環境保育」這三大可持續發展支柱，其規劃基礎令人高度質疑。

三、我們的具體要求

基於以上理據，八鄉鄉事委員會嚴正要求城市規劃委員會：

否決《石崗分區計劃大綱核准圖編號 S/YL-SK/9 的修訂》及《石崗分區計劃大綱圖編號 S/YL-SK/10》。

若 貴會認為有改動需要，必須即時擱置現行程序，並展開一場由下而上、真誠全面的公眾諮詢，包括但不限於舉辦由本會協辦的社區諮詢大會，讓所有持份者能在充分知情下發表意見。

並要求 貴會就本次修訂對八鄉社區的交通、環境、公共設施及社會影響，進行全面的可持續發展影響評估，並將報告公開予公眾審閱。

在可行的情況下，安排人員到本會進行諮詢會議，讓本會代表能就反對理據向委員會作出口頭陳述。

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此致

城市規劃委員會主席

八鄉鄉事委員會主席：鄧志光

副主席：張運球

黎永添

2025年12月12日





八鄉鄉事委員會

PAT HEUNG RURAL COMMITTEE

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本會檔號：132/PHRC/2025/27/02

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真：2877 0245 及 郵寄)



就《石崗分區計劃大綱核准圖編號 S/YL-SK/9 的修訂》及
《石崗分區計劃大綱圖編號 S/YL-SK/10》提交強烈反對意見

執事先生/女士：

本鄉事會收到八鄉各村村代表投訴，現根據《城市規劃條例》第 5 條，就上述規劃修訂正式提交書面申述，表達強烈的反對立場，並要求 貴會駁回有關修訂。

一、核心反對理由：

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1. 破壞鄉郊特色與社區結構：

將低密度、鄉村式的「住宅（丁類）」地帶，改為允許高密度、高容積的「住宅（丙類）」，將引入大量人口，徹底改變該區乃至整個八鄉的鄉郊風貌、低密度居住環境及既

八鄉鄉事委員會



PAT HEUNG RURAL COMMITTEE

新界元朗八鄉上村4號V 電話：2488 6633 2488 6409 傳真：2488 8056 電郵：office@patheung.com
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有社區網絡。此舉無異於將市區的高密度發展模式強加於鄉郊，破壞了八鄉珍貴的社區特色和生活質素。

2. 超出社區承載能力：

八鄉現有的道路網絡（尤其是錦上路一帶）、排污系統、醫療及教育設施，均以現時的鄉郊人口規模規劃。突然加入高密度住宅發展，將對區內本已緊繩的基礎設施造成難以負荷的壓力，導致交通擠塞、公共服務質素下降等問題，現有居民將首當其衝承受惡果。

3. 缺乏全面的可持續發展評估：

此修訂看似著眼於增加房屋供應，但完全忽略了對環境、社會及經濟的綜合影響。委員會未見有任何公開的獨立評估報告，說明此發展如何平衡「經濟需要」、「社會影響」及「環境保育」這三大可持續發展支柱，其規劃基礎令人高度質疑。

三、我們的具體要求

基於以上理據，八鄉鄉事委員會嚴正要求城市規劃委員會：

否決《石崗分區計劃大綱核准圖編號 S/YL-SK/9 的修訂》及《石崗分區計劃大綱圖編號 S/YL-SK/10》。

若 貴會認為有改劃需要，必須即時擱置現行程序，並展開一場由下而上、真誠全面的公眾諮詢，包括但不限於舉辦由本會協辦的社區諮詢大會，讓所有持份者能在充分知情下發表意見。

並要求 貴會就本次修訂對八鄉社區的交通、環境、公共設施及社會影響，進行全面的可持續發展影響評估，並將報告公開予公眾審閱。

在可行的情況下，安排人員到本會進行諮詢會議，讓本會代表能就反對理據向委員會作出口頭陳述。

本會在此聲明，代表八鄉社區的堅定立場。我們期望 貴會嚴肅處理我們的申述，恪守規劃程序公義，保障鄉郊社區的合法權益與可持續未來。

此致

城市規劃委員會主席

八鄉鄉事委員會主席：鄧志光

副主席：張運球

黎永添

2025年12月12日



強烈反對石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂及
石崗分區計劃大綱草圖編號 S/YL-SK/10 (石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂)

執事先生/女士：

Submission Number:
TPB/R/S/YL-SK/10-S30

本人是元朗八鄉 水盞田 村村代表，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建 19 幢樓高 6 層的住宅及 4 幢非住用途的建築物，地盤面積超過 4 萬平方米，住宅單位 850 個，停車位達 322 個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

項目規模與面積十分龐大，申請地段接連兩條村落部分的村屋，與黎屋村的法定古蹟植桂書室及二級法定建築黎氏大宅距離不足 80 米，六層高的大型建築，阻礙村民及村屋的視野，對村民及鄉郊環境造成無可挽救的破壞！

此外，蓮花地村以至黎屋村一帶（包括申請地段），經常出現嚴重水浸。兩村村民極度憂慮申請項目將加劇村民在過去十數年飽受困擾的水浸情況，對村民生命財產構成嚴重威脅！相關項目將帶來超過 3 千人入住，大量人口定必帶來交通及排污的問題。八鄉南主要幹線近年已嚴重擠塞，而政府亦致力發展八鄉及錦田南一帶，政府的交通基建和配套完全未能滿足八鄉居民的訴求，居民怨聲載道！申請項目帶來的人流及車輛勢必加劇八鄉交通擠塞的情況，令八鄉居民生活在水深火熱之中！

另一方面，八鄉是沒有中央排污系統，村民的家居污水都流經村內人工修建或天然渠道排放。大量人口排放的污水，對周邊地區的環境衛生造成破壞，同時亦增加渠道的負擔，減弱排洪的能力，增加水浸的風險！

本人懇請城市規劃委員會重視八鄉蓮花地村居民的意見，聆聽和接納我們的訴求，否決上標申請，避免我們在水深火熱的環境下生活，造福八鄉蓮花地村及錦上路一帶居民！

八鄉 水盞田 村村代表簽署： 張運球

姓名： 張運球

2025 年 12 月 11 日

通訊地址：

聯絡電話：

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真 : 2877 0245 及 郵寄)

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石崗分區計劃大綱草圖編號 S/YL-SK/10 (石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂)

執事先生/女士：

Submission Number:
TPB/R/S/YL-NSW/11-S36

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八鄉 水蓋田 村村代表簽署：

張運球

姓名：張運球

2025 年 12 月 11 日

通訊地址：

聯絡電話：





PAT HEUNG RURAL COMMITTEE

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本會檔號：132/PHRC/2025/27/02

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真：2877 0245 及 郵寄)

Representation Number:

TPB/R/S/YL-SK/10-R6

Submission Number:

TPB/R/S/YL-NSW/11-S33

執事先生/女士：

本鄉事會收到八鄉各村村代表投訴，現根據《城市規劃條例》第 5 條，就上述規劃修訂正式提交書面申述，表達強烈的反對立場，並要求 賁會駁回有關修訂。

一、核心反對理由：

嚴重缺失的公眾諮詢程序

本次將錦上路以南及黎屋村以西的大片地塊由「住宅（丁類）」改劃為「住宅（丙類）」，實質上是對八鄉未來發展格局具有深遠影響的重大土地用途變更。然而，整個修訂過程完全缺乏一場正式、深入、透明及具包容性的公眾諮詢。

1. 諒詢不足，漠視持份者權利：

此等重大改劃，理應預留充足時間，並透過多元渠道（如公眾論壇、深入解說會、書面諮詢文件等），主動諮詢受直接影響的鄉民、居民組織、商戶及地區重要持份者。現行倉促的展示程序，無法讓公眾充分理解高密度發展對交通、環境、社區配套所造成的長期負面影響，實質上剝奪了居民知情與參與的法定權利，程序上有嚴重缺陷。

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城市規劃並非單純的技術圖則修改，其本質是關乎社區未來的公共決策。缺乏真誠的公眾參與，此修訂便無法反映八鄉社區的真實意願與發展訴求，與可持續發展中「社會共融」的原則背道而馳。

二、對八鄉整體發展的深遠負面影響

撤除程序不公，單就規劃內容而言，此修訂亦將對八鄉帶來不可逆轉的傷害。

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將低密度、鄉村式的「住宅（丁類）」地帶，改為允許高密度、高容積的「住宅（丙類）」，將引入大量人口，徹底改變該區乃至整個八鄉的鄉郊風貌、低密度居住環境及既



八鄉鄉事委員會

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基於以上理據，八鄉鄉事委員會嚴正要求城市規劃委員會：

否決《石崗分區計劃大綱核准圖編號S/YL-SK/9 的修訂》及《石崗分區計劃大綱圖編號S/YL-SK/10》。

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並要求 貴會就本次修訂對八鄉社區的交通、環境、公共設施及社會影響，進行全面的可持續發展影響評估，並將報告公開予公眾審閱。

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八鄉鄉事委員會主席：鄧志光

副主席：張運球

黎永添

2025年12月12日





八鄉鄉事委員會

PAT HEUNG RURAL COMMITTEE

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城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真：2877 0245 及 郵寄)

RECEIVED

13 DEC 2025

執事先生/女士：

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八鄉現有的道路網絡（尤其是錦上路一帶）、排污系統、醫療及教育設施，均以現時的鄉郊人口規模規劃。突然加入高密度住宅發展，將對區內本已繁縝的基礎設施造成難以負荷的壓力，導致交通擠塞、公共服務質素下降等問題，現有居民將首當其衝承受惡果。

3. 缺乏全面的可持續發展評估：

此修訂看似著眼於增加房屋供應，但完全忽略了對環境、社會及經濟的綜合影響。委員會未見有任何公開的獨立評估報告，說明此發展如何平衡「經濟需要」、「社會影響」及「環境保育」這三大可持續發展支柱，其規劃基礎令人高度質疑。

三、我們的具體要求

基於以上理據，八鄉鄉事委員會嚴正要求城市規劃委員會：

否決《石崗分區計劃大綱核准圖編號 S/YL-SK/9 的修訂》及《石崗分區計劃大綱圖編號 S/YL-SK/10》。

若 貴會認為有改劃需要，必須即時擱置現行程序，並展開一場由下而上、真誠全面的公眾諮詢，包括但不限於舉辦由本會協辦的社區諮詢大會，讓所有持份者能在充分知情下發表意見。

並要求 貴會就本次修訂對八鄉社區的交通、環境、公共設施及社會影響，進行全面的可持續發展影響評估，並將報告公開予公眾審閱。

在可行的情況下，安排人員到本會進行諮詢會議，讓本會代表能就反對理據向委員會作出口頭陳述。

本會在此聲明，代表八鄉社區的堅定立場。我們期望 貴會嚴肅處理我們的申述，恪守規劃程序公義，保障鄉郊社區的合法權益與可持續未來。

此致

城市規劃委員會主席

八鄉鄉事委員會主席：鄧志光

副主席：張運球

黎永添

2025年12月12日



城市規劃委員會秘書

香港北角渣華道333號北角政府合署15樓

(傳真：2877 0245 及郵寄)

強烈反對石崗分區計劃大綱核準圖S/YL-SK/9的修訂及
石崗分區計劃大綱草圖編號S/YL-SK/10(石崗分區計劃大綱核準圖S/YL-SK/9的修訂)

執事先生/女士：

Submission Number:
TPB/R/S/YL-SK/10-S23

本人是元朗八鄉上村村代表，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建19幢樓高6層的住宅及4幢非住用途的建築物，地盤面積超過4萬平方米，住宅單位850個，停車位達322個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

項目規模與面積十分龐大，申請地段接連兩條村落部分的村屋，與黎屋村的法定古蹟植桂書室及二級法定建築黎氏大宅距離不足80米，六層高的大型建築，阻礙村民及村屋的視野，對村民及鄉郊環境造成無可挽救的破壞！

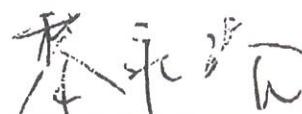
此外，蓮花地村以至黎屋村一帶（包括申請地段），經常出現嚴重水浸。兩村村民極度憂慮申請項目將加劇村民在過去十數年飽受困擾的水浸情況，對村民生命財產構成嚴重威脅！相關項目將帶來超過3千人入住，大量人口定必帶來交通及排污的問題。八鄉南主要幹線近年已嚴重擠塞，而政府亦致力發展八鄉及錦田南一帶，政府的交通基建和配套完全未能滿足八鄉居民的訴求，居民怨聲載道！申請項目帶來的人流及車輛勢必加劇八鄉交通擠塞的情況，令八鄉居民生活在水深火熱之中！

另一方面，八鄉是沒有中央排污系統，村民的家居污水都流經村內人工修建或天然渠道排放。大量人口排放的污水，對周邊地區的環境衛生造成破壞，同時亦增加渠道的負擔，減弱排洪的能力，增加水浸的風險！

本人懇請城市規劃委員會重視八鄉上村居民的意見，聆聽和接納我們的訴求，否決上標，避免我們在水深火熱的環境下生活，造福八鄉上村及錦上路一帶居民！

八鄉上村村代表簽署：

姓名：黎永添



2025年12月14日

通訊地址：

聯絡電話：

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真 : 2877 0245 及 郵寄)

強烈反對石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂及
石崗分區計劃大綱草圖編號 S/YL-SK/10 (石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂)

執事先生/女士：

Submission Number:

TPB/R/S/YL-SK/10-S59..

本人是元朗八鄉上村村代表，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建 19 棟樓高 6 層的住宅及 4 棟非住用用途的建築物，地盤面積超過 4 萬平方米，住宅單位 850 個，停車位達 322 個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

項目規模與面積十分龐大，申請地段接連兩條村落部分的村屋，與黎屋村的法定古蹟植桂書室及二級法定建築黎氏大宅距離不足 80 米，六層高的大型建築，阻礙村民及村屋的視野，對村民及鄉郊環境造成無可挽救的破壞！

此外，蓮花地村以至黎屋村一帶（包括申請地段），經常出現嚴重水浸。兩村村民極度憂慮申請項目將加劇村民在過去十數年飽受困擾的水浸情況，對村民生命財產構成嚴重威脅！相關項目將帶來超過 3 千人入住，大量人口定必帶來交通及排污的問題。八鄉南主要幹線近年已嚴重擠塞，而政府亦致力發展八鄉及錦田南一帶，政府的交通基建和配套完全未能滿足八鄉居民的訴求，居民怨聲載道！申請項目帶來的人流及車輛勢必加劇八鄉交通擠塞的情況，令八鄉居民生活在水深火熱之中！

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本人懇請城市規劃委員會重視八鄉上村居民的意見，聆聽和接納我們的訴求，否決上標，避免我們在水深火熱的環境下生活，造福八鄉上村及錦上路一帶居民！

八鄉上村村代表簽署 :

姓名 : 黎永添

黎永添

2025年 12 月 10 日

通訊地址 :

聯絡電話 :

2025-12-10

Urgent Return receipt Expand Group Restricted Prevent Copy

Representation Number:

TPB/R/S/YL-SK/10-R7

tpbpd/PLAND

寄件者:

寄件日期:

收件者:

主旨: S/YL-SK/10 - representations

附件: S61 Form completed.pdf

類別: Internet Email

Submission Number:

TPB/R/S/YL-SK/10-S173

Please find :

- S6 form,
- Representations 1 of 2
- Representations 2 of 2

Grateful if you could confirm your receipt of this email. Thanks

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*)

NG Ka Yiu

(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/YL-SK/10
--	------------

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 type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Pls see attached Representations.pdf
	<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 shaded areas in attached Representations.pdf		

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會提出。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

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寄件者:

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收件者:

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附件:

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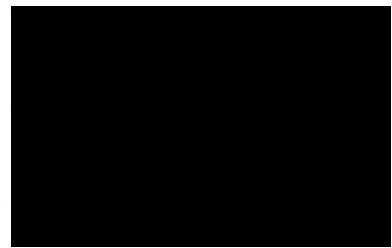
tpbpd/PLAND

S/YL-SK/10 - representations

Representations 2 of 2.pdf; Representations 1 of 2.pdf

類別:

Internet Email



17th December 2025

Dear Secretary of the Town Planning Board,

Re: Representation to the Town Planning Board in respect of Application S/YL-SK/10

We are resident of the compound Wah Yuen 華苑, we would like to share with you how our house will be affected by the Application.

The Proposed Development (“PD” hereafter) envelopes our compound 270 degrees. We feel that no consideration has been taken into account of Wah Yuen in the planning of the PD, and our living environment will be detrimentally affected.

During the Y/SL-SK/I phase, we have objected strongly to the Application.

1. Wah Yuen Introduction

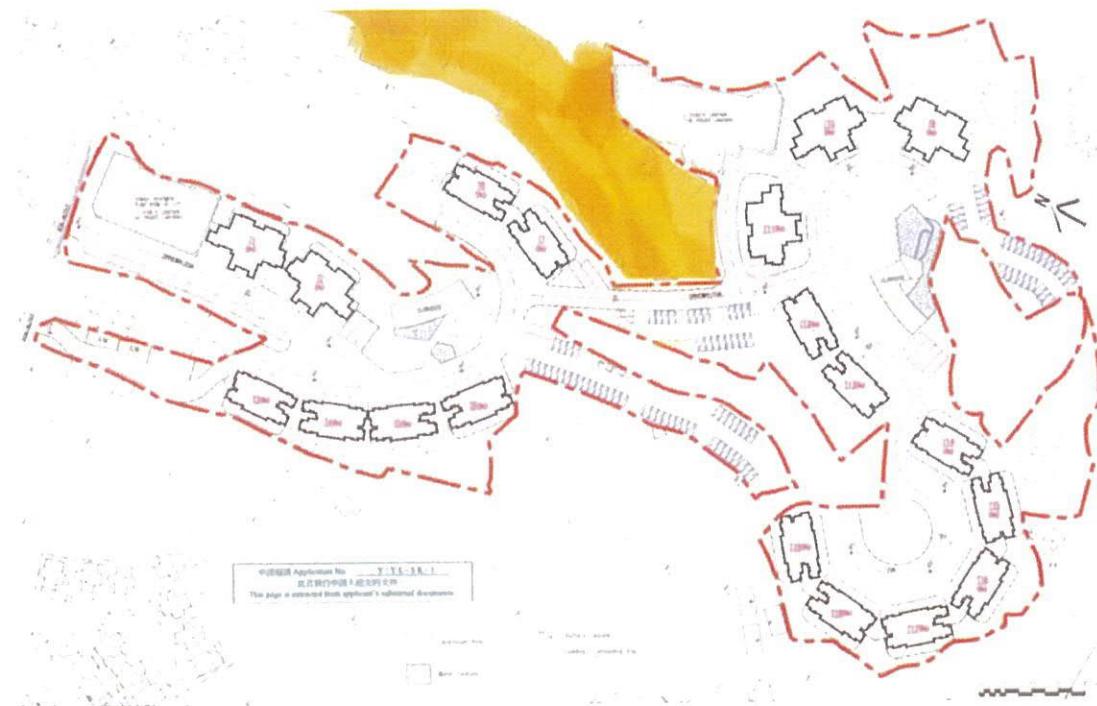


Fig.1 Wah Yuen, as shaded in yellow (Source: Gist Pg 9: Indicative Master Layout Plan)

Wah Yuen is a private compound comprising 9 detached houses each with spacious garden, founded by eminent members of the society back in the late 1970s, including Dr Chiu Hin Kwong OBE, JP [招顯洸醫生 OBE 太平紳士], whose name is widely recognised by the Chiu Hin Kwong Heart Centre of the Hong Kong Baptist Hospital, Professor Philip Shen, formerly College Head of Chung Chi College, CUHK (沈宣仁教授, 曾任崇基學院院長等職), and local successful business families. The choice of land was abundant at the time and the location of Wah Yuen was picked with optimal fung shui benefits, with view of the Tai Mo Shan mountain from all our windows. The location was chosen to ensure privacy, setback away from the main road by around 90m.

Change of ownership of Wah Yuen has been few and far between; currently residing within the compound, we have one original owner still, and few second-hand owners. Last transaction for the detached house was over 14 years ago. All the residents are well settled within the compound and we pay great care and expenses in upkeeping all our houses in good conditions and we enjoy the lifestyle (greenery views / wildlife including singing of birds / sunlight and natural wind) of the rural environment. Just like the potential buyers of the PD, we come from all walks of life, with the yearning of a greenery rural natural environment. **Yet, is it not ironic that in order to create such environment for the potential buyers of the PD, that the PD will be destroying exactly what we have ?**

2. Proposed Development in relationship to Wah Yuen

As can be seen from fig 1 above, the Proposed Development **engulfs Wah Yuen** so to speak. The PD is a stone's throw away from our 3-storey houses. In particular for T7 (6 storeys), T8 (6 storeys), T11 (6 storeys), and the carport (3 storeys), these are right adjacent to our houses.

The big picture is:

- Level of PD is raised, hence all future excess water caused by heavy rain will all go in our direction, this is our most feared scenario;
- All of Wah Yuen's visuals/airflow will be detrimentally affected as the PD is 6 storeys high, **a stone's throw away from Wah Yuen, and spanning 60m in length, creating a walled-in effect to us in Wah Yuen.** ALL neighbourhood is 3-storey building. Such negative drastic impact to us in Wah Yuen has already been mentioned by the Chief Architect amongst the various government departments comments.
- Seems like all such consultants reports are self-serving tools, just assisting the applicant in fulfilling the administrative requirements. Giving a preset conclusion no matter what the facts /comments from public are.

Given the drastic difference in height (3 storeys ~ 8.23 m) for Wah Yuen, and that of the PD (6 storeys 18.15m plus landfill of 1.5m), the new development will be totally towering over us, with wall effect with a span of 60m in length along both east and west side of Wah Yuen. This is detrimental to us:

- Visuals;
- Sunlight;
- wind circulation;

- air pollution (planned 3-storey carpark right adjacent to three of our houses) and
- noise (proposal estimated new residents of 2,380).

Plans of building setback from Kam Sheung Road and green buffers along the edge of the development site boundary are mentioned in the Application, these are almost irrelevant as far as protection of neighbourhood is concerned except for the benefit of the PD. Where such buffers are needed along the boundary of the PD with Wah Yuen, these are totally absent.

Increased risks of Flooding

In addition, between the edges of Wah Yuen and buildings T7 and T8 of the PD, there is a waterstream which splits into 2 streams flowing into the PD. **Throughout all the years, water flowed smoothly through their paths, yet in recent years due to the development work of the Application site, the movement of water became stagnant.** We had throughout all this time reported the situation to the local District Councillor and village head of Sheung Tsuen. We were told that there is not much we could do due the private ownership of the Application site. Our concerns were vindicated with the heavy rainstorm of **29th August 2018, which caused flooding to all the houses in Wah Yuen.** The black rain in September 2023 also caused similar havoc. **We are in the utmost fear of the negative impact of the PD will have on this waterstream DURING construction, as well as AFTER completion.**

Traffic Impact

On a more macro basis, with total vehicle spaces of 275, and estimated new residents of 2,380, there will certainly be a burden to Kam Sheung Road and the public transportation. The PD is 4.3 km away from Kam Sheung Road Station, not walking distance, feeder public transport is necessary. Currently in the peak hours, residents waiting for public buses/ minibuses to Kam Sheung Road Station along Kam Sheung Road have difficulty getting on the vehicles beyond the Shell station already. It takes two or more buses before one can get on.

It doesn't quite help that the survey per Traffic consultant report is conducted with flaws, to be explained in the later paragraphs of this paper.

There is no part in the Application where Wah Yuen is mentioned in the first round of information submission back in April 2022. And from the plan of the PD, with 6 storey residential buildings and car park building enveloping Wah Yuen, almost zero distance away with NO BUFFER at all, it seems that the Applicant **has not taken the welfare of Wah Yuen into consideration at all.** Our environment in Wah Yuen is detrimentally affected by the PD, yet there is total absence of mentioning of Wah Yuen in **ALL of the consultants' reports (Traffic / Landscape / Visual / Noise / Drainage / Sewerage / Water Supply).** It was not until the second round of submission during the Y phase of TPB submission that Wah Yuen was mentioned in certain consultants' reports, but by that time, design and layout of the PD was already done, with no further amendments to the plan throughout the 3 years period upto the time of the TPB meeting in March 2025.

Village houses of 700 sq ft per storey with 3 storeys height maximum are built in the whole area along Kam Sheung Road. General town planning common sense is to have the more densely populated residential built on/adjacent to transportation terminals / MTR stations.

Why is the applicant allowed to build a development of average size of a mere 38m2, with projected population size of 2,380 and 216 cars in the middle of Kam Sheung Road ?

Densely populated developments should be built near transportation terminals / MTR stations, where residents can get access to public transportation on foot, without causing burden on single 2-lane country roads like Kam Sheung Road. There is no alternative from the PD site to Kam Sheung Road MTR station except along Kam Sheung Road. If Kam Sheung Road is congested, there is no way out.

3. Misrepresentation of facts in the Application Phase

The never-ending rounds of amended consultants' reports during the Y/YL-SK/1 phase seemed to tunnel the audience into the thinking that if all infrastructure is well supported (heavy doubts on this anyway especially regarding the use of antiquated statistics in assessing the risk of heavy rainfall), then all will be fine and should be approved.

All the reports concentrate on proving that situation to the neighbouring areas will NOT BE WORSE OFF. If this is the basis of the PD's justification, then I would like to draw the attention of the members of the TPB that our situation **WILL BE MUCH WORSE OFF**. Our 3-storey houses will be blocked by the 6-storey buildings of the PD, few feet away. ALL views gone, natural airflow gone. MUCH MUCH WORSE OFF. And there is great uncertainty with the increase in **flooding risks** due to the desktop/antiquated database justification of the developer-paid consultants.

We question the fairness of this continuous bombardment of amendment reports in the process. We are the MOST ADVERSELY IMPACTED GROUP OF RESIDENTS adjacent to the PD. Yet, every few months, the same reports come back with the same outlook, paying lip service to the queries made by the government departments, yet NEVER ADDRESSING ANY OF OUR CONCERNS.

Before we move on to more details on the negative impacts of the PD due to its total neglect/lack of consideration of the existence of Wah Yuen, we feel that there are various areas within the Executive Summary in the Y/YL-SK/1 phase that we do not agree with. We would like to highlight these below. Below referencing and extract follows that of the Executive Summary.

- i. (f) Technical Assessments demonstrated that the Proposed Development *will not result in insurmountable visual, traffic, landscape, noise, drainage, sewerage and water supply impacts.*
- ii. 2.3.1) The site is located in areas with low-rise settlements, open storages and scattered active farmland. The immediate surroundings of the Site have the following characteristics (see (Figure 2.4):

- a. East – Lai Uk Tsuen / Tsang Uk Tsuen / Tse Uk Tsuen as well as a declared monument – Chik Kwai Study Hall in Lai Uk Tsuen;
- b. West – Lin Fa Tei Village, further SW Shui Tsan Tin / Ngau Keng;
- c. North – across Kam Sheung Road, zoned ‘Agriculture’ with temporary structures;
- d. South – ‘Agriculture’ abandoned farmland.

Wah Yuen, which is totally wrapped and engulfed by the Proposed Development, is not mentioned at all. This is telltale sign that the design of the PD, has not taken into consideration of Wah Yuen at all.

- iii. 2.4.1) Site is located only about 2.4km away from Kam Sheung Road Station.
By public transportation, only way is along Kam Sheung Road/ Tung Wui Road, the distance is 4.3km, NOT 2.4km. During morning peak hours, using public transportation, this will take 25 mins or more.
- iv. 2.5.2) Minor relaxation of plot ratio and building height restrictions
Afraid we do not see this as a minor relaxation. The PD contains 19 buildings twice as high, at 6-storey high, and a car park of 3-storey high, right outside our windows, with continuous span of 60m. Not quite sure why relaxing plot ratio means 6-storey. We are totally against 6-storey buildings wrapping around us.
- v. 3.3.2) Plot ratio of the area would gradually decrease from Kam Sheung Road Station (PR of 3) to Kam Shui South Road (with a PR of 0.8) spanning about 1.5km from east to the west. The Land Use Review (LUR) concludes that the development proposals of the area would respect and integrate with the adjoining low-rise and low-density rural settlements.

The Rezoning Site is located only about 700m away from the eastern peripheries of the boundary of Kam Tin South and Pat Heung area.

Planned Kam Tin South/ Pat Heung area developments are close to the Kam Sheung Road Station if along Kam Sheung Road, or on other roads such as Kam Shui South Road, or Kam Ho Road near the MTR Pat Heung Maintenance Centre. These areas have been planned for higher plot ratios, and we understand the rationale. However, further along Kam Sheung Road towards where Wah Yuen is, this is an area with well-established villages with low-rise 3-storey houses already. By saying that the rezoning site is a mere 700m away (we do not agree it is 700m btw, we measure it as 1km from junction of Kam Sheung Road and Kam Shui South Road to the PD) is not fair as where does this exception end then? The Kam Tin South / Pat Heung area for development has been well planned and it is not fair that vested interest players keep seeking for change of goalpost. The area attracts people coming to live, based on their views of whether they want to be closer to the MTR, hence more dense dwellings, or further away, hence low-rise with more space. It is not fair that such planning is disturbed just because such player has accumulated enough land as their justification. If this sets the precedent allowing such change of rule. Where on Kam Sheung Road with similar ‘exception’ will end? The whole of the rural environment would disappear then.

- vi. 3.4.1) Lin Fa Tei and its surrounding area has a general rural setting and mainly occupied by low-rise residential developments and village settlements, open storages and agricultural land. The area is gradually evolving to have more low-rise residential

developments. There is potential to catalyse the transformation of the local area to improve the living quality.

The PD will in fact totally ruin our Wah Yuen compound, blocking our views, sunlight and airflow, and will have unfathomable detrimental effect on our living quality. The information totally omitted the existence of Wah Yuen, which is a stone's throw away from the development, when the development is totally engulfing our whole complex.

The spiel about improvement of living quality does not apply to us, in fact as if we haven't said enough, this is ruining all our residences in Wah Yuen in all aspects.

4.1.3) It is evident that the current permissible plot ratio of 0.2 and 2 storeys in height under “R(D)” does not provide sufficient incentive for permanent residential developments with proper infrastructures.

There are three large scale residential developments in the area, two of these are over 100 houses, and one over 240 houses. These are all 2-storey, or 3-storey houses. Below such scale, there are also medium sized developments of over 30-40 houses. All these have proper infrastructures, not sure why 6-storey buildings are used to justify for the infrastructure. We are not expert in plot ratios and developers' profit calculations, but if applying the logic of this Application, so all such existing large scale 3-storey developments were loss-making, or have no infrastructure ?

vii. 4.1.5) Site currently comprises only few numbers of temporary structures for the storage of building materials in the north, whilst majority of the Site (about 75%) comprises vacant and abandoned farmland in the south.

Whilst the above is a correct statement, but without mentioning the existence of Wah Yuen which the PD is enveloping in the document (including the Appendices), this runs into the risk of misleading the reader that there really is nothing around the site, hence no impact on its neighbourhood.

viii. 4.1.6)

The Applicant and its subsidiary companies have spent tremendous efforts, resulting in successful private land assembly and formulation of innovation solutions to site constraints. The development restrictions of “R(D)” zone will defect the development potential of the Site with substantial landholdings of over 4ha, as well as the potential for a comprehensive upgrading of the environment.

It seems twisted logic here that as long as the Applicant has assembled enough land, then it has justification to change the planning guidelines, such as plot ratio, and restriction in height ? Our environment in Wah Yuen will be totally degraded, NOT upgraded.

In the area, there are existing 3 major housing developments by a major developer, these being:

- Seasons Palace 104 units (since 2006);
- Seasons Monarch 244 3-storey units (since 2009);
- Seasons Villas 112 units (since 2004)

(Above total number of units and years of completion are taken from local estate agent websites, for general reference.)

The above are all 3-storey complexes, with well developed infrastructures. So given the argument in the Proposed Development, were these loss-making projects ?

Applicant's justification in the "need" to have 6-storey structures is unfounded and twisted. So because of commercial profiteering reason, they can turn the rules and do whatever they want in the name of support of housing needs ? From a macro point of view, housing shortages would not be brought down by this development, as long as there are systemic problems of unequal distribution of housing resources.

ix. 5.2.2) The relatively small building footprint would also maximise the air permeability of the development and minimise its impact on wind capturing potential of the surrounding neighbourhood.

Above statement is totally erroneous and misleading. From Wah Yuen's perspective, air permeability will be gone, we will be totally walled, and airflow will be totally jeopardized.

The current PD has the 6-storey buildings T7, T8 and T11 right adjacent to our houses in Wah Yuen. There is also a 3-storey carpark right against the wall of three of our house in our compound. All our views will be gone, all our sunlight will be gone, all our wind will be gone. And with the carpark, our health will also be gone. To sum up, we are totally ruined, and the value of our treasured home will be hugely negatively impacted too.

x. 5.2.3), fig. 5.2

Building setback - 50m set back from kerb line of Kam Sheung Road – further enhance air ventilation and form the breeze ways along Kam Sheung Road. In addition, the proposed development also offers a Green Buffer with appropriate landscape treatment along the edge of development site boundary. By offering a green buffer, it would be able to soften the building edge of the building blocks, as well as providing a visual relief to the public and surrounding neighbourhoods.

There are NO building setbacks, NO green buffers in place at all in the PD as far as the boundary with Wah Yuen is concerned. The described building setbacks and green buffers have only benefits to the residents of the PD, that's all.

xi. 5.4.2) Green buffer plantings along the site boundary to maintain a high landscape visual quality to the neighbourhood.

There is no visual quality consideration for Wah Yuen at all when the PD is towering all over us. Such Green buffer area is for the benefit of the residents of the PD rather than anyone, really.

xii. 5.5) Visual Impact – The resultant visual change due to the PD is considered acceptable. Sensitive design measures (i.e. building setback...) to mitigate and improve the condition, quality and character of the area. The resultant visual change due to the Proposed Development is considered acceptable.

Total disregard of Wah Yuen in the plan.

xiii. 5.6 Noise impact)

This section discusses the impact of noise on the PD, but not vice versa. The noise impact on Wah Yuen from the PD will be further discussed below.

4. Negative impacts of the Proposed Development on Wah Yuen – **Permanent impact**

i. Visual / sunlight / air circulation / air pollution / noise

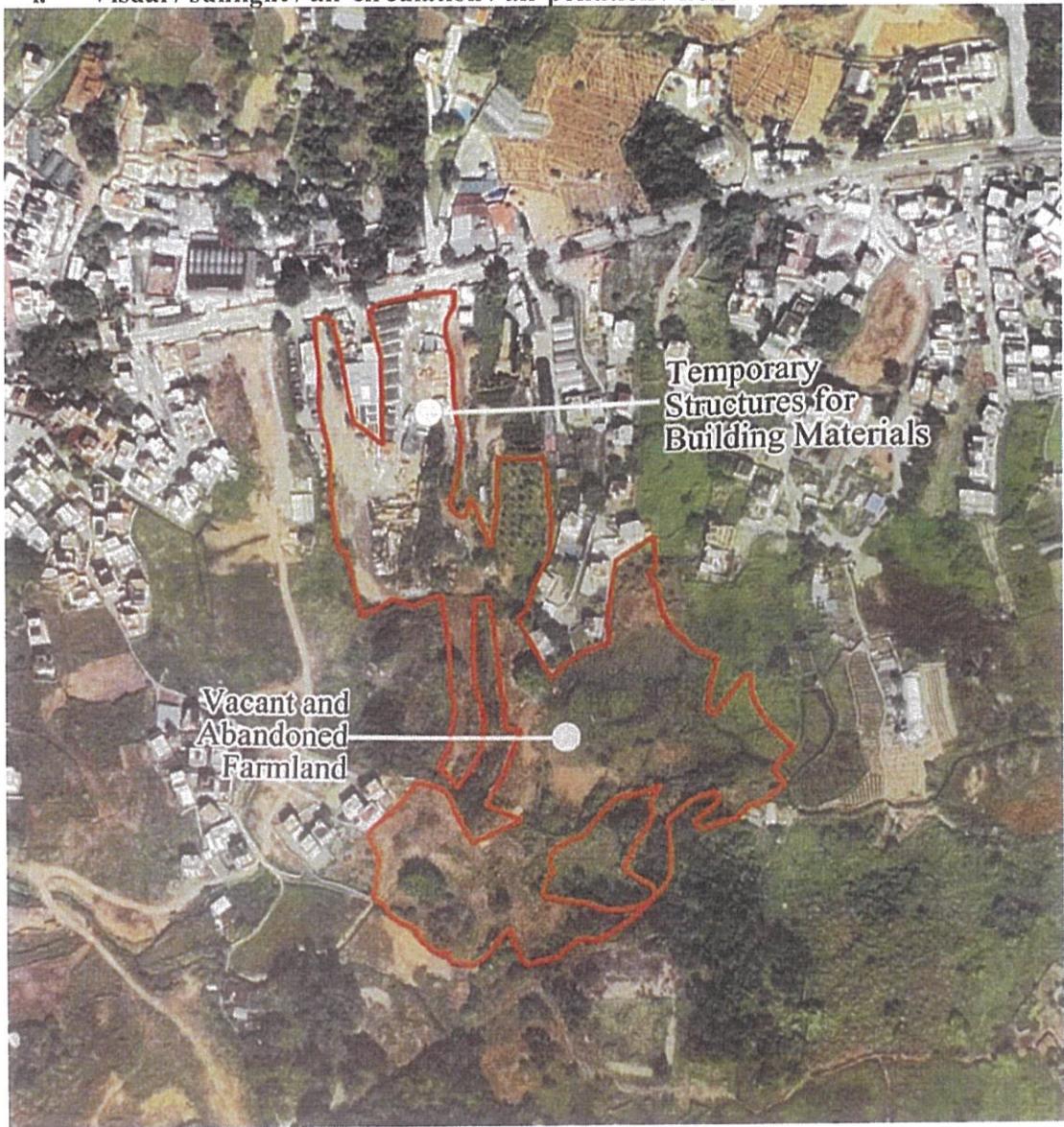


Fig. 2 Aerial Photo of the Site (Source Fig 4.2 of Executive Summary)



Fig 3. Landscape Master Plan (Source: Gist Pg 11)

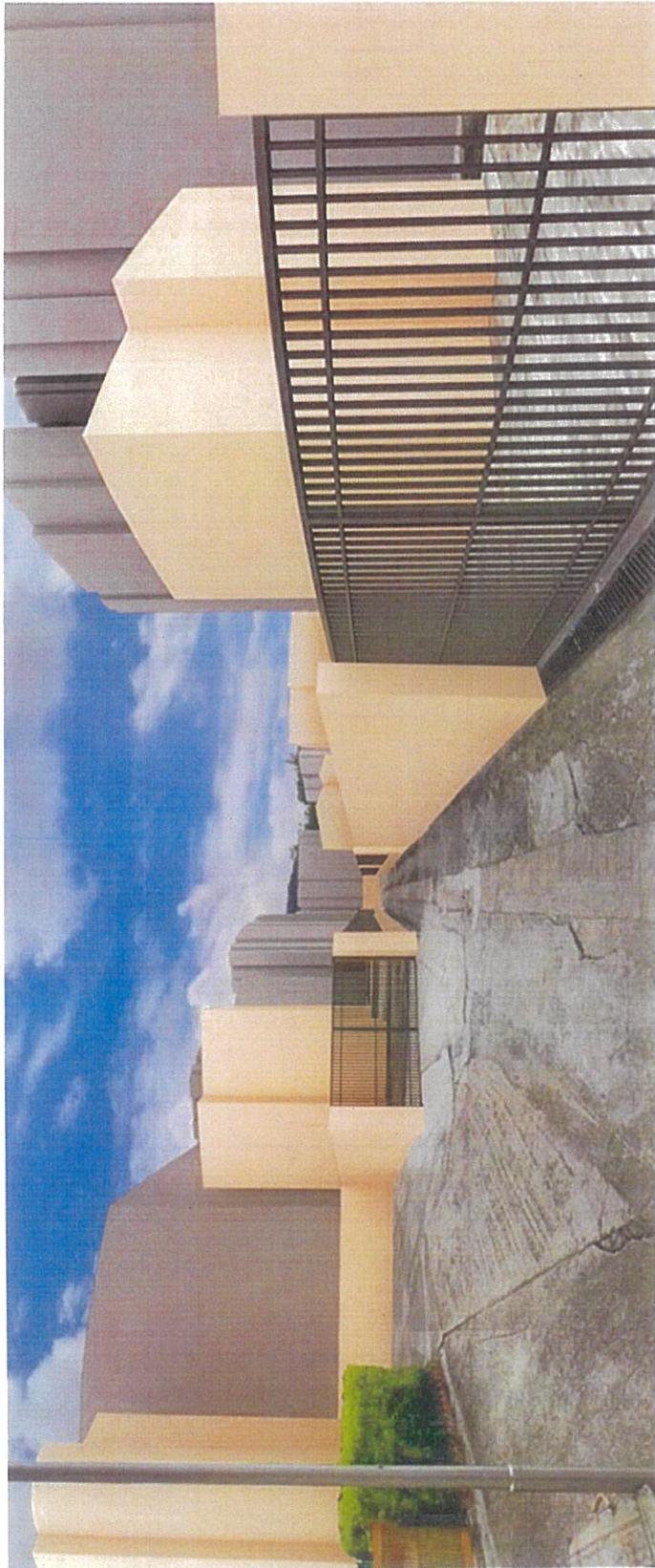


Fig 4 3D simulation of how our compound will look like after the PD (flesh colour – Wah Yuen houses, grey colour – PD)

Compared to our existing 3-storey houses, the PD comprises:

- 2 car parks – one of these being a 3-storey carpark holding 148 private car spaces backing on three of our houses on the eastern side of the Wah Yuen compound.
- Residential - 19 blocks of 6-storey buildings, each with height of 18.1m (plus 1.5m landfill). Each of the 19 buildings will house 44 units on average, hence each building around 125 residents. In particular buildings T7, T8 and T11 are stone's throw away, right adjacent to our houses in Wah Yuen, spanning 60m in length, creating a walled-in effect to us in Wah Yuen.

Given how Wah Yuen will be U-shaped engulfed by the PD, it is only intuitive to anyone that all our existent view / sunlight / airflow will be totally blocked.

Visuals

Please see fig.4 above, a 3D simulation of how our compound will look like after the PD.

Due to limited budget, we can only show the visual above using one angle. However, guess it needs no imagination to visualise that our houses will be totally walled in. This has a devastating impact on our living environment, as well as the monetary values of our properties.

So on completion of the PD, as residents of eleven 3-storey houses in Wah Yuen, we are expected to be wrapped 270 degrees by a 3-storey carpark, a full-time restaurant (per resubmitted info Appendix 8 – Air Quality Impact Assessment), 2,380 residents, 19 x 6-storey buildings, some of which **forming wind screen of 60m with great devastation to the air ventilation and visual permeability**. This is deplorable. This is an area where all houses are only of 3-storey high.

Western side

Per the proposed plan, on the west side of our house it is proposed that **there will be 2 6-storey buildings T7 and T8**. All the green views that we have will be gone, instead it will be 2 x 6 storeys worth of someone's living rooms / bedrooms and domestic noise, at stone's throw distance. Privacy and our peaceful life will be totally gone. This has a devastating impact on our lives, as well as the monetary values of our properties.

Eastern side

On the east side of our house, what is view of our neighbours' houses, will become view of a **3-storey car park, backing right on 3 houses in the compound**. A 3-storey carpark is sure to be taller than a 3-storey residential house. On top, the façade of such kind of carpark is usually dark in colour. As such, our view becomes that of a dark wall as we look out of our house. A dark wall that spans along the back of three of our houses in the compound.

Looking at the plan of the PD, the Applicant 'cleverly' planned their 3-storey car park in this protruding part of their plot, away from their 'neatly ordered' residential buildings. This is truly an negative illustration of "Do unto others as you would have them do unto you". This is totally totally unfair and unethical. Besides, we will be suffering from the fumes of the 24/7 operation carpark right in front of our house, how is it possible that such planning can be allowed ?

Southern Side

Wah Yuen has a history dating back 1979, the choice of land was abundant at the time and the location of Wah Yuen was picked with optimal fung shui benefits, with view of the Tai Mo Shan mountain from all our windows.

Our house faces right on the South side, facing the Tai Mo Shan and greenery. With the PD, **our views will be totally blocked by the line-up of the 6-storey buildings**.

Views, sunlight, air circulation, privacy etc, all these important features of the environment that attracted us to live here, to spend material amounts in making our homes that of a lifetime dwelling, are going to be gone with the proposed plan.

During the Y submission approval phase, amongst the comments made from various Government Departments, the **Chief Architect** raised the following comments:

- It is noted that the proposed residential development mainly consists of 19 towers with building height of 6 storeys (about 44.16mPD), which are about 200% higher than adjacent "R(D)" developments with BHR of 2 storeys permitted in OZP. It is **undesirable from visual impact point of view and may not be compatible to adjacent developments.**
- The building length of some of the residential towers (e.g. T3 to T6, T14 to T19) appear to exceed 60m which may have adverse impact on the air ventilation and visual permeability. The applicant is advised to comply with the building separation requirements of the design guidelines promulgated in the PNAP APP-152.

As residents of Wah Yuen, we totally concur with the above comment. This is the GRAVEST CONCERN to us, this is the issue we have been pounding all this time, but this seems to have been totally missed out by all vested interest parties.

Instead, looking at the response of the applicant, it seems that they are parroting the spiel of :

- PD not incompatible with the surrounding height profile
- Does not obstruct the mountain ridgeline and open skyview in the background
- Visual impact can be mitigated design measures such as building setback.
- Ridges still visible

It is misleading that the Application gist includes the skyline of the PD from the angles of :

- Lin Fa Tei bus stop (westbound) along Kam Sheung Road;
- Lai Uk Tsuen Bus Stop (eastbound) along Kam Sheung Road;
- Front Entrance of the Chik Kwai Study Hall.

hence giving a misleading conclusion about no having detrimental effect on neighbourhoods.

Can the developer also prepare what the skyline of Wah Yuen would be like after the completion of the PD ?

As far as town planning is concerned, how can one justify building a 850 units complex, forming a wall of over 60m in length, FEW FEET AWAY from existing environment ? Of all the possible plans the developer could have using its landspace, they have to be just RIGHT NEXT to our windows, blocking all the views/airflow we have ??????????

Building setback – per plan of PD, there are **NO building setbacks, NO green buffers in place at all in the PD as far as the boundary with Wah Yuen is concerned**. The described building setbacks (from Kam Sheung Road) and green buffers (along boundary areas with agricultural land) have only benefits for the residents of the PD, that's all.

Above response from the consultants reports IS TOTALLY UNTRUE for residents of Wah Yuen. We have repeatedly expressed our strong protest on the 6-storey high buildings, as well as the close proximity of buildings T7, T8, T11, T12 and T13 and carpark right adjacent to us.

As can be seen from the aerial photo above in fig. 2, there are almost no residential houses along the boundary of the plot, except for Wah Yuen.

The question of why, of all the planning of the buildings the Applicant can have, why the current plan has to have 6-storey buildings and 3-storey carpark **RIGHT ADJACENT** to our houses ?

Current Views from Wah Yuen - to be replaced by 6-storeys buildings, 3-storey carpark, clubhouse restaurant **RIGHT ADJACENT** to our houses ?!



1



3



4



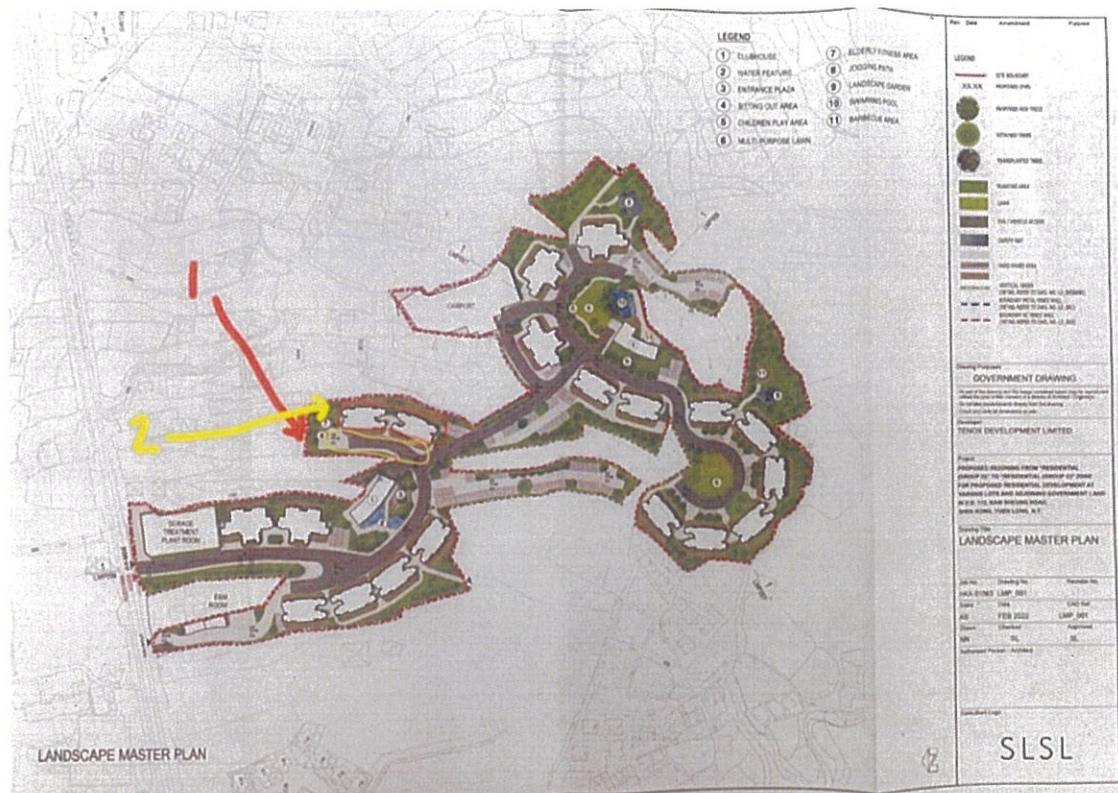
2

Configuration of open spaces of the PD are only for the benefits for the residents of the PD.

On plan / application, all proposed 'large-scale' residential developments come within boundary of the LUR (Land Use Review) for Kam Tin South and Pat Heung. Extensive studies had been conducted, including a 40-page Air Ventilation Assessment – Expert Evaluation conducted by the Planning Department.

With 19 towers 6-storeys built at 'zero distance' from us in Wah Yuen, blocking all our sunlight and wind, we question how can such proposal be approved. If the applicant wants to enjoy the plot ratio similar to that of the LUR, the applicant should look for land within the LUR boundary, instead of trying to break the plan and totally ruin our low rise neighbourhood.

We urge the applicant to review its own plan and make amendments so that we can all live in harmony with each other ?



Instead of having the two 6 storey buildings T7 and T8 right adjacent to our house, we suggest the minimal amendment to be swapping between ① T7 and T8 and ② driveway above. WE ARE STRONGLY PROTESTING THE CLOSENESS OF THE 6-STOREY BUILDINGS RIGHT ADJACENT TO OUR HOUSE.

There are no residential buildings bordering the PD plot except for Wah Yuen, yet, the applicant has to build 6-storey buildings/3 storey car park right adjacent to us in Wah Yuen ?????

A simple realignment of the buildings away from Wah Yuen will give us more distance away from each other, can the applicant look into this ? Negative impacts such as light, air quality all arise due to the close proximity of the PD from us in Wah Yuen.

Sunlight and Air Circulation

With two 6-storey buildings T7 and T8 on the west side of our house towering over us, at stone's throw distance, this means afternoon sun would be severely blocked, sunlight to our swimming pool and to our house will be detrimentally diminished.

As illustrated below, the reduction in sunlight has huge impact on the use of our pool. The design and layout of the pool at the time of planning was to capture the best of sunlight. WITHOUT DIRECT SUNLIGHT AT ALL in the autumn / winter time, the pool will be too cold to use. Usage of pool will be cut by half. And in the summer, the pool will be in full shade around 16:30 or before. This will have huge impact on our lifestyle after all the investment we made to the house, notwithstanding the huge impact in the valuation of our property.

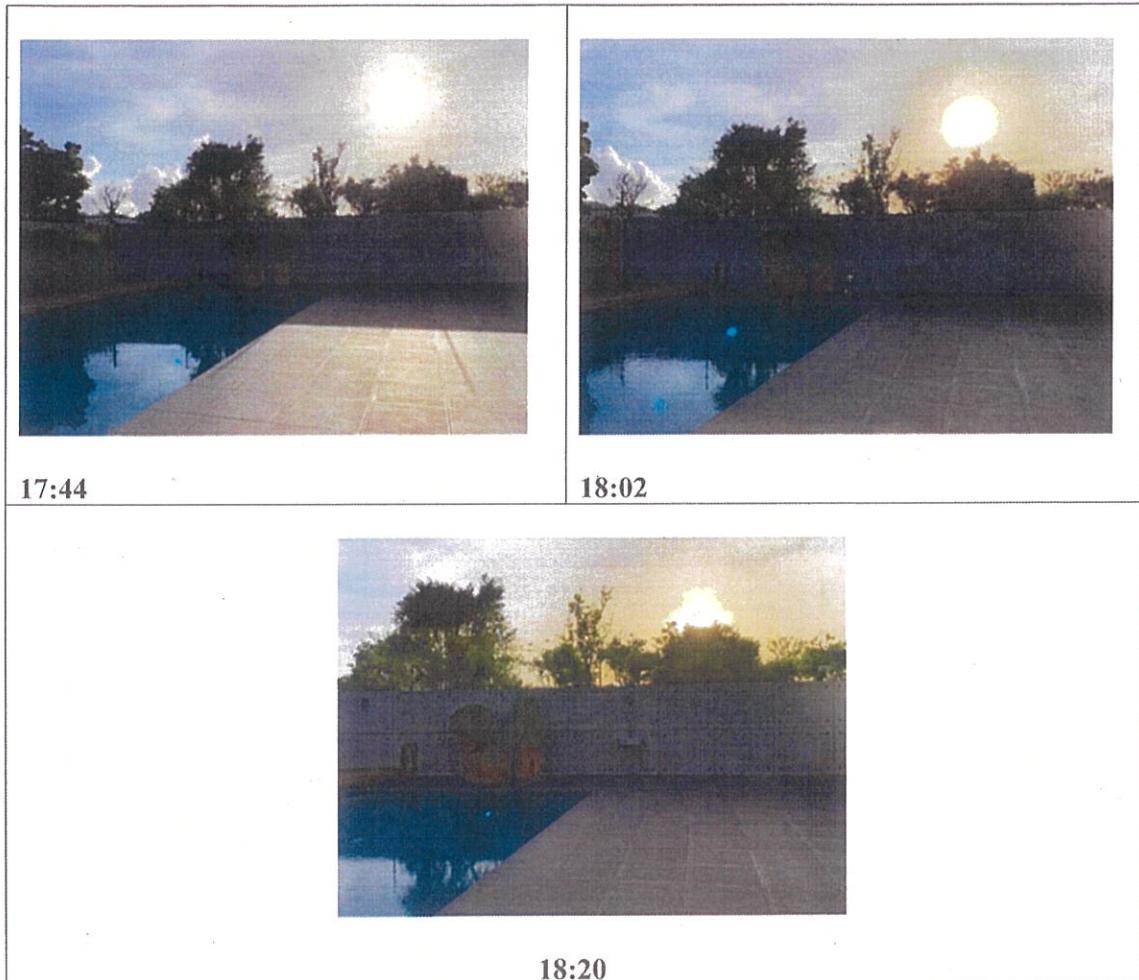
As an **illustration of the huge change in sunlight before and after the PD is constructed**, the Interactive Sun Path Diagram per the Hong Kong Observatory has been used. Taking approximation of our garden having a width of 18m, wall height at 2m, and the PD with height of 18.15m, here are the findings:

As at 29/5/2022:

	Before	After	diff
When half of garden is in shade	18:00	16:02	-2 hours
Last sunlight (when garden is in full shade)	18:29	6:39	-2 hours

As at 29/11/2022:

	Before	After	diff
When half of garden is in shade	16:34	13:39	-3 hours
Last sunlight (when garden is in full shade)	17:04	14:54	-2 hours



Above shows how the sun is setting between 17:44 to 18:20 on one sunny day in May 2022. The view would be replaced by two 6-storey buildings, and the sun will be blocked much earlier, **between 2-3 hours less sun**.

Looking above, we are losing at least 2-3 hours of the sun each day in the afternoon if the PD is built. Similar implication can apply for sunrise.

During winter time, with the sun at altitude of ~44-46 degrees maximum, given the 6-storey buildings are towering over our houses, we will basically have NO DIRECT sunlight at all times in the afternoon as the new buildings will be blocking the sun.

Air pollution

A 3-storey carpark holding 148 private car spaces is to be built right next to three of our houses in Wah Yuen. Firstly, we see that a 3-storey carpark is significantly higher than a 3-storey height residential house.

This design has no regard to our existing residents in Wah Yuen. There is so much spiel about building setback from Kam Sheung Road and green buffers along boundary areas with agricultural land, mainly for the benefit of the residents of the PD. **Yet, for the boundary with Wah Yuen, this PD has 6-storey high buildings + 3-storey carpark right outside on our boundary wall, right in front of our windows ?**

There does not seem to be any consideration for residents of Wah Yuen. Living in this rural environment, we are all receptive to new houses of similar height for residential purpose. Why does the Applicant have to have a 3-storey carpark leaning on our wall ? Why does it not have this structure leaning against its 19 blocks ? Why ?

Living next to an all-purpose 3-storey carpark building surely is not anyone's choice, and this is an understatement. It is totally not acceptable that the design of the Proposed Development has such disregard to our living environment. We did not come to live in the rural area to have a carpark next to our windows.

In the Air Quality consultant report, in description of the vicinity of the PD:

“The project site is located south of Kam Sheung Road. The residential developments Lotus Hill (500m) and Hoi Tong Garden (450m) are located to the west, and Jazz Garden (400m) is located to the east. “

Existence of Wah Yuen is totally ignored, when it is right adjacent to the Site, ZERO m.

How can it be possible that a 3-storey carpark right next adjacent to three of our houses in Wah Yuen be of no impact ?

Aim of report is to assess the surrounding industrial and vehicular emissions ON THE proposed development. What about study of the impact of the PD, especially that of the 3-storey carpark to its surrounding neighbourhoods, especially Wah Yuen ? This is not in the report at all.

In the plan of the PD, there will be the operation of a **full-time restaurant in the clubhouse** with a GFA of 180m² and staff of 10, such operation would release oily fumes and cooking odour. So on top of being close to a 3-storey carpark with 24/7 exhaust fumes, we are to suffer from the cooking fumes of a full-time restaurant ? **And the design of these, just like all the other designs of the PD, are to push all the undesirable parts away from the development's precious customers i.e. residents/purchasers, and facing towards us ? Is this going to be the case ?**

So the Proposed Development is seeking for approval of 0.8 plot ratio, for building of 6-storey blocks, and as a result, justifying itself in building such 3-storey carparks backing onto 3 of our houses servicing its residents, which is totally ruining our environment and lives ?

Besides the great concern with the 24-hours running carpark outside our bedroom windows, with devastating visual impact on our homes, the 24/7 operation of the carpark means that we will suffer from noise, fumes and increase in air pollutant levels issues from the carpark.

We would like to request that the car park building being moved AWAY from Wah Yuen. Wah Yuen only forms small part of the border of the PD land, yet current plan puts its buildings

right up to our side instead of the unoccupied borderline, This takes no consideration to us in Wah Yuen at all.

Noise

The Noise Impact study (Appendix 5) seems to be assessing the noise affecting the Proposed Development only, as opposed to whether the PD is affecting the neighbourhood areas. As a noise mitigating measure for the benefit of the PD, there is mentioning of Building Setback.

Turning the table around, at Wah Yuen, we are concerned about the noise levels created by the PD. Currently, we enjoy the nature environment, the only 'noise' we have being singing of birds. We question whether these will all disappear when we are towered by the PD.

Also, it is mentioned that the two clubhouses will be equipped with central air-conditioning full time, so we question if such kind of 24 hours operation will have noise impact on us. Wah Yuen is right next the PD, humming noise of ventilating system of such scale non-stop 24/7 will be very significant given our serene environment. We strongly request for acoustic silencers and acoustic enclosures for these equipments. Also we strongly request for such equipment to not be facing towards direction of Wah Yuen.

Moreover, given the stone's throw distance of the adjacent 6-storey buildings, as well as the 3-storey carpark, we are extremely concerned with the noise that will be created. From our existing 3-storey houses to this sudden neighbourhood of 125 residents on average per building, this will definitely cause disturbance to our tranquil environment which we treasure so much. There is no information on the design of the carpark, whether it is completely enclosed or not, but a 24/7 operational carpark right next to our windows in the rurals, how is it possible that such planning arose ?

Wah Yuen houses are situated between 90 to 220 m away from Kam Sheung Road, we enjoy the sound of nature, birds etc. This environment of nature will disappear once the development is built, as the 6-storey buildings will be shielding us from the existing greenery and views and nature. Moreover, **we will be on the receiving end to the 24/7 ventilation system in the two clubhouses, as well as the noise arisen from activities of a potential of 125 residents per 19 buildings, and the 24/7 usage of the 3-storey carpark.**

We need the developer to take serious rethink / replan of moving its T7, T8, T11, T12, T12, carpark and clubhouse AWAY from Wah Yuen. A **SIGNIFICANT SETBACK** needs to be in place, to maintain harmony.

ii. Flooding Risk

Regarding the drainage impact, this is one **critical issue** for Wah Yuen, and for our house, absolutely critical as we were mostly affected in the heavy rainstorm of 29th August 2018 and the black rain on 8th September 2023.

Our house is along the westbound wall of Wah Yuen. Just outside this wall, and between the proposed buildings T7 and T8 of the PD, there is a waterstream which splits into 2 streams flowing into the PD. Throughout all the years, water flowed smoothly through their paths, **yet**

in recent 5 years due to the development work of the Application site, the site has become brownfield site. Since then the water becomes almost stagnant and the previous flow movements along the stream cannot be seen anymore. Water level of the stream rises high, and too quickly, even after moderate rainfall. Some Wah Yuen residents even need to install electric pumps to bump away the backflow of water from our houses. As much as we repeatedly made reports to our Local Councillors and village head, we were informed that there is not much that they could do as the land where the stream path is blocked is under private ownership.

Our concerns were vindicated with the heavy **rainstorm of 29th August 2018, which caused flooding to all the houses in Wah Yuen**. This has never happened in Wah Yuen in its history of 46 years and we were completely unprepared for, we had to call for support from the Police and Fire Departments. From the main road Kam Sheung Road to Wah Yuen along the driveway, water level was over 30cm. Within 11 days on 9 September there was the typhoon Mangkhut, we had to procure and install electric pumps to bump away the backflow of water caused by the overflow outside the western wall of Wah Yuen. This situation has still not been improved despite our continuous reporting to the same parties above. As the proposed plan shows landfill in the area where the waterstream flows into, we are in the utmost fear of the negative impact of the PD will have on this waterstream DURING construction, as well as AFTER completion.

With the black rain on 8th September 2023, Wah Yuen was flooded again. Please see photos below, these are self-explanatory. During the day, officers from Drainage Services Department also came for site visit. They are fully aware of how water rushes into Wah Yuen in all directions, through gravity as there is a gently slope within the compound, as well as through overflow of water from waterstream along the boundaries of the complex. Unfortunately, our house takes in water from all these directions.

The consultants' reports are self-servicing. How can anyone deny that global warming is not making huge impact on climate, increasing the frequency of typhoons, increased duration of typhoon season, intensity, as well as heavy rain. Labelling events as occurring one in last 200 years, one in 400 years, are just blindfolded statistics serving no purpose as far as prevention of the destruction of these natural disasters are concerned.

In general, the report has been using the following phrases throughout:

- Not worse than before
- 200 years flood event.

This is alarming. So as long as the 'desktop' analysis shows that the water level is NOT worse than before, the PD can build on artificially elevated grounds, filling up the soil, and surrounding itself by high walls ?? We at Wah Yuen, wrapped by the PD on 3 sides will bear ALL the water that flows down.

With global warming, the world is changing. We might face the end of the world, whilst still quoting such meaningless statistics, as one in 1 million years, before the demise of mankind ????????

We vehemently dispute the reliability of these self-servicing consultancy reports, where they justify their what-so-called channels in scenarios of 1 in 10 years, 1 in 50 years, 1 in 200 years. Haven't we just had just a heavy rain of 1 in 400 years ??

Raising the whole PD above existing ground level, with walls enclosing the entire compound, means all the surroundings will be flooded with the PD not being affected at all, the proposed channels are purely for the benefit of the PD itself. Water that is currently absorbed by the earth / soil in the surrounding, will flow into the surroundings, into Wah Yuen as all surface will be converted to concrete/tarmac.

Quoting a recent article from the South China Morning Post dated 22nd September 2023, by Johnny Chan, emeritus professor, City University of Hong Kong, and science director, Asia-Pacific Typhoon Collaborative Research Centre (in excerpts):

With global warming, the amount of moisture in the atmosphere will continue to increase. Also, the Pearl River Delta, and in fact the Greater Bay Area, will further develop and become even more urbanised. These two factors are therefore likely to lead to not only more frequent heavy rain events, but also higher rainfall intensity or the amount of rain per hour.

Given this very likely scenario, Hong Kong has no choice but to adapt to the possible consequences of heavy rain, namely flooding and landslides.

A main cause of the flooding this time was that the drainage system was designed based on historical heavy rain events, and these assumptions are no longer valid because global warming will very likely cause a further increase in rainfall intensity. A review of the adequacy of the current drainage system should therefore be made.

For too long, society has not been willing to address the impacts of climate change and has now paid the price. It is hoped that this extreme rainfall event can serve as a wake-up call for everyone on the need to take action to adapt to these impacts and make our city more resilient.

It does not take an expert like Professor Chan to see the points above. This is happening right in front of our eyes. And we are still relying on such self-serving consultant reports using unchanged methods ?

What are our recourse if flooding situation in Wah Yuen deteriorates during / after the completion of the PD? How to prove such deterioration? Onus on us? We need to know parties / governmental departments who can offer direct personal assistance in such scenarios. We need contacts of individuals / teams who are assigned to monitor the situation for us in Wah Yuen. We do not want to be told to call 1823 to say the least.

1) North/northeast side of Wah Yuen main Gate – topography ignored by any study

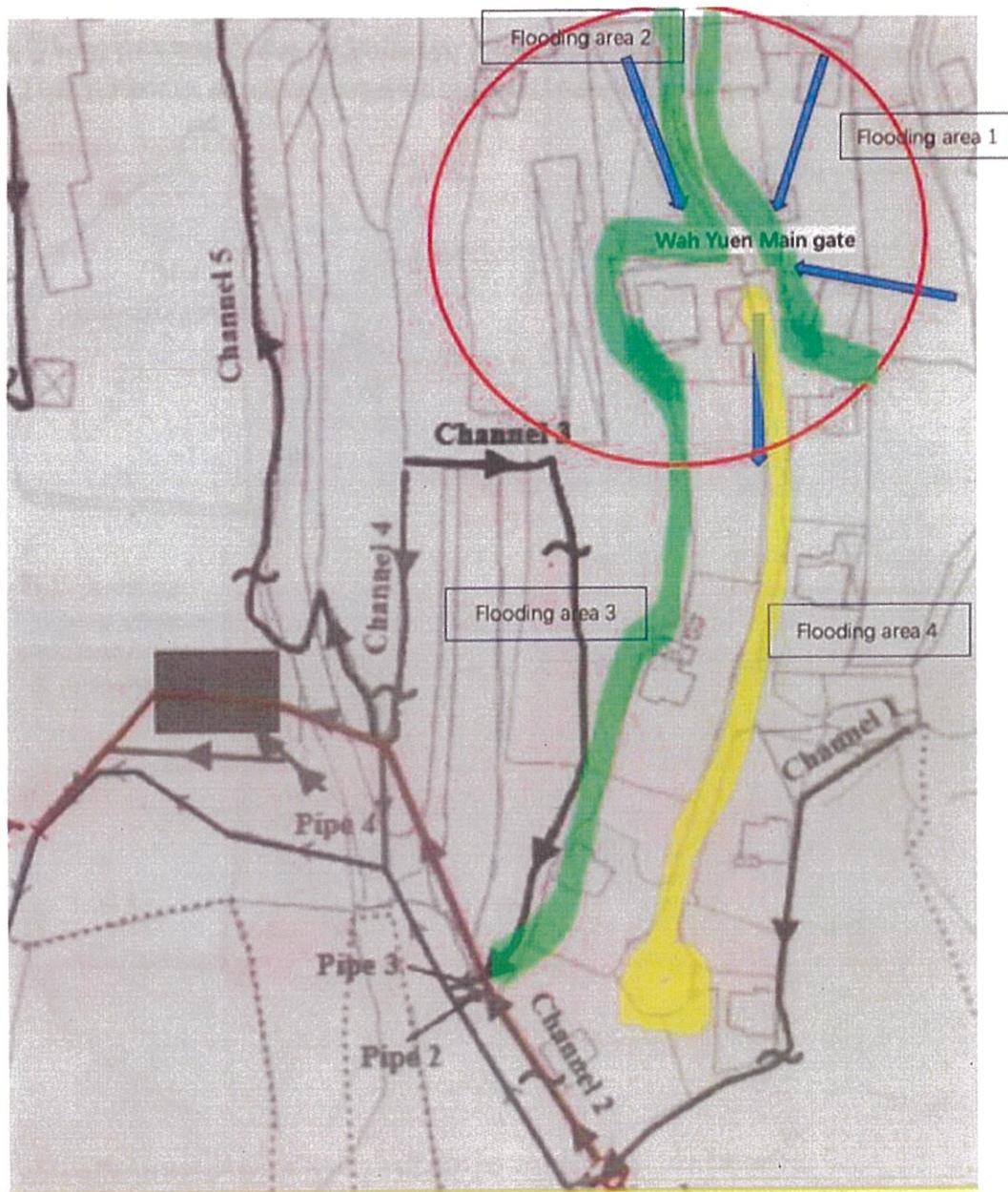
The Drainage Impact Assessment did not address the origin of the water flooding on the North / Northeast side of the Wah Yuen main gate. All five proposed water channels are only close to the proposed development (on the West and Southwest of Wah Yuen), nothing really beneficial for Wah Yuen.

See the water catchment area below map in red circle. This is where all the water starts to flow into Wah Yuen, as driveway from Kam Sheung Road to Wah Yuen is bordered by waterstreams. When water level rises and overflows, the driveway will be flooded and water will go through the

main gate area (Blue arrows). The water flows along the driveway (high- lighted in yellow) into our houses.

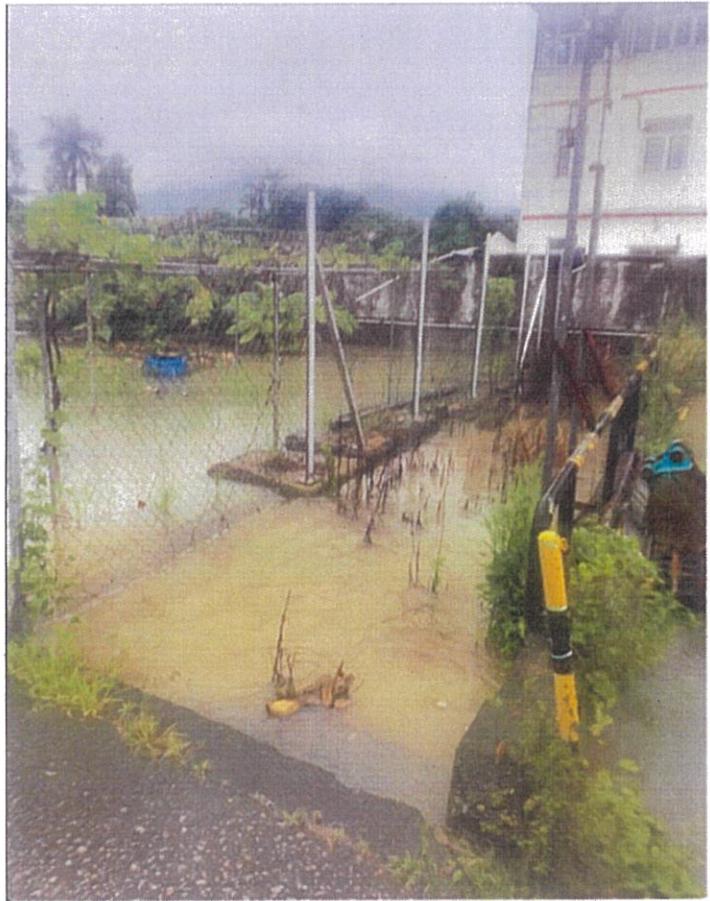
We use the recent pictures of the late 8 Sept 2023 Black rain day as example to illustrate where the floodings are. **The situation in Wah Yuen, with water overflowing from north/northeast side of Wah Yuen to the common driveway, water flowing down (due to slight slope within the compound) from east to west side, and backflow of water from waterstream on west side of boundary wall ...leading to the houses on the western side of Wah Yuen all flooded, were all witnessed by the officers.**

The flooding stream is highlighted in green in the picture. The water level of the streams have drastically increased after rain to **above road level of over 20 cm**. This measurement however is not to be taken as maximum as we were only able to venture outside of our house when the situation in our house subsided. As such water level above road was definitely higher.

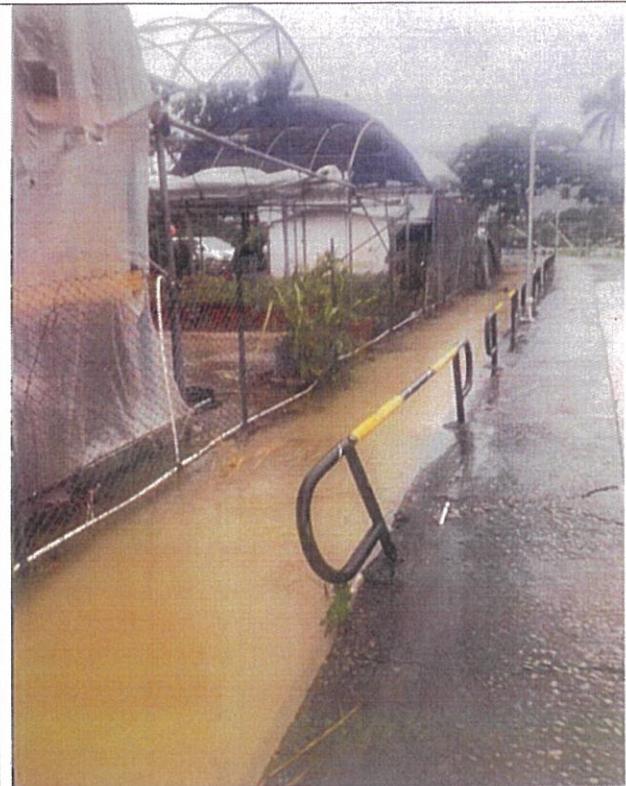




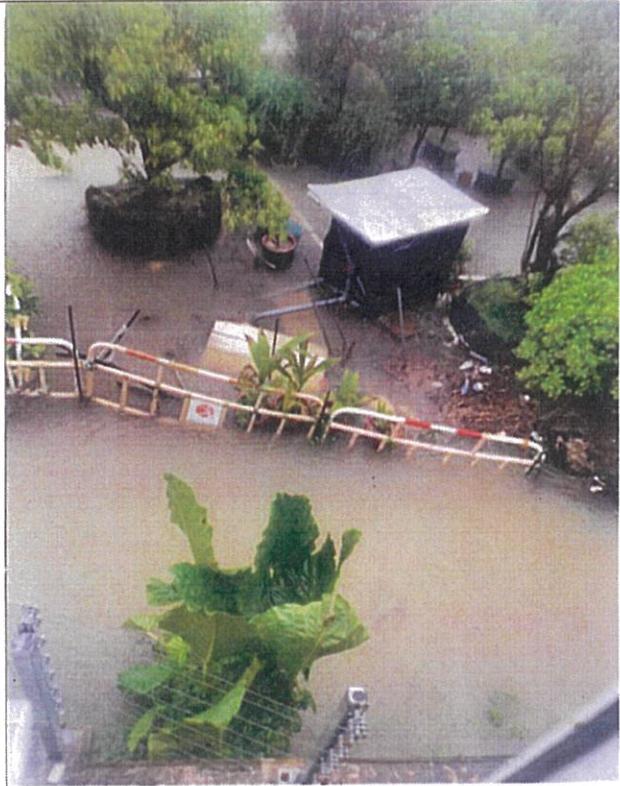
Wah Yuen main gate area (flooding due to overflow of small streams surrounding Wah Yuen)



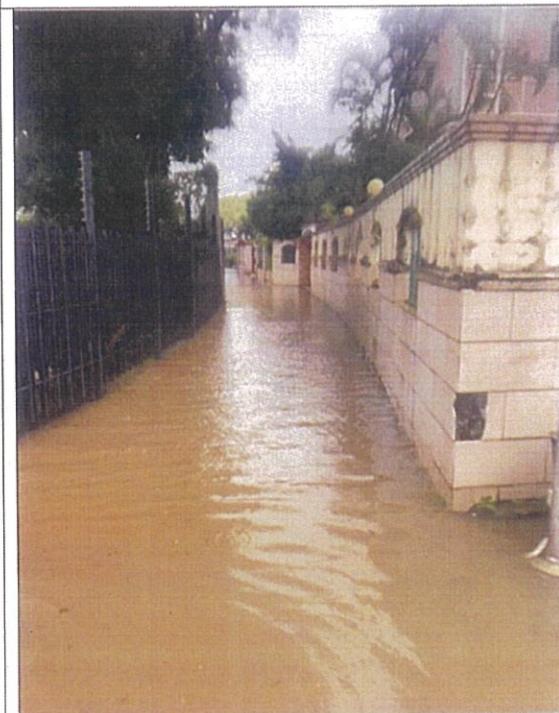
Flooding area 1 East side of Wah Yuen main gate (stream overflowed)



Flooding area 2 West side of Wah Yuen main gate, water level of stream has gone up by 1 to 1.5m within 2 hours.



Flooding area 3 West boundary outside compound wall (you cannot distinguish the stream with the nursery ground level)



Flooding area 4 internal driveway of Wah Yuen (highlighted in yellow on map)

Given the above, in the summer rainy seasons, we can only resort to ad hoc measures such as sandbags / flooding prevention panels over main doors. And every heavy rain forecast is nerve wrecking to our residents, this has never happened before in the history of Wah Yuen, until the the last few years when the Application site was starting to get prepared for the construction.

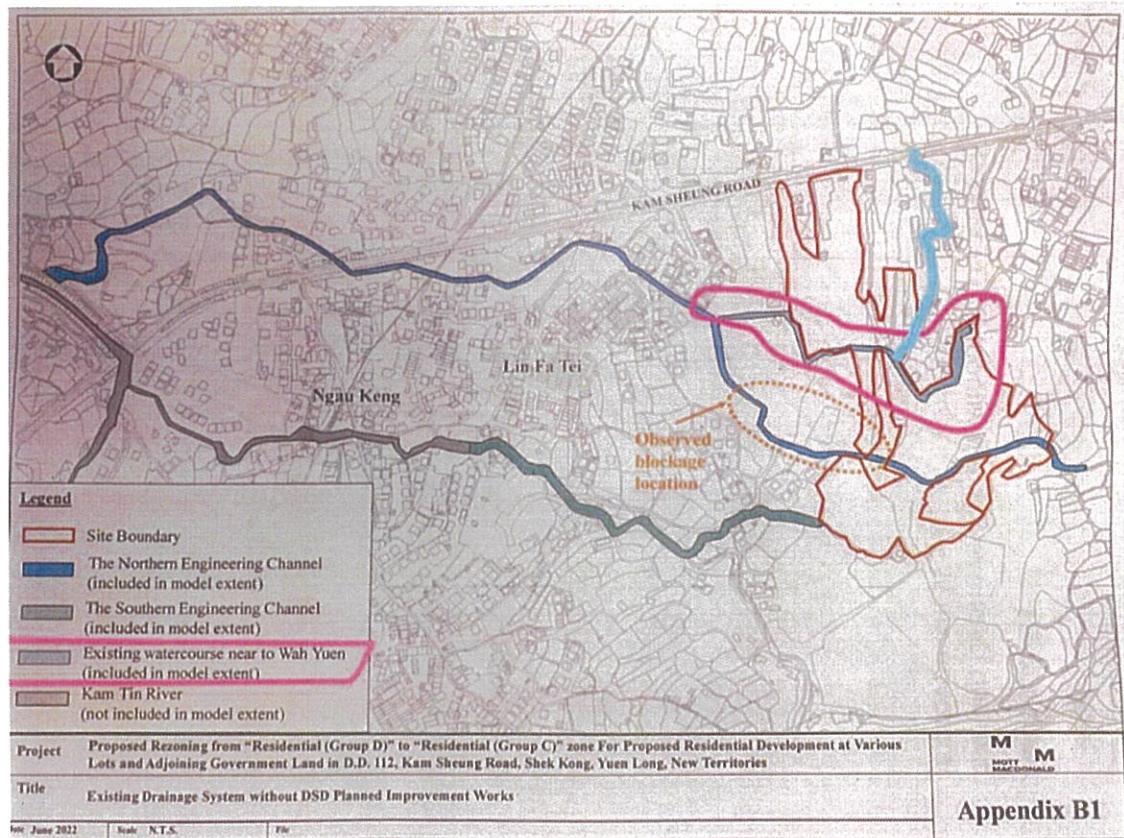
2) Waterstream outside western wall of Wah Yuen IGNORED and IGNORED and IGNORED

Despite repeatedly expressing our concerns, there is nothing mentioned on how to deal with possible flooding threat to the area on the western side of Wah Yuen (area highlighted in red below).

Below Appendix B1 of Drainage Assessment is supposed to identify the existing watercourse near Wah Yuen, However, the waterstream on western side on Wah. Yuen is missing / ignored despite us mentioning this in the 15 rounds on public opinion before TPB approval in March this year. Same is ignored in the Water Quality Impact Assessment.

See **BLUE** line below, at boundary between western wall of Wah Yuen and PD, there is a narrow strip of watercourse which we added by hand, this is no man's land. From the plan of the PD, as it will be landfilled blocking further flow of such water course, there is huge risk of where the water, at times of heavy rain can flow to. Water is not moving already due to the development work in the PD'site since last few years. During heavy rain before, the water level of this stream occasionally goes up 1.5m + from the trough of the stream within 1 or 2 hours. In fact this is the original point where previous floodings in Wah Yuen began. It has never been taken into consideration in any of the original PD nor additional information before.

This is the watercourse that caused flooding in our houses in Wah Yuen in 29th August 2018 as it its path was very blocked and overflowed. The situation of the watercourse remains the same or has become worse since, any rain causes level of the watercourse to rise. Again, on the day of the Black Rain dated 8th September, houses along this western boundary were flooded, as witnessed by the officers from the Drainage Services Department.

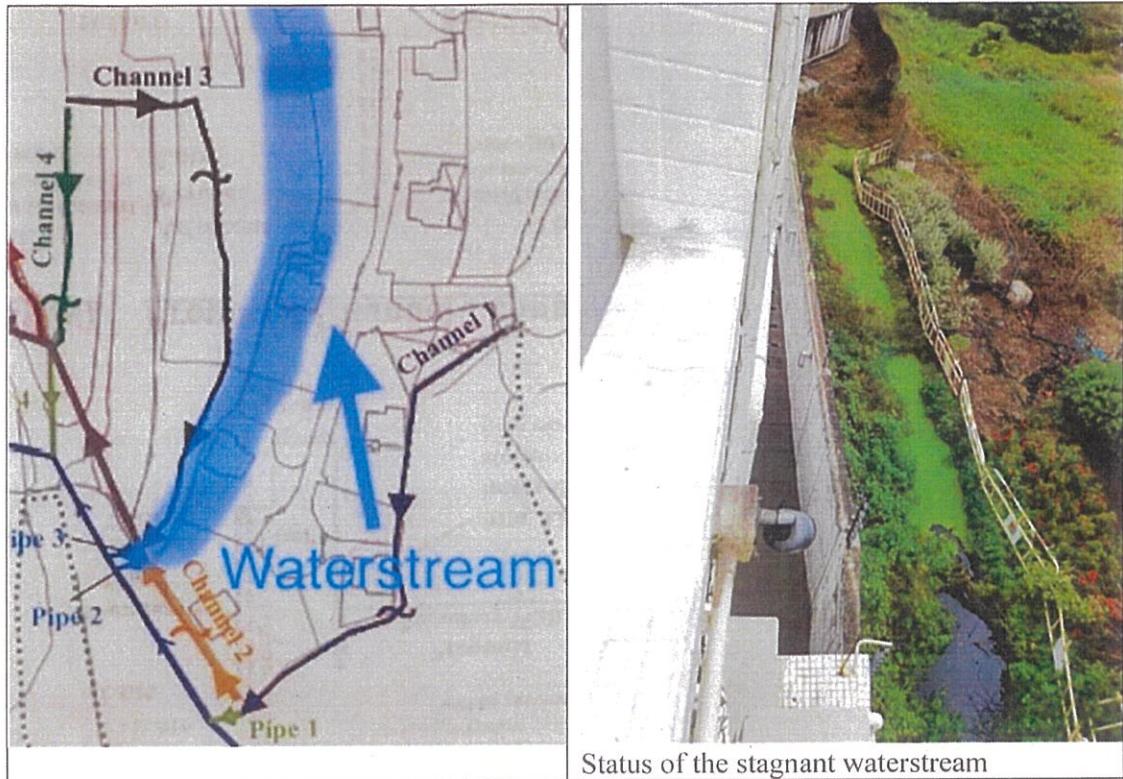


From Kam Sheung Road, the 'missing' blue watercourse flows between western boundary wall of Wah Yuen and a nursery 頌英園 (rented property from the local Lai clan to our understanding). Further in, it flows between the western boundary wall of Wah Yuen and the PD. As this is a narrow strip of land, and with the development demarcating its border in the last few years, the neighbourhood nursery does not get access to the watercourse area anymore and this has become a no-man's land. Waterflow along this watercourse is more or less stagnant.

It is our great concern as to where this watercourse will flow into if the PD is landfilling the downstream part of the waterflow.

Given that these watercourses are so easily flooded already, as demonstrated by the flooding in August 2018, with i) the ground surface of the PD site turned to hard concrete surface from agricultural land; ii) the raised level to 26.0mPD; and iii) the solid high wall of the PD, this would mean additional water runoffs that are no longer absorbed by the former agricultural land will be going to the watercourse near Wah Yuen.

As mentioned all this time in our previous rounds of comments, there is a small stream along the western boundary wall of Wah Yuen.



This issue needs to be managed with utmost planning as **construction debris can immediately block the already non-flowing stream. Flooding risk will certainly increase and this will be catastrophic.**

As such this drainage issue needs to be addressed before the start of construction before the landfill covering the stream, and this is not clear from the Application material.

Uncontrolled dumping and construction runoff, such as dumping construction waste and pollutions running into the water courses would cause blockage to the already very stagnant drains. Giving the current stagnant status of the watercourses near Wah Yuen, it will not take any moment to block up all the watercourses.

As much as we have repeatedly in the 15 rounds of public comments stage before the case was approved in March this year, the drainage consultant report and the Water Quality Impact Assessment have totally ignored the waterstream on the west side of Wah Yuen, overflow of which goes DIRECT into our house. We are not convinced how the drainage 'design' of the PD will alleviate flooding risks.

Again, as mentioned above, the Water Quality Impact Assessment does not have full picture of this missing watercourse. The plan only shows the northern part from Kam Sheung Road,

rather than the continuation of this flowing through southwards to the border between some of the houses within Wah Yuen and that of the PD.

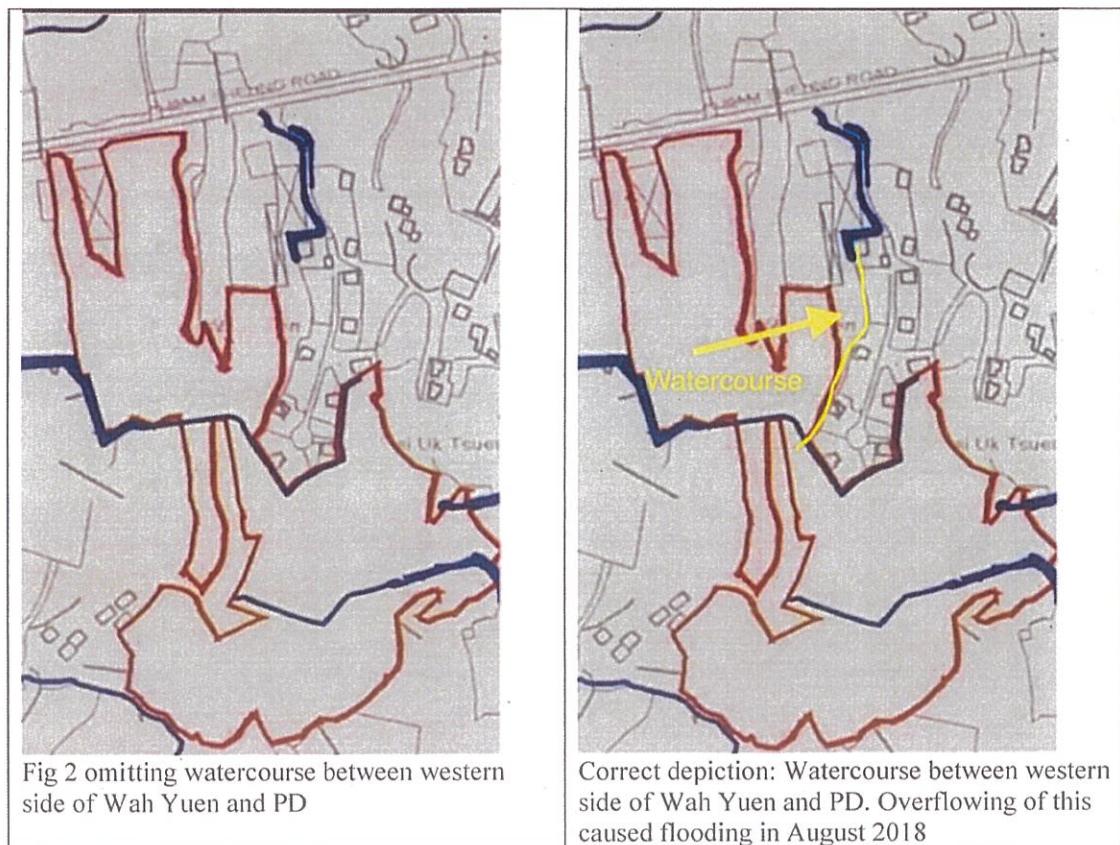


Fig 2 omitting watercourse between western side of Wah Yuen and PD

Correct depiction: Watercourse between western side of Wah Yuen and PD. Overflowing of this caused flooding in August 2018

The proposed development area are all natural soil which can retain water during heavy rain. The ability to retain water would largely reduced after construction. We as residents of Wah Yuen are very anxious, the threat of flooding will become higher.

With the PD being raised significantly higher than existing residential, including Wah Yuen, all excess water from heavy rain and typhoon will flow to our side as we are totally enveloped by the PD. This will be catastrophic to us.

As much as the Applicant, through the consultant reports, portrayed that it has made consideration on the water drainage issue, it has ALL THIS TIME IGNORED THE FACT THAT THERE IS A WATERSTREAM ALONG THE WESTERN SIDE OF WAH YUEN. This has been ignored probably as this does not form part of boundary of the PD. However, with the construction of the PD along the border of Wah Yuen, it is affecting the flow of this waterstream along Wah Yuen.

Is the applicant ignoring the impact the PD by simply arguing that this is NOT ALONG its border ? This seems to be a no-man's land with no parties wanting to take responsibility on. Yet the waterstream lies within this strip of land.

The Applicant seems to have been blatantly ignoring this existing waterstream along western side of Wah Yuen by saying that this is not part of its land, and that it CANNOT GET ACCESS

to this part as it is 'private land', hence doing nothing. Yet, the flow of this waterstream will be devastatingly affected by the concrete construction of the PD. With the construction of the PD, water will have no where to go along this waterstream, high risk of backflow to Wah Yuen.

We request the developer to re-visit the drainage/flooding issue by including this stagnant waterstream onn west side of Wah Yuen wall, bording the. PD.

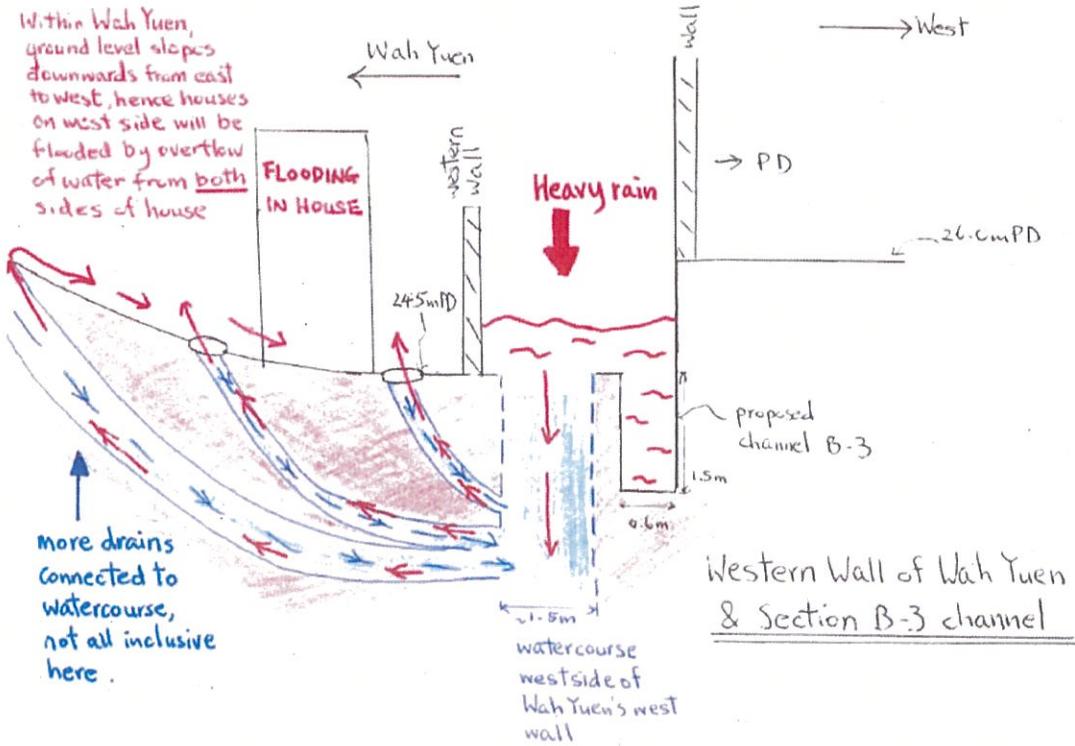
Proposed Boundary Channels

200A case is considered the upper limit of the testing, whilst we are not technical expert on this front, we would like to know how does this 200A case compares to the floodstorm on 29th August 2018, which caused the whole of Wah Yuen / Lin Fa Tei area to be flooded, with water going into most of our homes. On this date, more than 70mm of rainfall in one hour to 4pm, and 300 to 400mm by 6:45pm in Shek Kong/Kam Tin/Pat Heung area. With the change in weather due to global warming, we are getting heavier rain, and typhoon seasons are getting longer each year, shouldn't there be a significantly bigger margin of safety built into the sizes of the channels ?

Can the channels be built deeper and wider ? The consultant report shows cross-sections of the Proposed Boundary Channels, in all the 200A cases for each of the proposed channels, water level is only 0.1 to 0.2 mPD below that of Wah Yuen or adjacent private lots, this margin is just too narrow. If water level exceeds that of the hypothetical case 200 A, the mere 0.1-0.2m cushion is totally insufficient. Afterall, **given the raised level of the PD to 26.0mPD, and with their solid Proposed Boundary wall, if water level increases above the projections, they will only flow towards Wah Yuen and the adjacent private lots as the PD will be totally walled off from any waterflow.** This is a much worse situation than if the PD had not been built. Without the PD, overflowing water would be able to be absorbed by agricultural land and soil and gets runoff in all directions. However with the PD, any waterflow will be trapped between the PD Proposed Boundary Wall and the wall of Wah Yuen. **Given that units in Wah Yuen drains out to the waterways outside the wall, overflowing water between the 2 walls will flow into our houses in Wah Yuen and our risk of flooding will be CATASTROPHICALLY increased.**

As mentioned above, quality of water along this watercourse drastically deteriorated due to work due in the PD site in the last few years, water is almost stagnant and water level of this watercourse easily rises whenever there is rain each time.

To add to the severity, within Wah Yuen, the eastern side houses slopes down towards the western side houses. If the water level exceeds that of the projected worse case 200A, there will be overflow on all the channels B-1, B-2 and B-3, and the overflowing water will all flow down westwards. And houses on western side of Wah Yuen will swarmed by overflowing water from watercourse / channel outside wall as well as water rushing down from east side. **This is CATASTROPHE.** We suffered from this with the heavy rainstorm in 2018, now with the water having nowhere to go between our wall and that of the PD's, risk of this happening will greatly increase.



The depth of the Proposed Boundary Channels needs to be much deeper and much wider in order to compensate for the risk of water trapped between the high wall of the PD and the porous wall (due to drainage within Wah Yuen flowing out to waterways outside the compound wall) of Wah Yuen. The existing 0.1-0.2 mPD cushions between ground level and highest anticipated level in 200A case is totally misleading. The assessment is misleading and ignores the scenario if water level exceeds that of the ground level. In this scenario, the situation will be much much worse off as water will rush into Wah Yuen at great speed and capacity as it has nowhere else to go with the PD wall built.

Looking at the Cross-sections of the Proposed Boundary Channels, the PD is raising its ground level compared to ALL its surrounding boundaries, to a difference of 1-1.9m. So with the high wall, raised level, all the surrounding households / lots will get all the water flooding to our homes.

	Boundary Channels	PD (mPD)	Adjacent lots / Wah Yuen (mPD)	Difference (mPD)
Adjacent lots	A1	26	24.5	1.5
	A2	25	24	1
	A3	24.5	23.5	1
	A4	24.3	23.2	1.1
Wah Yuen	B1	26	24.6	1.4
	B2	26	24.1	1.9
	B3	26	24.2	1.8

- Inclusion of the 'missing' watercourse is vital.
- We also need a physical model to explain and illustrate how the drainage 'design' of the PD will work.
- We need sensitivity tests taking into account of global warning, as well as the impact of the PD being raised higher by 1m right next to us, the loss of water absorbing soil in Wah Yuen's vicinity, to give a the comfort that flooding risks is not deteriorated.

Without above, we have no comfort at all to the increase in flooding risks with the construction of the PD.

Given the uncertainty of so many assumptions, and the omission of factual existence of the waterstream on western side of Wah Yuen, we are extremely concerned about how reliable the consultant report is. The model needs to be amended to include this western side waterstream for a start.

Per the Drainage Impact Assessment, Table 4.4 tabulates the Proposed Condition with DSD planned works under scenarios 10A, 50A and 200A for 7 Control Points. We note that there are 7 occurrences where freeboard is positive per the table. This is our laymen's reading, obviously we are no expert. As with all the other Appendices, **we are extremely concerned that the Applicant has not taken the welfare of Wah Yuen into its consideration in the Drainage Impact study.** Subsequent amendments made in the consultant reports eventually mentioned Wah Yuen as a namesake mention, nothing seems to have been amended in the design and planning in consideration of Wah Yuen.

There is the construction of a viaduct in the PD, we are still unconvinced how this would prevent the deterioration of the flooding risks. The technical studies use historical statistics of 1 in 50 years, 1 in 200 years. Given the impact of global warning, we question heavily how such desktop standard approach is relevant. As mentioned above, **Wah Yuen NEVER had flooding problem since it was first built in the late 1970s, until 2018 August.** And now, during each annual rainy season, there is serious risk of flooding. Why ? Should the 1 in 50, 1 in 200 statistics be still applicable ?

iii. Traffic

Regarding the Traffic Impact Assessment, we have the following comments:

- a) The report only picked 4 main road junctions as study sample. It has not investigated the impact of the traffic and parking issues within Kam Sheung Road and Pat Heung area, such as Kam Tin town center (main local shopping area meeting our daily needs) and Sheung Tsuen bus stop area (where there are about 6-7 restaurants, one grocery shop, car repair shops and property agents). Even on weekdays, one can hardly find a parking space in these two areas. We cannot imagine the addition of another 2,380 inhabitants from the PD. The situation will be overwhelming to handle.

- b) The impact study has not mentioned mini buses No 72 and No 23 and the Sunlight Bus NR 918 that goes to Central/Wanchai area. These are always very popular and fully loaded during peak times in the morning. Also, one can hardly find taxis available in the peak hours. What would be the impact when 2,380 inhabitants are added ?
- c) Junction C (Kam Sheung Road / Kam Tin Road) will reach full capacity soon.

Per the Traffic Impact Assessment consultant report para 3.2.1, we have repeatedly stated that “The Application Site is located out of a 500m radius of the rail station” IS INCORRECT !!! The PD is 4.3 km away from Kam Sheung Road Station, not walking distance, feeder public transport is necessary. ***There is NO alternative shorter way.***

This misguidance of information can mislead the uninitiated reader that the PD is close/walking distance to the near Kam Sheung Road MTR. **IT IS NOT.** The location of the PD is in the middle of a 2-lane country road, where all residential houses alongside are 3-storey buildings. Public transportation takes 15-20 minutes to the near MTR station.

As much as what was mentioned in our comments in the public opinion rounds, as well as raised by the [Transportation Department on 8th February 2021], both pointing out that the public transport survey as done by CTA cannot form basis for public transport demand assessment due to the misunderstanding of how the commuters will travel in the area, the revised Traffic Impact Assessment makes no amend. The same survey and same results are included. In any case, the survey was conducted in [October 2022], more than three years ago, and applying an out-of-the-air COVID adjustment factor, which is all desktop theoretical

Public Transport Surveys were conducted on 10 October 2022 at Stops A and B, basically Lai Uk Tsuen bus stop, between the hours of 7:30am to 8:30am and 6:00pm to 7:00pm. Average Occupancy is noted during the survey. it was concluded that there is surplus in public transportation capacity during these times. Such surplus is used as a basis for the calculation of an Expected Surplus in 2030. Such ‘surplus’ is then compared to the assumed increase in Peak Hour trips from the PD, reaching the conclusion that the Expected Surplus in 2030 covers more than enough of the increased traffic from PD.

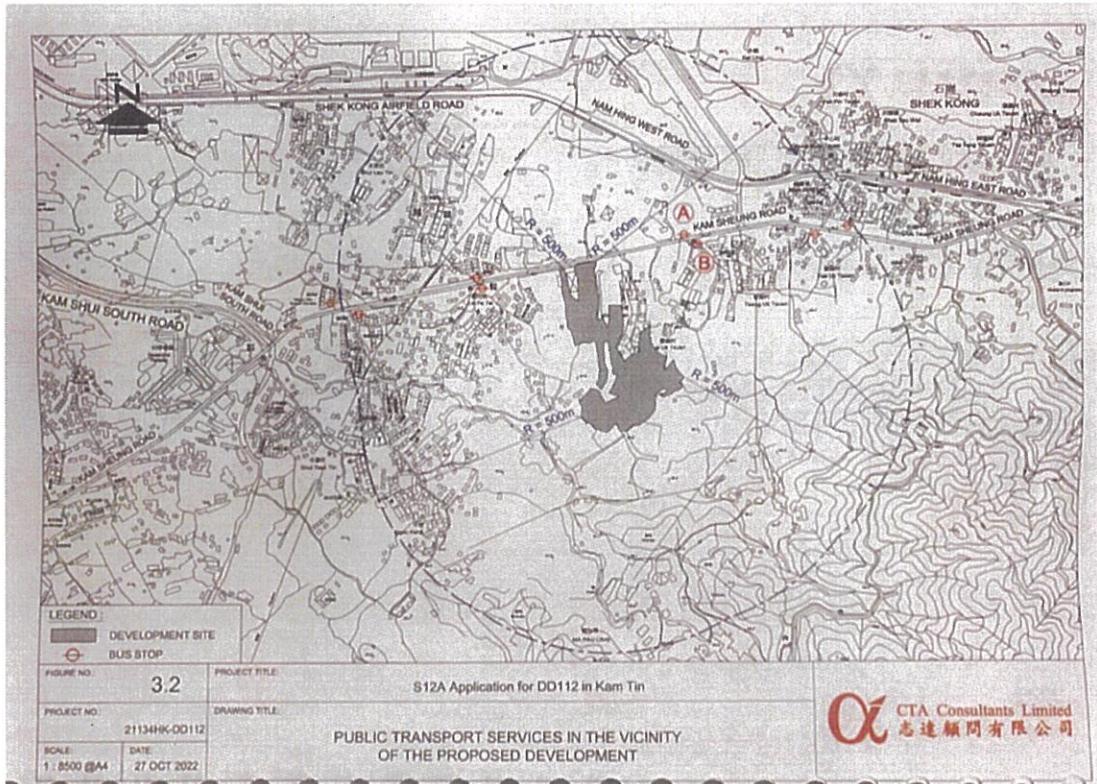
Whilst we are not traffic experts, and neither do we have the full information on how the Public Transport Surveys were performed, we can, as residents close to the PD, strongly opine that the survey does NOT match with that of our daily experience as far as public transport is concerned during peak hours.

We question the methodology of the survey: location of the test points, Bus Stops A and B, which leads to incorrect calculation of Expected Surplus 2030

Since the last few years, during the peak hours of morning and evening, Buses 251A, 64K and minibuses are always full, and it is not uncommon that passengers need to wait for the next vehicle before they can get aboard. In fact, in the past few years, there has already been strong complaints from commuters who use these public transportations in the morning as the buses

/ minibuses are all full by the time these arrive at their bus stops. From Lin Fa Tei going westwards towards Kam Sheung Road MTR station, it is not uncommon for commuters to have to wait for few minibuses / buses before they could get aboard.

The location where the surveys were conducted i.e. during AM Peak (7:30 – 8:30) at Stop B westwards and PM Peak (18:00 – 19:00) at Stop A eastwards totally misses the issue.



Take for example bus 64K, during peak hours, say AM, with most public transportation demand being westwards towards Kam Sheung Road MTR. Once the bus reaches Kam Sheung Road (from Tai Po), there are a total of 18 bus stops from Kam Sheung Road (Sheung Tsuen Playground) westwards to Kam Sheung Road MTR. Bus Stop Lai Uk Tsuen (named Bus stop B in the Traffic Impact Assessment Report) is only the 4th bus stop along Kam Sheung Road from the Sheung Tsuen Playground bus stop. The bus still has capacity, hence 'meeting the demand of the residents of the PD', satisfying the Applicant's needs. Yet, very soon, as the bus passes Lin Fa Tei and westwards beyond, number of passengers boarding drastically increases as these are the more densely populated villages. It is not unusual that the bus reaches full capacity, with all passengers standing up to the driver's seat in the later bus stops along Kam Sheung Road.

Same applies to the minibuses GMB and RMB, it is not uncommon that all these minibuses are already full by the time it passes Lin Fa Tei area towards Kam Sheung Road MTR, and one has to wait for few more minibuses before there are vacancies.

The survey becomes even more 'meaningless' for the PM study, when public transportation demand being eastwards from Kam Sheung Road MTR along Kam Sheung Road. Taking the survey at Bus Stop A is almost meaningless to be frank. Commuters need public transportation

taking them from Kam Sheung Road MTR to Lin Fa Tei area which is more populated. By the time the bus / minibus passes the PD, at Bus Stop A (Lai Uk Tsuen), most of the passengers would have alighted. As such during the survey at Stop A would have shown that these public transportations have ample surplus. Yet such kind of statistics/survey results illustrate nothing useful perhaps useful in the sense that it illustrates the lack of thought in how the survey was conducted.

For PM, the real test comes from observing the long queues of commuters at the bus stop terminal at Kam Sheung Road MTR. This is the only stop where almost 100% of passengers aboard the buses/minibuses. This is the location where one can see that at peak times, passengers need to wait for few minibuses before they can go aboard. The same applies for the 64K, which is also full, with passengers standing right next to the driver, as much as its capacity is much more compared to the minibuses.

Besides, treating buses 64K and 251A to serve the same purpose is not correct. Hence capacity of these buses should not be simply added.

Bus 251A takes a circular route and goes from Bus Stop B (Lai Uk Tsuen) westwards towards to Tai Lam Tunnel Bus Stop Interchange, then to Kam Sheung Road MTR, and back to Tai Lam Tunnel Bus Interchange before it loops back to Kam Sheung Road heading eastwards. Similar to Bus 64K, Lai Uk Tsuen is the 4th bus stop along Kam Sheung Road from Sheung Tsuen Playground (first stop on Kam Sheung Road westwards), and there are 15 more bus stops, diverting to Tai Lam Tunnel Bus Interchange before it reaches Kam Sheung Road MTR. No one would take 251A from Kam Sheung Road to go to Kam Sheung Road MTR as it takes a longer route going to Tai Lam Tunnel Bus Interchange first. Again, from Kam Sheung Road MTR, 251A is NOT the option to go to Kam Sheung Road as the bus goes to Tai Lam Tunnel first.

As such, in the study where it includes bus 251A as part of the connection to Kam Sheung Road MTR station (Tables 6.1 and 6.3), it **overcounts the capacity significantly**.

For bus 251A, during AM peak, strong demand comes from residents from the Lin Fa Tei area onwards towards Tai Lam Tunnel Bus Interchange. Hence the survey probably missed out the strong demand as Bus Stop B is only the 4th stop along Kam Sheung Road.

For PM, the real test comes from observing the demand of the 251A bus at Tai Lam Tunnel Bus Stop Interchange, NOT Stop A. Tai Lam Tunnel Bus Stop Interchange is the stop where almost 100% of passengers board the buses/minibuses. This is the location where one can see that at peak times, standing passengers right next to the driver's seat, with other passengers waiting for the next bus.

Summarising the above, basically during peak hours AM and PM, there is NO surplus capacity as of now already. Public Transportation reaches full capacity when they reach Lin Fa Tei area westwards AM, and for PM, queues for buses are long during peak times.

Based on the inaccurate surveys at Stops A and B, and the projected 2030 Surplus thereon, the survey concludes that public transportation is sufficient for the added demand from the residents of the PD. It does not take into consideration as to how the added PD demand means

to the rest of the commuters along Kam Sheung Road. During AM peak hours, this means in addition to the already long wait before commuters can get aboard the minibuses/buses, the 'projected' increase from the PD, 343 passenger trips (Table 6.9) means commuters along Kam Sheung Road will have to wait for 3 more buses (roughly speaking) in addition to the current wait before they could get aboard. Same applies for PM peak hours. Commuters have to wait for 3 more buses before they could get aboard.

Can Kam Sheung Road support this ?

Moreover, the choice to take minibus or bus is subject to the actual walking distance to nearby bus stops. The PD is located between 2 bus stops Lai Uk Tsuen and Lin Fa Tei, this means that its residents are less inclined to walk to the bus stop if they see minibuses right outside their complex. This means demand for minibuses will probably be more from PD residents, which exasperates the existing problem of minibuses reaching full capacity along the western part of Kam Sheung Road. In general, green minibus is the preferred choice for commuters along Kam Sheung Road as it gives flexibility of boarding and alighting points. Yet green minibuses are already reaching their full capacity in the morning, with commuters along western side of Kam Sheung Road having to wait for a few minibuses before they could go aboard, or that they have no choice but to take the very crowded bus instead. Not quite sure how the spiel of neighbourhood harmony per Applicant's material actually will work out

This is only one part of the study to which where we can see the flaws. Given that there are so many other assumptions used throughout, we question whether the what-so-called surveys and projections are to be really relied on.

This fully illustrates that consideration in how the PD will impact on existing local residents has not been taken. Just like the other reports and studies submitted by the applicant so far, such studies were purely from the perspective of the PD. As long as existing surroundings support the needs of the PD, it is concluded that "there is no impact on the area".

Such studies rely on assumptions and desktop data, with no real understanding and observation of actual site and its vicinity, we cannot help not feeling sceptical of such reports.

On a different note, queue for taxis are long during PM time at Kam Sheung Road MTR station. Waiting time is over 15-20 mins during peak hours.

In addition, both surveys above were done during the defined peak hours AM and PM. In fact, given the diversity of the population in the area, demand for public transport is always strong in the evening, after dinner time when commuters are returning home, with the green minibuses no longer in operation, queue for taxi becomes extremely long, with people lining right towards the end of the rank.

Frankly speaking, the way how the public transportation survey probably hints that the survey was done, as much as outdated 3 years ago, with the junior consultant sitting in a car near points A and B, this person, by the way the conclusion was made, probably never got on the bus/minivan and experience how the passengers build up as vehicle moves westwards towards the Kam Sheung Road, MTR station. Similarly, by standing at points A/B near the PD without

joining the actual vehicles from the MTR station, the survey totally missed the picture that buses/minibuses were all filled up at the MTR station and with most passengers alighting before the buses/minibuses reaches the PD location eastwards.

5. Negative impacts of the Proposed Development on Wah Yuen – Impact during Construction

Regarding the impact during the construction period, the proposal has not taken Wah Yuen into its consideration at all.

- a) **Structural impact** – Wah Yuen is a compound of over 42 years. The impact of the construction work few metres away from us on our foundation is not within our laymen's grasp, but we fear for the worst.

During the construction of the Shek Kong Stabling Sidings (High Speed Rail train repair center) along Kam Sheung Road a few years back, neighbouring villages including Lai Uk Tsuen, Tsang Uk Tsuen, Tse Uk Tsuen and us in Wah Yuen have suffered different degrees of damages including cracks and subsidence.

How will our 42-years old houses be able to bear such heavy construction work ? This is rural land where small scale 3-storey buildings have been built, most times by small scale developers / contractors. We fear that the large scale 6-storey construction, built at literally stone's throw away from our houses will cause structural cracks and damages to our houses.

What protection do we have in Wah Yuen when the site is only a few meters away from Wah Yuen at closest point ? Is this going to be a scenario of having to prove the damages before our voice would be heard ? **This would bring huge psychological stress to our lives throughout the 5 years of construction.**

For our case, we have a swimming pool in our premise. **We are extremely concerned about damages / cracks that the heavy construction work, at such close distance to us, could cause to our pool.**

Again, no preventive measures had been mentioned in the Applicant's material as to how to mitigate and monitor structural impact/damages, especially, with the close proximity, on our houses in Wah Yuen.

If the construction of the PD goes ahead, we strongly request for a survey to be done at our houses in Wah Yuen, setting a base case for the structural condition BEFORE start of construction. We need periodic surveyance monitoring throughout the construction process for any immediate actions if need be, if our structural is impacted by the close-to-zero construction, and recourse from the developer. Such surveyance work should be done by surveyor of our choice, and paid for by the developer, for avoidance of vested interest.

b) **Noise impact** - During construction period, how to minimise the noise pollution, again nothing mentioned in the impact assessment.

Especially during initial piling phase, with T7, T8 and the 3-storey car park so close to us, we see no mention of minimizing such impact on us at all.

We need to hear from the developer solid plans as to how such noise impact will be made to a minimal, surely it needs no explanation as to the stress and disturbance of a zero-distance construction site that will be caused during the construction period.

c) **Drainage impact** - It is mentioned that during construction period, the north channel will be connected to a new system replacing the existing blocked portion. However it is not clear how Wah Yuen is covered for the risk of flooding during this interim construction period. As mentioned in previous section 4 above, since the Applicant's site has turned to brownfield site, the stream along the outside edge of Wah Yuen does not flow well anymore and water level rises rapidly after each bout of heavy rain. Moreover, **with the construction work, construction debris can immediately block the already non-flowing stagnant stream.** As such this drainage issue needs to be addressed before start of construction, before the landfill covering the stream. **This is not clear from the Application material.**

Before construction starts, must treat all drainage issues, otherwise with heavy rain and typhoon, there would be catastrophic impact to Wah Yuen due to opened earth / dust flooding / blockage of the already problematic drainage issues we have due to the PD.

We need to hear from the developer solid plans as to how such drainage issue will be addressed during the construction phase.

d) **Air pollutant and construction debris impact** – **we will be totally exposed to construction contaminants and dust during the full period of construction**, it is not seen from the Applicant's material as to how such impact would be minimized. **Our dwellings are not flats where we could just close our windows, we have our outdoor garden areas which will be badly affected.**

From our past experience, during renovation period of our neighbouring house which was even more of a distance away from our house than the planned T7, T8, the construction debris that got into our swimming pool caused blockage in our pool filter pump. We ended up having to pump away all water in order to perform thorough cleaning by external maintenance vendor. This caused great hassle and financial costs to us. We were warned by the maintenance team that had the construction debris been bigger in size, there will be risk of the debris trapped in the pump causing overheating and could easily damage the system with replacement being the only option.

Besides, given such heavy construction work at such close distance to us, the regular cleaning and maintenance work for our pool would definitely need to be intensified, as such increased financial burden.

Obviously the inconvenience and stress in handling such situations of our pool are not quantifiable.

Per the Waste Management report as provided by the applicant, whilst it mentions how such waste will be sorted / collected / stored on site, there is no mention of where such will take place in the site, albeit a mentioning of “will be provided at location away from public areas (para 3.9)”.

As existence of Wah Yuen has been totally ignored by the development in the submission all along, does Wah Yuen constitute public area ? With the vastness of the site, we strongly ask the developer NOT to operate its waste management facilities at any distance close to us.

Again, waste from construction is a huge concern for us as the watercourses outside walls of Wah Yuen can easily be filled by such. This is a serious flooding risk.

We need to know how the developer will deal with construction contaminants / debris / dust during time of construction, as the watercourse between west of Wah Yuen and the PD can be easily blocked, as already is the case currently. In addition, there is risk of construction debris that will get into our swimming pool causing blockage in our pool filter pump.

What is our recourse if water quality of our pool renders our pool unusable during the years of construction ? Where and how do we seek recourse ? We need to have agreement from Applicant that there is clear avenue of recourse and make good if we are affected during the construction period, and thereafter.

e) **Traffic impact** - The proposal has not assessed issues of how the construction heavy trucks and cranes would have impact on the traffic along Kam Sheung Road during construction period.

The completion date of the PD is 2027, this means construction period will be 5 years roughly. 5 years of continuous suffering under above scenarios is health damaging and distressful to say the least. Needless to say, there will be financial detriments to us as well in terms of repairs and cracks which take time to prove (if at all), as well as the adverse impact on the market values of our homes.

6. Conclusions

To summarise the above sections,

Permanent Impact:	
Before	After
- Greenery Views	- All Views blocked. No Privacy
- Singing of birds	- 24/7 ventilation system of the club houses - 24/7 carpark operation right next to us

- Natural sunlight	<ul style="list-style-type: none"> - 125 residents per building x 19, right next to us - Sunlight cut by 2-3 hours during afternoon each day - No direct sunlight at all in winter as 6-storey buildings towering over us - Without direct sunlight, our swimming pool will not be suitable for swimming for half of the year
- Natural air circulation	<ul style="list-style-type: none"> - Wall effect
- Rural freshness of air	<ul style="list-style-type: none"> - Air pollutants from carpark right next to us
- Drainage problem exacerbated in last few years since brownfield	<ul style="list-style-type: none"> - Unknown if situation will be worse
- Traffic	<ul style="list-style-type: none"> - added burden on public transport, parking facilities and the already congested Kam Sheung Road

Impact during Construction period (5 years roughly):

- High risk of structural damage to our houses in Wah Yuen due to the proximity from the development. For our house, we are right in the middle of the T7, T8 and the 3-storey car park. We have a swimming in our premise and we are extremely worried about the heavy impact of construction work on our pool and house;
- Noise from construction site, again we are right in the middle of the T7, T8 and the 3-storey car park;
- Increased risk of flooding on western side of Wah Yuen wall due to construction debris, our house is right next to a stagnant stream of which its level rises too quickly with heavy rain;
- Construction contaminants and dust impact, especially on our outdoor area. For our case, construction debris going to our pool could run the risk of damaging our pump system rendering replacement, which would be very costly. Besides, given such heavy construction work at such close distance to us, the regular cleaning and maintenance work for our pool would definitely need to be intensified, as such increased financial burden. Obviously the inconvenience and stress in handling such situations are not quantifiable; and
- Traffic impact with the construction heavy trucks and cranes as the site is right next to us.

As a house compound, we are one of the earliest one along Kam Sheung Road, with detached houses and each with our gardens. We are all proud owners of our homes and we have spent significant amount of monies in maintaining and updating our houses throughout all the years since 1979.

From the day when we had sight of the gist details made available publicly, the sentiment of all the residents in Wah Yuen had been that of sadness, anger, and confusion.

Of course we support the development of housing in vicinity areas, in response to the need of housing requirements of Hong Kong. We support this whilst trusting in the well understood planning of the area, the boundary of the Kam Tin South / Pat Heung LUR (Plan 1), which is 1km away from the Proposed Development. Zoning of land around Wah Yuen are all agricultural land and V-zoned and we are of course open to development of nearby areas with zoning plans to build 3-storey residences, similar to ours in Wah Yuen. Yet to have all we have

to disappear because the PD is close to us and twice as tall as our houses, this is a very disturbing situation to say the least.

Given the vastness of the Applicant's land, and the good intention of the Applicant's building setback as well as the green buffer measures for the benefit of the development's new residents, we sincerely hope that the Proposed Development would apply such measures to the boundary in Wah Yuen, for the benefit of us, the existing residents right next to the development.

We did not move from the city to the rural area to have a **3-storey carpark right next to our bedroom windows**. We did not move to live in this compound knowing that there will be **buildings twice of that of our homes right adjacent (4m closest) to us**. The changes to our lives, of this proposed rezoning, is brutal, and it is just too hard to stomach.

We hope that this is not a case of 850 units vs 9 houses, not a case of the big developer vs our small complex, which has been here since 1979.

We hope that committee members to consider and hear our voice.

We are vehemently against the current proposed Application as represented.

If the approval back in March this year means there the PD will go ahead, we request the developer / government departments to assist onn the actionns shaded in GREY throughout this document.

We thank you for taking our views into your consideration on this Proposed Development.

Urgent Return receipt Expand Group Restricted Prevent Copy

Representation Number:

TPB/R/S/YL-SK/10-R8

tpbpd/PLAND

寄件者:

2025年12月17日星期三 3:46

Submission Number:

TPB/R/S/YL-SK/10-S121

寄件日期:

收件者:

tpbpd/PLAND

主旨:

AMENDMENTS TO THE APPROVED SHEK KONG OZP NO. S/YL-SK/9

類別: Internet Email

AMENDMENTS TO THE APPROVED SHEK KONG OZP NO. S/YL-SK/9

Item A – about 81,3ha. Rezoning of an area to the south of Kam Sheung Road and west of Lai Uk Tsuen from "Res (Group D)" to "Res (Group C)"

OBJECT. THE BLANKET REZONING DOES NOT RESOLVE THE ISSUE OF THE IRREGULAR CONFIGURATION OF THE APPROVED APPLICATION:

Y/YL-SK/1 Approved 14 Mar 2025

Lots 246, 247 (Part), 251 (Part), 253 (Part), 254, 255 (Part), 256, 257, 258 (Part), 260, 263, 273 RP, 274, 275, 277, 278 S.B, 279, 280, 284, 294 RP, 295, 849, 850, 851 (Part), 853, 856 (Part), 859 (Part), 861 (Part) and 862 in D.D. 112 and Adjoining Government Land, Kam Sheung Road, Shek Kong

Site area: About 41,290sq.m Includes Government Land of about 415sq.m

Zoning: "Res (Group D)"

Proposed Amendment: Rezone to "Res (Group C)" / 19 Blocks - 850 Units / PR 0.8 (0.2) / 6 (2) floors / 2 Club Houses / 2 Parking blocks / OS 2,380sq.m / 254 Vehicle Parking / 21 Heavy Goods / 51 Bike Parking

The site is not cohesive; it is interspersed with a number of lots belonging to others that could impact the well-being of the residents and create problems and confrontations going forward. This was recognized by members but the proposed blanket rezoning does not resolve this issue:

"In considering the s.12A application, while having no objection to the proposed development at the application site, the Committee considered that the irregular configuration of the application site would constrain its development as well as that of the surrounding land and pose interface issues with adjacent private lots not included in the application site. In this regard, the Committee noted that PlanD would conduct a review of the "R(D)" zone to explore the feasibility of rezoning the entire "R(D)" zone to "R(C)" or rationalising the boundary of the proposed "R(C)" zone.

the irregular and patchy configuration of the "R(C)" zone as proposed in the s.12A application might hinder the comprehensive development of the Site. To avoid fragmented development as far as possible and to provide incentives for comprehensive development of the Site, instead of merely rationalising the boundary, it is considered appropriate to rezone the entire "R(D)" zone to "R(C)"

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The applicant would continue to explore ways to assemble other surrounding private lots within the "R(D)" zone and there was no update at the current stage."

Until additional lots are included in the site, the application in its current form is an inefficient use of land as it requires an inordinate amount of road connections and provides no community benefit. Moreover, if it goes ahead in its current form, it could create obstacles to the development of a well-co-ordinated community,

The Paper ignores the very substantial number of objections to Y/YL-SK/1 from a broad and diverse pool of local interests:

10.2 Out of the 7,285 comments raising objection/expressing concerns received, 7,211 (about 99% of the total public comments received) are standard comments in the form of two types of standard letters from the residents of Pat Heung Sheung Tsuen and 74 are non-standard comments from Yuen Long District Council members, Pat Heung Rural Committee members, village representatives and residents from various villages, residents of Wah Yuen, owners of nearby lots, companies and individuals

Their major comments/views are summarised as follows:

(a) the proposed development will result in **adverse drainage impact**. The surrounding areas have already been prone to severe flooding, and raising the foundation level of the proposed development will worsen the existing flooding issue for nearby residential developments in the area. Tampering with the existing streams and drainage channels will also affect drainage of the area in the future;

(b) the **additional traffic** generated by the proposed development will intensify traffic congestion along the local roads and nearby road junctions. There are insufficient public transport provisions in the vicinity to cater for the additional population generated by the proposed development;

(c) the proposed development will result in **adverse visual impact**. It will block the sunlight for nearby existing developments. The views of the nearby private residential developments have not been considered;

(d) the proposed development **intensity is not compatible** with the low-rise and low-density character of the surrounding areas;

(e) **adverse environmental impacts**, such as air quality and noise nuisances, will arise from the proposed development and affect the current living quality in the area;

(f) the **technical assessments undertaken by the applicant** and their methodologies, including that for the traffic, drainage and visual impact assessments, **are flawed and inaccurate**. They do not accurately take into account the existing conditions on the ground in the area;

(g) the proposed development will **affect the feng shui** of the area. It will also pose a threat to the security and safety of existing residents; and

(h) there is a **lack of parking, shops and other community facilities to support the local population**.

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The proposed rezoning doubles the footprint but PlanD has not provided any supporting data to supplement that provided by the applicant. As the rezoning is initiated by PlanD, then it should provide its own data and assessments with regard to traffic and other impacts.

However, the only additional data is a Visual Appraisal.

The extended site borders Kam Sheung Road, the main artery for the district. It is therefore an ideal location for the provision of both community and recreational facilities. As the area was previously rural in character there are currently no facilities in place. The larger community (*the estimated number of units and population would increase from 250 and 675 to 1,672 and 4,419 respectively*) would also require retail, localized day care services, public parking, open space, etc.

As usual the deficits in services are being glossed over, but the HKPSG data indicates that practically every community service has a significant shortfall. The paper admits that "There are also shortfalls in the provision of recreational facilities".

Pickleball, for example, is growing in popularity and an excellent form of outdoor activity for folk of all ages that does not take up much space.

But PlanD has provided no concept plan as to how an integrated community structure could be achieved.

Note also an **average unit size of about 38.9m²** so in other words just over 50% of the GFA of ONE FLOOR of a village house.

This is quite alarming as 400sq.ft. is not large enough to raise a family, particularly in rural areas where there are fewer community facilities and alternative spaces. In urban areas there is a wide variety of indoor and outdoor recreational facilities; coffee shops, etc one could escape to.

While we are being told that all this development is going to provide a better quality of life, most of the plans going through indicate that this is not the case. Going forward the scenario for many will be living in a constricted space with far fewer community amenities and longer commutes.

The OZP should be rejected as the Sect 12 and the enlarged footprint are not compatible.

While the intention of the rezoning the larger area is understandable, this has to be supported by concrete facts and assessments not some vague aspirations that the land owners will suddenly decide to co-operate and play ball.

Amendments to the Notes of the Plan

(b) 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 2 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

Urgent Return receipt Expand Group Restricted Prevent Copy
(d) Incorporation of 'Hotel (Holiday House only)' under Col 2 of the Notes for "R(D)" and "V" zones.

OBJECT TO INCLUSION IN 'V ZONE. THE PLANNING INTENTION OF "V" ZONE IS TO PROVIDE FAMILY HOMES FOR INDIGENOUS VILLAGERS. THE PROPOSED AMENDMENT ENCOURAGES THE ALREADY RAMPANT ABUSE OF DEVELOPMENT IN THE ZONE.

(e) Incorporation of 'Field Study/Education/Visitor Centre' 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 and the Remarks of the Notes for "Conservation Area" zone on filling of land/pond or excavation of land in accordance with the Master Schedule of Notes to Statutory Plans.

THE IMPLICATIONS OF THIS ARE NOT OUTLINED IN THE CONSULTATION PAPER.

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.

THE ONLY EXEMPTIONS ALLOWED SHOULD BE FOR MAINTENANCE AND REPAIR OF EXISTING STRUCTURES.

MANY FACILITIES ADDED FOR TOURISM HAVE RESULTED IN DEGRADATION AND DAMAGE TO HERITAGE AND SENSITIVE AND FRAGILE ECOSYSTEMS.

Mary Mulvihill

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真：2877 0245 及郵寄)

強烈反對石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂及
石崗分區計劃大綱草圖編號 S/YL-SK/10 (石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂)

執事先生/女士：

Representation Number:

TPB/R/S/YL-SK/10-R9

Submission Number:

TPB/R/S/YL-SK/10-S4

本人是元朗八鄉上村居民，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建 19 棟樓高 6 層的住宅及 4 棟非住用途的建築物，地盤面積超過 4 萬平方米，住宅單位 850 個，停車位達 322 個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

項目規模與面積十分龐大，申請地段接連兩條村落部分的村屋，與黎屋村的法定古蹟植桂書室及二級法定建築黎氏大宅距離不足 80 米，六層高的大型建築，阻礙村民及村屋的視野，對村民及鄉郊環境造成無可挽救的破壞！

此外，蓮花地村以至黎屋村一帶（包括申請地段），經常出現嚴重水浸。兩村村民極度憂慮申請項目將加劇村民在過去十數年飽受困擾的水浸情況，對村民生命財產構成嚴重威脅！相關項目將帶來超過 3 千人入住，大量人口定必帶來交通及排污的問題。八鄉南主要幹線近年已嚴重擠塞，而政府亦致力發展八鄉及錦田南一帶，政府的交通基建和配套完全未能滿足八鄉居民的訴求，居民怨聲載道！申請項目帶來的人流及車輛勢必加劇八鄉交通擠塞的情況，令八鄉居民生活在水深火熱之中！

另一方面，八鄉是沒有中央排污系統，村民的家居污水都流經村內人工修建或天然渠道排放。大量人口排放的污水，對周邊地區的環境衛生造成破壞，同時亦增加渠道的負擔，減弱排洪的能力，增加水浸的風險！

本人懇請城市規劃委員會重視八鄉上村居民的意見，聆聽和接納我們的訴求，否決上標申請，避免我們在水深火熱的環境下生活，造福八鄉上村及錦上路一帶居民！

八鄉上村居民簽署：



姓名：王翠琼

2025 年 12 月 12 日

通訊地址

聯絡電話

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真 : 2877 0245 及 郵寄)

強烈反對石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂及
石崗分區計劃大綱草圖編號 S/YL-SK/10 (石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂)

執事先生/女士：

Submission Number:
TPB/R/S/YL-SK/10-S40

本人是元朗八鄉上村居民，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建 19 棟樓高 6 層的住宅及 4 棟非住用用途的建築物，地盤面積超過 4 萬平方米，住宅單位 850 個，停車位達 322 個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

項目規模與面積十分龐大，申請地段接連兩條村落部分的村屋，與黎屋村的法定古蹟植桂書室及二級法定建築黎氏大宅距離不足 80 米，六層高的大型建築，阻礙村民及村屋的視野，對村民及鄉郊環境造成無可挽救的破壞！

此外，蓮花地村以至黎屋村一帶（包括申請地段），經常出現嚴重水浸。兩村村民極度憂慮申請項目將加劇村民在過去十數年飽受困擾的水浸情況，對村民生命財產構成嚴重威脅！相關項目將帶來超過 3 千人入住，大量人口定必帶來交通及排污的問題。八鄉南主要幹線近年已嚴重擠塞，而政府亦致力發展八鄉及錦田南一帶，政府的交通基建和配套完全未能滿足八鄉居民的訴求，居民怨聲載道！申請項目帶來的人流及車輛勢必加劇八鄉交通擠塞的情況，令八鄉居民生活在水深火熱之中！

另一方面，八鄉是沒有中央排污系統，村民的家居污水都流經村內人工修建或天然渠道排放。大量人口排放的污水，對周邊地區的環境衛生造成破壞，同時亦增加渠道的負擔，減弱排洪的能力，增加水浸的風險！

本人懇請城市規劃委員會重視八鄉上村居民的意見，聆聽和接納我們的訴求，否決上標申請，避免我們在水深火熱的環境下生活，造福八鄉上村及錦上路一帶居民！

八鄉上村居民簽署 :

姓名 : 王翠琼

2025 年 12 月 12 日

通訊地址

聯絡電話

RECEIVED

12 DEC 2025

Town Planning

城市規劃委員會秘書

香港北角渣華道 333 號北角政府合署 15 樓

(傳真 : 2877 0245 及 郵寄)

強烈反對石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂及
石崗分區計劃大綱草圖編號 S/YL-SK/10 (石崗分區計劃大綱核準圖 S/YL-SK/9 的修訂)

執事先生/女士：

Representation Number:

TPB/R/S/YL-SK/10-R10

Submission Number:

TPB/R/S/YL-SK/10-S5

本人是元朗八鄉上村居民，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建 19 幢樓高 6 層的住宅及 4 幢非住用途的建築物，地盤面積超過 4 萬平方米，住宅單位 850 個，停車位達 322 個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

項目規模與面積十分龐大，申請地段接連兩條村落部分的村屋，與黎屋村的法定古蹟植桂書室及二級法定建築黎氏大宅距離不足 80 米，六層高的大型建築，阻礙村民及村屋的視野，對村民及鄉郊環境造成無可挽救的破壞！

此外，蓮花地村以至黎屋村一帶（包括申請地段），經常出現嚴重水浸。兩村村民極度憂慮申請項目將加劇村民在過去十數年飽受困擾的水浸情況，對村民生命財產構成嚴重威脅！相關項目將帶來超過 3 千人入住，大量人口定必帶來交通及排污的問題。八鄉南主要幹線近年已嚴重擠塞，而政府亦致力發展八鄉及錦田南一帶，政府的交通基建和配套完全未能滿足八鄉居民的訴求，居民怨聲載道！申請項目帶來的人流及車輛勢必加劇八鄉交通擠塞的情況，令八鄉居民生活在水深火熱之中！

另一方面，八鄉是沒有中央排污系統，村民的家居污水都流經村內人工修建或天然渠道排放。大量人口排放的污水，對周邊地區的環境衛生造成破壞，同時亦增加渠道的負擔，減弱排洪的能力，增加水浸的風險！

本人懇請城市規劃委員會重視八鄉上村居民的意見，聆聽和接納我們的訴求，否決上標申請，避免我們在水深火熱的環境下生活，造福八鄉上村及錦上路一帶居民！

八鄉上村居民簽署


 姓名 : 

2025 年 12 月 12 日

通訊地址 :

聯絡電話 :

城市規劃委員會秘書

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執事先生/女士：

Submission Number:
TPB/R/S/YL-SK/10-S41

本人是元朗八鄉上村居民，就上標申請作出強烈和堅決的反對。有關申請地段位於八鄉蓮花地村與上村黎屋村的交界。申請項目將興建 19 幢樓高 6 層的住宅及 4 幢非住用用途的建築物，地盤面積超過 4 萬平方米，住宅單位 850 個，停車位達 322 個。我們八鄉居民重申：八鄉居民堅持在沒有任何地區諮詢，更沒有基建和配套的前提下，反對這項大型發展，懇請城市規劃委員會正視！

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八鄉上村居民簽署：

黎桂興

姓名：

黎桂興

2025 年 12 月 12 日

通訊地址

聯絡電話

RECEIVED

10 DEG 2025