



圖例 NOTATION

ZONES	地帶	COMMUNICATIONS	交通
COMPREHENSIVE DEVELOPMENT AREA	綜合發展區	MAJOR ROAD AND JUNCTION	主要道路及路口
RESIDENTIAL (GROUP A)	住宅 (甲類)	ELEVATED ROAD	高架道路
RESIDENTIAL (GROUP B)	住宅 (乙類)		
RESIDENTIAL (GROUP C)	住宅 (丙類)		
VILLAGE INLAND URBAN USE	住宅 (丁類)	MISCELLANEOUS	其他
RURAL TYPE DEVELOPMENT	鄉村式發展	BOUNDARY OF PLANNING SCHEME	規劃區界線
GOVERNMENT, INSTITUTION OR COMMUNITY	政府、機構或社區	PLANNING AREA NUMBER	規劃區編號
OPEN SPACE	休憩用地	BULLETTED LIGHT-GREY ZONE BOUNDARY	綠帶物表劃定控制界線
RECREATION PRIORITY AREA	康樂優先區	MAXIMUM BUILDING HEIGHT (IN METRES ABOVE PRINCIPAL DATUM)	最高樓宇高度 (每座主要建築物最高樓宇高度)
OTHER SPECIFIED USES	其他指定用途	MAXIMUM BUILDING HEIGHT RESTRICTIONS AS SPECIFIED IN THE NOTES	(註釋) 內訂明最高樓宇高度限制
GREEN BELT	綠化地帶	MAXIMUM BUILDING HEIGHT (IN NUMBER OF STOREYS)	最高樓宇高度 (樓層數目)
CONSERVATION AREA	自然保育區	PETROL FILLING STATION	加油站
SITE OF SPECIAL SCIENTIFIC INTEREST	具特殊科學價值地點	NON-BUILDING AREA	非建築用地
COUNTRY PARK	郊野公園		

土地用途及面積一覽表 SCHEDULE OF USES AND AREAS

USES	本圖所載地帶之 APPROXIMATE AREA & %		用途
	公頃 HECTARES	% 百分比	
COMPREHENSIVE DEVELOPMENT AREA	18.37	0.75	綜合發展區
RESIDENTIAL (GROUP A)	109.05	4.47	住宅 (甲類)
RESIDENTIAL (GROUP B)	26.43	1.21	住宅 (乙類)
RESIDENTIAL (GROUP C)	146.60	5.68	住宅 (丙類)
RESIDENTIAL (GROUP D)	2.73	0.03	住宅 (丁類)
VILLAGE TYPE DEVELOPMENT	150.26	6.17	鄉村式發展
GOVERNMENT, INSTITUTION OR COMMUNITY	176.61	7.20	政府、機構或社區
OPEN SPACE	65.27	2.70	休憩用地
RECREATION PRIORITY AREA	3.78	0.15	康樂優先區
OTHER SPECIFIED USES	166.74	7.74	其他指定用途
GREEN BELT	1259.80	51.58	綠化地帶
CONSERVATION AREA	79.48	3.10	自然保育區
SITE OF SPECIAL SCIENTIFIC INTEREST	43.80	1.78	具特殊科學價值地點
COUNTRY PARK	5.73	0.24	郊野公園
RIVER CHANNEL	20.38	0.84	河道
MAJOR ROAD ETC.	145.62	5.86	主要道路等
TOTAL PLANNING SCHEME AREA	2472.95	100.00	規劃區總面積

核准圖編號 S/T/P/24 的修訂 AMENDMENTS TO APPROVED PLAN No. S/T/P/24

AMENDMENTS SUBMITTED UNDER SECTION 5 OF THE TOWN PLANNING ORDINANCE

AMENDMENT ITEM	修訂項目
AMENDMENT ITEM A1	修訂項目 A 1
AMENDMENT ITEM A2	修訂項目 A 2
AMENDMENT ITEM A3	修訂項目 A 3
AMENDMENT ITEM A4	修訂項目 A 4
AMENDMENT ITEM A5	修訂項目 A 5
AMENDMENT ITEM B	修訂項目 B
AMENDMENT ITEM C	修訂項目 C
AMENDMENT ITEM D1	修訂項目 D 1
AMENDMENT ITEM D2	修訂項目 D 2
AMENDMENT ITEM E	修訂項目 E
AMENDMENT ITEM F	修訂項目 F
AMENDMENT ITEM G	修訂項目 G
AMENDMENT ITEM H	修訂項目 H
AMENDMENT ITEM J1	修訂項目 J 1
AMENDMENT ITEM J2	修訂項目 J 2

(參閱附表)
(SEE ATTACHED SCHEDULE)

2014年4月11日 香港城市規劃條例第5條訂立的
核准圖編號 S/T/P/24 的修訂
AMENDMENTS TO APPROVED PLAN No. S/T/P/24 EXHIBITED
UNDER SECTION 5 OF THE TOWN PLANNING ORDINANCE ON
11 APRIL 2014

香港城市規劃委員會依據城市規劃條例擬備的大埔分區計劃大綱圖 TOWN PLANNING ORDINANCE, HONG KONG TOWN PLANNING BOARD TAI PO - OUTLINE ZONING PLAN

核准圖編號 S/T/P/24 的修訂
AMENDMENTS TO APPROVED PLAN No. S/T/P/24

Signed: **Ophelia Y. S. WONG** 黃婉儀 署理
SECREARY 副秘書長
TOWN PLANNING BOARD 城市規劃委員會秘書

SCALE 比例尺

圖則編號
PLAN No. **S/TP/25**

**SCHEDULE OF AMENDMENTS TO
THE APPROVED TAI PO OUTLINE ZONING PLAN NO. S/TP/24
MADE BY THE TOWN PLANNING BOARD
UNDER THE TOWN PLANNING ORDINANCE (Chapter 131)**

I. Amendments to Matters shown on the Plan

- Item A1 – Rezoning of two sites at Tai Po Area 9 from “Green Belt” (“GB”) to “Residential (Group A)9” (“R(A)9”) and stipulation of building height restriction for the “R(A)9” zone
- Item A2 – Rezoning of a site at Tai Po Area 9 and the eastern portion of Chung Nga Road from “Government, Institution or Community” (“G/IC”) to “R(A)9” and stipulation of building height restriction for the “R(A)9” zone
- Item A3 – Rezoning of a site at the western portion of Chung Nga Road from “GB” to “R(A)9” and stipulation of building height restriction for the “R(A)9” zone
- Item A4 – Rezoning of two sites at the western portion of Chung Nga Road from “G/IC” to “R(A)9” and stipulation of building height restriction for the “R(A)9” zone
- Item A5 – Rezoning of a site at the western portion of Chung Nga Road from “G/IC” to area shown as “Road”
- Item B – Revising the building height restriction for a site within the “G/IC” zone for the Hong Chi Pinehill Village from 4 storeys to 8 storeys
- Item C – Rezoning of a site to the west of Nethersole Hospital from “GB” to “R(A)10” and stipulation of building height restriction and incorporation of non-building area for the “R(A)10” zone
- Item D1 – Rezoning of a site near Fung Yuen from “G/IC” to “Residential (Group C)10” (“R(C)10”) and stipulation of building height restriction for the “R(C)10” zone
- Item D2 – Rezoning of a site near Fung Yuen from “GB” to “R(C)10” and stipulation of building height restriction for the “R(C)10” zone
- Item E – Rezoning of a site at Lo Fai Road near Tycoon Place from “GB” to “R(C)9” and stipulation of building height restriction for the “R(C)9” zone
- Item F – Rezoning of a site at Lai Chi Shan from “GB” to “Residential (Group B)8” (“R(B)8”) and stipulation of building height restrictions and incorporation of non-building areas for the “R(B)8” zone

- Item G – Rezoning of a site near Yat Yiu Avenue from “R(C)” to “R(C)7” and stipulation of building height restriction for the “R(C)7” zone
- Item H – Rezoning of a site at Kon Hang from “GB” to “R(C)8” and stipulation of building height restriction for the “R(C)8” zone
- Item J1– Rezoning of a site at Po Heung Street from “G/IC” to “G/IC(2)” and stipulation of building height restriction for the “G/IC(2)” zone
- Item J2– Rezoning of a site at Po Heung Lane from “G/IC” to area shown as ‘Road’

II. Amendments to the Notes of the Plan

- (a) Revision to the Remarks for “R(A)” zone to incorporate development restrictions for sub-zones “R(A)9” and “R(A)10”, and the planning intention of developing the sites zoned “R(A)1” and “R(A)9” for public housing;
- (b) revision to the Remarks for “R(B)” and “R(C)” zones to incorporate development restrictions for sub-zones “R(B)8”, “R(C)7”, “R(C)8”, “R(C)9” and “R(C)10”; and
- (c) incorporation of the Notes for the “G/IC(2)” zone.

Town Planning Board

11 April 2014

城市規劃委員會根據城市規劃條例(第 131 章)
對大埔分區計劃大綱核准圖編號 S/TP/24
所作修訂項目附表

I. 就圖則所顯示的事項作出的修訂項目

- A1 項 — 把第 9 區的兩塊用地由「綠化地帶」改劃為「住宅（甲類）9」地帶，以及訂明該「住宅（甲類）9」地帶的建築物高度限制。
- A2 項 — 把第 9 區及頌雅路東面的一塊用地由「政府、機構或社區」地帶改劃為「住宅（甲類）9」地帶，以及訂明該「住宅（甲類）9」地帶的建築物高度限制。
- A3 項 — 把頌雅路西面的一塊用地由「綠化地帶」改劃為「住宅（甲類）9」地帶，以及訂明該「住宅（甲類）9」地帶的建築物高度限制。
- A4 項 — 把頌雅路西面的兩塊用地由「政府、機構或社區」改劃為「住宅（甲類）9」地帶，以及訂明該「住宅（甲類）9」地帶的建築物高度限制。
- A5 項 — 把頌雅路西面的一塊用地由「政府、機構或社區」地帶改劃為顯示作「道路」的地方。
- B 項 — 把匡智松嶺村內劃為「政府、機構或社區」地帶的一塊用地的建築物高度限制由四層改為八層。
- C 項 — 把那打素醫院以西的一塊用地由「綠化地帶」改劃為「住宅（甲類）10」地帶，以及訂明該「住宅（甲類）10」地帶的建築物高度限制，並納入「非建築用地」的限制。

- D1 項 — 把近鳳園的一塊用地由「政府、機構或社區」地帶改劃為「住宅（丙類）10」地帶，以及訂明該「住宅（丙類）10」地帶的建築物高度限制。
- D2 項 — 把近鳳園的一塊用地由「綠化地帶」改劃為「住宅（丙類）10」地帶，以及訂明該「住宅（丙類）10」地帶的建築物高度限制。
- E 項 — 把露輝路近聚豪天下的一塊用地由「綠化地帶」改劃為「住宅（丙類）9」地帶，以及訂明該「住宅（丙類）9」地帶的建築物高度限制。
- F 項 — 把荔枝山的一塊用地由「綠化地帶」改劃為「住宅（乙類）8」地帶，以及訂明該「住宅（乙類）8」地帶的建築物高度限制，並納入「非建築用地」的限制。
- G 項 — 把近逸遙路的一塊用地由「住宅（丙類）」改劃為「住宅（丙類）7」地帶，以及訂明該「住宅（丙類）7」地帶的建築物高度限制。
- H 項 — 把乾坑的一塊用地由「綠化地帶」改劃為「住宅（丙類）8」地帶，以及訂明該「住宅（（丙類）8」地帶的建築物高度限制。
- J1 項 — 把寶鄉街的一塊用地由「政府、機構或社區」地帶改劃為「政府、機構或社區(2)」地帶，以及訂明該「政府、機構或社區(2)」地帶的建築物高度限制。
- J2 項 — 把寶鄉里的一塊用地由「政府、機構或社區」地帶改劃為顯示作「道路」的地方。

II. 就圖則《註釋》作出的修訂項目

- (a) 修訂「住宅(甲類)」地帶《註釋》以納入「住宅(甲類)9」及「住宅(甲類)10」支區的發展限制，以及加入劃作「住宅(甲類)1」及「住宅(甲類)9」的用地作公共房屋發展的規劃意向。
- (b) 修訂「住宅(乙類)」地帶及「住宅(丙類)」地帶的《註釋》以納入「住宅(乙類)8」、「住宅(丙類)7」、「住宅(丙類)8」、「住宅(丙類)9」及「住宅(丙類)10」支區的發展限制。
- (c) 加入「政府、機構或社區(2)」地帶《註釋》。

城市規劃委員會

2014 年 4 月 11 日

TPB/R/S/TP/25-2

就草圖作出申述

Representation Relating to Draft Plan

參考編號

Reference Number:

140422-174004-66637

提交限期

Deadline for submission:

11/06/2014

提交日期及時間

Date and time of submission:

22/04/2014 17:40:04

提出此宗申述的人士

Person Making This Representation: Co Ltd

先生 Mr. Leo Leung for The Hong Kong and China Gas

申述詳情

Details of the Representation :

與申述相關的草圖

Draft plan to which the representation relates:

S/TP/25

申述的性質及理由

Nature of and reasons for the representation:

有關事項 Subject Matters	性質 Nature	理由 Reason
Item F		We have no objection on Item F of S/T P/25. However, we note that there may be a new development of residential buildings in close vicinity of an existing high pressure pipeline in future. In this regard, we would request the future developer to conduct a risk assessment for evaluation the potential risk and necessary mitigations if required. The future developer should also consult the Company in design stage and close coordinate with the Company during construction stage and provision of protective measures.

對草圖的建議修訂(如有的話)

Proposed Amendments to Draft Plan(if any):

MTR Corporation Limited
香港鐵路有限公司

www.mtr.com.hk



TPB/R/S/TP/25-3

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

Our ref: T&ESD/EnvE/L611

9 June 2014

By Post and Fax
(Fax no.: 2877 0245 / 2522 8426)

Dear Sir/Madam,

Representation on the Draft Tai Po Outline Zoning Plan (No. S/TP/25)
Rail Operation Noise Concern

The Corporation, in general, has no objection to the amendments of the captioned Outline Zoning Plan (OZP). However, we note that there is a site at Po Heung Street (Amendment Item J1) which will be re-zoned from "Government, Institution or Community" to "Government, Institution or Community 2". This site is situated about 10 metres away from the East Rail Line and noise from rail operations will be of concern to future occupants. We note from the OZP document and the relevant Tai Po District Council Paper that there will be a 16-floor hostel-cum-youth centre development which provides with openable windows. Potential noise nuisance from rail operations at this proposed rezoning site should be adequately and comprehensively addressed.

From the captioned OZP document, we understand that this development will be subject to environmental requirements including a Noise Impact Assessment (NIA) and the implementation of noise mitigation measures as identified and recommended in the NIA.

The development at the proposed rezoning site might be exposed to substantial rail noise impacts. The existing noise barrier located on the opposite side of the trackway for the protection of Pan Chung Village would not be adequate to protect the proposed rezoning site. Town Planning Board shall require the project proponent's NIA and proposed noise mitigation measures be subjected to the approval of relevant authorities for compliance with the statutory noise requirements before occupation.

Similar to other property developments close to our railway network, additional provisions of noise mitigation measures, such as single-aspect building design, double-glazed fixed windows or architectural fins, shall be considered.



Should any mitigation measures proposed by the project proponent require the Corporation's participation, please make the request to us in due course. The project proponents shall ensure that all adequate noise mitigation measures are implemented at their own cost. On completion of the NIA study, we request that the project proponent provides us with a copy of completed report for our reference and record.

Thank you for your attention. Should you have any queries, please feel free to contact our Environmental Engineering Manager, Dr. Kam CHAN at 2993-3745.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ronald Cheng'.

Ronald Cheng

General Manager – Technical & Engineering Services

c.c Mr. K.F. Tang – Assistant Director (Environmental Assessment) of EPD



中華人民共和國香港特別行政區
Hong Kong Special Administrative Region of
People's Republic of China



TPB/R/S/TP/25-4

大埔區議會 Tai Po District Council
陳笑權議員 CHAN Siu-kuen, MH, DC Member

香港北角渣華道 333 號
北角政府合署 15 樓
城市規劃委員會
發展局常任秘書長
周達明先生

本處檔案:CSK/2014/052

周先生：

有關：大埔分區計劃大綱核准圖
S/TP/24 的修訂 H 項把乾坑的一塊用地
由『綠化地帶』改劃為『住宅(丙類)8』地帶以及訂明建築物高度限制

收到有關樟樹灘村及大埔尾村來函就上述標題事宜提出申述，本人亦認同兩村居民的意見及支持建議，懇請 貴會能體恤居民苦況並考慮兩村的意見。隨函附上該鄉來函副本，以供查閱！

此致



大埔區議員 陳笑權 MH 謹啟

2014 年 6 月 10 日

副本抄送：大埔樟樹灘鄉代表溫文傑先生
大埔樟樹灘村原居民代表邱福平先生
大埔樟樹灘村原居民代表江世榮先生
大埔尾村原居民代表李永強先生
大埔尾村原居民代表李少文先生
大埔尾村居民代表李煌勝先生

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敬啟者：

大埔分區計劃大綱核准圖
S/TP/24 的修訂 H 項——把乾坑的一塊用地
由「綠化地帶」改劃為「住宅(丙類)8」地帶，
以及訂明建築物高度限制

大埔樟樹灘鄉樟樹灘村及大埔尾村兩村村代表及村民已就標題事宜開會討論並議決向貴會提交下列申述：

1. 自樟樹灘村數百年前立村以來，乾坑地區屬樟樹灘村一部分。現時該區已被政府定為樟樹灘村居民代表選舉選區(附件(一))，政府須確保日後有關選區不會被廢除。
2. 該區位處樟樹灘鄉協天宮及樟樹灘村龍脈位置(附件二)，屬重點保護風水區。該區附近亦有三個原居民葬區(附件二)。在這特殊環境下，該區的建築物不宜太高，本鄉認為 3-4 層高度可接受。
3. 該區有一巨石被視為風水石(附件二)，任何人不得將該石移除或破壞。該區的溪流屬風水重要組成部分，任何人不得將其填平、堵塞或改動。
4. 事關重大，政府在賣地前應就該區風水事宜與本鄉商議保障風水方案。發展商亦應就有關事宜與本鄉溝通。
5. 該區發展不得影響葬區通道、殯葬及拜祭事宜。
6. 政府須確保該區發展不會妨碍樟樹灘路的交通安全。
7. 現時本鄉「鄉村式發展」用地遠遠不足應付村民的建屋需求，為公平起見，本鄉要求政府將本鄉兩村周邊的「綠化地帶」及荒廢多年的「政府、機構及社區」用地改劃為「鄉村式發展」用地，以紓民困。

此致

城市規劃委員會主席

樟樹灘鄉鄉代表：溫文傑

樟樹灘鄉樟樹灘村

原居民代表：邱福平

江世榮

居民代表：溫文傑

樟樹灘鄉大埔尾村

原居民代表：李永強

李少文

居民代表：李焯勝

樟樹灘鄉協天宮理事：李永強

江戊嬌

邱民偉

溫文傑

樟樹灘鄉村民：(見下頁)

二零一四年六月十日

副本送：大埔鄉事委員會

陳笑權區議員

樟樹灘鄉村民：

李成祥

印秋公

李騰煌

李玉明

李裕民

李更先

李亞聰

李才有

李偉文

李觀德

吳新嬌

李偉康

李劍明

李振斌

李正華

李寶強

李瑞光

tpbpd

TPB/R/S/TP/25-43

寄件者: [REDACTED]
寄件日期: 09日06月2014年星期一 0:33
收件者: tpbpd@pland.gov.hk
主旨: 大埔分區計劃大綱草圖S/TP/25: 反對改劃「綠化地帶」政府不應做樹木殺手

致 城市規劃委員會

有關修訂大埔分區計劃大綱草圖編號 S/TP/25 意見書
反對改劃「綠化地帶」，要求保護樹林

本人 [REDACTED]，反對大埔分區計劃大綱草圖編號 S/TP/25 中的有關「綠化地帶」的修訂。原因如下

1. 施政報告提出要發展「沒有植被、荒廢或已平整」的綠化地帶，但實際提議改劃的都有豐富植被及茂密樹林。我們認為政府誤導市民；
2. 政府於全港各區大規模改劃「綠化地帶」，是香港規劃政策方向上的重大改變，卻未有深入全面諮詢。現時只「斬件式」於區議會處理，違反程序公義；
3. 是次擬改劃的「綠化地帶」上每一塊都長有茂盛林木，不少樹齡達廿多年，一旦被斬，是環境極大損失，將無法補償及復完；
4. 「綠化地帶」在規劃上對維持市民生活質素十分重要，既可改善景觀及空氣質素，亦能緩和熱島效應；
5. 「綠化地帶」一直為市區和郊野公園之間的重要屏障，絕不可輕易被犧牲；
6. 露輝路地皮已放進勾地表，但城規程序卻只剛開始。城規會應否決申請，不可助長政府先把土地放入賣地表，後向城規會申請改劃的歪風。因為其意在混淆公眾，壓迫城規會委員，非常不尊重城規程序及公眾的意見；
7. 政府至今仍不斷容許市區住宅地皮改劃作酒店用途，出賣珍貴土地資源；卻又以土地不足為由，破壞「綠化地帶」以提供住宅，所作所為前後矛盾，不可接受！

本人請求各位城市規劃委員會委員否決是次修訂，及要求政府當局公開解釋規劃政策及展開廣泛諮詢。

tpbpd

TPB/R/S/TP/25-14

件者: [REDACTED]
寄件日期: 11日06月2014年星期三 19:57
收件者: tpbpd; Paul Zimmerman
主旨: Re: Draft Tai Po Outline Zoning Plan No. S/TP/25
附件: 201406 DHK re Tai Po OZP 25.pdf

Dear Sirs,

Our comment on Draft Tai Po Outline Zoning Plan No. S/TP/25 is enclosed.

Best Regards,
Debby Chan Ka Lam
Designing Hong Kong Limited
Tel: 3104 3107
Fax: 2187 2305
Unit 7, 5/F, Eastern Harbour Centre, 28 Hoi Chak Street, Quarry Bay, Hong Kong
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Hong Kong, 10 June 2014

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

Dear Sirs,

Re: Draft Tai Po Outline Zoning Plan No. S/TP/25

Objection to rezone Green Belt for Development Uses without adequate public consultation on a well-considered planning framework

- The government's current approach is ad hoc and unprofessional. The demarcation of land to change from GB to development uses should take into account both buffer function and ecology.
- The TPB should first agree with the community on clear principles and guidelines for rezoning Green Belt to development uses, or protecting Green Belt for conservation purposes.
- A well-developed proper assessment framework including a range of indicators (e.g. buffer function, species diversity, vegetation coverage, surrounding conditions, visual impact, etc) is required.
- According to 'Town Planning Board Guidelines for Application for Development within Green Belt Zone', the planning intention of the "Green Belt" zone is to:
 - *conserve existing landscape features, areas of scenic value and areas of recognised "fung shui" importance;*
 - *to define the outer limits of urbanized districts and to serve as a buffer between and within urban areas; and*
 - *to provide additional outlets for passive recreational uses.*

Objection to rezone the Tai Po Green Belt for Development Uses

- The propose zoning is contrary to the zoning intention and approval of the plan poses a threat to all green belt areas and, even worse, and all the protected areas to be buffered by green belts.
- Government departments should not underplay the ecological value of the Tai Po Green Belt. Though the government said that only the areas "which are devegetated, deserted or formed for possible residential use" are considered, most of the areas listed are covered with mature vegetation. We suspect that the site assessment was incomplete as plant with conservation values such as the *Aquilaria sinensis* was spotted on site D2 (see photo below) but was not recorded.
- No rezoning of Green Belt for urban sprawl is preferred. We should not neglect the social value of existing zoning. Hong Kong citizens treasure the Green Belt area next to the urban area as visual relief and a place for rest. For example, site item E (see photo below) is a well-vegetated area and the only dog-walking site nearby and popular with residents nearby. Green Belt area plays an important role as a buffer zone for sustainable urban planning.
- Development items, including Flat, House and residential Institution should be moved from column 1 to column 2 to ensure the Board retains the power to consider and inspect whether development projects fulfil the requirement listed in the planning papers.
- Tree preservation proposals should be considered by the Board before any approval for development in the subject sites is given.

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Concerns over Tai Po Town carrying capacity

- The proposed rezoning or amendments will increase the local population with 29,500 residents, or an increase of 10% over the existing population. Increase of the population comes along with more demand for land for infrastructure, commercial and community facilities. According to Appendix VI of RNTPC Paper No. 6/14, there will be a deficit of hospital beds and post office services after proposed rezoning. We doubt that the land supply in Tai Po is adequate for further development accommodating the planned population. This risks the living quality and well-being of current and future Tai Po residents.
- Besides, sites Item D1, D2, E, F, G and H are distant from town centre. Demand on public transport and transport infrastructure between the Town and the new development sites impacts existing and future residents as Ting Kok road is already congested. A holistic transport development plan is required and the potential further losses of rural land to road works need to be identified for the public's understanding BEFORE the green belt is rezoned.
- Rezoning and amending conservation land uses will directly affect surrounding environment and communities. No approval should be granted without thorough assessments and discussion of all impacts with the local community to safeguard the interests of existing and future residents. If any development is needed, assessments should include environment, traffic, noise, air quality, drainage, sewerage, air ventilation, and landscape and geotechnical impacts.

Further concerns over Item A1, A2, A3, A4

- The sites are connected with Tai Po Hospital and Hong Chi Pinehill Village. Construction work and development will bring nuisances to the sensitive receivers in the hospital and the village.
- Shading effect to the farmland and Fung Yuen Valley SSSI by the proposed development should be assessed. Hong Chi Pinehill Village has active farmland and is used in the therapy for mentally handicapped persons. Fung Yuen Valley SSSI is an important habitat for butterflies that are sensitive to sunshine.

Concerns over Item H

- The location of site is close to Tai Po Kau Nature Reserve, there is no merit to rezone the site.

Herewith we so submit for your consideration.

Designing Hong Kong
June 2014



Dense vegetation on site Item E
photo taken on 25 January 2014



Secondary woodland on site Item D2,
photo taken on 25 January 2014



立法會 Legislative Council

陳家洛議員 Hon Chan Ka Lok Kenneth



TPB/R/S/TP/25-16

Facsimile Note

To	: Town Planning Board	From	: Dr. Hon. CHAN Ka-lok Kenneth
Tel	:	Pages	: 3 (including this page)
Fax	: 2877 0245 / 2522 8426	Date	: 3 JUN 2014
Please notify Ms. LAM on tel. no. [REDACTED] if message received is incomplete.			



傳真號碼：2877 0245 / 2522 8426

致：城市規劃委員會

就《大埔分區計劃大綱草圖編號 S/TP/25》作出的申述

政府建議改劃大埔區內八幅「綠化地帶」用地為「住宅」用途，連同改劃其他「政府、機構或社區」用地，所涉面積近 30 公頃。此舉引起區內居民關注，本人對改劃綠化地帶作都市擴展的做法亦有保留。

公民黨曾於 2013 年 11 月 25 日至 12 月 2 日進行一項有關增加土地供應的問卷調查，訪問了 1284 名市民，結果指市民普遍認為應先透過收回廢棄農地、收回軍事用地、檢討丁屋政策等滿足土地需求，只有不足一成受訪者同意應優先發展荒廢的綠化地帶。政府應參考及尊重民意，先以其他方式開發土地，不應破壞綠化地帶及郊野公園。

正如城市規劃委員會規劃指引編號 10 所述，「『綠化地帶』的規劃意向主要是促進自然環境保育，以及防止市區式發展滲入該地帶」，可見綠化地帶作為市區之間和在市區內各區之間的緩衝地帶的重要性。而且，樹木擁有不同的生態功能，並非於砍伐後重新補種一定數量的樹木可以補償。然而，政府卻為盲目搶地而砍樹和大興土木，不顧上述自 1991 年已公布的規劃指引，自相矛盾。

翻查《2011-12 年施政報告》，政府以創新思維開拓土地資源的措施是「檢討新界沒有植被、荒廢或已平整的『綠化地帶』，把失去其原有功能的土地改作房屋發展用途」。惟政府覓得一定數量的沒有植被、荒廢或已平整的綠化地帶後，又變本加厲意圖侵佔建設地區邊緣、鄰近現存市區和新市鎮的綠化地帶，屬言行不一，失信於民。

再者，政府早於去年十一月已表示第二階段的綠化地帶檢討即將完成，卻一直沒有公開有關的研究報告全文，公眾無從判斷被改劃的綠化地帶是否屬「保育價值相對較低」類別；而保育團體就該些土地進行的實地視察和生態調查，結果和發現更往往與政府所述的大相逕庭。

以 D1 及 D2 項修訂為例，其與被納入 12 個優先保育地點的蝴蝶天堂 – 鳳園 – 最近只有 300 米距離之餘，為應付將增加的交通流量，新發展區更須興建一條連接鳳園路的道路，勢令鳳園失去生態緩衝區。政府於 2005 年透過環境及自然保育基金在鳳園舉行的管理協議計劃，令蝴蝶種類由當年的 162 種增至 2012 年的 213 種，蝴蝶的多樣性明顯增加。而且，該兩幅土地不僅被植被覆蓋，有大量成熟大樹，更有土沉香、石筆木、吊鐘王等多種易危或近危樹種。不過，政府卻未就此完成詳細樹木調查，日後更可能倚賴發展商保育珍貴樹木；而移動性高的蝴蝶，更可能因鄰近生態被毀而受到影響。這樣倉卒搶地的做法，與政府的自然保育政策背道而馳，令人擔心以往大力保育鳳園的成果毀於一旦。

至於 E 項修訂，大埔區區議會一份由規劃署提交的文件指「該幅面積約 4.13 公頃的土地主要為植被所覆蓋」；附近居民亦指該處綠樹成蔭，對毗鄰一些厭惡性設施如污水處理廠等發揮不可或缺的屏障功能，故反對將之改作豪宅發展。

就此，本人不認同以開發已建設地區邊緣、鄰近現存市區和新市鎮的綠化地帶作都市擴展用途；反之，政府應先以發展棕土、收回廢棄農地、收回軍事用地等方式開發土地，並就每幅擬改劃的綠化地帶，提供充份理據予公眾參考並諮詢其意見。

公民黨立法會議員（港島區）
陳家洛

2014 年 6 月 3 日

tpbpd

TPB/R/S/TP/25-17

件者: [REDACTED]
寄件日期: 11日06月2014年星期三 14:58
收件者: tpbpd@pland.gov.hk
主旨: Comments on Tai Po Outline Zoning Plan (OZP) (No: S/TP/25)
附件: TPB20140611(Tai Po).pdf

Dear Sir/ Madam,

Attached please find our comments regarding the captioned.

Yours faithfully,

Ng Hei Man

Assistant Campaign Manager

The Conservancy Association

00453



長春社 since 1968

The Conservancy Association

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11th June 2014

Chairman and Members
Town Planning Board

E-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

Comments on Tai Po Outline Zoning Plan (OZP) (No: S/TP/25)

The Conservancy Association (CA) would object to Tai Po OZP (No: S/TP/25).

Inconsistency to Policy Address 2014

In general, Under the Policy Address 2014, the Administration planned to rezone sites for residential use in Green Belt areas which are “devegetated, deserted or formed”¹. CA, however, CA notes that most of the proposed Green Belt sites are still covered by massive vegetation (see the case of Lo Fai Road, Tai Po in Figure 1 and 2). We are doubtful that the proposals are not in line with the principles to rezone Green Belt areas. For the time being, Green Belts which are still vegetated and serving as a buffer between urban areas should not be rezoned to give way for residential development.

Site near Fung Yuen

~~CA objects to rezone the proposed site near Fung Yuen to residential use.~~ The RNTPC Paper No.6/14 does not reflect the site condition and potential impacts on environment in full.

1. Inadequate information on habitats and species of conservation importance

AFCDD mentions in the paper that the site is “plantation woodland” and dominated by exotic species such as *Acacia confusa*, *Eucalyptus sp.* and *Lophostemon confertus*. From our observation during a site visit in April 2014, however, some secondary woodland patches

¹ Please refer to Section 125 of Policy Address 2014. <http://www.policyaddress.gov.hk/2014/eng/p124.html>

comprising native trees species, such as *Endospermum chinense*, *Syzygium hancei*, *Syzygium levinei*, *Choerospondias axillaris*, *Archidendron clypearia*, could be identified in the slope area and roadside (i.e. along Sha Lo Tung Road), together with abundant shrubs and understorey vegetation (Figure 3). Species such as *Schima superba* and *Machilus sp.* can be as tall as 12-15m in height. We believe that this plantation site is undergoing natural succession and it can become mature woodland if given time and protection from disturbance².

From both previous ecological study and site visit, species of conservation interest can be found in this Green Belt. We can spot *Rhodoleia championii* and *Pyrenaria spectabilis*, (Figure 4 and 5) and both species are protected under the Forestry and Countryside Ordinance (Cap 96), while at least one *Aquilaria sinensis* (Figure 6), listed under State Protection (Category II) and considered "Near Threatened" in the China Plant Red Data Book, can be spotted on the roadside of Sha Lo Tung Road. From the RNTPC Paper No.6/14, however, these species are missing in the evaluation.

So far no detailed tree survey can be provided for public inspection and from our approximate estimation, at least 3,000 mature trees are subjected to be felled. Such estimation still does not calculate some young trees with less than 9.5cm in diameter in breast height and they would not be reflected in the tree survey. Since information provided by the RNTPC Paper No.6/14 is not adequate, we do not think Town Planning Board members, for the time being, can make a professional decision. In fact, the presence of those tree species of conservation concern alone would require an ecological impact assessment under the EIA Ordinance. Without an EIA, the Town Planning Board should not make any decision in changing this green belt to allow any form of development.

We are also in extreme worries that the existing mechanism for tree removal and transplantation would be adopted to so-called fulfill the target of tree preservation. It might, to a certain extent, help preserve individuals but certainly it would not re-create an equivalent ecological value of a habitat.

2. Impact by a new access road connecting the subject rezoning site

RNTPC Paper No.6/14 revealed that a new access road connecting Fung Yuen Road would be proposed and the formation works of this access would be carried out by the prospective developer. The potential impacts such as additional traffic flow and tree removal along

² Please refer to Table 9.6 Ecological Evaluation of Plantation, Pilot Project For Public-Private Partnership Conservation Scheme, Sha Lo Tung Valley, Tai Po EIA report.
http://www.epd.gov.hk/eia/register/report/eiareport/eia_2032012/HTML/EIA%20Report/0099337%20EIA_Section%209.htm

existing roadside, however, remain unknown as no further details of the new access, in particular the alignment, have been provided. Such details should be made available now when the rezoning proposal is considered.

3. Cumulative impact

The preliminary assessment fails to take account of cumulative traffic flow brought by the new proposed development together with adjacent development projects, especially the proposed new columbarium in Sha Lo Tung. Currently the provision of additional traffic flow generated from the new residential development in AM peak only is inadequate to evaluate the worse-case scenario. One of the cases could be combination of traffic flow from the new development and the columbarium in Sha Lo Tung during festival days (i.e. Ching Ming and Chung Yeung).

We have to highlight that with such proximity to Fung Yuen and Sha Lo Tung, both designated as priority sites under New Nature Conservation Policy, so far no details has been provided to evaluate if any cumulative impacts would pose threat to these two ecological hubs.

4. Visual impact

It was noted that only two view points, one at Ha Hang Playground and the other at the cycle track at Ting Kok Road, have been selected for assessing visual impact of the proposed residential development. However, we are quite concerned if another 2 view points, one at Cloudy Hill (Kau Lung Hang Shan) and the other at Fung Yuen Road (Kau Lung Hang Shan) (Figure 7 and 8), would indeed pose significant visual impacts on the area.

Site at Lai Chi Shan

From our observation, a water course flows from the northern portion of the site down to the area next to the workplace of Highways Department and Water Supplies Department (Figure 9 and 10). Although Section 3.45 of the RNTPC Paper No.6/14 stated clearly that "*Avoidance of impact to this water course should also be duly considered*", we are still concerned about the potential indirect impacts posed on the section next to the workplace in both construction and operation phase.

Site at Tai Po Area 9

The Green Belt at this subject site is indeed a natural hillslope and covered by dense vegetation. It can still perform its function to act as a buffer within the urban periphery, and also Fung Yuen SSSI further north of the site. No changes should be proposed to this Green Belt (Figure 11).

It is noted that a feasibility study had been conducted and submitted to Tai Po District Council for discussion in 2009³. Planning Department has once mentioned some constraints of developing housing project in the subject sites, including high relief and potential impacts of chimney at hospital to the residents (Figure 12). We are quite concerned if these issues remain valid until now. The issue of high relief, for example, is at least applicable to the Green Belt from our observation.

Yours faithfully,



Ng Hei Man
Assistant Campaign Manager

³ Please refer to the minutes of Tai Po District Council Environment, Housing and Works Committee meeting in 11/3/2009.

[http://www.districtcouncils.gov.hk/archive/tp_d/Document/Agenda,%20Min%20&%20Summary/Min%2009/Mar%2009/EHW-M2\(11.3.2009\)\(revised\).doc](http://www.districtcouncils.gov.hk/archive/tp_d/Document/Agenda,%20Min%20&%20Summary/Min%2009/Mar%2009/EHW-M2(11.3.2009)(revised).doc)

Figure 1 and 2 The Green Belt at Lo Fai Road near Tycoon Place, Tai Po. The site is still covered by species such as *Acacia confusa*, *Acacia magium*, *Eucalyptus torelliana*. According to Policy Address 2014, the Administration intends to rezone sites for residential use in Green Belt areas which are “devegetated, deserted or formed”

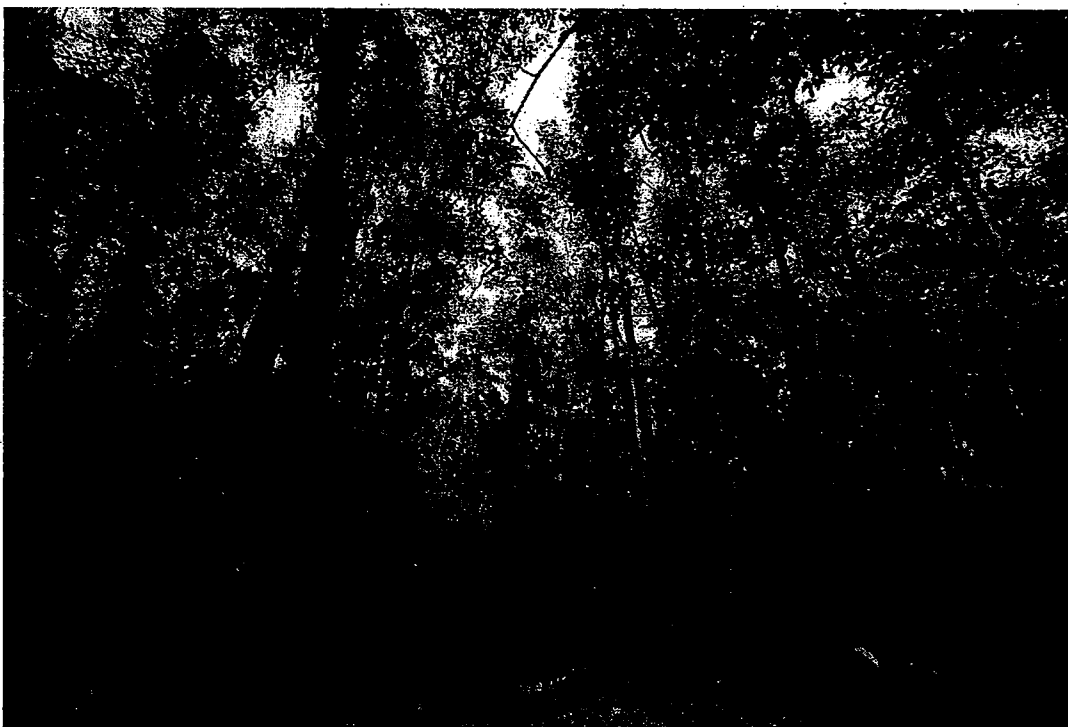


Figure 3 The Green Belt site near Fung Yuen. Within this plantation, some secondary woodland patches can be spotted. Both mature trees, shrubs and understorey vegetation can be identified



Figure 4 *Rhodoleia championii*. This species has not been mentioned in the RNTPC Paper No.6/14



Figure 5 *Pyrenaria spectabilis*. This species has not been mentioned in the RNTPC
Paper No.6/14



Figure 6 *Aquilaria sinensis*. This species has not been mentioned in the RNTPC
Paper No.6/14



Figure 7 Viewing the Green Belt site near Fung Yuen (circled in red) at Cloudy Hill (Kau Lung Hang Shan). After removal of massive number of trees, the residential blocks can be quite visible viewing from the uphill area

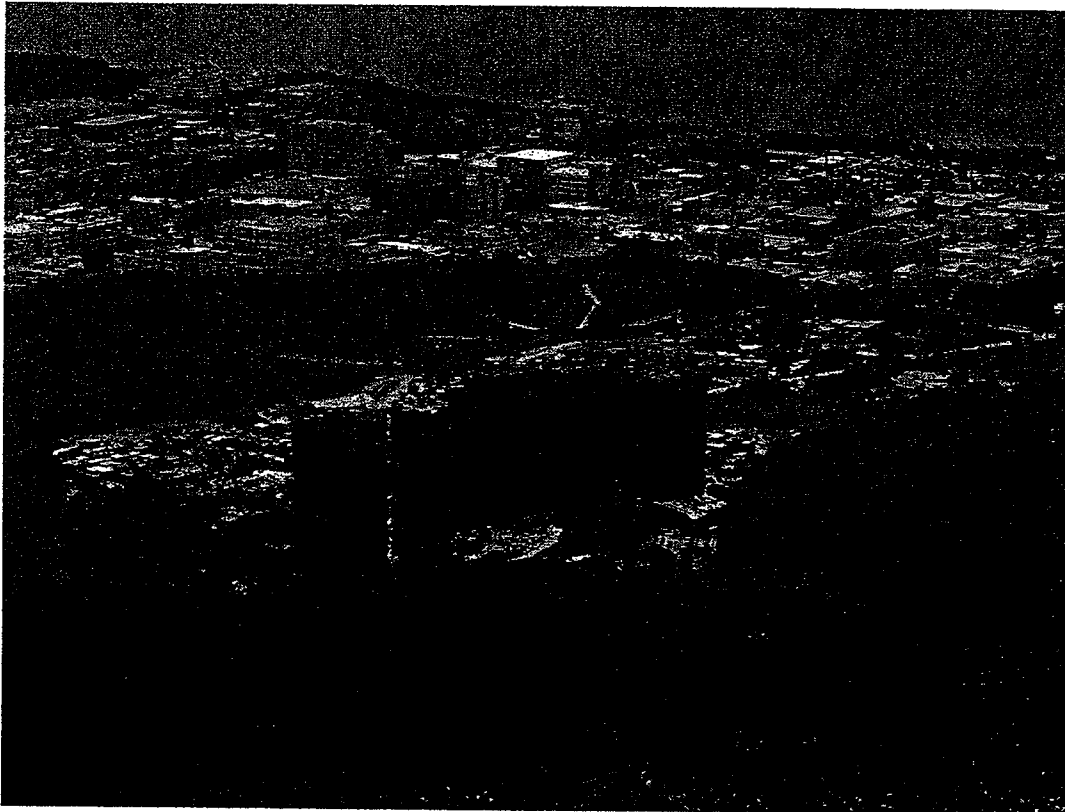


Figure 8 Viewing the Green Belt site near Fung Yuen (circled in red) at Fung Yuen Road



Figure 9 and 10 A water course flow from the northern portion of the site down to the area next to the temporary workplace by Highways Department and Water Supplies Department. Any development in the paved area in future might pose indirect impact to the water course.

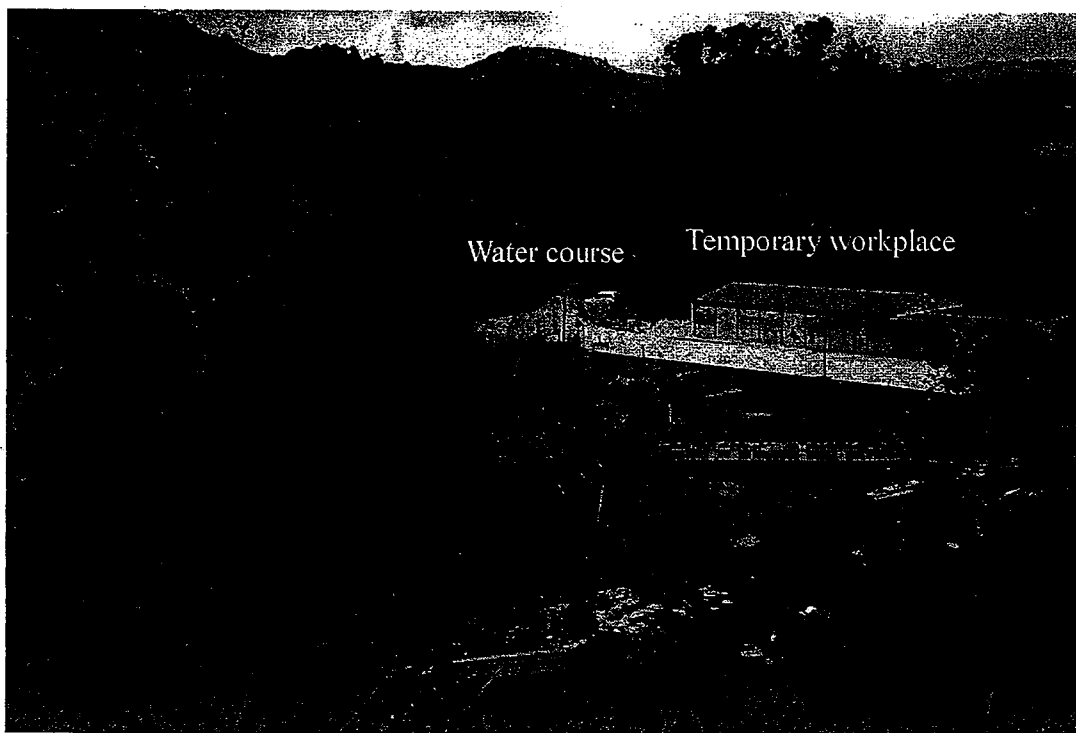
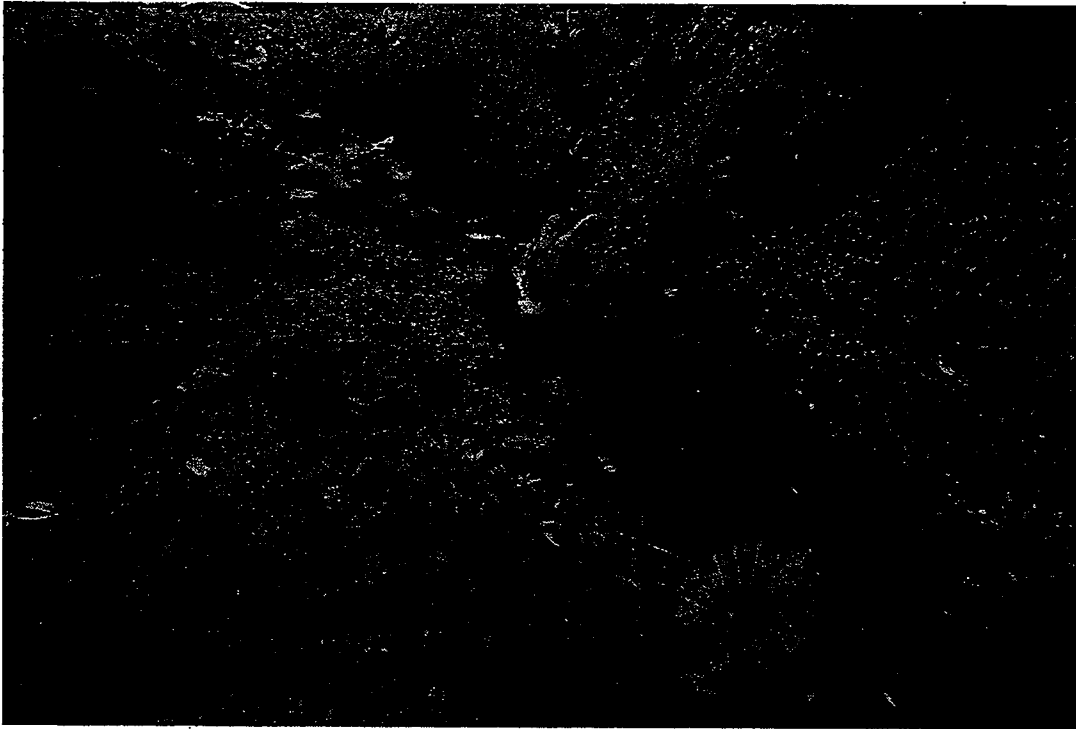


Figure 11 The Green Belt (marked in yellow) is still well-covered by vegetation so that the zoning should remain unchanged

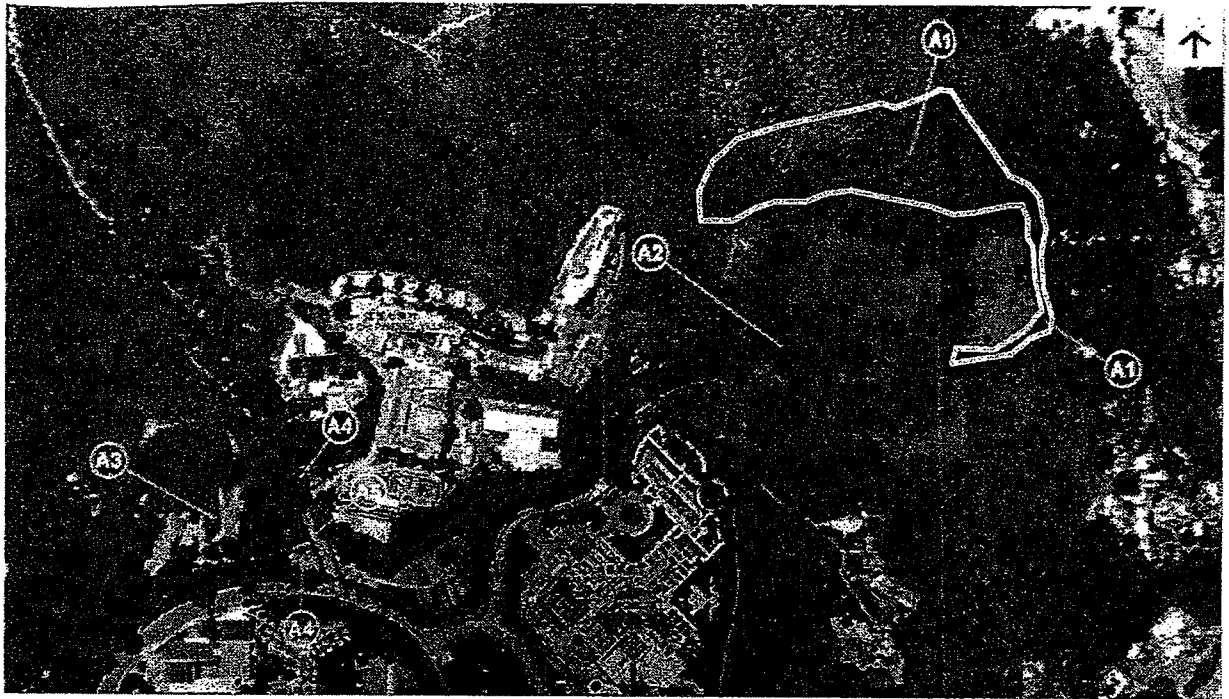


Figure 12 Excerpts of the minutes of Tai Po District Council Environment, Housing and Works Committee meeting in 11/3/2009. Planning Department has once mentioned that due to various site constraints (highlighted in red), Tai Po Area 9 was not suitable for Public Housing project.

7. 蘇應亮先生回應表示，他充分理解委員極希望能盡快在大埔物色土地，興建公屋，以解決區內人口增長和紓緩公屋擠迫戶的情況等問題。不過，蘇先生認為照顧有關需求固然重要，但仍得考慮有關地點是否適合用於興建公屋，以免公屋落成後各樣配套問題接踵而至。政府部門在經過專業分析後，認為大埔第 9 區在地勢、景觀協調和空氣質素方面均非理想的興建公屋的地點。儘管如此，政府部門經過研究和與地區人士接觸後，認為寶鄉街地皮符合多項發展公屋的重要原素，即配套設施齊備、交通便捷和能於短時間落成；此外，在該土地興建公屋為區內注入新的發展原素，並進一步提升大埔墟的經濟活動，因此向大埔區議會建議該幅土地。至於委員擔心的交通負荷問題，蘇先生相信可藉實施改善道路方案和交通管制措施，避免帶來交通問題，而若委員會接受寶鄉街地皮興建公屋的建議，房屋署將會與其他政府部門研究道路改善措施的方案。

11. 蘇應亮先生回應表示，部門代表出席是次會議是為交代過去數月各部門所進行的詳細研究的結果。就大埔第 9 區的地盤來說，政府部門確實認為該址原則上不適合用作發展高密度和高層的公屋發展。蘇先生再次向委員說明在大埔第 9 區發展住宅的技術困難，包括醫院煙囪對附近民居會構成影響、地盤的地勢過高、地盤遠離市中心而無法獲得配套支援、擬議的公屋發展的人口不足以支持完善的交通服務和社區設施，以及該公屋項目因無法發展為自給自足的社區而會對富亨邨的設施造成壓力等。至於政府部門提出寶鄉街地皮的目的，是希望向區議會提交一個能於短期內上馬推行的方案。規劃署對委員提出的建議如擴大該項發展的地盤至包括部分寶鄉街和大埔青年空間及大埔社區中心的土地持開放態度；若在是次會議獲得委員會給予原則性同意，各部門便會着手就在寶鄉街地皮發展公屋進一步的規劃研究工作，並會在利用寶鄉街地皮進行第一階段的公屋發展時，同時研究委員會的建議，以達到地盡其用的目標。至於委員要求的一些具體數據如在寶鄉街地皮發展公屋的社區設施需求和公屋輪候人數等資料，有關部門會在諮詢寶鄉街時擬議公屋發展時，一併交待。

tpbpd

TPB/R/S/TP/25-18

件者: KFBG EAP [eap@kfbg.org]
寄件日期: 11日06月2014年星期三 14:27
收件者: tpbpd
副本: mailbox
主旨: Proposed Amendments to the Approved Tai Po Outline Zoning Plan No. S/TP/24
附件: 140611 Tai Po OZP Amendments_KFBG.pdf

Dear Sir/ Madam,

Our comments regarding the captioned is attached.

Best Regards,
Ecological Advisory Programme
Kadoorie Farm & Botanic Garden
Lam Kam Road, Tai Po, N.T., Hong Kong
<http://www.kfbg.org>
Please consider the environment before printing this e-mail

00456

The Secretary,
Town Planning Board,
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333, Java Road, North Point,
Hong Kong.

(Email: tpbpd@pland.gov.hk)

11th June, 2014.

By email only

Dear Sir/ Madam,

Proposed Amendments to the Approved Tai Po Outline Zoning Plan No. S/TP/24

We notice that many of the proposed amendments for the Approved Tai Po Outline Zoning Plan (OZP) No. S/TP/24 involve the re-zoning of the “Green Belt” (GB) zone, and we understand that such amendments are in response to the pressing need for housing land supply in Hong Kong. However, we would like to draw the Board’s attention to the 2014 Policy Address which stated that the Government is “*taking steps to re-zone for residential use sites in Green Belt areas which are de-vegetated, deserted or formed*”. From aerial photographs and our on-site observations, it is highly obvious that most of the locations of the proposed zoning amendments are well-vegetated (Figure 1). We consider that the current amendments do not conform to and are obviously not in compliance to this statement in the 2014 Policy Address. Every proposed amendment in the OZP should be carefully reviewed and amended to exclude all well-vegetated areas and natural habitats.

We would like to remind the Board that the planning intention of a GB zone in the Tai Po OZP is “*primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone*”. We consider that this principle should be adhered to as a matter of course. We are deeply concerned that the inclusion and any subsequent approval of the re-zoning of well-vegetated GB zones would set an undesirable precedent for similar developments in Hong Kong, and thus, the Board should consider the potential cumulative impacts on the natural environment and living quality in Hong Kong caused by the re-zoning of well-vegetated GB zones. Such far-reaching changes in the intention of a GB zone should not be lightly undertaken without proper review and a public consultation process.

We would also like to highlight the fact that about 20 hectares of well vegetated areas under GB zone is going to be “lost to urban development” in the current amendment proposal without any compensation. This is unacceptable. Tai Po is an area surrounded by the natural countryside of Hong Kong, and in its neighbourhood are several sites of conservation concern (e.g., Fung Yuen Valley Site of Special Scientific Interest (SSSI), Sha Lo Tung SSSI, Tai Po Kau Nature Reserve, Tai Mo Shan Country Park, and Pat Sin Leng Country Park). Conservation zonings such as GB and “Conservation Area” (CA) are vitally important to protect these ecologically sensitive countryside areas and to act as a buffer between the urban settings and the natural landscapes. We urge the Board and the relevant Authorities to carefully consider re-zoning suitable areas within the general locality of Tai Po into GB or CA zonings and to include such areas as part of the amendment process into the current OZP plan for consideration by the TPB to compensate for any area of GB zone that would be cut out and “lost to urban development”.

To sum up, we consider that the current proposed amendments do not comply with the 2014 Policy Address, ignores the value of GB zones for their conservation importance and as a buffer between urban settings and natural landscapes, and, no compensation has been proposed for the direct loss of these well vegetated areas with GB zoning to development. We, therefore, strongly object to the re-zoning of the GB zones in the Tai Po OZP.

In the following paragraphs, we would like to further elaborate our views on some of the amendment items proposed in the Tai Po OZP.

Item D: Site near Fung Yuen

According to Section 3.32 of the RNTPC Paper No. 6/14, the Director of Agriculture, Fisheries and Conservation (DAFC) advised that the site is “*largely a plantation woodland. Although some native tree species could be found like *Alangium chinense* and *Schima superba*, the woodland is dominated by exotic trees such as *Acacia confusa*, *Eucalyptus sp.* and *Lophostemon confertus*. He has no strong view on the proposed rezoning from the nature conservation point of view*”. During our on-site observations, the wooded area is indeed a plantation dominated by exotic species. However, many patches with rich under-storey vegetation were found within the site which are likely to have been established through natural succession and are comparable to the secondary woodland on the opposite side of the Sha Lo Tung Road and, thus, could be regarded as young secondary woodlands (Figure 2). Moreover,

one mature Incense Tree, a species which is considered to be of conservation concern and is a protected species under the Protection of Endangered Species of Animals and Plants Ordinance (CAP. 586), was found within the site on the roadside to the south of the Water Supplies Department Service Reserve (Figure 3). Hence, we consider that the site is NOT simply a plantation woodland but rather a young secondary woodland established through and undergoing natural succession.

The under-storey vegetation constitutes an important component of secondary woodlands and the clearance of this community already constitutes a direct impact on the development of secondary woodland. We have grave concerns regarding the ecological impacts of the private housing development on the locality. During the construction phase, under-storey vegetation within the site including young trees and even some mature trees will unavoidably be cleared in order to facilitate the construction works. There is a secondary woodland opposite the development site (i.e., to the west of Sha Lo Tung Road) and we are concerned the construction of private housing would adversely affect this wooded area. If road widening works are undertaken or a new road constructed to connect to Fung Yuen Road, further direct habitat loss may happen to these woodlands.

Furthermore, the private housing development site is within 500 metres from the Fung Yuen Valley SSSI, and is located next to Sha Lo Tung Road which leads to one of Hong Kong's ecological hotspots, Sha Lo Tung. Both Fung Yuen and Sha Lo Tung are identified as two of the 12 priority Sites for Enhanced Conservation under the New Nature Conservation Policy. We are concerned that the operation of the proposed private housing development would increase the human disturbance to the surrounding environment (i.e., increase light and noise pollution). In the RNTPC Paper, it stated that "*...the requirement for an adequate landscaping area around the site periphery to serve as buffer to the SSSI and adjacent dense woodland should be included under lease conditions*". We consider such measures are highly inadequate for protecting natural habitats. Development in a GB zone, by itself, is destroying the buffer between urban settings and natural landscapes. A man-made urban landscaped area would not provide a sufficient buffer to protect the adjacent natural habitats of conservation concern.

In addition, we are concerned that the Sha Lo Tung road improvement works due to the proposed private housing development would likely facilitate developments within the ecologically sensitive Sha Lo Tung area. In late 2013, it was reported in the local newspapers^{1,2}

¹ <http://news.sina.com.hk/news/20121201/-37-2836995/1.html>

that a villager in Sha Lo Tung spotted a digger entering the village, and later on, the track leading to Cheung Uk was found to have been widened from two to three metres (Figure 4). We visited Sha Lo Tung after receiving the news, and noticed some vegetation was cleared near Lei Uk and concrete waste was dumped near the road next to the public toilet, and a stream was also partially blocked (Figure 5) by debris. Even though the Lands Department placed concrete bollards to try to halt the destruction, we are worried that the environmental degradation would be even more severe after the road condition of Sha Lo Tung is improved or upgraded due to the proposed housing development, thus, causing damage to the long term ecological integrity in the locality.

Apart from the ecological perspective, the site is adjacent to the Sha Lo Tung Road which is a popular hiking route. We conducted a questionnaire survey along Sha Lo Tung Road in 2012, and our results showed that over half of the interviewers are Tai Po residents and visit the Sha Lo Tung area at least once a week mainly for routine exercise, hiking or for the enjoyment of nature in the quiet surroundings. Any development in this site would inevitable change the tranquil environment within the rezoning site and in the locality. We consider that the passive recreational value of the GB zonings and the public interest in the enjoyment of the countryside is being ignored.

Therefore, we have grave concerns regarding the private housing development at the site near Fung Yuen and we strongly object to the Item D amendment of the OZP.

Item H: Site at Kon Hang near Cheung Shue Tan

According to Sections 3.61 and 3.62 of the RNTPC Paper No. 6/14, the site is “surrounded by woodland zoned ‘Conservation Area’ (CA)” and “residential developments in Kon Hang are mainly old house lots”. It is also located about 100 metres from the Tai Po Kau Nature Reserve. We would like to remind the Board again that the general intention of a “Green Belt” (GB) zone is for conservation and to act as a buffer between urban settings and natural landscapes. This principle should be adhered to as a matter of course. We consider that the existing residential development should not be used as an excuse for re-zoning GB into “Residential (Group C)” (R(C)) zoning. We are concerned that the construction and operation of the proposed private housing development would cause ecological impacts on the locality (e.g., increase human disturbance to the nearby woodland habitat). Therefore, we consider that

² <http://hk.apple.nextmedia.com/news/art/20121201/18086627>

the previous GB zoning should be maintained in order to serve as a buffer for the adjacent CA zoning and for the biologically rich natural habitats within the Tai Po Kau Nature Reserve; thus we object to the Item H amendment of the OZP.

Items C, E and F: Site to the west of Nethersole Hospital; Site at Lo Fai Road near Tycoon Place; and Site at Lai Chi Shan

These sites are originally designated with GB zoning. We would like to re-iterate the fact that the one of the planning intentions of a GB zone is to act as a buffer between urban settings and natural landscapes. We consider that this principle should be adhered to as a matter of course. We are concerned that these OZP amendments regarding the re-zoning of GB to R(C) would set an undesirable precedent for similar private housing developments in Hong Kong, and some members of the public may be given the wrong impression that development (e.g., private development) within the GB zone would eventually be approved by the Board. Obviously, this is not the intention of Government and the potential cumulative impacts which would be caused by developing the GB zones should be carefully reviewed. Hence, we do not support any of these amendments items.

Item G: Site near Yat Yiu Avenue

According to Section 3.54 of the RNTPC Paper No. 6/14, the site is “*a wooded knoll*” and “*within a low-rise residential neighbourhood*”. Even though the site is already zoned as R(C), it is well-vegetated and the woodland is ecologically connected to the adjacent woodland habitats zoned GB. A detailed and comprehensive ecological assessment, including a tree survey, should be conducted prior to any development in the area to avoid loss of woodland habitats with ecological value.

Convention on Biological Diversity

The Convention on Biological Diversity (CBD) was extended to Hong Kong by the Central People's Government on 9 May 2011. Article 8 (in-situ conservation) of this Convention³ has required the contracting party to follow the approaches below:

³ <http://www.cbd.int/convention/articles/?a=cbd-08>

Article 8, (d): Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings

Article 8, (i): Endeavour to provide the conditions needed for compatibility between present uses and the conservation of biological diversity and the sustainable use of its components

We consider that the Government should fully respect the CBD principles.

Concluding Remarks

We would like to stress that when dealing with the pressing need of Land for housing supply, it is not only meant to fill the gap between the supply and demand of the built-up residential environment but should also consider the informal envelope of “breathing space” – the recreational green space and natural landscapes surrounding the community where many social activities take place – should also be considered in order to ensure that everyone living in Tai Po, and in Hong Kong, can enjoy a physical and mental environment that facilitates a healthier lifestyle for both the present and future generations of this highly crowded and densely populated city.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

cc.

Agriculture, Fisheries and Conservation Department

Conservancy Association

Designing Hong Kong

Hong Kong Bird Watching Society

WWF – Hong Kong

Figure 1. Many of the proposed re-zoning sites with GB zonings are well-vegetated. These can hardly be considered to be land that is de-vegetated, deserted or formed areas.



Figure 2. The understory vegetation and the young secondary woodland habitat at the site near Fung Yuen are identical to the secondary woodland on the opposite side of the road.



Figure 3. A mature Incense Tree - individual found near Fung Yuen at the side of Sha Lo Tung Road.

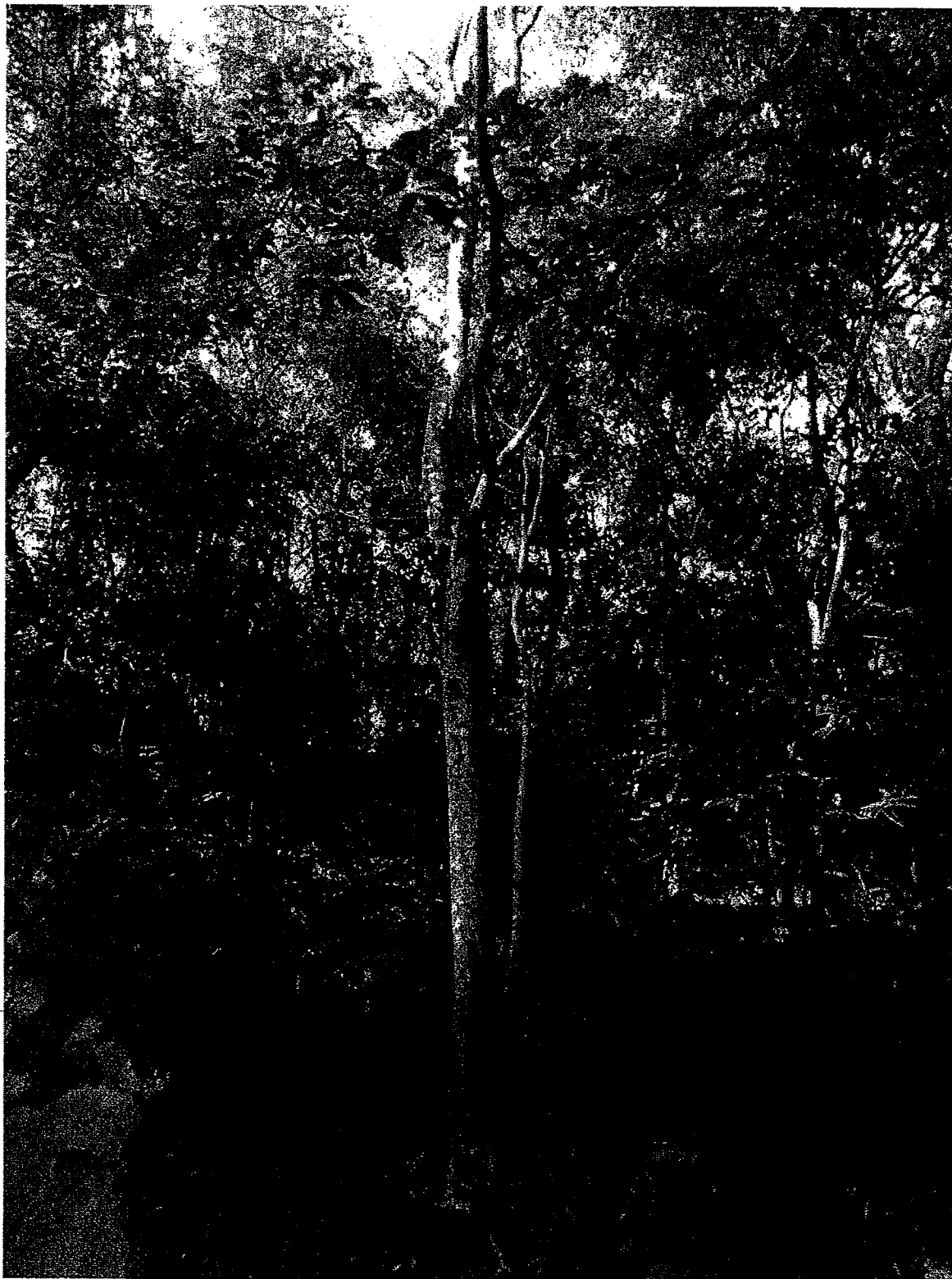


Figure 4. The track leading to Cheung Uk was found to be widened in late 2013.

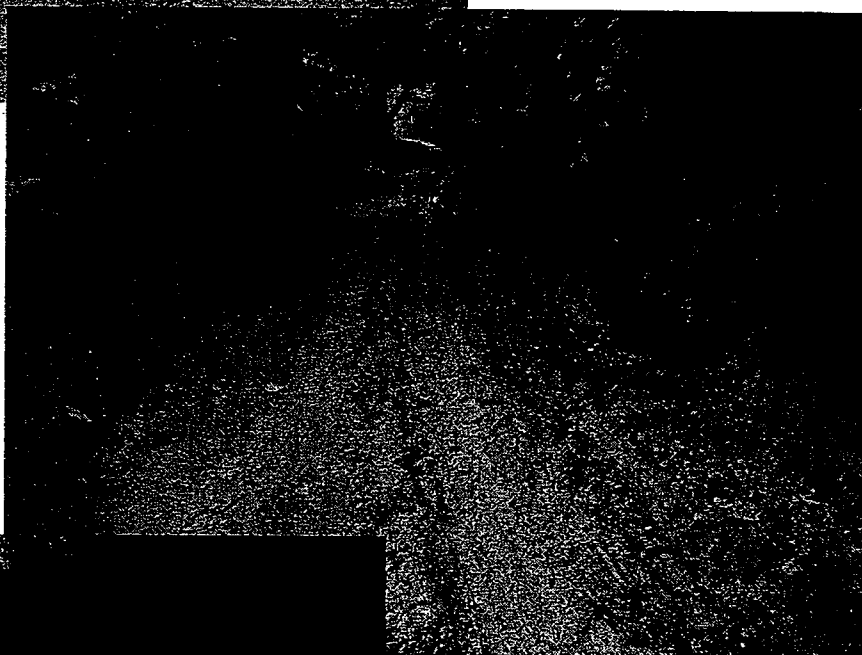
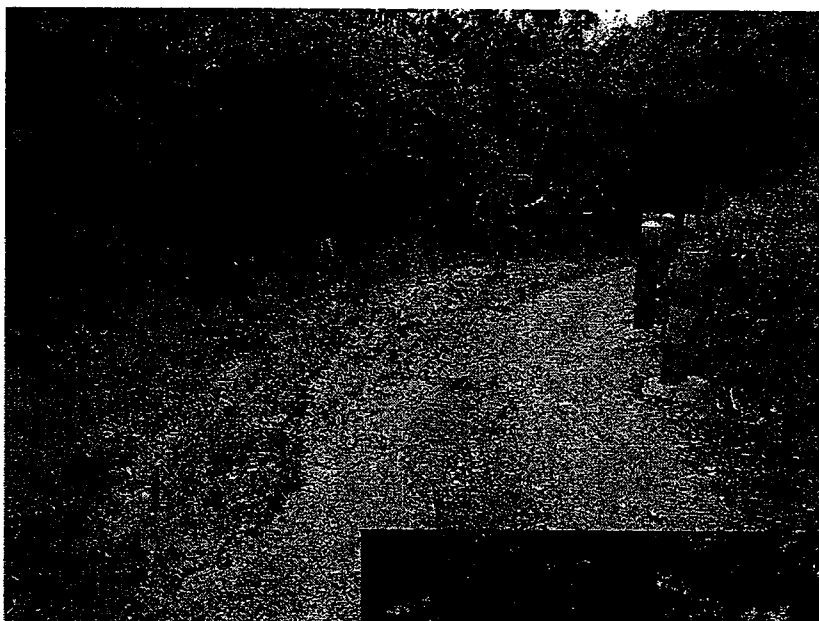
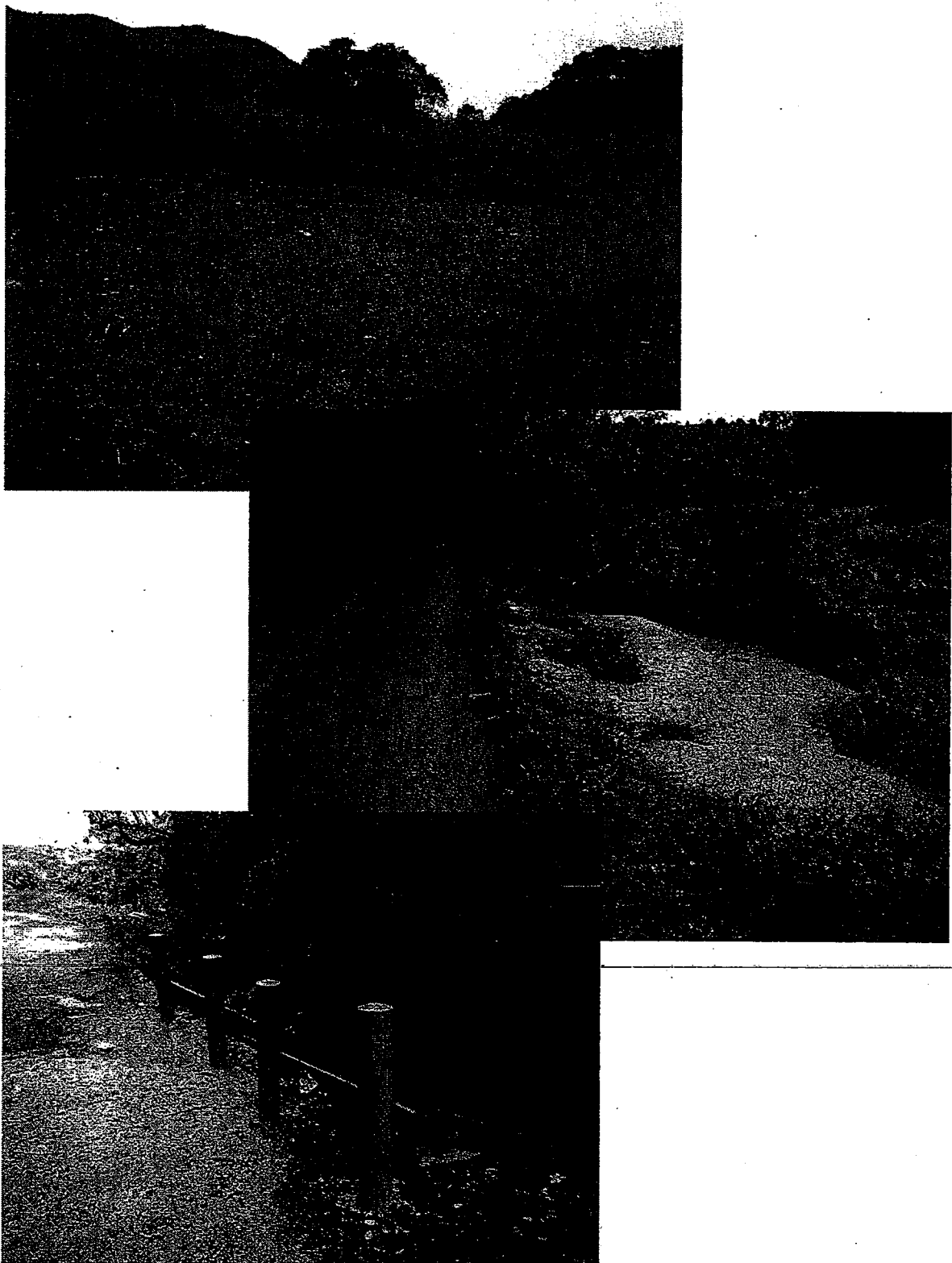


Figure 5. Some suspected vegetation clearance, dumping of concrete and blocking of stream were observed in Sha Lo Tung in late 2013.



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tpbpd

TPB/R/S/TP/25-19 -

件者: Pui Lam Jocelyn Ho [hjocelyn@hkbws.org.hk]
 寄件日期: 11日06月2014年星期三 21:25
 收件者: Town Planning Board
 副本: dafcoffice@afcd.gov.hk
 主旨: Comments on GB rezoning for Tai Po draft OZP
 附件: HKBWS_comments_TaiPoRezoning.pdf

Dear sir or madam,

Please refer to the attachment for our comments on the rezoning proposals for GBs, Tai Po draft OZP. Thank you.

Best regards,

Jocelyn Ho

Senior Conservation Officer

The Hong Kong Bird Watching Society

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Best regards,

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00457

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香港觀鳥會
THE
HONG
KONG
BIRD
WATCHING
SOCIETY

Since 1957 成立

11 June 2014

Dear Sir/Madam,

**Comments on the Review of "Green Belt" Zoning for Area West of Tung Tsz Road
in The Draft Tai Po Outline Zoning Plan No. O/S/TP/22**

The Hong Kong Bird Watching Society (HKBWS) would like to object the rezoning of Green Belt areas (GBs) in the Draft Tai Po Outline Zoning Plan (No. O/S/TP/22).



國際鳥盟成員

Inconsistent with the 2014 Policy Address

In the 2014 Policy Address, the Chief Executive (CE) announced his plan to tackle housing issues by rezoning GBs that are, "devegetated, deserted or formed"¹. As a department authorized by the CE, rezoning proposals by the Town Planning Board must be in-line with the orders made by the CE. However, an inconsistency has been noted during a recent site visit to the proposed rezoning sites in May 2014, when site observations revealed that the rezoning sites do not fulfill the description of, "devegetated, desert or formed" but instead are well-vegetated with intact tree canopies (Figures 1 and 2).

Policy change in the use of Green Belts

Green Belts in Hong Kong have now been identified as land bank for housing development opportunities. The functions of GBs to, "*conserve existing natural environment amid the built-up areas/at the urban fringe, to safeguard it from encroachment by urban type development, to define the limits of urban and sub-urban development areas by natural features, to contain urban sprawl as well as to provide passive recreational outlets*"² would be lost in various locations in Hong Kong which will affect a great portion of the general public. This change in policy with regards to the use of GBs is high-level planning issue. The Planning Department as the overlooking authority with a mission committed to, "*formulate sustainable development strategies and plans, guide the use and development of*

¹ Section 125 of the 2014 Policy Address Available at:
<http://www.policyaddress.gov.hk/2014/eng/p124.html>

² Section 3.5.2. (iv) Chapter 10 of the Hong Kong Planning Standards and Guidelines: Conservation.
Available at: http://www.pland.gov.hk/pland_en/tech_doc/hkpsg/full/ch10/ch10_text.htm

land, and encourage community involvement and support"³ is responsible for consulting and engaging the community to develop a sustainable plan to address the proper use of GBs before rezoning takes place.

Lack of cumulative impact assessment and consideration of impacts to nearby ecological sensitive sites

No detailed cumulative impact assessment in regards to the rezoning of GBs in Tai Po has been carried out and the environment functions of GBs have not been properly studied. Vegetated areas adjacent to the urbanized areas provide environmental functions including, reduction of carbon dioxide and moderating extreme temperatures. An assessment should be done to address the change of environmental conditions as a result of the loss of large areas of vegetated habitats in Tai Po.

Furthermore, Tai Po Area 9 site is located near two sensitive and ecologically important sites, Fung Yuen and Sha Lo Tung, both of which are ranked within top four of the priority sites under the New Nature Conservation Policy⁴. Their ecological importance has already been recognized by the Town Planning Board, they are both zoned as Site of Special Scientific Interest (SSSI)⁵. It is the duty of the Town Planning Board to, "control adjoining uses to minimize adverse impacts on conservation zones and optimize their conservation values"⁶. Detailed assessments on the potential primary and secondary ecological impacts arising from the construction and operation of residential development should be carried out prior to rezoning of Tai Po Area 9.

The Town Planning Board should not make decisions for rezoning until proper assessments have been completed.

Yours faithfully,



³ Mission of the Planning Department. Available at:
http://www.pland.gov.hk/pland_en/about_us/vmv/index.html

⁴ Sha Lo Tung is ranked second and Fung Yuen is ranked fourth under the List of Priority Sites for Enhanced Conservation. Available at:
http://www.afcd.gov.hk/english/conservation/con_nncp/con_nncp_list/con_nncp_list.html

⁵ Sha Lo Tung OZP: S/NE-SLT/4 and Tai Po OZP: S/TP/25

⁶ Section 2.1 (iii) Chapter 10 of the Hong Kong Planning Standards and Guidelines: Conservation. Available at: http://www.pland.gov.hk/pland_en/tech_doc/hkpsg/full/ch10/ch10_text.htm

Jocelyn Ho
Senior Conservation Officer
Hong Kong Bird Watching Society

cc:

AFCD - Mr. Wong, Director of Agriculture, Fisheries and Conservation
Conservancy Association
Designing Hong Kong
Kadoorie Farm and Botanic Garden
WWF – Hong Kong

Figure 1 –Proposed rezoning site: Tai Po Area 9



Figure 2 –Proposed rezoning site: Green Belt area west of Tung Tsz Road



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有關 S/TP/25 大埔分區計劃大綱草圖 環保觸覺 意見書

請仍有良心的規劃署高層及城規會委員 制止梁振英及陳茂波進行大規模斬樹

綠化地帶的設立，原意是不作發展，但梁振英及陳茂波並不理會數十年來建立的城市規劃原則。梁振英上任後，他不聽民意、倒行逆施及任意妄為的作風，於覓地建屋的施政上，可見一斑。政府打算發展 72 幅綠化地，世紀大伐林即將在香港發生。

城市規劃是一項專業工作，理論上規劃署的公務員是為良好城市規劃把關。可惜，政府高層以政治影響專業，很多規劃師被逼跟從。我們期望政府內有良心的規劃師，可以向規劃署署長力陳發展綠化地的弊端。

過去數年，政府透過兩個免費電視台，於廣告時段播放「人樹共融 綠滿家園」的宣傳廣告。廣告拍得如何美輪美奐，也包裝不到政府「講一套做一套」的事實。

於 2014 年施政報告中，特區政府將房屋問題歸咎於土地供應不足，打算改劃 152 幅土地，包括綠化地帶、休憩用地及機構社區(GIC)用地，以作興建房屋。起初，政府於施政報告中提及綠化地帶是「沒有植被、荒廢或已平整」的，以爭取市民不反對發展綠化地帶。可惜，政府再次失信於民，近月陸續將選址向區議會諮詢時，事實上大部份選址都有大量樹木，並有地皮達到百份百樹木覆蓋。

很多綠化地是百份百樹林覆蓋

原來，政府已靜悄悄地進行第二階段的綠化地檢討，而這階段的目標再不是「沒有植被、荒廢或已平整」，而是有樹林的也不放過。其中 7 幅，包括 3 幅於大埔、2 幅於赤柱、1 幅在屯門及 1 幅在石硤尾，竟然已極速放進賣地表。這屆政府不重視保護環境，是人所共知，但連程序公義也不尊重，再次突出今屆政府施政任意妄為。暫時政府打算改劃的綠化地，共達 70 幅，其中 7 幅便在大埔。環保觸覺堅決反對在未進行廣泛諮詢前，將綠化地改劃作住宅用途。

綠化地帶的重要性，在於它是郊野公園的緩衝。大家試想像，若郊野公園側便是高樓大廈，郊野公園內的生物必然受人類活動所影響；又或是大家到行山徑遠足，皆期望左右兩旁數公里內綠樹成蔭，讓身心及眼球放鬆，而不希望左右兩旁是大廈。所以，綠化地帶是城市規劃的重要一環，區隔郊野公園及市區。

重大政府改變 卻沒有廣泛諮詢

如此大型開發綠化地帶，是規劃政策上的重要改變，理應作充份公眾諮詢，並諮詢各持分者如環保團體。可惜，到了今天，環保觸覺在多番要求下，發展局仍不願意進行公眾諮詢，甚至連和環團會面也不答應。

大規模改劃綠化地不但和一直以來的規劃原則矛盾，而部份改劃地皮明顯是作豪宅用途，這絕對是錯上加錯。根據差餉物業估價署，豪宅的空置率超過百份之十，所以政府開拓豪宅用地並無意義，但可惜政府放入賣地表的 7 幅綠化地，全部鄰近豪宅屋苑，其中兩幅更是在赤柱黃麻角道的多座獨立屋旁，請問陳茂波局長，樹林為何要犧牲作獨立屋？

環保觸覺強調，綠化地多為樹林，並非覓地建屋的理想選擇。政府在處理房屋問題時，應選擇較少負面影響的選項。數月前有規劃關注團體揭露市區並不缺地，只是自由行政策使土地擁有人不斷將住宅大廈重建為酒店，而城規會又任由項目成功過關。房產達人姚松炎教授更指容許商住用途的舊樓，特別是油尖旺一帶，住宅單位不斷被改裝作自由行居住的賓館。政府讓大量酒店及賓館佔用本港土地資源，使政府開發綠化樹林的計劃，更顯得毫無說服力！

所以，本會反對大埔區所有綠化地的改劃。我們認為，必須透過廣泛諮詢，才可判斷綠化地改劃是否可取的選擇。以本會立場，綠化地是重要的自然資源，除非有凌駕性的公眾需要，加上詳細的環境評估，才可討論是否作出改劃。就目前資料，大埔區的改劃，大部份是作私人屋苑，並非作公屋及居屋。當私人發展商投得土地後，將斬盡地皮內的樹，然後將興建豪宅，並無公眾利益可言。而若用作興建公屋或居屋的一幅(大埔醫院側)，則較有條件討論改劃，但在政府未進行政策上的廣泛諮詢，本會暫時仍作出反對。

環保觸覺現要求城規會否決所有大埔區的綠化地改劃。我們要求政府作出廣泛的諮詢，並珍惜樹林，做到真正的人樹共融，綠滿家園。

本會在以下篇幅及附件，進一步說明每一幅大埔的綠化地，為何不適合合作改劃。綜合簡述如下：

A1 第 9 區範圍 – 地皮中部至南部有一茂密樹林的山谷，而北部的樹林較茂密，亦鄰近八仙嶺郊野公園，應避開該兩範圍，不作發展（見附件二）

A3 頌雅路西面範圍 – 部份有樹林覆蓋，不建議作發展（見附件三）

C 富亨邨側範圍 – 該位置是林木茂密的小山崗，並長有一棵巨大的「細葉榕」，樹冠直徑達

三十米，樹齡超過 20 年。樹木多生長在斜坡上，進行移植是否可能。若發展住宅，需要進行大型的地盤平整及挖走大量沙泥，並要修築護土牆，受影響範圍將可能比劃定的範圍大。在工程角度及環保角度皆非常不智。

D2 汀角路及鳳園路附近 – 另一環保團體長春社考察後，認為生態價值高，更發現包括「土沉香」、「吊鐘王」等等珍貴本地樹木品種。本會成員實地考察，認為該範圍是一個很大的山坡，若要進行地盤平整，將需要挖掘極大量的沙石泥土，估計達數萬公噸。這不但對堆填區造成負擔，而大量的運泥車來往，亦帶來空氣污染。

若任何一個有正常智慧的成人到過現場考察，都會認為該山坡是難以作住宅發展。我們強烈質疑政府選擇地皮時，究竟有沒有實在考察過過？

E 露輝路近聚豪天下 – 地皮上林木茂密，樹木數以千計；而且亦非平整土地，實為山崗；將地皮改劃為住宅（丙類），未能提供一般大眾所能負擔的居所。再者，此地皮已先放進勾地表，但城規程序卻在後。城規會應否決申請，不可助長政府先把土地放入賣地表，後向城規會申請改劃的歪風。其意在混淆公眾，壓迫城規會委員，非常不尊重城規程序及公眾的意見。（見附件四、五）

F 及 H 近逸遙路及乾坑 – 兩個範圍都滿佈樹木，任何發展等同大規模伐林；而且兩個範圍的附近是獨立屋或低密度豪宅，換言之，當發展商投得地皮後，將作豪宅發展。

在施政報告及政府提交改劃的文件，皆以覓地解決房屋需要為藉口，但政府高層越來越喜歡以「語言偽術」來誤導市民，今次申請改劃的大部份土地，皆作私人住宅及豪宅用途。我們希望規劃署的公務員不應和梁振英及陳茂波同流合污，應指出問題所在。若要覓地，應以公屋及居屋地為目標。

懇請各城規會委員為香港的城市規劃把關，共同反對是次不尊重城規會、不尊重公眾意見的改劃。如有查詢或回覆，可致電 8100 4877 或 電郵至 info@greensense.org.hk。

環保觸覺

二零一四年六月十一日

附件列表：

附件一 二零一四年一月二十一日 16 個環保團體聯合聲明

附件二 二零一四年二月十二日 綠化地帶 - 實地考察 大埔第九區及頌雅路旁(大埔醫院)

附件三 二零一四年二月十二日 綠化地帶-實地考察 頌雅路和全安路交界

附件四 二零一四年二月十二日 綠化地帶-實地考察 露輝路

附件五 二零一四年四月十三日 大埔露輝路聯苑—環保觸覺 保衛露輝路樹林行動 新聞稿

16個環保團體聯合聲明

開發土地應兼顧環境保護 綠化地帶不應偷步發展 改變政策須先廣泛諮詢

在剛發表的2014年施政報告中，特區政府繼續將房屋問題歸咎於土地供應不足，一而再、再而三高舉開發土地的重要，彷彿只要不斷開發新的土地，所有住屋問題就能迎刃而解。除了各個填海、新市鎮發展等「鴻圖大計」外，現正進行得如火如荼的是改劃「綠化地帶」用地。

根據施政報告中所述，政府現正陸續將不同的「綠化地帶」用地，改劃作住宅用途。儘管報告中強調此等綠化地帶是「沒有植被、荒廢或已平整」的，但事實上部份選址有植被及有非常多樹木，令人擔憂此舉會進一步使市區周邊的環境惡化，進一步的城市化將侵蝕綠化空間。

眾所周知，植物對於改善城市空氣質素及緩和熱島效應等有著重要作用，而綠化地帶亦是郊野公園及城市間的重要緩衝。就如城市規劃委員會條例下對綠化地帶的規劃意向所述，綠化地帶不僅能「保育已建設地區或市區邊緣地區內的現有天然環境」，亦是「利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區範圍的擴展」，更能作為康樂休憩地點。最重要的是，城規會在此備注中已表明在一般情況下，綠化地帶乃「不宜進行發展的」。

此時，政府在瘋狂的覓地過程中，竟然選中向綠化地帶開刀，這樣完全違反過往城市規劃條例下的規劃原則，明顯是一政策上的轉變，應先進行廣泛的公開諮詢，並為發展荒廢的綠化地帶訂定嚴謹準則，減少對環境的影響。事實上，我們認為既然綠化地帶對社區環境如此重要，政府理應檢討現時部分綠化地荒廢的原因，並全面修復這些地帶的植被，而非將之轉化為高樓大廈。部份位於私人土地上的綠化地帶，更可能是「先破壞，後發展」，為更易向城規會成功改劃鋪路。

試想像，當政府真的滿足了 47 萬的建屋目標，也許我們在營營役役的生活中有一個蝸居可棲身，但我們已失去了美好的居住環境，沒有休憩的地方，失去綠化空間，假日都只能困在一式一樣的大商場。梁振英特首不斷強調香港人未來應「住得好」，我們需要的不只是一個安身之所，而同時應給予香港人一個有生氣及綠化的生活空間，不是一個石屎森林。

面對城市發展、土地和房屋供應目標，首當其衝受害的往往是生態環境，但那只是因為政府往往將土地供應與生態保育置於對立面，製造社會必須取捨、二擇其一的假象。然而，這真的是一個大都會城市解決問題唯一的方法嗎？當政府面對市民殷切的置業願望時，只是以一貫直線的思維方式，大推各項土地開發計劃，但卻絕口不提民間討論已久的發展部分軍營土地、高球場以及荒廢的棕土地帶等，或是將人口政策與土地政策的討論割裂，對此我們深感失望。我們要求政府重新審視發展綠化地帶的弊處，整體上考慮全港的人口、住屋需求推出一套可持續發展的土地政策。

聯署團體：Ark Eden 香港地貌岩石保育協會 創建香港 海下之友 西貢之友 香港地球之友 綠色力量
環保觸覺 綠領行動 綠色和平 香港自然生態論壇 香港觀鳥會 香港海豚保育學會 香港野遊
長春社 世界自然基金會香港分會 （團體排名不分先後）



環保觸覺

綠化地帶 – 實地考察

大埔第九區及頌雅路旁（大埔醫院）G/I C及綠化地帶

簡介

地皮面積：約 9 公頃

原規劃用途：部分為政府、機構或社區用地，部分為綠化地帶

規劃署擬議：住宅（甲類）9

土地情況：中間大部分原來預留作興建私家醫院，惟上次招標失敗，交回政府作其他用途；西南面有仍在營運之小型農莊

現場觀察

我們經發現該地段北面一帶：

1. 花木繁茂，鳥語處處，大小樹木多不勝數；
2. 非平整土地，實為斜坡；
3. 鄰近大片林木北連九龍坑山、八仙嶺郊野公園，又接近具特殊科學價值地點鳳園，緩衝大埔市區對自然保育地點的影響

而中間部分：

1. 現為平地，上面有植被覆蓋，已蓋有石屎渠道；
2. 長有數棵健康之大樹

西南部分：

1. 仍運作中之農莊，為地區市民提供地方體驗農樂；
2. 有一河谷長滿植物及樹木；
3. 已建有道路（現為大埔醫院私家路）連接建未來建屋區域

比對政府參考文件：

- 一）現擬議改劃之面積比於 2009 - 2010 年預留建造私立醫院之地皮為大，而北面之茂密樹林正就是今次比上次規劃多出的部分；
- 二）今次擬議改劃包括一個小型農莊，這也是上次私立醫院招標時沒有包含的部分。

結論

本會認為只可已平整部分興建公共房屋，不應乘機擴大工程位置。而且當局必須保留北面樹林、地皮內所有大樹及農莊（附件 3 之綠色及黃色部分）；設計及興建時亦須預留位置廣植樹木，補償地區環境。

附件 1 – 規劃署圖則 2014 擬議改劃地帶



來源：大埔區議會文件 EHW 10/2014 號 附件一

附件 2 – 規劃署圖則 2009-2010 大埔私家醫院招標位置



來源：立法會文件 CB(2)494/09-10(03) 號



附件 3 – 影像地圖



來源：政府地理資訊地圖 2014-02-07

附件 4 – 實地考察相片（一）



拍攝日期：二〇一四年二月四日

拍攝地點：大埔醫院外下望農莊
一直有人耕作及管理



附件 5 – 實地考察相片（二）



拍攝日期：二〇一四年二月四日

拍攝地點：中間部分平地望向樹林

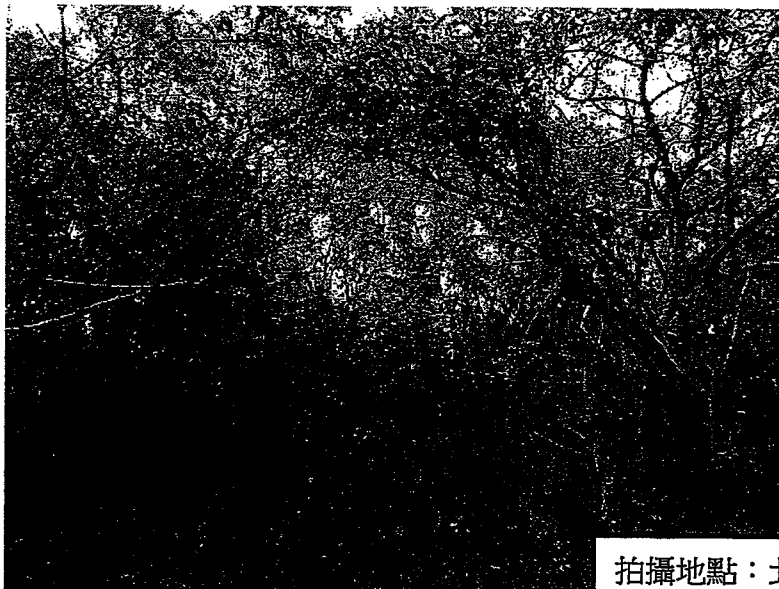
附件 6 – 實地考察相片（三）



拍攝日期：二〇一四年二月四日

拍攝地點：近觀北面樹林
樹木高大及茂盛

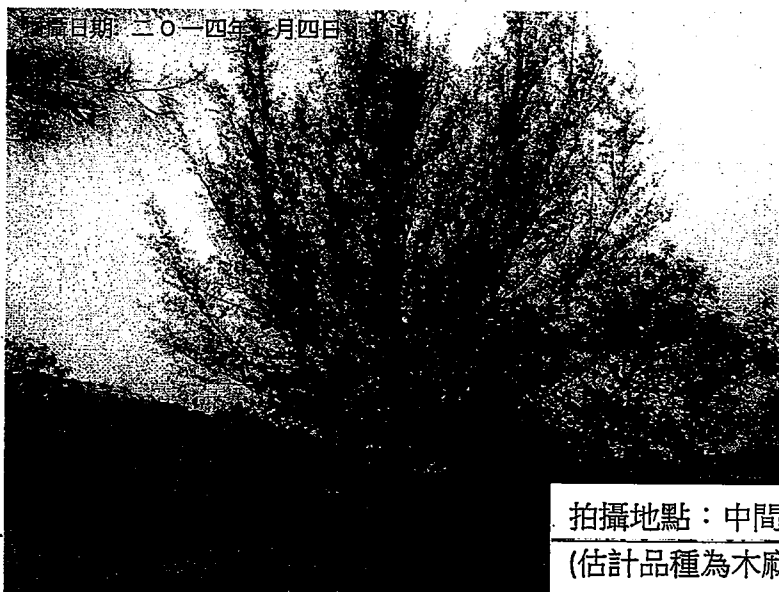
附件 6 – 實地考察相片 (四)



拍攝日期：二〇一四年二月四日

拍攝地點：北部樹林內
樹木及其他植物遍佈

附件 7 – 實地考察相片 (五)



拍攝日期：二〇一四年二月四日

拍攝地點：中間部分近大埔醫院大樹
(估計品種為木麻黃)
樹冠巨大且樹形漂亮，應作保留

參考文件

大埔區議會文件 EHW 10 /2014 EHW 10/2014 號

http://www.districtcouncils.gov.hk/tp/doc/tc/committee_meetings_doc/EHWC/2014/TP_ehwc_2014_010_TC.pdf

立法會文件 CB(2)494/09-10(03) 號

<http://www.legco.gov.hk/yr09-10/english/panels/hs/papers/hs1214cb2-494-3-e.pdf>



環保觸覺

綠化地帶 – 實地考察

大埔頌雅路 and 全安路交界 綠化地帶

簡介

地皮面積：約 0.57 公頃
原規劃用途：綠化地帶
規劃署擬議：住宅（甲類）11

現場觀察

我們經發現該地段：

1. 樹林茂密，連帶旁邊林木及北面全安路花園，形成大埔區北部一個重要的「綠色小島」；
2. 地皮中心有一大榕樹，盤根錯節，樹冠高大；
3. 大部分為斜坡，工程需挖走大量泥土，製造廢料；
4. 位於鄰近屋邨與那打素醫院中間，為醫院提供自然屏障，阻隔社區及交通之煩囂

結論

該地段附近已有大量居民，再於該綠化地興建樓宇會對一帶設施增加負擔。再者工程影響大量樹木，危及大榕樹，破壞綠化環境，同時消耗鉅額人力物力。

本會反對將該綠化地帶改劃為住宅用途



附件 1 – 規劃署圖則



來源：大埔區議會文件 EHW 10/2014 號 附件一

附件 2 – 影像地圖



來源：政府地理資訊地圖 2014-02-10

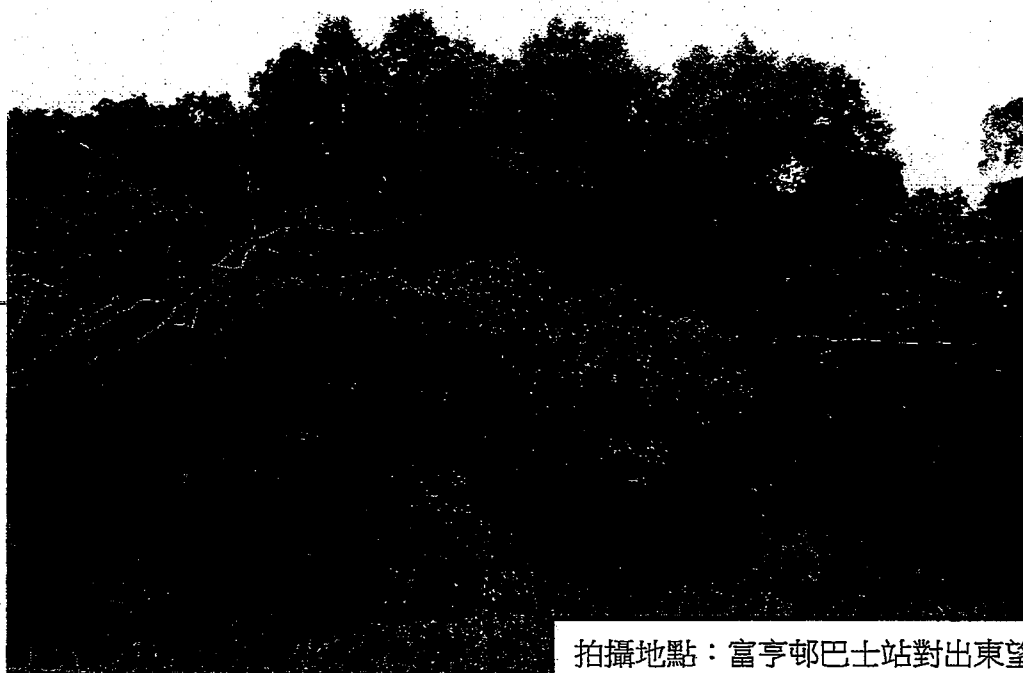
附件 3 – 傳媒圖片（高處）



該地樹木林立，為大埔北部之綠色小島

附件 4 – 實地考察相片（一）

拍攝日期：二〇一四年二月四日



拍攝地點：富亨邨巴士站對出東望
山坡上有不少高大樹木，生長茂盛



附件 5 – 實地考察相片 (二)

拍攝日期：二〇一四年二月四日

拍攝地點：位於附件 3 黃色標誌之大榕樹
枝葉發達，樹幹粗壯，應作保留



附件 6 – 實地考察相片 (三)



拍攝地點：樹林內
樹木及其他植物遍佈

參考文件

大埔區議會文件 EHW 10 /2014 EHW 10/2014 號

[http://www.districtcouncils.gov.hk/tp/doc/tc/committee_meetings doc/EHWC/2014/TP_ehwc_2014_010_TC.pdf](http://www.districtcouncils.gov.hk/tp/doc/tc/committee_meetings/doc/EHWC/2014/TP_ehwc_2014_010_TC.pdf)

環保觸覺

綠化地帶 – 實地考察

大埔露輝路 綠化地帶

簡介

地皮面積： 4.13 公頃

原規劃用途：綠化地帶

規劃署擬議：住宅（丙類）9

現場觀察

我們經實地考察發現：

1. 林木茂密，樹木數以千計；
2. 亦非平整土地，實為山崗；
3. 貼近民居，具重要綠化作用，工程亦影響該區居民；
4. 附近民居均為低密度住宅，該地皮亦只能興建低密度住宅出售，不能提供大量單位

比對政府參考文件：

- 一）梁振英於2014年施政報告中指等等綠化地帶用地為「沒有植被、荒廢或已平整」，明顯與事實不符；
- 二）規劃署在其向區議會擬議文件中形容該地段僅為「植被所覆蓋」，隱瞞地皮上植有大量樹木，淡化環境問題；
- 三）規劃改為低密度住宅，只會變為豪宅，未能提供合適樓宇供一般市民購置

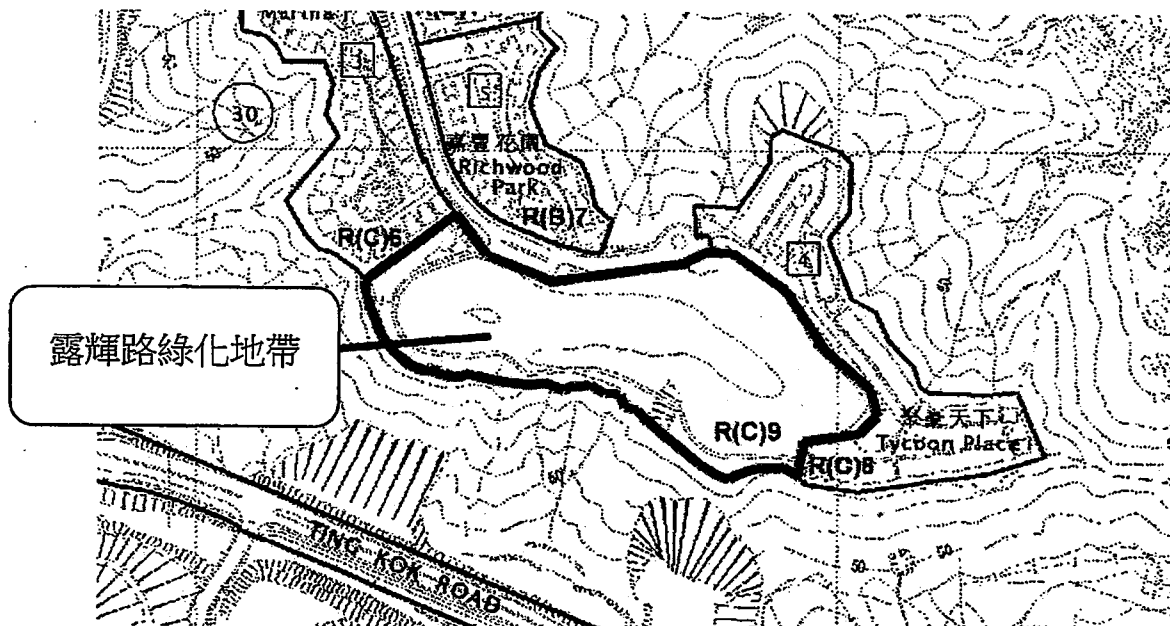
總結

本會認為不應破壞該處自然環境

反對將露輝路綠化地帶改劃為住宅用地



附件 1 – 規劃署圖則



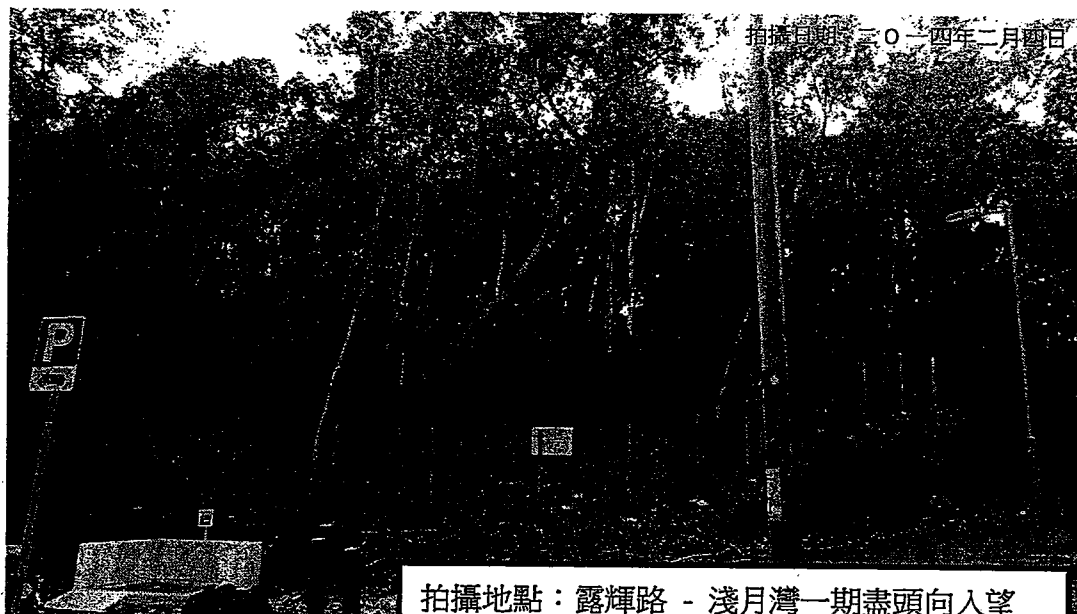
來源：大埔區議會文件 EHW 10/2014 號 附件一

附件 2 – 影像地圖



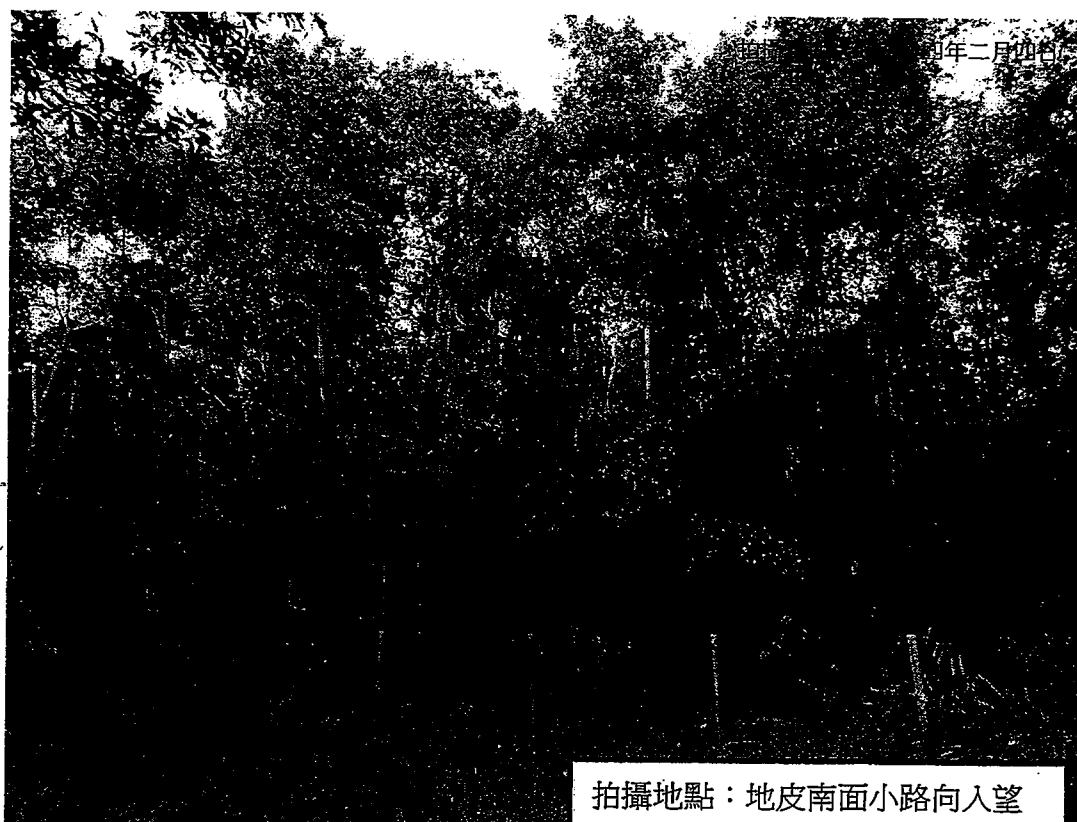
來源：政府地理資訊地圖 2014-02-06

附件 3 – 實地考察相片 (一)



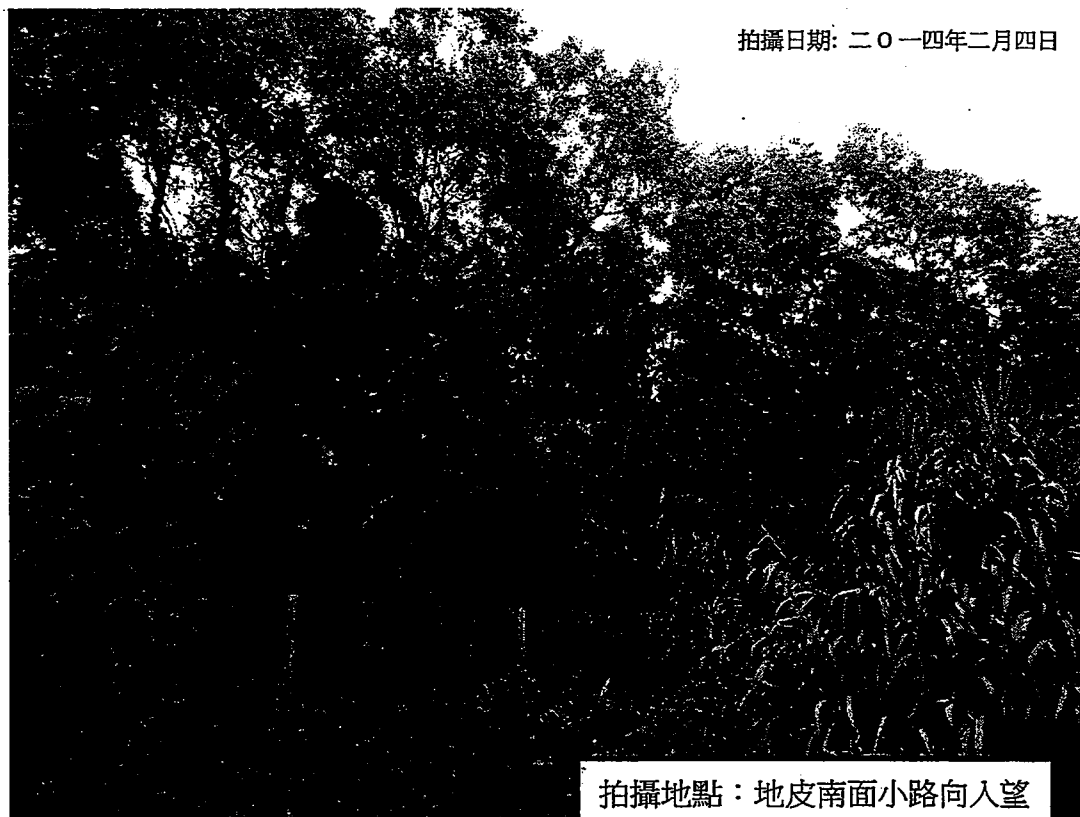
拍攝地點：露輝路 - 淺月灣一期盡頭向入望
 地皮不是平整土地，實為山崗

附件 4 – 實地考察相片 (二)



拍攝地點：地皮南面小路由入望
 可見地皮上生長有極多樹木

附件 5 – 實地考察相片 (三)



拍攝日期：二〇一四年二月四日

拍攝地點：地皮南面小路向入望
不少樹木十分高大

參考文件

大埔區議會文件 EHW 10 /2014 EHW 10/2014 號

http://www.districtcouncils.gov.hk/tp/doc/tc/committee_meetings_doc/EHWC/2014/TP_ehwc_2014_010_TC.pdf

新聞稿
2014年4月13日
大埔露輝路聯苑—環保觸覺 保衛露輝路樹林行動

環保觸覺與露輝路各屋苑，今日聯合舉辦保衛露輝路樹林行動。

香港政府一直將房屋問題輕易歸咎於土地供應不足，城規會剛於4月11日將大埔分區計劃大綱核准圖的修訂進行公眾查閱，史無前例提出7項由「綠化地帶」轉劃作興建住宅的項目。另外，露輝路林地首當其衝，政府已將此地皮納入本年度賣地計劃，4.13公頃綠化地將被分為兩塊地皮出售，合共建屋逾 600 伙。

2013及2014連續兩年的施政報告，特首梁振英先生向全港七百萬市民公開表示，開發的綠化地帶是「沒有植被、荒廢或已平整」的；但事實卻是，改劃綠化地的大部份選址均有豐富植被及大量樹木。以露輝路綠化地為例，地皮上林木茂密，樹木數以千計，以面積計算，即等於約4個標準足球場的樹林；露輝路綠化地亦非平整土地，實為山崗。露輝路聯苑居民，對規劃署公然違反特區首長的施政承諾，感到非常震驚及遺憾！

環保觸覺亦認為當局淡化環境問題，肆意發展綠化地帶，破壞自然環境，將香港進一步變為「石屎森林」，惡化空氣質素及熱島效應問題。儘管多個環保團體聯署反對，可惜政府無視民間聲音，決心一意孤行。

年初環保團體的聯署提及，植物對於改善城市空氣質素及緩和熱島效應等有著重要作用，而綠化地帶亦是郊野公園及城市間的重要緩衝。就如城市規劃委員會條例下對綠化地帶的規劃意向所述，綠化地帶不單能「保育已建設地區或市區邊緣地區內的現有天然環境」，亦是「利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區範圍的擴展」，更能作為康樂休憩地點。最重要的是，城規會在此備注中已表明在一般情況下，綠化地帶乃「不宜進行發展的」。

露輝路現時的規劃，限制綠化地皮亦只能興建低密度住宅出售，無助解決香港整體的住屋問題。若將該綠化地平整及發展成住宅，工程期間及新增的人口亦會引起該區交通及教育配套問題。現時，露輝路是一條單線的彎曲「掘頭路」，如人口增加多逾600戶，將使露輝路接連的人口大幅增加80%。

居民認為，開發滿有植被的綠化帶並非可持續發展的土地政策，政府應積極落實其他不擾大自然的方案，例如啟德機場舊址，軍營用地等。香港市民需要的不只是一個安身之所，同時是有生氣及綠化的生活空間。環保觸覺項目經理何嘉寶認為，政府一方面以「人樹共融 綠滿家園」去傳揚愛護樹林和綠化環境的訊息，另一方面卻帶頭破壞原有的綠化地帶，實在自相矛盾！

環保觸覺及露輝路聯屋苑代表，帶領過百名市民沿露輝路綠化地遊行，並會於終點把黃色絲帶及心意卡繫上樹木及鐵絲網上，喻意要保護自然，向政府表達要求保留露輝路綠化地的決心。



大埔鄉事委員會 TAI PO RURAL COMMITTEE

TPB/R/S/TP/25-1326

主席：文春輝, MH
Chairman : MAN CHEN-FAI, MH
副主席：李國英 BBS 太平紳士
Vice-Chairman : LI KWOK YING, BBS, J.P.
李有慶
LI YAU HING

本會檔號：20-410

Received for on 11.6.14 傳真及郵遞

香港北角渣華道 333 號
北角政府合署 15 樓
城市規劃委員會

敬啟者：

大埔分區計劃大綱核准圖 S/TP/24 的修訂 H 項
把乾坑的一塊用地由「綠化地帶」改劃為「住宅(丙類)8」地帶
以及訂明建築物高度限制

本會支持大埔樟樹灘鄉樟樹灘村及大埔尾村的立場和建議，祈請 貴會尊重並
考慮兩村的意見。隨函附上該鄉來函副本，以供察照！

大埔鄉事委員會主席：文春輝

副主席：李國英 BBS, MH 太平紳士

李有慶



二零一四年六月十日

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大埔鄉事委員會 TAI PO RURAL COMMITTEE

主席：文春輝, MH
Chairman : MAN CHEN FAI, MH
副主席：李國英 BBS 太平紳士
Vice-Chairman : LI KWOK YING, BBS, J.P.
李有慶
LI YAU HING

本會檔號：20-412

AC051

傳真及郵遞

→ TAI PO RURAL ON 10 6.14

香港北角渣華道 333 號

北角政府合署 15 樓

城市規劃委員會

敬啟者：

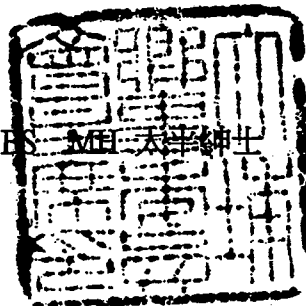
大埔分區計劃大綱核准圖 S/TP/24
修訂項目 D1 項將鳳園村「政府、機構及社區」用地及
D2 項「綠化地帶」改劃為「住宅(丙類)10」
以及訂明建築物高度限制

本會支持大埔鳳園村的立場和建議，祈請 貴會尊重並考慮該村的意見。隨函
附上該村來函副本，以供察照！

大埔鄉事委員會主席：文春輝

副主席：李國英 BBS MH 太平紳士

李有慶



二零一四年六月十日

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中華人民共和國香港特別行政區
Hong Kong Special Administrative Region
People's Republic of China



TPB/R/S/TP/25-1327

大埔區議會 Tai Po District Council

區議員 劉志成博士 Dr. LAU Chee Sing, DC Member

BSc, PhD, MICE, MStructE, MHKIE, AP, RSE
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

城市規劃委員會主席

周達明先生, JP

P028

2014年6月4日



周主席：

有關：根據《城市規劃條例》(第131章)第6(1)條就草圖：
S/TP/25的D項作出申述

本人是大埔船灣選區區議員劉志成博士。

規劃申請編號：S/TP/25的D項土地是位於汀角路近鳳園的一塊面積4.85公頃土地，包括香港園藝學會的臨時用地，改劃為「住宅(丙類)10」地帶。該地段位置貼近汀角路/大發街路口，為改善該路口現時呈現樽頸型的交通擠塞，本人於2014年1月30日致函沙田、大埔及北區規劃專員，要求保留約10m闊政府土地用作將來擴闊該段路口(見附件一)，由現時的四線路口改為六線路口，解決長期呈現樽頸型的交通擠塞。

汀角路沿線有多個發展項目，例如慈山寺觀音像、船灣三宮廟、龍尾泳灘，水療酒店，哥爾夫球場及骨灰龕等等，都吸引很多外來車輛行駛汀角路，日後擠塞情況必定倍加嚴重。

政府部門應有長遠規劃，不能把主要道路旁的土地毫無保留地拍賣。保留約10m闊政府土地(面積約1,500m²，佔整塊地的總面積4.85公頃約3%)，亦不會影響整塊土地的吸引性和發展潛力。政府部門亦可考慮加入特別條款，要求將來發展商出資改善該約10m闊政府土地內的路口改善工程，改善民生，造福社會。

本人懇請城市規劃委員會主席及委員接納本人的建議，修改規劃地界保留沿汀角路旁約10m闊政府土地用作擴闊該路口之用。

劉志成

大埔區議員
劉志成博士

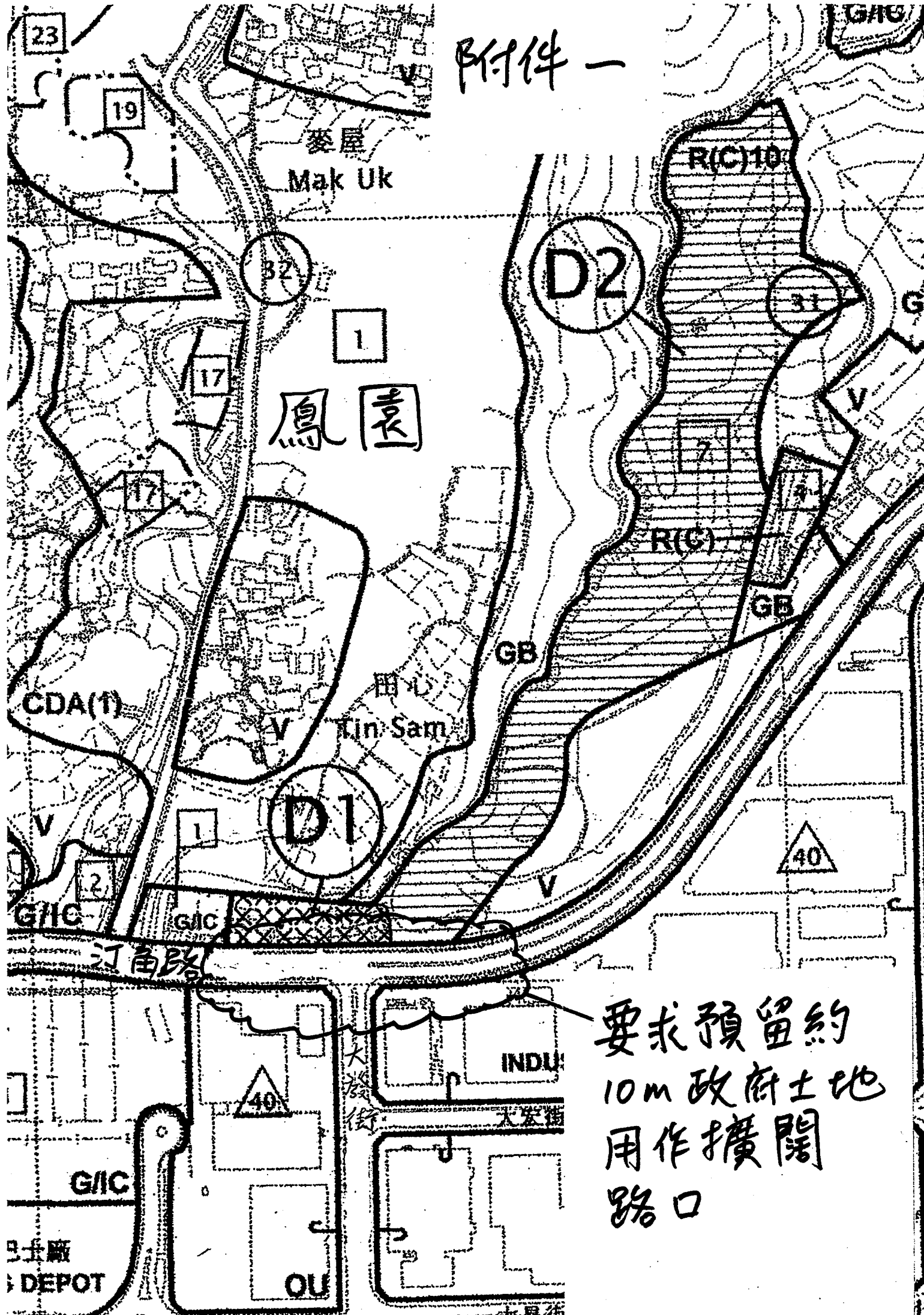
358

附件一：汀角路近鳳園的一塊土地位置圖

辦事處：香港新界大埔船灣詹屋村30號
Office Address: No.30, Shuen Wan Chim Uk, Tai Po, N.T., H.K.

電話 Tel: 2658 1238 / 2658 1239 • 傳真 Fax: 2658 1236
電郵 E-mail: laucheeting@gmail.com

附件一



要求預留約
10m 政府土地
用作擴闊
路口



中華人民共和國香港特別行政區
Hong Kong Special Administrative Region of the
People's Republic of China



TPB/R/S/TP/25-1327

大埔區議會 Tai Po District Council

區議員 劉志成博士 Dr. LAU Chee Sing, DC Member
BSc, PhD, MICE, MStructE, MHKIE, AP, RSE

2014 年 6 月 5 日

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
城市規劃委員會主席
周達明先生, JP

周主席：

有關：根據《城市規劃條例》(第 131 章) 第 6(1)條就草圖：
S/TP/25 的 E 項作出申述

本人是大埔船灣選區區議員劉志成博士。

規劃申請編號：S/TP/25 的 E 項土地是位於本人的選區範圍，自 2014 年 1 月 7 日從報章得知規劃署有意改劃 E 項土地為住宅，便收到我區居民的反對意見，尤其是居住在 E 項地塊旁的五個屋苑，更組成「露輝路關注組」，舉行了一連串遊行、示威等反對 E 項地塊建住宅的行動，媒體亦有廣泛的報導。

2014 年 2 月 13 日上午(即 4 月 11 日刊憲前)，本人代表居民在大埔區議會環境、房屋及工程委員會的特別會議，討論有關擬議改劃部份大埔區土地作為房屋發展用途的事宜，對 E 項地塊的改劃提出強烈反對。

2014 年 3 月 4 日，本人安排「露輝路關注組」16 位居民與沙田、大埔及北區規劃專員進行長達三個多小時的直接對話，讓專員聆聽及了解居民的反對意見。會議結束前，居民有要求規劃專員抽起 E 項土地。

2014 年 4 月 30 日，本人安排「露輝路關注組」13 位居民與大埔區議會張學明主席會面，聽取居民的反對意見。

2014 年 5 月 8 日，大埔區議會 2014 年第三次會議為 E 項地塊的反對意見展開討論。討論結束前，獲得 21 票贊成，零票反對，零票棄權通過以下修訂動議：『大埔區議會要求規劃署及城市規劃委員會就建議修改露輝路土地(E 項地塊)由綠化地帶改劃為「住宅(丙類)9」地帶一事，充分考慮大埔區議會，當區居民和相關持份者的反對意見』。

(第一頁)

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本人及居民反對政府把露輝路綠化地改劃為住宅用途，歸納理據如下：

1) 尊重民意

露輝路五屋苑合共 834 戶，收到 800 多戶簽名反對信，佔 90% 的地區民意基礎。反對簽名信已於三月頭送交沙田、大埔及北區規劃專員存檔。

2) 行政長官應守承諾

行政長官於 2013 年及 2014 年連續兩年施政報告中，明確指出可改劃的綠化地是「已失去其原有功能、沒有植被、荒廢及已平整的土地」。露輝路樹林的實況與首長的定義完全相反。露輝路樹林是完全植被，有 2500 棵大樹的茂密樹林，位處未被平整的小山崗上。要求行政長官信守承諾，保護完好的露輝路樹林。(見 2013 年施政報告 53 段及 2014 年 125 段)

3) 交通配套不勝負荷

改劃露輝路住宅用地面積為 4.13 公頃，擬建單位數目 660 戶，比現時五屋苑共 834 戶多出 80% 及鄰近香港教育學院每天亦有近萬人流，加上沿汀角路已落實的未來發展項目，包括：慈山寺、水療中心、12,000 個骨灰龕位、龍尾泳灘及鳳園新樓盤等，勢必導致露輝路及汀角路的交通相當繁忙，不勝負荷。約五年後新增 660 戶，塞車情況更為嚴重，而大埔東消防局座落於汀角路/露輝路口，交通擠塞將直接影響拯救效率。

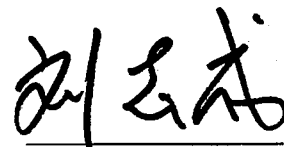
4) 尊重原有綠化規劃

露輝路樹林是該區於 1994 年整體規劃的一部份，利用天然地理環境作為市區和近郊發展區的界線，以抑制市區擴展，並提供晨運徑作靜態康樂場地，根據一般推定，此地帶不宜進行發展。此綠化規劃一直為附近的厭惡性設施提供天然屏障，包括：船灣堆填區、水泥廠、污水處理廠、煤氣廠、大埔工業村及繁忙的交通。露輝路樹林位處山頂，其屏障功能不可取締。

5) 錯估低密度住宅的需求

大埔已有低密度住宅供應達 2,300 個單位 (嵐山、富盈門、天賦海灣等)，空置率甚高。三月白石角地皮賣地流標。五月尾白石角地皮成交標價低市價 50%。現時有近 28 萬市民排隊上公屋，興建公屋和居屋才能有效解決一般市民面對的住屋問題。

鑒於居民強烈反對意見及大埔區議會的修訂動議，本人懇請城市規劃委員會否決將大埔露輝路綠化地帶改劃為住宅用地。



劉志成博士
大埔區議員



中華人民共和國香港特別行政區
Hong Kong Special Administrative Region of the
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TPB/R/S/TP/25-1327

大埔區議會 Tai Po District Council
區議員 劉志成博士 Dr. LAU Chee Sing, DC Member
BSc, PhD, MICE, MStructE, MHKIE, AP, RSE

2014 年 6 月 5 日

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
城市規劃委員會主席
周達明先生, JP

周主席：

有關：根據《城市規劃條例》(第 131 章) 第 6(1)條就草圖：
S/TP/25 的 E 項作出申述

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規劃申請編號：S/TP/25 的 E 項土地是位於本人的選區範圍，自 2014 年 1 月 7 日從報章得知規劃署有意改劃 E 項土地為住宅，便收到我區居民的反對意見，尤其是居住在 E 項地塊旁的五個屋苑，更組成「露輝路關注組」，舉行了一連串遊行、示威等反對 E 項地塊建住宅的行動，媒體亦有廣泛的報導。

2014 年 2 月 13 日上午(即 4 月 11 日刊憲前)，本人代表居民在大埔區議會環境、房屋及工程委員會的特別會議，討論有關擬議改劃部份大埔區土地作為房屋發展用途的事宜，對 E 項地塊的改劃提出強烈反對。

2014 年 3 月 4 日，本人安排「露輝路關注組」16 位居民與沙田、大埔及北區規劃專員進行長達三個多小時的直接對話，讓專員聆聽及了解居民的反對意見。會議結束前，居民有要求規劃專員抽起 E 項土地。

2014 年 4 月 30 日，本人安排「露輝路關注組」13 位居民與大埔區議會張學明主席會面，聽取居民的反對意見。

2014 年 5 月 8 日，大埔區議會 2014 年第三次會議為 E 項地塊的反對意見展開討論。討論結束前，獲得 21 票贊成，零票反對，零票棄權通過以下修訂動議：『大埔區議會要求規劃署及城市規劃委員會就建議修改露輝路土地(E 項地塊)由綠化地帶改劃為「住宅(丙類)9」地帶一事，充分考慮大埔區議會，當區居民和相關持份者的反對意見』。

(第一頁)

00477

本人及居民反對政府把露輝路綠化地改劃為住宅用途，歸納理據如下：

1) 尊重民意

露輝路五屋苑合共 834 戶，收到 800 多戶簽名反對信，佔 90% 的地區民意基礎。反對簽名信已於三月頭送交沙田、大埔及北區規劃專員存檔。

2) 行政長官應守承諾

行政長官於 2013 年及 2014 年連續兩年施政報告中，明確指出可改劃的綠化地是「已失去其原有功能、沒有植被、荒廢及已平整的土地」。露輝路樹林的實況與首長的定義完全相反。露輝路樹林是完全植被，有 2500 棵大樹的茂密樹林，位處未被平整的小山崗上。要求行政長官信守承諾，保護完好的露輝路樹林。(見 2013 年施政報告 53 段及 2014 年 125 段)

3) 交通配套不勝負荷

改劃露輝路住宅用地面積為 4.13 公頃，擬建單位數目 660 戶，比現時五屋苑共 834 戶多出 80% 及鄰近香港教育學院每天亦有近萬人流，加上沿汀角路已落實的未來發展項目，包括：慈山寺、水療中心、12,000 個骨灰龕位、龍尾泳灘及鳳園新樓盤等，勢必導致露輝路及汀角路的交通相當繁忙，不勝負荷。約五年後新增 660 戶，塞車情況更為嚴重，而大埔東消防局座落於汀角路/露輝路口，交通擠塞將直接影響拯救效率。

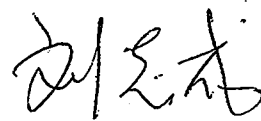
4) 尊重原有綠化規劃

露輝路樹林是該區於 1994 年整體規劃的一部份，利用天然地理環境作為市區和近郊發展區的界線，以抑制市區擴展，並提供晨運徑作靜態康樂場地，根據一般推定，此地帶不宜進行發展。此綠化規劃一直為附近的厭惡性設施提供天然屏障，包括：船灣堆填區、水泥廠、污水處理廠、煤氣廠、大埔工業村及繁忙的交通。露輝路樹林位處山頂，其屏障功能不可取締。

5) 錯估低密度住宅的需求

大埔已有低密度住宅供應達 2,300 個單位 (嵐山、富盈門、天賦海灣等)，空置率甚高。三月白石角地皮賣地流標。五月尾白石角地皮成交標價低市價 50%。現時有近 28 萬市民排隊上公屋，興建公屋和居屋才能有效解決一般市民面對的住屋問題。

鑒於居民強烈反對意見及大埔區議會的修訂動議，本人懇請城市規劃委員會否決將大埔露輝路綠化地帶改劃為住宅用地。



劉志成博士
大埔區議員



中華人民共和國香港特別行政區

Hong Kong Special Administrative Region of the People's Republic of China

附件 Annex III-14

TPB/R/S/TP/25-1328



大埔區區議會 Tai Po District Council

王秋北議員 Wong Chau Pak D.C. Member

19.5.14
DPO/STN on

Our Ref:L004-2014

15-05-2014

致：

城市規劃委員會

主席閣下及全體委員：

強烈反對規劃署將

頌雅路全案公園側綠化地帶改劃為“住宅（甲類）10”事宜

我們支持政府利用荒廢、冇植地、已平整土地地段興建房屋解決市場需要。但規劃署沙田、大埔及北區規劃專員蘇雲國先生在2014年5月14日大埔區議會環境、房屋及工程委員會中介紹《大埔分區計劃大綱草圖編號S/TP/25》修訂項目，大埔區議會文件Z-HW34/2014號中提出（將那大素醫院以西一塊用地由“綠化地帶改劃為住宅（甲類）10，提供約680個單位住宅，將一個樹木茂盛的地段給為“住宅”用途，本人在議會中提出強烈反對。政府已在大埔第九區、頌雅路東由“綠化地帶”及政府機構或社區地帶改劃為“住宅（甲類9）興建公共房屋單位，解決基層家庭訴求，我們表示支持。但在頌雅路西我們反對興建房屋，那裡樹木茂密有獨特“綠色小島”之稱。富亨邨對外只有頌雅路段，將來第九區、頌雅路東興建大型公共房屋，對外交通也是頌雅路。嚴重破壞了綠化環境地帶及富亨邨對外交通服務。

規劃署未經諮詢周邊持份者意見，就將文件交予城市規劃署。我們訴望主席閣下及全體委員支持我們的訴求，反對規劃署將頌雅路西綠化地帶改劃為住宅用途。保留綠化地帶，造福市民！

為我們下一代著想，保衛綠色家園。

如有查詢可致電 2660 9007 與本人或林先生聯絡

祝

工作順利！

RECEIVED
2014 MAY 19 P 3:16
TOWN PLANNING BOARD

大埔區議員

王秋北

辦事處地址：新界大埔富亨邨亨裕樓22號地下 王秋北區議員辦事處

No.22, G/F, Heng Yue House, Fu Heng Estate, Tai Po, N.T.

電話 TEL : 2660 9007 傳真 FAX : 2661 7909

The Office of Wong Chau Pak, Tai Po District Councillor

電子郵件 E-mail : wongchaupak@yahoo.com.hk

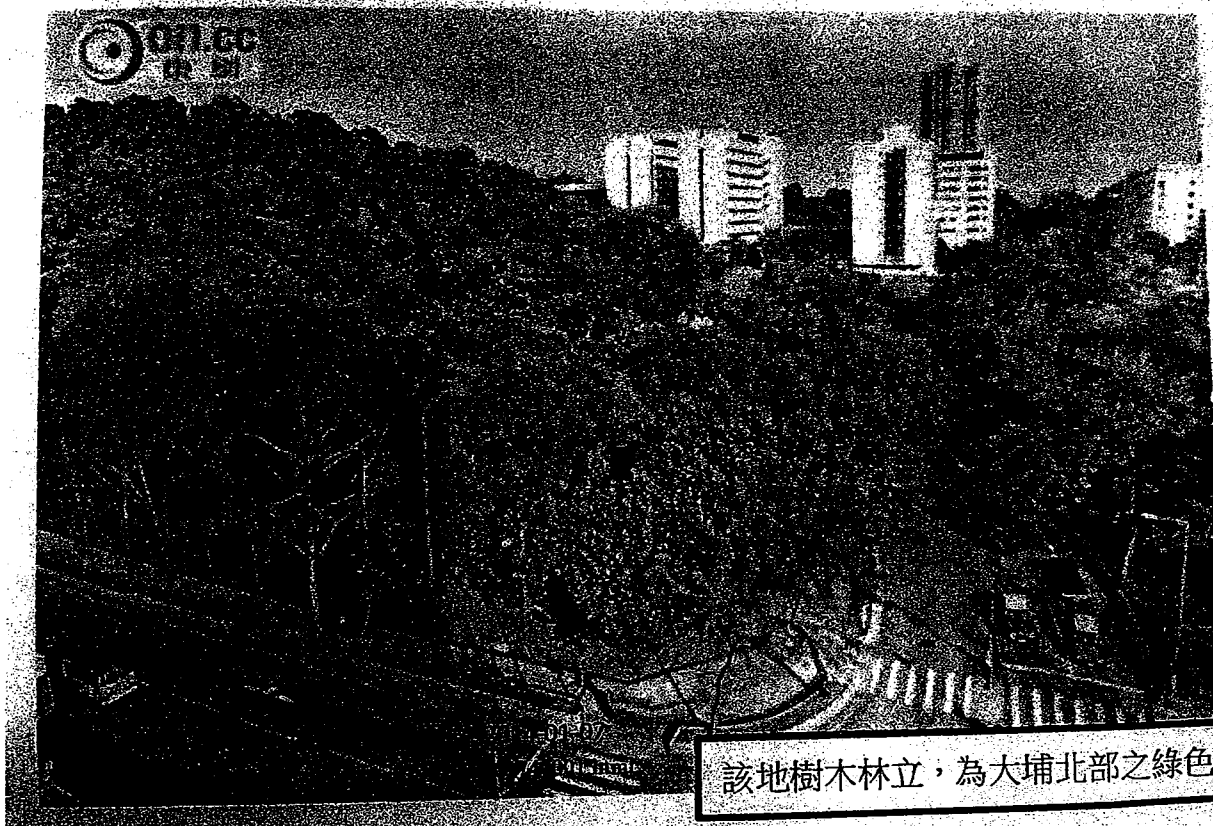
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中華人民共和國香港特別行政區
Hong Kong Special Administrative Region of the People's Republic of China

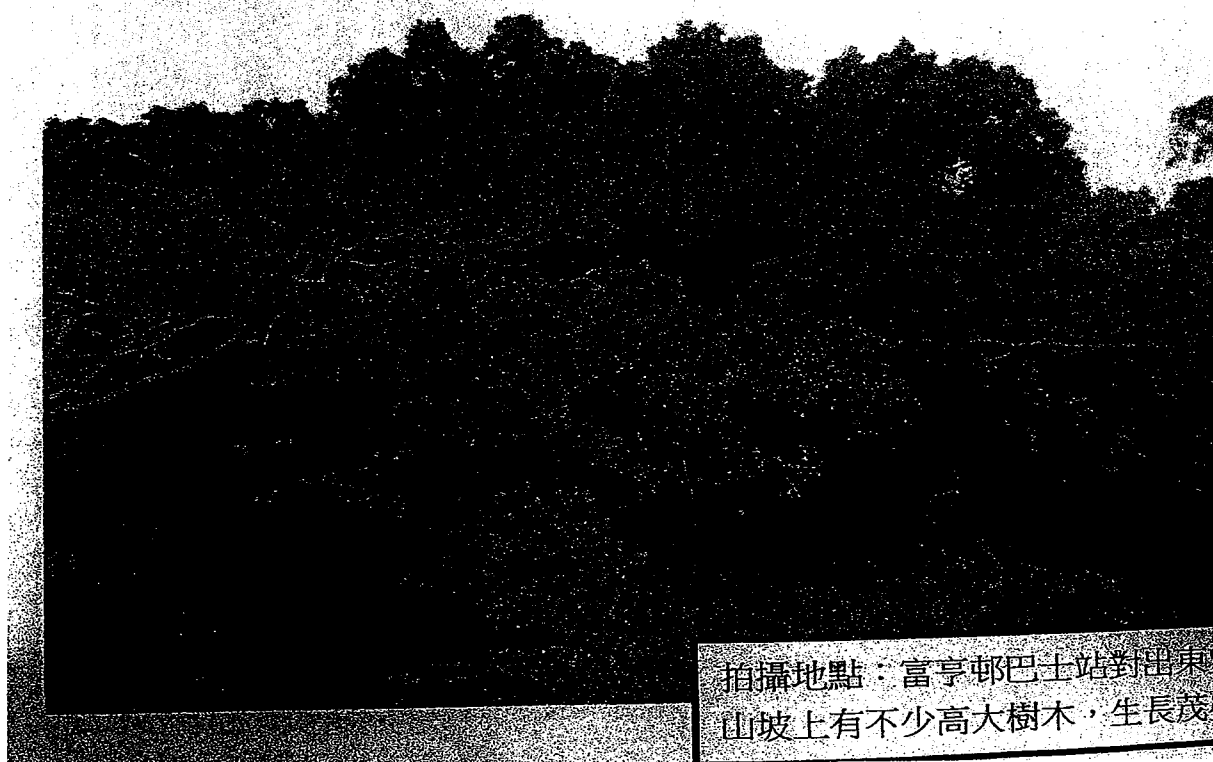


大埔區區議會 Tai Po District Council
王秋北議員 Wong Chau Pak D.C. Member



該地樹木林立，為大埔北部之綠色小島

拍攝日期：二〇一四年二月四日



拍攝地點：富亨邨巴士站對出東望
山坡上有不少高大樹木，生長茂盛

辦事處地址：新界大埔富亨邨亨裕樓22號地下 王秋北區議員辦事處

No.22, G/F, Heng Yue House, Fu Heng Estate, Tai Po, N.T.

電話 TEL : 2660 9007 傳真 FAX : 2661 7909

The Office of Wong Chau Pak, Tai Po District Councillor

電子郵件 E-mail : wongchaupak@yahoo.com.hk



大埔鳳園村村公所

新界大埔汀角路鳳園村

敬啟者：

反對政府發展鳳園 (D1) (D2)

鳳園原居民立村於三百三十多年前，麥、葉、薛、黎、韋、莫、六姓聚居於現在的老圍山腳下，以農為業，天氣好時，下海捕魚，自力其食，生活也相當豐富。村入口處，有一片小小的山林，鳳園巡山王（大王爺）供奉在此。大王爺保衛鳳園二三百年，使到村民出入平安，身壯力健。

大約 70 年前，有一個村民搬大王爺離開原來的寶座，怪事立刻發生，村民一個一個迅速地病死，而其他鄉村毫無影響，村民惶恐萬分，用盡方法去消除這次災難，不過無效。最後，大家試搬回大王爺到原來的地方，看有什麼變化。最奇怪的事，災情立刻有轉變，村民死亡越來越少，漸漸回復健康。從此村民視大王爺及鄰近的樹木為神聖寶地，大王爺不得移動，樹木不能夠侵犯，發展一定要避免用這片土地，不然，鳳園居民會寢食不安，那有安居樂業可言呢？如有事情發生，誰人來負責！

鳳園立村，背山面海三面環山，風景幽美，林木茂盛，野生動物眾多。只有南面沿著汀角路小小地方為出口，通風及透氣，政府現在計劃在 D1 及 D2 地方興建住宅單位。這些建築物對鳳園會引起屏風作用，使到鳳園谷內空氣不流通，樹木及野生動物減少，夏天氣溫會高升。無可否認，無端端加強建石屎森林，更加影響鳳園村風水。

近年，長江實業在鳳園北興建八座高層住宅大廈，已將近

完成，四座在計劃中，不過通往外出車路只有一條，長江住宅入伙後，預測鳳園路及香港園藝學會附近交通會極度堵塞，公共交通也會嚴重影響，返工，上學，會非常的不便。如果興建額外 540 個單位，後果真不堪想象。設備不完善，不宜再加建住宅！

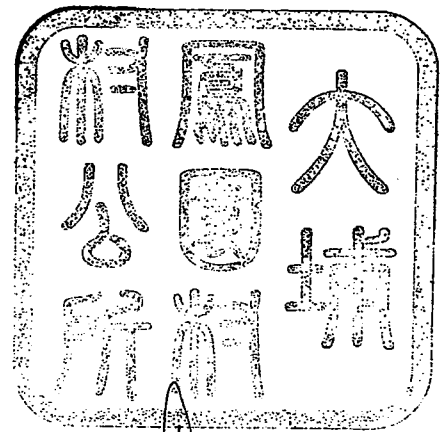
當長江實業計劃發展鳳園的時候，城市規劃委員會在 1997 年已經定下政策不准興建超過三層以上的住宅在(D1)及有些(D2)地帶之內，原因是在工業邨裏有個煤氣廠/煤氣鼓，如果發生事故的話，可能會引起爆炸，影響人生安全。

發展(D2)，一定要移山，這山是鳳園龍脈帶。如果要移，鳳園人會極度不安。此山樹木林立，美觀茂盛，移山要剷除樹木，影響環保，破壞風水。

為此，本村公所曾於二〇一四年五月四日舉行會議，一致通過反對題述規劃修訂。

謹致

城市規劃委員會秘書



鳳園村村公所主席：

(葉偉才)

鳳園村村公所副主席：

(葉志強) 全啟

二〇一四年五月三十日

反對將鳳園的二塊「政府、機構或社區」
(D1 項)及「綠化地帶」(D2 項)改劃為住宅用地

本人為大埔鳳園村原居民，對城市規劃委員會的大埔分區計劃大綱核准圖編號 S/TP/24 內列 D1 及 D2 項擬將鳳園村二塊「政府、機構或社區」及「綠化地帶」改劃為住宅用地修訂提出強烈反對，理由如下：

- (1) D1 項土地內有庇佑鳳園村民的大王爺(伯公石壇)，如有改動，會影響本村村民生命、健康；百多年前，本村曾移後過該伯公位，本村死了幾十個村民，後搬回原位至平安無事。
- (2) D2 項土地山嶺為鳳園龍脈帶，樹木林立，並且鄰近煤氣廠，
- (3) 加劇鳳園村車路及汀角路口的交通堵塞。

謹致

城市規劃委員會

鳳園原居民代表： 麥廣生

簽 名： 麥廣生

地 址： [REDACTED]

聯絡電話： [REDACTED]

大埔鄉事委員會	
文件編號	3054
日期	2014年5月29日
主席	[REDACTED]
副主席	[REDACTED]
秘書	[REDACTED]
總幹事	[REDACTED]

副本抄送：大埔鄉事委員會

鄧友發議員辦事處

2014-5-29

tpbpd

寄件者: Tobi Lau [REDACTED]
寄件日期: 11日06月2014年星期三 14:40
收件者: tpbpd@pland.gov.hk
主旨: Amendments to OZP_S_TP_24_WWF
附件: Amendments to Approved OZP_S_TP_24_2014 06(Jun)_WWF.pdf

Dear Sir/Madam,

Please find our submission on the captioned Application. See attached file: Amendments to Approved OZP_S_TP_24_2014 06(Jun)_WWF.

Thank you for your attention.

Yours faithfully,

Tobi

Tobi Lau (Mr.)
Conservation Officer, Local Biodiversity
World Wide Fund For Nature Hong Kong
世界自然(香港)基金會
15/F, Manhattan Centre,
8 Kwai Cheong Road,
Kwai Chung, New Territories
Tel: (852) 2161 9626 or 3193 7508
Fax: (852) 2845 2764
Website: www.wwf.org.hk

WWF Hong Kong works to ensure a better environment for present and future generations in Hong Kong

00454



世界自然基金會
香港分會

WWF-Hong Kong

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wwf@wwf.org.hk
wwf.org.hk

Our Ref.: SHK/GB-Amt TPO/ 14
11 June 2014

Chairman and Members
Town Planning Board
15/F North Point Government Offices,
333 Java Road, North Point, H.K.
(E-mail: tpbpd@pland.gov.hk)

By E-mail ONLY

Dear Sir/Madam,

Re: Proposed Amendments to the Approved Tai Po Outline Zoning Plan No. S/TP/24

WWF is writing to object the Proposed amendments on Items D1 and 2 which is the Site near Fung Yuen from the captioned Application based on the following reasons:

According to the site visit on 15 May 2014, signs of natural succession were established with under-storey vegetation were found at the Site (Fig 1). As such, we consider that the Site is a secondary woodland rather than "a plantation woodland" depicted by the Director of Agriculture, Fisheries and Conservation in the Rural and New Town Planning Committee (RNTPC) Paper No. 6/14¹. Based on the Conservancy Association's information, 3,000 mature trees of approximately 30 years old, not including young trees with less than 9.5cm in diameter in breast height, are indeed present in the proposed Site which had developed multiple layers including big-canopied trees together with shrubs and mosses. We are concerned with housing development and relevant infrastructural works such as road widening² would pose undesirable impact to this wooded area. In addition, tree species *Rhodoleia championii* and *Pyrenaria spectabilis* protected under the Forestry and Countryside Ordinance (CAP. 96) and *Aquilaria sinensis* protected under the Protection of Endangered Species of Animals and Plants Ordinance (CAP. 586) had been recorded at the Site with respective references to the Conservancy Association's tree surveys and Kadoorie Farm and Botanic Garden's records at the area. Although the Government has pointed out that the guidelines and mechanisms will require developers to save, relocate or re-planting of trees³, this approach can

¹ Section 3.32 of the RNTPC Paper No. 6/14

² Section 3.30 of the RNTPC Paper No. 6/14

³ <http://hk.apple.nextmedia.com/news/art/20140603/18742560>

Accessed on 11 June 2014

贊助人：香港特區行政長官
梁振英先生, GBM, GBS, JP
主席：楊子信先生
行政總裁：顧志強先生

義務核數師：香港立信德豪會計師事務所有限公司
義務公司秘書：嘉信秘書服務有限公司
義務律師：孖士打律師行
義務司庫：匯豐銀行
註冊慈善機構

Patron: The Honourable CY Leung, GBM, GBS, JP
Chief Executive of the HKSAR
Chairman: Mr Trevor Yang
CEO: Mr Adam Koo

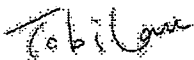
Honorary Auditors: BDO Limited
Honorary Company Secretary:
McCabe Secretarial Services Limited
Honorary Solicitors: Mayer Brown JSM
Honorary Treasurer: HSBC
Registered Charity
(Incorporated With Limited Liability)

only save individual trees and the Proposed amendments had completely neglected the whole piece of wooded area's ecological functions.

Please be noted that the general planning intention of a "Green Belt" ("GB") zone is to act as a buffer between urban settings and natural landscapes so as to prevent urban sprawl. The loss of the "GB" in the area will bring cumulative impacts on the environment and the living conditions potentially. We regard that this principle should be adhered to as a matter of course and the existing "GB" zoning hence should be maintained. Besides, as the ecological baseline information provided by the RNTPC Paper No.6/14 has not entirely reflected the ecological value of the Site and is far from adequacy for the Town Planning Board members to make a professional decision, the members are respectfully requested to reject the captioned Proposed amendments.

We would be grateful if our comments could be considered by the Town Planning Board.

Sincerely yours,

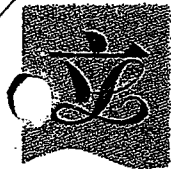


Tobi Lau (Mr.)

Conservation Officer, Local Biodiversity

Fig.1 Patches with rich under-storey vegetation at the Site (Photo taken on 15 May 2014)





工黨
LABOUR PARTY

張超雄立法會議員辦事處
Fernando Chiu Hung Cheung Legislative Councilor's Office

附件 Annex III-17

傳真號碼 : 2877 0245

電郵地址 : tpbpd@pland.gov.hk

TPB/R/S/TP/25-1629

城市規劃委員會主席

周達明先生

周主席：

根據《城市規劃條例》(第131章)第6(1)條就草圖：

S/TP/25的E項作出申述

我關注到規劃署建議改劃露輝路綠化地作低密度發展，我促請城規會，考慮以下因素，保留露輝路綠化地原有的綠化地規劃意向。

一、綠化地規劃意向和用地政策突改，影響公眾對香港規劃制度的信心

綠化地一直是全港各區，尤其是七、八十年代起新市鎮規劃的重要原則，具法律效力的規劃意向清楚訂明，綠化地的功能為：

1. 保育已建設地區或市區邊緣地區內的現有天然環境，
2. 利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區擴展，
3. 並提供土地作靜態康樂場地。
4. 根據一般推定，此地帶不宜進行發展。

城規會多年來，一直按以上規劃意向，多次否決來自個人或私營項目的發展申請；但規劃署目前根據同樣的綠化地規劃意向，突然主動大幅建議改劃綠化地去發展，在邏輯上完全不合常理，將影響城規會作為法定委員會的公信力。

而且就露輝路綠化地而言，發展局早於年初已把該地分割兩地，放入本年度的賣地表中，漠視城規會還未審批改劃申請；此舉進一步蠶食城規會的獨立性。

規劃署同時於全港建議改劃綠化地，共涉達150公頃的綠化地(面積達八個維園)，明明是全港性的用地規劃，但審批的方法是分區處理，並未提供總體(cumulative)對香港和分區的環境影響，和環境補償機制，也未就選取綠化地的準則作清楚界定及諮詢相關的部門和專家，也未限制取綠化地上限。如此斬件 (piecemeal) 和欠缺框架的處理方法，將嚴重影響公眾對香港規劃制度的信心，不合香港一貫的程序公義。

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二、露輝路綠化地界定為「沒有植被、荒廢及已平整的土地」，理據不通

根據城規會鄉郊及新市鎮委員會4月4日的會議文件第3.17段顯示，露輝路綠化地被規劃署界定為「沒有植被、荒廢及已平整的土地」，因為該地為重置的綠化地。但人追索規劃歷史文件，重置的時期早於86年，綠化地上至今已生長二千四百棵成熟大樹。以常識角度，以近三十年前曾重置為由，去界定露輝路綠化地是「沒有植被、荒廢及已平整的土地」，理據不通，亦不合一般社會事情的判斷準則。

三、香港需要發展與綠化平衡的規劃

植物對於改善城市空氣質素，重要作用。香港的空氣質素，因來自北方的污染物和道路上的交通，每況愈下；剛於6月8日才錄得全港所有地區(塔門及大埔稍好)空氣質素嚴重污染超標，達危害健康、不宜長時間留戶外的情況。在有其他選址考慮下，綠化地應儘量予以保護。

四、選址應先善用現有荒廢土地

據公共專業聯盟的實地考察，大埔是全港四大棕地重災區之一，共有棕地超過二百公頃。「長策督導委員會」亦促請政府善用棕地。

在露輝路綠化地一街之隔，已有兩片棕地，應先善用作發展。

五、取走公共資源應謹慎

綠化地是重要的公共資源，在環境上對空氣質素、緩和熱島效應、保護郊野公園貢獻重大，在人文上為社區提供靜態康樂場地、為市民提供觀景減壓。規劃署擬改劃綠化地作私人住宅，是把公共資源改劃作私人資源。

就露輝路綠化地而言，將之改劃作低密度私人住宅，更是把公共資源改劃作少數人的私人資源。城規會須謹慎考慮，改劃是否合乎重大公眾利益。

六、低密度住宅非重大公眾利益

露輝路綠化地可建的樓高五層低密度住宅，由於須涉及大形地基平整工程，建造成本特高，估計每平方呎總成本超過一萬元，市場訂價每呎達萬四、五元，精品豪宅也每戶訂價過千萬；這類樓宇並非主流的公眾或主流的中產需求，故此並非重大公眾利益。

「長遠房屋策略報告」中，公眾廣泛支持建屋照顧劏房戶、居屋公屋、年輕人和首次置業者。

另外，大埔低密住宅目前已有過剩的供應，露輝路的二手供應亦一向充足。近年大埔低密住宅的買家，不少為投資者，買後掉空情況不少；按晚上十時的「亮燈情況」，空置率有三至五成。故此露輝路擬提供的低密住宅，在發展商紛紛以公司形式售樓的安排下，恐怕最終未必能惠及本地用家。

七、提供選擇不應取具爭議性用地

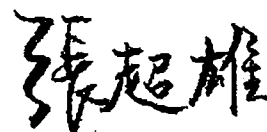
市民對改劃綠化地發展低密住宅，甚表爭議。當然香港應提供多元化房屋供不同階層市民選擇，但為中上層提供選擇，並非社會急需，不應開先例，以具爭議的綠化地改劃去進行。

「長策報告」亦建議公私營房屋比例為60:40，當中私營房屋的土地資源，亦應用於適合年輕人和首次置業者的房屋類型。

鑒於以下七點理由，本人懇請城市規劃委員會否決將大埔露輝路綠化地帶改劃為住宅用地：

- 一. 綠化地規劃意向和用地政策突改，影響公眾對香港規劃制度的信心
- 二. 露輝路綠化地界定為「沒有植被、荒廢及已平整的土地」，不合常理
- 三. 香港需要發展與綠化平衡的規劃
- 四. 選址應先善用現有荒廢土地
- 五. 取走公共資源應謹慎
- 六. 低密度住宅非重大公眾利益
- 七. 提供選擇不應取具爭議性用地

立法會議員



張超雄

2014年6月11日

寄件者: Shatin Office [REDACTED]
寄件日期: 10日06月2014年星期二 17:21
收件者: 城市規劃委員會
主旨: 保護露輝路樹林關注組[本處檔號: T140523(1)]
附件: 保護露輝路樹林關注組[本處檔號: T140523(1)].pdf

城市規劃委員會主席
周達明先生

周主席:

現藉電郵傳遞函件予 閣下，敬請參閱附件。

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本處檔號：T140523(1)

城市規劃委員會主席
周達明先生

周主席：

本辦事處於本月九日接獲大埔保護露輝路樹林關注組的求助，謂露輝路綠化地種有過千棵大樹，是居民日常的休憩空間，樹林亦提供了天然的屏障，阻隔附近工業區帶來的污染，因此他們反對當局建議將露輝路綠化地改劃作住宅用途。

據關注組稱，露輝路樹林佔地 4 公頃，是擁有完整植被及樹木的綠化地，但政府卻建議將該地改規劃為住宅（丙類）用途，興建低密度豪宅，並納入本年的賣地表，而事前更沒有進行廣泛公眾諮詢。他們謂行政長官在 2013 及 2014 年的施政報告中，明確指出可改劃的綠化地是「已失去其原有功能的、沒有植被、荒廢及已平整的土地」。但露輝路樹林是完全植被、有過千棵大樹的茂密樹林、位處未被平整的小山崗上，無論在地理位置、原社區規劃及生態上，都有重要的環保價值。因此，居民促請政府善用現有的荒廢土地去發展，並作詳細平衡的規劃，諮詢和尊重市民的意見，不要急就章去盲搶地。他們更要求保留大埔露輝路綠化林。隨函附上其函件，以供閣下參閱。

為此，保護露輝路樹林關注組請本人致函閣下，轉達其求助。如有需要，煩請致電 [REDACTED] 與周家禮先生聯絡，敬希賜覆，為荷。並頌

籌祺！



劉慧卿 謹上

二〇一四年六月十日

附件：保護露輝路樹林關注組信函

致：香港立法會申訴部、立法會新界東議員
立法會環境事務委員會
立法會房屋事務委員會

5月16日更正版

綠化地規劃政策突變無諮詢，短視規劃禍延後代

請於5月21日(星期三)午飯12:30-2:00，於金鐘行人天橋市民靜坐行動中發言

我們是大埔露輝路樹林關注組，亦已聯合石硤尾大窩坪關注組及其他地區保護綠化地帶的居民。

摘要：我們關注到發展局正史無前例，企圖大幅改劃香港各區的綠化地帶，不少計劃興建低密度豪宅。綠化地是香港自八十年代新市鎮規劃的一貫重要元素，對香港的空氣質素及減低熱島效應，非常重要。政府現在「盲搶綠化地」，政策突變，卻全無公眾共識，無環境評估，無取地準則、彌補機制等。據悉連城規會委員也覺無所適從(見南華早報訪問)；而發展局現時取走綠化地的準則，也不合乎行政長官施政報告承諾。

一、請議員監察發展局，只可取走施政報告承諾的「失去其原有功能」綠化地，並要求政府，就綠化地政策作公眾諮詢。請議員去信城規會，反對大埔露輝路樹林改建豪宅，防止建立第一個壞先例。

二、民憤升溫：政府在全港18區盲搶地，已引起民憤四起，大部份涉及興建豪宅，今年中國和香港有多項政治性事件，勿讓地區民憤升溫至政治抗爭。

三、取地優次：新界遍佈數百公頃荒廢的貨櫃場、電子廢料場、割草場等棕土地帶；港九也有上百幢半廢工廈；屯積熟地、荒廢農地過千公頃；以上完全足夠十年建屋目標有餘。現在發展局取的卻全是綠化地、社區用地等擾民、永久破壞環境的選址，對棕土、荒廢工廈全不著力。施政報告要取走過百公頃綠化地(等於6個維園面積，估計超過十萬棵樹)，香港的空氣質素及熱島效應，會變成怎樣？環境惡果不可逆轉，禍及後代！城市規劃的影響是永遠的，政府如此取易不取難、短視卻影響深遠的取地優次錯誤，請議員立即叫停盲搶綠化地，應先用棕土、荒廢工廈，並向政府索取各種荒廢土地的數據！

四、剷走綠化地建豪宅，無助市民置業：政府在全港18區盲搶綠化地，大部份位處各區的山頂，從來因公眾景觀及屏障價值，一直保留作綠化地。現在政府改劃綠化地起低密度豪宅，根本脫離長策會的重點建屋方向：公營房屋、協助劏房戶、年青人上車盤；但剷走綠化地所帶來的環境代價，卻是整個社會往後多代要付出的！興建豪宅不能幫助本港市民「上車」置業，規劃處當然沒有充分理據去剷平具有公眾景觀、保育天然環境、和屏障功能的綠化地！

而且大埔現有多項低密度住宅的供應連積壓達 2300 單位(比華利山、嵐山、富盈門、天賦海灣等)，加上白石角地皮賣地剛流拍，反映社會對大埔(特別是鄉郊)地區的低密度住宅需求不高。因此，改劃位處各區山頂的綠化地去建低密度住宅，違反行政長官施政理念「急市民之所急」。

五、行政長官不守施政承諾，可導致政府誠信、施法覆核危機

特區首長在 2013 及 2014 連續兩年的施政報告中，明確指出可改劃的綠化地是已失去其原有功能，「沒有植被、荒廢及已平整的土地」(見 2013 年施政報告 53 段、2014 年 125 段)，現在發展局盲搶多幅綠化地，都是完好，具高度環保屏障功能的，發展局如硬推，將會放大事件至政府誠信危機！

「綠化地」幾十年來一直未被用作大型發展，居民幾十年前入住/窮盡積蓄置業時，也是基於規劃文件清楚列明：「綠化地帶的規劃意向，主要是利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區範圍的擴展，並提供土地作靜態康樂場地。根據一般推定，此地帶不宜進行發展。」政府突然發展綠化地，是重要的政策改變，但卻連立法會也未諮詢過；居民已預備司法覆核，現時發展局劃走綠化地起豪宅，肯定不是社會共識！政府應付居民的司法覆核，會大大拖慢整體規劃進度，反而影響急需上樓的公/居屋的進度！請議員叫停發展局盲搶綠化地起豪宅，提醒行政長官要信守施政承諾，只應取已失去其原有功能的綠化地。

六、影響香港的國際聲譽

香港是多項國際環保公約的成員，包括剛於 2011 年加入的多元生態公約 (Convention of Biological Diversity)，環保署是正式推動的政府部門。公約訂明，綠化地不可被發展，樹木及各類生態不可因發展而被移除。郊野公園條例 96 條亦訂明，不能在政府用地上無故伐樹(無論樹木品種是否稀有)。香港政府作為歷史久遠的國際公民，明目張膽違反國際公約，斬樹十萬棵起豪宅，香港的國際聲譽何存？留意環境及空氣質素，是多項國際排名、特別是對國際人才、資金吸引力排名的重要因素。請議員立即叫停盲搶綠化地，維護香港國際聲譽。

七、綠化地政策突變的「第一塊骨牌」，是大埔露輝路綠化地改劃豪宅的建議，現已進入城規會諮詢至 6 月 11 日，政府並偷步將它納入本年賣地表，擬建私樓 660 戶。露輝路樹林佔地 4 公頃，位於大埔露輝路山頂，鄰近教育學院；是政府自 94 年整個社區原本規劃的一部份，一直為附近的厭惡性設施提供天然的屏障：船灣堆填區、污水處理廠、水泥廠、煤氣廠、大埔工業村及汀角路。露輝路樹林種有 2500 棵大樹，並已成為多元生態棲息之所。露輝路樹林無論在地理位置上、原社區規劃上及生態上，都有重要的環保價值。

露輝路線化樹林是未被平整的小山崗，平整地基、建築期達6-7年，連規劃、司法覆核等，至少8-10年(若政府勝數)才可成事。以同樣時間去善用棕土、活化工廈，相信帶來的建屋數字遠超660戶。

八、規劃過程粗疏，諮詢不足，「盲搶地」因急得慢

發展局急於「交數」，多區改劃建議都「硬推」，多區區議會及居民反對，包括大埔區議會亦發言表達規劃署提供資料不足，配套不全，諮詢不達。去年土地改劃就算獲得城規會的通過，之後的詳細規劃也跟不上進度，令最終的建屋數字因加得減。

據報導，以往須用兩年時間的規劃，現在趕工幾個月就要起貨，引致規劃署壓力大增，似乎公務員執行上也趕不上發展局的「硬推」。在執行資源緊張下，更應集中資源規劃急需上樓、無爭議的地方，不應硬搶原好綠化地建豪宅，免得政府因快得慢。

請議員就以上八點理據，叫停發展局盲搶綠化地起豪宅，並於6月11日前去信城規會，就大埔露輝路線化地改劃住宅(S/TP/25 Item E)作出反對，避免第一個盲搶綠化地起豪宅的壞先例建立。

召集人：孫生 (手機：[REDACTED])
副召集人：許太 (手機：[REDACTED])
聯絡人：周生 (手機：[REDACTED])

大埔露輝路關注組
c/o 倚龍山莊管業處

lo.fai.road.concern.group@gmail.com
www.facebook.com/LFRGB
www.supporthk.org/i.php/View/426





立法會議員湯家驊辦事處

Office of Hon Ronny Tong Ka-wah SC, Legislative Councillor

TPB/R/S/TP/25-1631

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城市規劃委員會秘書處
城市規劃委員會主席
周達明先生, JP

Alu
→ DPO/STN on 12.6.13

周主席：

根據《城市規劃條例》(第 131 章)第 6(1)條就草圖： S/TP/25 的 E 項作出申述

本人是立法會議員。

本人關注到規劃署建議改劃露輝路綠化地作低密度發展，本人促請城規會，考慮以下因素，保留露輝路綠化地原有的綠化地規劃意向。

- 一、綠化地規劃意向和用地政策突改，影響公眾對香港規劃制度的信心
- 綠化地一直是全港各區，尤其是七、八十年代起新市鎮規劃的重要原則，具法律效力的規劃意向清楚訂明，綠化地的功能為：
- 「1. 保育已建設地區或市區邊緣地區內的現有天然環境，
 2. 利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區擴展，
 3. 並提供土地作靜態康樂場地。
 4. 根據一般推定，此地帶不宜進行發展。」

城規會多年來，一直按以上規劃意向，多次否決來自個人或私營項目的發展申請；但規劃署目前根據同樣的綠化地規劃意向，突然主動大幅建議改劃綠化地去發展，在邏輯上完全不合常理，將影響城規會作為法定委員會的公信力。

而且就露輝路綠化地而言，發展局早於年初已把該地分劃兩地，放入本年度的賣地表中，漠視城規會還未審批改劃申請；此舉進一步蠶食城規會的獨立性。

規劃署同時於全港建議改劃綠化地，共涉達150公頃的綠化地(面積達八個維園)，明明是全港性的用地規劃，但審批的方法是分區處理，並未提供總體(cumulative)對香港和分區的環境影響，和環境補償機制，也未就選取綠化地的準則作清楚界定及諮詢相關的部門和專家，也未限制取綠化地上限。如此斬件(piecemeal)和欠缺框架的處理方法，將嚴重影響公眾對香港規劃制度的信心，不合香港一貫的程序公義。

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二、取地優次，所作用途不乎公眾共識，具司法覆核風險

規劃署是次擬改劃的大埔八幅土地，七幅是綠化地，一幅是社區用地，完全不乎公眾於「長遠房屋策略公眾諮詢」中表達的取地優次(重建舊區、活化工業區、開發新發展區、善用棕地等)。所建的低密度住宅亦非「長策」文件中的首要目標(劏房戶、居屋公屋、年輕人和首次置業者)；加上上段到說明的綠化地用地政策突變和欠缺框架，規劃署對露輝路綠化地的改劃建議，具司法覆核風險。

三、露輝路綠化地界定為「沒有植被、荒廢及已平整的土地」，不合常識

根據城規會鄉郊及新市鎮委員會4月4日的會議文件第3.17段顯示，露輝路綠化地被規劃署界定為「沒有植被、荒廢及已平整的土地」，因為該地為重置的綠化地。但追索規劃歷史文件，重置的時期早於86年，綠化地上至今已生長二千四百棵成熟大樹。以一般常識角度，以近三十年前曾重置為由，去界定露輝路綠化地是「沒有植被、荒廢及已平整的土地」，理據不通，同樣具司法覆核風險。

四、選址應乎公眾共識

據公共專業聯盟的報告，大埔共有棕地超過二百公頃。「長策督導委員會」亦促請政府善用棕地。在露輝路綠化地一街之隔，已有兩片棕地，應先善用發展。

五、香港需要發展與綠化平衡的規劃

植物對於改善城市空氣質素，重要作用。香港的空氣質素，因來自北方的污染物和道路上的交通，每況愈下；剛於6月8日才錄得全港所有地區(塔門及大埔稍好)空氣質素嚴重污染超標，達危害健康、不宜長時間留戶外的情況。在有其他選址考慮下，綠化地應儘量予以保護。

六、取走公共資源應謹慎

綠化地是重要的公共資源，在環境上對空氣質素、緩和熱島效應、保護郊野公園貢獻重大，在人文上為社區提供靜態康樂場地、為市民提供觀景減壓。規劃署擬改劃綠化地作私人住宅，是把公共資源改劃作私人資源。

就露輝路綠化地而言，將之改劃作低密度私人住宅，更是把公共資源改劃作少數人的私人資源。城規會須謹慎考慮，改劃是否合乎重大公眾利益。

七、低密度住宅非重大公眾利益

露輝路綠化地可建的樓高五層低密度住宅，由於須涉及大形地基平整工程，建造成本特高，估計每平方呎總成本超過一萬元，市場訂價每呎達萬四、五元，精品豪宅也每戶訂價過千萬；這類樓宇並非主流的公眾或主流的中產需求，故此並非重大公眾利益。

另外，大埔低密住宅目前已有過剩的供應，露輝路的二手供應亦一向充足。近年大埔低密住宅的買家，不少為投資者，買後掉空情況常有；按晚上的「亮燈情況」，空置率有三、四成。故此露輝路擬提供的低密住宅，在發展商紛紛以公司形式售樓的安排下，恐怕最終未必能惠及本地用家。

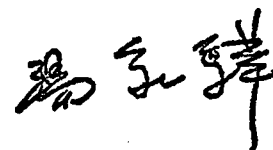
八、提供選擇不應取具爭議性用地

市民對改劃綠化地發展低密住宅，甚表爭議。當然香港應提供多元化房屋供不同階層市民選擇，但為中上層提供選擇，並非社會急需，不應損害公眾環境利益，以具爭議的綠化地改劃去進行。

「長策報告」亦建議公私營房屋比例為 60:40，當中私營房屋的土地資源，亦應用於適合年輕人和首次置業者的房屋類型。

鑒於以下八點理由，本人懇請城市規劃委員會保留露輝路綠化地作公眾綠化地用途：

- 一、綠化地規劃意向和用地政策突改，影響公眾對香港規劃制度的信心
- 二、取地優次，所作用途不乎公眾共識，具司法覆核風險
- 三、露輝路綠化地界定為「沒有植被、荒廢及已平整的土地」，不合常識
- 四、選址應乎公眾共識
- 五、香港需要發展與綠化平衡的規劃
- 六、取走公共資源應謹慎
- 七、低密度住宅非重大公眾利益
- 八、提供選擇不應取具爭議性用地



湯家驊
立法會議員

2014年6月11日

F9



大埔區議會

新界大埔

鄉事會街 8 號

大埔綜合大樓四樓

傳真號碼：2654 6624

本處檔號 Our Ref. (74) in HAD TPDC 13/30/10/1/14

來函檔號 Your Ref.

電話 Tel.:

TAI PO DISTRICT COUNCIL

4/F, TAI PO COMPLEX

8 HEUNG SZE WUI STREET

TAI PO, N.T.

FAX NO: 2654 6624

TPB/R/S/TP/25-1633

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

李啟榮先生

李先生：

**《大埔分區計劃大綱核准圖》S/TP/24 的修訂
E 項：把露輝路近聚豪天下的一幅用地由
「綠化地帶」改劃為「住宅(丙類)9」
地帶，以及訂明該「住宅(丙類)9」
地帶的建築物高度限制**

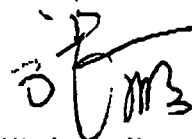
大埔區議會曾在 2014 年 5 月 8 日的會議上討論標題所述對《大埔分區計劃大綱核准圖》S/TP/24 所作修訂中的 E 項，即把露輝路近聚豪天下的一幅用地由「綠化地帶」改劃為「住宅(丙類)9」地帶，以及訂明該「住宅(丙類)9」地帶的建築物高度限制。相關的會議文件(大埔區議會文件 31/2014 號)隨本函付上(請見附件一)。會上多位區議員對有關修訂發表意見，他們的意見收錄在附件二。大埔區議會亦在會上通過一項動議，要求規劃署及城市規劃委員會就這項修訂充分考慮大埔區議會、當區居民和相關持份者的反對意見。動議的全文如下：

“大埔區議會要求規劃署及城市規劃委員會就建議修改露輝路土地(E 項地塊)由綠化地帶改劃為「住宅(丙類)9」地帶一事，充分考慮大埔區議會及當區居民和相關持份者的反對意見。”

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現特修函向城市規劃委員會傳達大埔區議員對這項修訂的意見及關注。我們希望貴會在審議這項修訂時，能重視及認真考慮這些意見及關注。

此外，敬請備悉，我們亦已致函規劃署署長，信件內容與本函相同。



大埔區議會主席

張學明

2014年6月12日



大埔區議會 Tai Po District Council

余智榮議員辦事處 Ken Yu District Council Member Office

TPB/R/S/TP/25-1634

本處檔號: WTT/1803/P11/14

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

城市規劃委員會主席 - 周達明先生, JP

有關：根據《城市規劃條例》(第 131 章) 第 6(1)條就草圖：S/TP/25 的 E 項作出申述

您好, 本人是大埔運頭塘區區議員余智榮。現就規劃申請編號：S/TP/25 的 E 項土地作出申述, 自 2014 年 1 月 7 日從報章得知規劃署有意改劃 E 項土地為住宅, 便收到眾多居民的反對意見, 尤其是居住在 E 項地塊旁的五個屋苑, 更組成「露輝路關注組」, 舉行了一連串遊行、示威等反對 E 項地塊建住宅的行動, 媒體亦有廣泛的報導。

本人及居民反對政府把露輝路綠化地改劃為住宅用途, 歸納理據如下：

1) 尊重民意

露輝路五屋苑合共 834 戶, 收到 800 多戶簽名反對信, 佔 90% 的地區民意基礎。反對簽名信已於三月頭送交沙田、大埔及北區規劃專員存檔。

2) 行政長官應守承諾

行政長官於 2013 年及 2014 年連續兩年施政報告中, 明確指出可改劃的綠化地是「已失去其原有功能、沒有植被、荒廢及已平整的土地」。露輝路樹林的實況與首長的定義完全相反。露輝路樹林是完全植被, 有 2500 棵大樹的茂密樹林, 位處未被平整的小山崗上。要求行政長官信守承諾, 保護完好的露輝路樹林。(見 2013 年施政報告 53 段及 2014 年 125 段)

3) 交通配套不勝負荷

改劃露輝路住宅用地面積為 4.13 公頃, 擬建單位數目 660 戶, 比現時五屋苑共 834 戶多出 80% 及鄰近香港教育學院每天亦有近萬人流, 加上沿汀角路已落實的未來發展項目, 包括: 慈山寺、水療中心、12,000 個骨灰龕位、龍尾泳灘及鳳園新樓盤等, 勢必導致露輝路及汀角路的交通相當繁忙, 不勝負荷。約五年後新增 660 戶, 塞車情況更為嚴重, 而大埔東消防局座落於汀角路/露輝路口, 交通擠塞將直接影響拯救效率。

4) 尊重原有綠化規劃

露輝路樹林是該區於 1994 年整體規劃的一部份, 利用天然地理環境作為市區和近郊發展區的界線, 以抑制市區擴展, 並提供晨運徑作靜態康樂場地, 根據一般推定, 此地帶不宜進行發展。此綠化規劃一直為附近的厭惡性設施提供天然屏障, 包括: 船灣堆填區、水泥廠、污水處理廠、煤氣廠、大埔工業村及繁忙的交通。露輝路樹林位處山頂, 其屏障功能不可取締。

5) 錯估低密度住宅的需求

大埔已有低密度住宅供應達 2,300 個單位 (嵐山、富盈門、天賦海灣等), 空置率甚高。三月白石角地皮賣地流標。五月尾白石角地皮成交標價低市價 50%。現時有近 28 萬市民排隊上公屋, 興建公屋和居屋才能有效解決一般市民面對的住屋問題。

鑒於居民強烈反對意見及大埔區議會的修訂動議, 本人懇請城市規劃委員會否決將大埔露輝路綠化地帶改劃為住宅用地。



00439

余智榮議員

2014-06-09

tpbpd

TPB/R/S/TP/25-1635

寄件者: Chu Kwan Lee
 寄件日期: 09日06月2014年星期一 18:59
 收件者: tpbpd@pland.gov.hk
 主旨: 有關: 根據《城市規劃條例》(第131章) 第6(1)條就草圖: S/TP/25的E項作出申述(修正版)

本處檔號: WTT/1803/P11/14

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

城市規劃委員會主席 - 周達明先生, JP

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余智榮議員

2014-06-09

Eric Lee

余智榮議員辦事處

[REDACTED]

[REDACTED]

[REDACTED]

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
城市規劃委員會主席
周達明先生, JP

周主席：

有關：根據《城市規劃條例》(第 131 章)第 6(1)條就草圖：
S/TP/25 的 E 項作出申述

本人大埔宏福選區黃碧嬌議員。

感謝 貴委員會一直為規劃香港土地用途、促進城市發展及維護優良生活環境所作出努力。本人得悉城市規劃委員會正為大埔八幅土地改劃徵收諮詢意見，本人作為服務大埔多年的區議員，深明大埔區的狀況及市民的需要；為此本人就是次改劃提供以下意見，期望城規會能慎重參考，為建設大埔未來美好社區一同努力。

就露輝路綠化的改劃，本人明白規劃署提出的理由為建 660 戶低密度住宅，本人希望提出以下替代方案供參：

一、綠化地是大埔區珍貴的環境公共資源

露輝路綠化地是大埔東重要的環境資源，濃密樹林所覆蓋，一直肩負著淨化市內空氣及阻隔污染的責任，二十多年來，一直為附近的厭惡性設施提供天然的屏障：船灣堆填區、污水處理廠、水泥廠、煤氣廠、大埔工業村及汀角路繁忙的交通。

二、可考慮其他棕土用地

大埔有不少用地被荒廢或污染，如教育學院的山谷約六公頃，多年來因被用作堆放建築材料，而飽受附近居民及師生的投訴；該棕地可建中密度住宅(R(B)) 過千單位。另外，九龍坑和合石村對面，近吐露港公路分叉支線位置，也有適合用地，可發展大型公共房屋數千單位，附近亦鄰近交通配套。以上兩項建屋種類，能重點提供現時最大需求的房屋。這才是急市民所急之良策，才是市民樂意看見的德政。善用棕土用地，亦合乎「長遠房屋策略」報告。

三、放寬大埔墟高度限制，鼓勵舊區重建

除善用「棕土」以外，「長遠房屋策略」報告亦鼓勵以舊區重建方式去釋放土地資源。大埔墟 (即第一區) 的業戶相當希望舊區重建，他們年來一直接觸本人作具體商討。現時大埔第一區的高度限制為 55 米，本人建議把高度限制放寬為 80 米，並配合今次分區規劃 S/TP/25 文件中，通風研究所作的建議，「設通風廊、休憩用地、在建築物之間多留空間，增加平台的通風位」。

以上建議一舉數得：

一來可提供額外 3000-5000 個住宅單位；

二來可提供長策文件的重點單位類型：交通方便、實惠大眾化的上車盤；

三來可有助解決大埔舊區的劏房問題(大埔舊區的部份唐樓有劏房問題)；

四來可解決長久以來大埔舊區排樓、屏風樓的通風問題，令路面上的空氣更加流通，

實質幫助眾多每天都於大埔墟購物、乘車、作社交活動的幾萬大埔人。

四、露輝路綠化地，應顧及教育學院發展和協同需要

露輝路綠化地鄰近香港教育學院，步行只須 3 分鐘，附近亦無其他適合的政府公地。教育學院在進行大學正名申請，政務司司長林鄭月娥女士，亦在近月指出教院正名「目標非常清晰，時機已經成熟」，可見教院正名為大學之期將近。而若教院正名為大學，必將需要土地作發展，特別是碩士和博士學位的發展。

城市規劃委員會應保留露輝路綠化地，在不太影響綠化的大前提下，預留作教育用途，不僅可促進師範教育的發展，同時亦可平衡環保需要，減少居民的反對，實為兩全其美之法。

本人意見到此結束，希望城市規劃委員會能清楚考慮大埔區的需要，為大埔區規劃出更美好的明天。最後再次感謝 貴委員會的努力及付出。

祝 公務順利



黃

黃碧嬌 區議員

二零一四年六月十日

tpbpd

TPB/R/S/TP/25-1637

寄件者: 公民力量
寄件日期: 09日06月2014年星期一 17:28
收件者: tpbpd@pland.gov.hk
主旨: 反對《大埔分區計劃大綱草圖編號S/TP/25》第E項修訂
附件: 反對大埔露輝路樹林改建成豪宅.doc

尊敬的周達明先生，

以下附件為公民力量提出的 反對《大埔分區計劃大綱草圖編號 S/TP/25》第 E 項修訂，
請閱，謝謝！

如有疑問，請聯絡公民力量秘書處！電話：2698 2285

公民力量秘書處

VIVIEN

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
城市規劃委員會主席周達明先生
(傳真: 2877 0245)

尊敬的周達明主席：

反對《大埔分區計劃大綱草圖編號 S/TP/25》第 E 項修訂

就《大埔分區計劃大綱草圖編號 S/TP/25》第 E 項修訂，即把大埔露輝路近聚豪天下的一塊用地由「綠化地帶」改為「住宅（丙類）9」地帶，以及訂明該「住宅（丙類）9」地帶的建築物高度限制，公民力量了解有在露輝路一帶居民提出強烈反對。我們認為他們的理據合理，因此向城市規劃委員會就是項修訂提出強烈反對。

我們理解政府為滿足市民的住屋需求而須大規模覓地，然而改變土地用途必須要有優次。更改規劃露輝路綠化地帶的土地用途，並不符合公眾利益。政府於 2014 年的施政報告中承諾改變規劃作住宅用途的綠化地帶用地須是「沒有植被」、「荒廢」或「已平整」，然而大埔露輝路綠化地帶顯然完全不符合以上條件。於綠草如茵的綠化地帶上興建豪宅，更是完全偏離長遠房屋策略委員會的重點建屋方向，無助市民「上車」置業。當局若堅持改劃，把施政承諾視為兒戲，誠信及形象將受到拖累，試問政府日後施政如何取信於民？

當局不集中資源開發棕土、活化工廈及善用荒廢土地以作建屋用途，而選擇直接改劃綠化地帶，不但是捨難取易，更是本末倒置，我們絕對不認同政府有關的政策。

大埔露輝路綠化地帶無論在地理位置上、原社區規劃上及生態上都有極重要的環保價值。若更改規劃獲城規會通過，除了破壞該處的天然環境及生態，亦有可能出現骨牌效應，令全港的綠化地帶都有被改劃的堪虞。香港作為多元生態公約的成員之一，此舉難免會影響香港的國際聲譽。

我們強烈要求政府撤回將大埔露輝路綠化地帶改劃成住宅區的決定，並釐清更改土地用途原則，及就綠化地帶政策作公眾諮詢。改劃大埔露輝路綠化地帶並非只關乎大埔區居民的福祉，同時是關係到香港長遠的發展方向、政府誠信及香港的國際聲譽。希望城規會能正視及嚴肅處理這項事件，並將錯誤消弭於萌芽狀態。

公民力量
二零一四年六月五日

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1 Science Museum Road,
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PlanArch Consultants Ltd.
建港規劃顧問有限公司



TPB/R/S/TP/25-1638

Our Ref.: ob/tp/1406495

Secretary
Town Planning Board
15/F., North Point Government Offices,
No. 333, Java Road,
North Point, Hong Kong
(Attn.: Mr LI Wang Kei)

11 June 2014

Dear Sir,

Representation to the Draft Tai Po Outline Zoning Plan
Plan No. S/TP/25

On behalf of Lo Fai Road Green Belt Concern Group, and the respective Incorporated Owners of Forest Hill, Richwood Park, Casa Marina 1 & 2 and Tycoon Place, we are writing to lodge a representation to the Town Planning Board under Section 6(1) of the Town Planning Ordinance and object to amendment item E as shown in the Draft Tai Po Outline Zoning Plan No. S/TP/25 exhibited on 11.4.2014.

Attached please find the authorisation letter from the representer, a copy of duly signed Form No. S6, and 90 copies of planning statement to support the representation.

Should you have any questions, please feel free to contact the undersigned.

Thank you for your kind attention.

Yours faithfully,
For and on behalf of
PlanArch Consultants Ltd.

Betty S. F. Ho

w/e.

cc: Client

00444



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

- The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會 (下稱「委員會」) 提出, 填妥的表格及支持有關申述的文件 (倘有), 必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。
- Please read the "Town Planning Board Guidelines on Submission and Publication of Representations, Comments on 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 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.info.gov.hk/tpb/>.
填寫此表格之前, 請先細閱有關「根據城市規劃條例提交及公布申述、對申述的意見及進一步申述」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) (香港北角渣華道北角政府合署 17 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓) 索取, 亦可從委員會的網頁下載 (網址: <http://www.info.gov.hk/tpb/>)。
- This form can be downloaded from the Board's website, and obtained from the Secretariat of the Board and the Planning Enquiry Counters 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。

1. Person Making This Representation (known as "Representer" hereafter) 提出此宗申述的人士 (下稱「申述人」) Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*) Lo Fai Road Green Belt Concern Group and incorporated owners of Forest Hill, Richwood Park, Casa Marina 1 & 2 and Tycoon Place
--

2. Authorized Agent (if applicable) 獲授權代理人 (如適用) Name 姓名/名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生/夫人/小姐/女士/公司/機構*) PlanArch Consultants Ltd.

3. Details of the Representation 申述詳情	
Draft plan to which the representation relates 與申述相關的草圖	Draft Tai Po Outline Zoning Plan No. S/TP/25

* Delete as appropriate

* 請刪去不適用者

Please fill "NA" for inapplicable item

請在不適用的項目填寫「不適用」

3. Details of the Representation (Continued) (use separate sheet if necessary) 申述詳情(續)(如有需要, 請另頁說明)		
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
Item E: Rezoning of a site at Lo Fai Road near Tycoon Place from "Green Belt" ("GB") to "Residential (Group C)9" ("R(C)9") and stipulation of building height restriction for the "R(C)9" zone	<input type="checkbox"/> support 支持 <input checked="" type="checkbox"/> oppose 反對	Please see attached planning statement
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
	<input type="checkbox"/> support 支持 <input type="checkbox"/> oppose 反對	
Any proposed amendments to the draft plan? If yes, please specify the details. 對草圖是否有任何擬議修訂? 如有的話, 請註明詳情。 Please see attached planning statement		

@ 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 Amendments.
請形容圖則內與申述相關的指定事項。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 fill "NA" for inapplicable 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

4. Plan, Drawings and Documents 圖則、繪圖及文件

Please list location plans, sites plans, other relevant plans, drawings and other documents submitted with the representation. For coloured drawings/plans or plans/drawings larger than A3 size, 90 copies each should be provided. For other supplementary documents, e.g. reports on impact assessment, 90 copies each should be submitted.
請列明連同申述一併遞交的位置圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有圖則/繪圖為彩圖或超過 A3 大小，須一式 90 份。至於其他補充文件（例如：影響評估報告），則須一式 90 份。

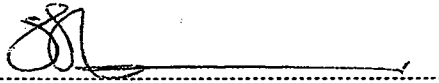
..... Please see attached planning statement

.....

.....

5. Signature 簽署

Signature
簽署



"Representer"/ Authorized Agent*
「申述人」/ 獲授權代理人

Betty S. F. HO

Director

Name in Block Letters 姓名（以正楷填寫）

Position (if applicable) 職位（如適用）

Professional
Qualification(s) 專業資格

Member 會員/Fellow 資深會員* of

☒ HKIP

☐ HKIA

☐ HKIS

☐ HKIE

☐ HKILA

Others 其他 RPP

on behalf of
代表

PlanArch Consultants Ltd.



Company/Organization Name and Chop (if applicable)

公司 / 機構名稱及蓋章（如適用）

Date
日期

11 June 2014

Statement on Personal Data 個人資料的聲明

- The personal data submitted to the Board in this representation will be used by the Secretary of the Board and Government departments for the following purposes:
 - the processing of this representation which includes making available the name of the "representer" for public inspection when making available this representation for public inspection; and
 - facilitating communication between the "representer" and the Secretary of the Board/Government departments in accordance with the provisions of the Town Planning Ordinance and the relevant Town Planning Board Guidelines.
委員會就這宗申述所收到的個人資料會交給委員會秘書及政府部門，以根據《城市規劃條例》及相關的城市規劃委員會規劃指引的規定作以下用途：
 - 處理這宗申述，包括公布這宗申述供公眾查閱，同時公布「申述人」的姓名供公眾查閱；以及
 - 方便「申述人」與委員會秘書及政府部門之間進行聯絡。
- The personal data provided by the "representer" in this representation may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.
「申述人」就這宗申述提供的個人資料，或亦會向其他人士披露，以作上述第 1 段提及的用途。
- A "representer" has a right of access and correction with respect to his/her personal data as provided under the Personal Data (Privacy) Ordinance (Cap.486). Request for personal data access and correction should be addressed to the Secretary of the Board at 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
根據《個人資料（私隱）條例》（第 486 章）的規定，「申述人」有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道 333 號北角政府合署 15 樓。

* Delete as appropriate
Please fill "NA" for inapplicable item
「√」 at the appropriate box

* 請刪去不適用者
請在不適用的項目填寫「不適用」
請在適當的方格內加上「√」號

Objection to Tai Po Outline Zoning Plan No. S/TP/25

**Lo Fai Road Concern Group and incorporated owners of
Forest Hill, Richwood Park, Casa Marina I & II and Tycoon Place
PlanArch Consultants Limited**

June 2014

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1. INTRODUCTION

On behalf of Lo Fai Road Green Belt Concern Group, and incorporated owners of Forest Hill, Richwood Park, Casa Marina I & II and Tycoon Place, PlanArch Consultants Ltd. lodge a representation to the Draft Tai Po Outline Zoning Plan (OZP) No. S/TP/25 gazetted on 11.4.2014.

We object to amendment item E of the said OZP i.e. rezoning of a site (the Subject Site) at Lo Fai Road near Tycoon Place from “Green Belt” (“GB”) to “Residential (Group C)9” (“R(C)9”) and stipulation of building height restriction for the “R(C)9” zone. This planning statement will provide the analysis of the site context and the justifications for our objection.

We request the Town Planning Board (“TPB”) to revert the zoning of the Subject Site back to “GB”.

2. SITE CONTEXT

2.1 LOCATION (PLANS 2.1 & 2.2)

The Subject Site is government land with an area of about 4.13ha. It is located at Lo Fai Road and situated between Tycoon Place and Casa Marina I, right on the top of the ridgeline facing Tolo Harbour, and under Pak Sin Leng.

2.2 LAND USE ZONING AND PLANNING HISTORY

The Subject Site under objection is zoned “R(C)9” with a height restriction of 5 storey on the draft Tai Po OZP No. S/TP/25 gazetted on 11.4.2014.

The Subject Site had long been zoned as “GB”. According to the Notes attached to the OZP, which is statutory in nature, *the planning intention* of “GB” is “*primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.*”

The site was first zoned “Residential (Group C)” (“R(C)”) in the first Tai Po OZP No. LTP/47, but it was subsequently rezoned to “GB” and “Open Space” on the draft Tai Po OZP No. S/TP/2 since 1986. Majority of the site, which is a densely

vegetated knoll abutting Lo Fai road, was zoned “GB”, while a 10m-wide strip of land along the southern periphery of the site was zoned “Open Space”.

In 2010, the whole Subject Site was rezoned into “GB” on the draft Tai Po OZP No. S/TP/22, and the two sites on the ridgeline facing Tolo Harbour were zoned as “R(C)6”, both with plot ratio of 0.8 and respective height restrictions of 3 and 4 storeys. The two other sites at the back, north to Lo Fai Road and facing the hillside, were are zoned as “R(B)1” (plot ratio 1.8) and “R(B)7” (overall plot ratio about 1.6) respectively, both with height restrictions of 5 storeys.

2.3 EXISTING CONDITION

The Subject Site is located in a low-density residential neighbourhood at Lo Fai Road off Ting Kok Road in Tai Po. It is situated between two low-rise and low-density residential development, namely Casa Marina I (3-storeyed) and Tycoon Place (3-storeyed above ground).

The Subject Site is on the top of the ridgeline, consists of 3 densely vegetated knolls with about 2,500 nos. of trees (Photo 1), overlooking Tolo Harbour. It connects to natural native woodland at the lower foothill.

It has an undulating site level ranging from 80mPD to 101.2mPD, as compared to 89mPD to 94mPD of Casa Marina I to the immediate northwest; and 77mPD to 81mPD of Tycoon Place in the immediate east. These 2 estates adhere immediately to the Subject Site, with the narrowest distance being only less than 1 feet between a unit in Casa Marina I and the border of the Subject Site.

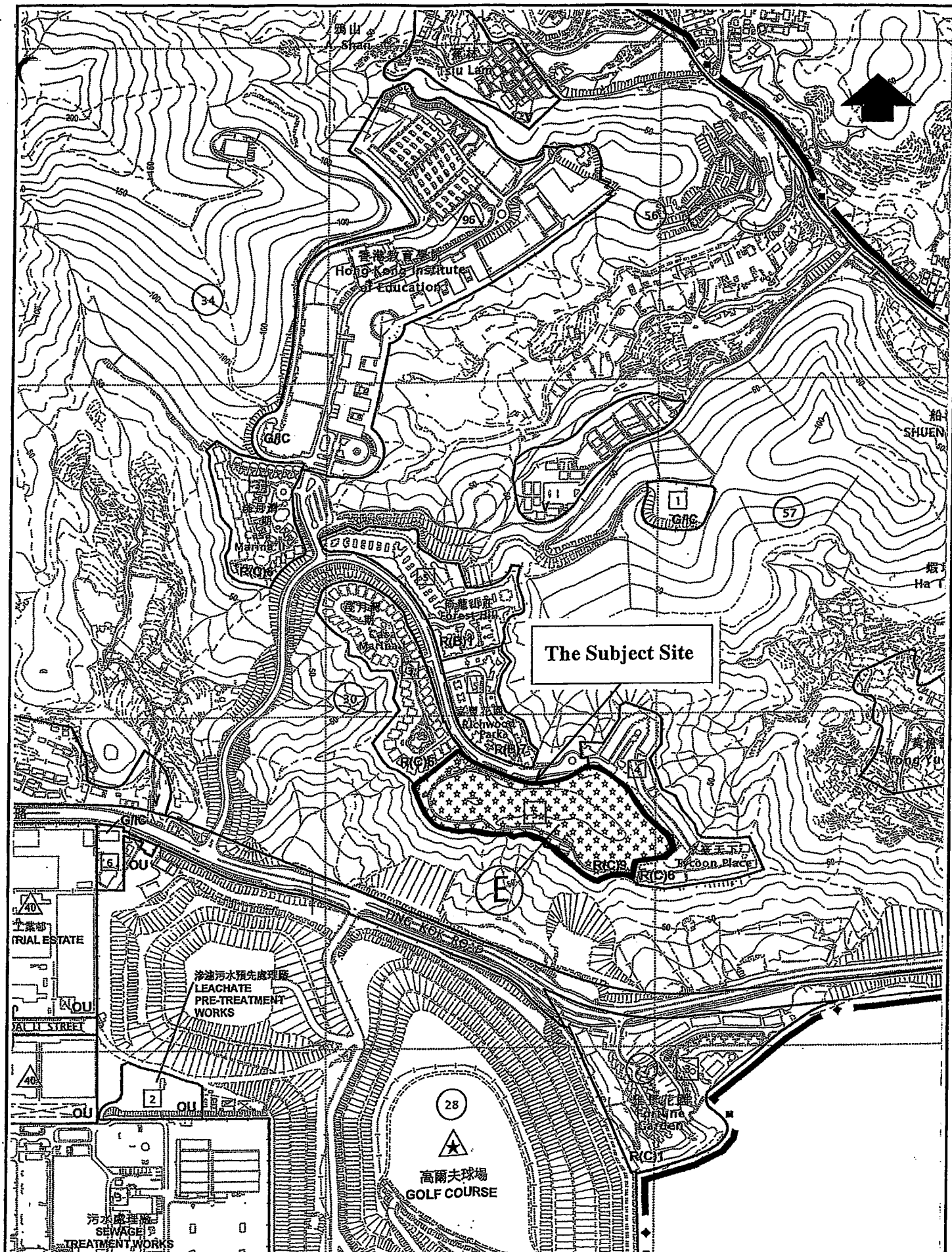
Across Lo Fai Road to the north of the Subject Site, there are other low-density residential developments, Richwood Park (5-storeyed) and Forest Hill (5-storeyed). They are located at lower platforms facing hillside and about 1 to 2 floors are sheltered by Lo Fai Road, so they appear to be only 3-4 storeys tall. They are not visible from Tolo Harbour.

The Subject Site is accessible and frequently used by the public and local community. There is a 4m-wide paved footpath with street lighting provided by the Government around the northern, northwestern and southern periphery of the site. This shows clearly the Government’s aim to prepare the site for passive recreational use for the public as defined in the planning intention of “GB”. The mature trees and natural setting in the site provide a valuable breathing and green space for public enjoyment. Local community, including the elderly, the young and small children will use the Subject Site for morning walk, exercise and walking the dogs. It is a popular communal space for both the public and the

communities of residential development at Lo Fai Road. The Subject Site fully fulfills its original planning intention as a "GB" by (i) defining the limits of urban and sub-urban development areas by natural features, (ii) containing urban sprawl, and (iii) providing passive recreational outlets.

The tall trees in the site is also an important buffer for the community to screen off traffic noise, dust, pollutants and bad smell from various industrial establishment just 1 block away down the slope. Even with this tree buffer, there has been a multi-year history of complaints record from various estates against bad smell blown over from the Sewage Treatment Plant.

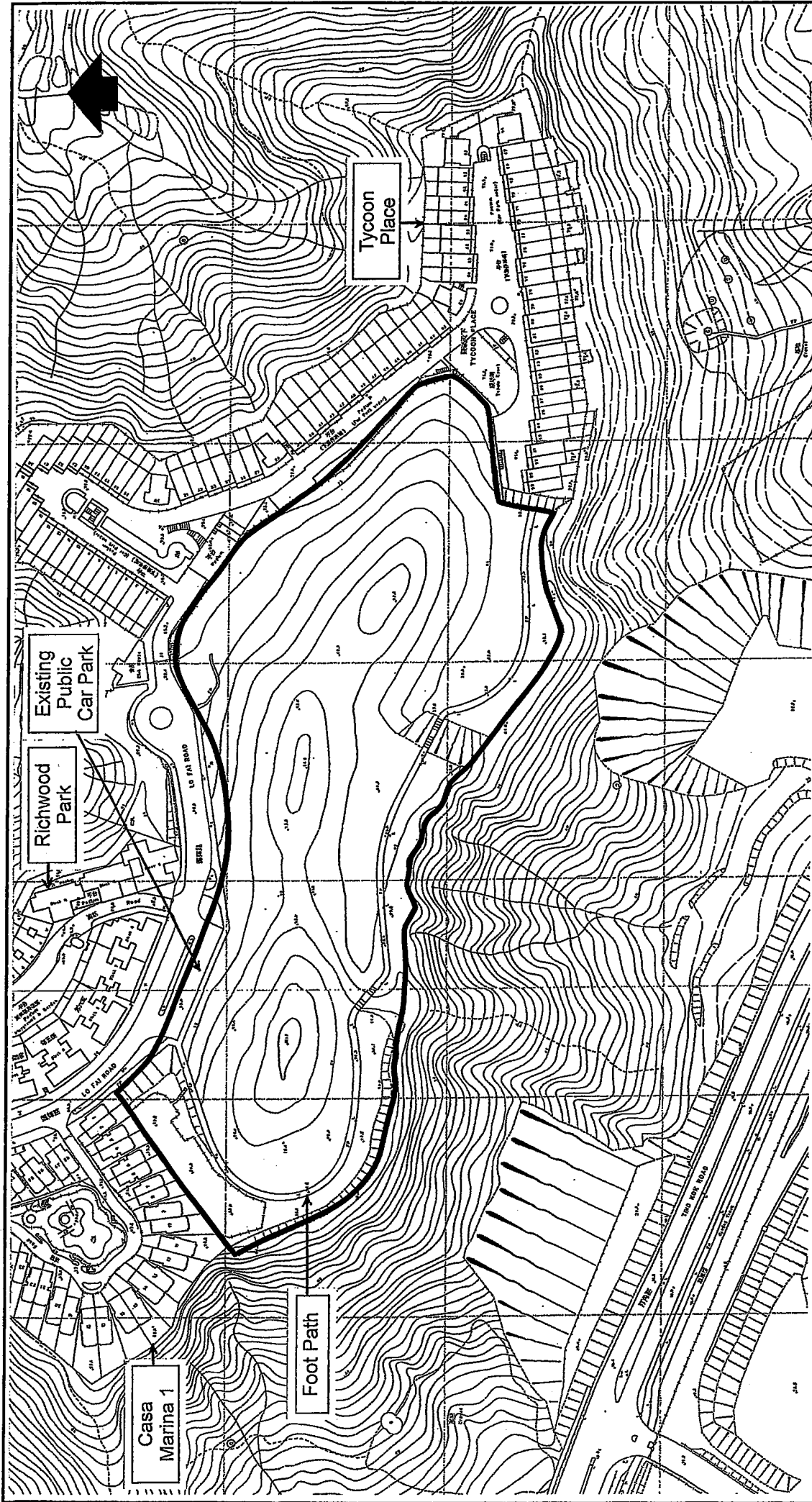
Apart from the greeneries, 19 public parking spaces for private vehicles and motorcycles are found at the northern part of the Subject Site abutting Lo Fai Road. These parking spaces are fully used every day especially in the evening.




Plan Based on
Tai Po Outline Zoning Plan
No. S/TP/25 Exhibited on 11.4.2014

Location Plan
Objection to "Item E"
Tai Po Outline Zoning Plan No. S/TP/25
Scale 1 : 7 500

Plan 2.1
PlanArch Consultants Ltd.
Revision: Date: 4.6.2014



Legend

 The Subject Site

Base Plan Extracted from
Survey Sheet No. 7-NE-1A and 7-NE-1B
updated on 27.9.2013

Site Plan

Objection to "Item E"
Tai Po Outline Zoning Plan No. S/TP/25

Scale 1 : 2 500

Plan 2.2

PlanArch Consultants Ltd.

Revision:

Date: 4.6.2014

Photo 1 - The Subject Site is located on top of a ridgeline where dense vegetation with about 2,500 nos. of tree is found. With rezoning to R(C), all the trees and the landscape will be gone.



Photo 2 - The rezoning will remove a number of public parking spaces for private vehicles and motorcycles abutting Lo Fai Road.



Photos 3 & 4 - The site is a popular communal space for local community including the elderly, the young and small children. The mature trees provide a valuable breathing and green space for public enjoyment.



Photos 5 & 6 - The Subject Site is located in a low-density residential neighbourhood at Lo Fai Road. It is situated between two low-rise and low-density residential development, namely Casa Marina I (3-storeyed) and Tycoon Place (3-storeyed above ground).

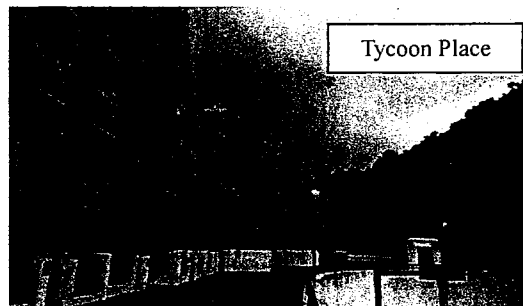
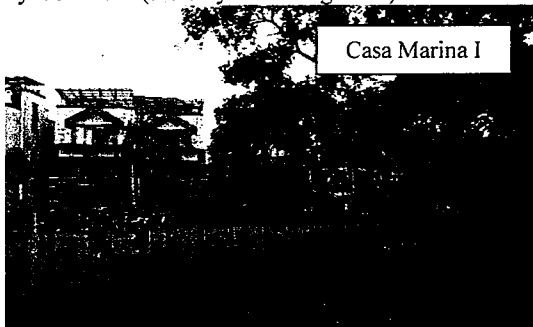


Photo 7 - Across Lo Fai Road to the north of the Subject Site, there are other low-density residential developments, Richwood Park (5-storeyed) and Forest Hill (5-storeyed). They are located at lower platforms facing hillside and about 1 to 2 floors are sheltered by Lo Fai Road, so they appear to be only 3-4 storeys tall.

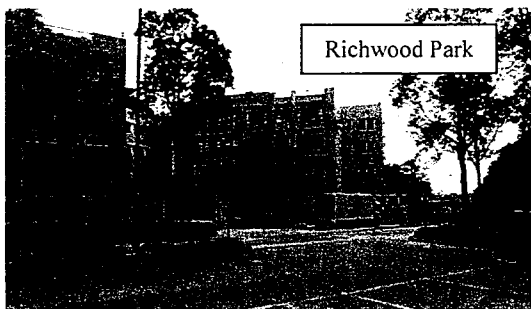


Photo 6 - In the vicinity of the residential neighbourhood, a "GB" area of about 6 ha was devegetated and formed for storage of construction materials and other open storage uses since 2000s. The area is an eyesore and should be rezoned to residential use instead.



3. OUR OBJECTION

We object to amendment item E of the OZP that rezones the Subject Site from “GB” to “R(C)9” and stipulation of building height restriction for the “R(C)9” zone.

We request the Town Planning Board (“TPB”) to revert back the zoning of the Subject Site to “GB”.

4. JUSTIFICATIONS

4.1 REZONING OF THE SUBJECT SITE FROM “GREEN BELT” FOR RESIDENTIAL USE IS AGAINST GOVERNMENT’S POLICY

The *2014 Policy Address* clearly states that:

*“We are taking steps to rezone for residential use sites in Green Belt areas which are **devegetated, deserted or formed.**”*

While we fully agree to the policy to rezone devegetated, deserted or formed “GB” sites for residential purpose to meet the territorial housing demand, we consider that rezoning the Subject Site, which is densely vegetated with mature trees and is neither ***devegetated, deserted nor formed***, is against the government’s policy as proclaimed in the 2014 Policy Address.

However, the Secretary for Development subsequently mentioned that *“the current reviews on GB sites focus mainly on those sites that are located in the fringe of developed land and are close to existing transport infrastructure, and with a relatively **lower conservation value.**”*

It should be pointed out that the planning intention of “GB” is not for conservation of areas with high conservation value. Areas with high conservation value should be zoned as “Conservation Area” or “Site of Special Scientific Interest”, etc. The planning intention of “GB” is very clear: to define the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets, and there is a general presumption against development within this zone. If green belt with relatively low conservation value can be developed into residential use, it implies that all green belt should be developed. Rezoning areas of “GB” with low conservation value should **NOT** be interpreted as the policy objective of the CE.

As demonstrated, rezoning the Subject Site which is densely vegetated with mature trees and is neither devegetated, deserted nor formed, is against the government's policy as proclaimed in the 2014 Policy Address. The "so-called" second stage of site search for sites with low conservation value is entirely unjustified and illogical. The Planning Department should adhere to the criteria as set by the Chief Executive. Therefore the Subject Site should be reverted back to "Green Belt".

4.2 REZONING OF THE SUBJECT SITE FROM "GREEN BELT" FOR RESIDENTIAL USE IS AGAINST THE PLANNING INTENTION AND ALL ESTABLISHED PLANNING GUIDELINE

The Subject Site was rezoned to "GB" since 1986 because it was considered suitable to be zoned as such. The planning intentions of the Subject Site are:

- (i) to define the limits of urban and sub-urban development areas by natural features and;
- (ii) to contain urban sprawl as well as;
- (iii) to provide passive recreational outlets.
- (iv) There is a general presumption against development within this zone.

The TPB determines the suitability of a development in a "GB" zone in accordance with the town planning policy as stipulated in *TPB Guidelines PG-No.10 - Application for Development within Green Belt Zone under Section 16 of the Town Planning Ordinance* (Appendix I). This guideline sets out the main planning criteria for allowing development in a "GB" zone, which include the followings:

- ♦ There is a general presumption against development in a "GB" zone,
- ♦ The scale and intensity of the proposed development including the plot ratio, site coverage and building height should be **compatible with the character of surrounding areas**;
- ♦ With the exception of New Territories Exempted Houses, a plot ratio up to 0.4 for residential development may be permitted;
- ♦ The development **should not involve extensive clearance of existing natural vegetation, affect the existing natural landscape, or cause any adverse visual impact** on the surrounding environment.

However, the rezoning to R(C) 9 is totally against the planning intention of Green Belt and the TPB Guidelines. The rezoning of the Subject Site allows incompatible development with a maximum *plot ratio of 1.6 on the net site* which *doubles* the plot ratio of the adjoining residential developments and is four times the usual permitted plot ratio of 0.4 in "GB".

The Subject Site is located at the top of the ridgeline, with a site level of about 80mPD to 101.2mPD. As shown in the Site Plan in Plan 2.2, the Subject Site comprises of 3 knolls. Any developments in this site will inevitably involve **extensive site formation and clearance of existing natural vegetation** of about 2,500 nos. of trees, and **affect existing natural landscape**.

Since the future development will be situated on the ridgeline and the maximum building height will be 5 storeys, it will be much taller than the adjoining residential developments. As a result, the future development will **interrupt the ridgeline** and have **adverse visual impact** to important public landmarks for the whole of Hong Kong, namely the Tolo Harbour, the Pak Sin Leng and the Guang Yin.

These demonstrated that the proposed development in the Subject “GB” zone could not meet the planning criteria set out in the TPB Guidelines PG-No.10. Should a project proponent (private sector) apply to the TPB for the proposed development under Section 16 of the Town Planning Ordinance, it will unlikely be approved. Although the rezoning of the Subject Site is not a Section 16 application, the nature of the rezoning is to allow development in a “GB” site, and therefore the planning criteria set out in the guideline should be used as a yardstick to determine the suitability of the rezoning. The same set of guideline should also be applicable to the Government. Since the proposed development could not meet the planning criteria, the rezoning of the Subject Site from “GB” to “R(C)9” was a complete departure from the established planning policy.

Since the rezoning to R(C) 9 contravene the original planning intention for the area and contradicts with the established Town Planning Board Guideline, it should be reverted to the original zoning of “Green Belt”.

4.3 THE BUILDING HEIGHT OF PROPOSED DEVELOPMENT AND THE OVERALL BUILT FORM ARE UNDESIRABLE FROM URBAN DESIGN POINT OF VIEW

Ridgeline is identified as an important urban design attribute as it defines the *Image of City*, according to the Urban Design Guidelines of the Hong Kong Planning Standards and Guidelines (HKPSG), which was promulgated in 2006. The Urban Design Guidelines in Chapter 11 of HKPSG states that:

- ♦ Ridgelines and mountains in the New Territories define the edges of new towns as well as vista points of the city and the country parks beyond.
- ♦ It has been generally supported by the community that ridgelines / peaks are valuable assets and their preservation should be given special consideration as far as possible in the process of development.

- ♦ The main goal of a height profile in the Hong Kong context should be to protect and enhance the relationship of the city and its natural landscape context, particularly to its ridgelines / peaks.

The Subject Site is located on the ridgeline of a local peak at Lo Fai Road. As shown in the photo taken from Tai Po Road in Figure 4.1, the dense vegetation of the Subject Site is an important visual feature in Tai Po, with the mature and dense trees defining the ridgeline. It is also an important visual relief and buffer for the two residential developments of Tycoon Place and Casa Marina 1.

However, after the rezoning and development of the Subject Site, extensive site formation together with clearance of dense vegetation at this local peak would be carried out for 5-storey residential development. As a result, the natural ridgeline would be replaced by artificial features. The photomontage prepared by Planning Department extracted from RNTPC Paper No. 6/14 is shown in Figure 4.2. However, given the topography mentioned in earlier sections, there is reasonable doubt that this is a true reflection of the proposed development.

Figure 4.1 Photos of the Subject Site taken from Shuen Wan Golf Course

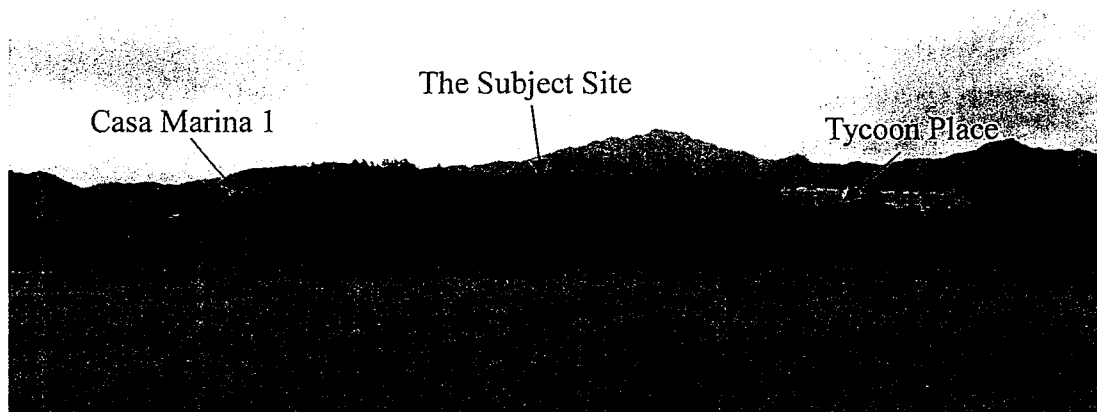
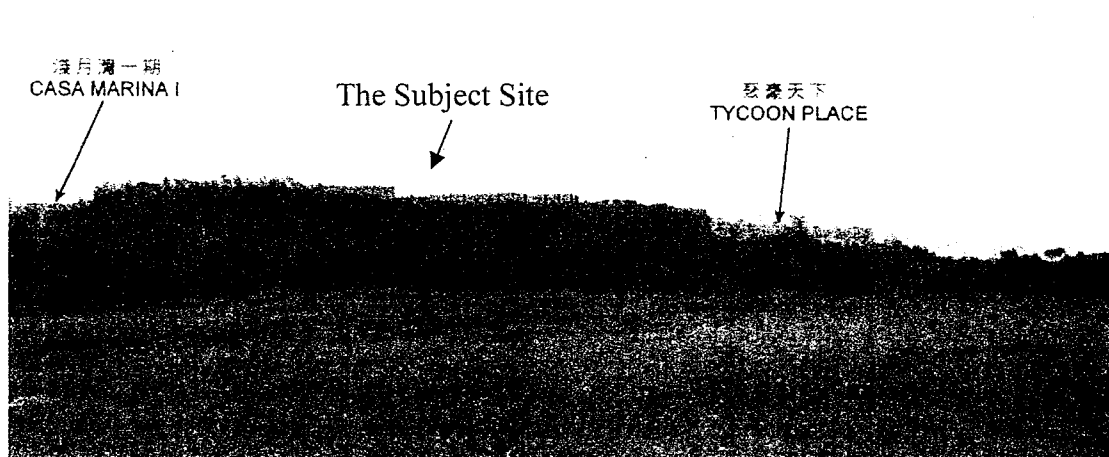


Figure 4.2 Photomontage of Proposed Development (Viewing from Shuen Wan Golf Course)



(source: extracted from RNTPC Paper No. 6/14)

The proposed development at the Subject Site would destroy the natural ridgeline that defines the edges of Tai Po new town as well as vista points of the city and the country parks beyond, as shown in the photomontage prepared by Planning Department in Figure 4.2.

Lo Fai Road knoll being a green “hat”, currently forms a coherent relationship with the Pak Sin Leng at the back, the Guang Yin on the right and the Tolo Harbour in front, when the Hong Kong public view across from the Tolo Harbour Highway or the Tai Po Road. It is also an important view for the general public when they cycle along the Tolo Harbour Cycling Track.

Currently, the overall height profile of residential developments at Lo Fai Road protects and enhances the relationship of the city and its natural landscape context. The developments facing Tolo Harbuor, including Tycoon Place (3-storeyed above ground) and Casa Marina I (3-storey), are situated at lower platforms at Lo Fai Road; and taller 5-storey developments, including Richwood Park and Forest Hill, are located at the back and invisible when viewing from the south, while the local peak (the Subject Site) was planted with dense vegetation. The overall urban design at Lo Fai Road is therefore very desirable and fully complies with the Urban Design Guidelines. However, the rezoning of the Subject Site will allow 5-storey development at the highest location of the ridgeline and, as a result, the overall desirable urban design and height profile of residential developments at Lo Fai Road would be completely destroyed.

The proposed rezoning to R(C)9 contravenes the urban design guidelines set out in the HKPSG which promote the preservation of ridgelines and peaks. Therefore, the original zoning of “GB” at the Subject Site should be reinstated.

4.4 DENSE VEGETATION AT THE SUBJECT SITE CONTRIBUTES TO THE ENVIRONMENTAL QUALITY AND REDUCE URBAN HEAT ISLAND EFFECTS

Hong Kong is suffering from the Urban Heat Island effects. Researches show that natural vegetation can create cooler air movement and is beneficial to the exchange of air mass with the neighbouring residential communities. Extensive clearance of the dense vegetation of about 2,500 nos. of trees at the Subject Site will worsen Urban Heat Island effects at the local level, and cause environmental impact to Hong Kong as a whole.

The mature trees at the Subject Site play a pivotal role as a buffer to screen off the odour, air pollutants including toxic chemicals and particulates from pollution sources such as Tai Po Industrial Estate, Tai Po Sewage Treatment Works and the heavily trafficked Ting Kok Road.

The dense vegetation and mature trees are crucial to the environmental quality of the community on Lo Fai Road and contribute to reduction of urban heat island effects. Therefore, the original zoning of “GB” at the Subject Site should be reinstated.

4.5 FUNDAMENTAL FLAWS IN THE CONSULTATION WITH TAI PO DISTRICT COUNCIL AND DISTRICT COUNCIL MEMBERS WERE MISLED

Planning Department consulted the Environment, Housing and Works Committee (EHWC) of Tai Po District Council (TPDC) on 8.1.2014 and 13.2.2014, before the RNTPC meeting on 4.4.2014. However, views and concerns of all members of TPDC were not reflected since EHWC only include a portion of TPDC members. In the TPDC meeting on 8.5.2014, there were complaints from some DC members who were not members of EHWC were not consulted in the consultation process.

Apart from the flawed consultation process, many crucial information were also missing in the EHWC papers presented to the members. The plot ratio of future development were not given in the paper for the EHWC meetings on 8.1.2014 and 13.2.2014. After being requested, Planning Department stated that the “net plot ratio (淨地積比率)” of the Subject Site is about 1.1 (Item 6 (xii) of minutes of EHWC meeting on 8.1.2014 in Appendix II). However, the net plot ratio became 1.6 when Planning Department presented the rezoning to the TPB. As a result, members of the TPDC were being misinformed about the plot ratio and development intensity, and were not able to make an informed and conscious decision on the proposed rezoning at the Subject Site.

The members of TPDC were not properly consulted and were given insufficient and misleading information regarding the Subject Site. Therefore, the re-zoning of “GB” at the Subject Site should be re-considered.

4.6 FUNDAMENTAL FLAWS IN THE RNTPC PAPER AND TOWN PLANNING BOARD MEMBERS WERE MISLED

Members of the TPB relied on the RNTPC Paper provided by Planning Department to consider the proposed amendments to the Tai Po OZP in the RNTPC meeting on 4.4.2014. However, there were fundamental flaws in the RNTPC Paper No. 6/14. Members of the TPB were misled when they considered the rezoning of the Subject Site.

The objections and concerns from the local community on Lo Fai Road were not properly reflected in the RNTPC Paper No. 6/14. Although the paper reported that “some objections to the Lo Fai Road site (Item E) were received from nearby

owners incorporations and green group” during the consultation with EHWC of TPDC (para. 8.3, RNTPC Paper No. 6/14), and “representatives of owners’s incorporations of Forest Hill, Richwood Park, Casa Marina I & II and Tycoon Place together with a district councillor raised objection to the proposed rezoning amendment to the site at Lo Fai Road” (para. 8.5, RNTPC Paper No. 6/14), the strong objections from residents on Lo Fai Road were significantly down-tuned in the RNTPC paper and members of the TPB were not able to understand the strong objections from the residents and their ground for objection. As a matter of fact, 800 petition signatures out of 833 units among all 5 estates on Lo Fai Road were presented to the Planning Department (DPO/Shia Tin, Tai Po and North) in the meeting on 4.3.2014, clearly showing 95% of the residents strongly oppose to the rezoning proposal.

The RNTPC Paper No. 6/14 clearly stated that *“It was reaffirmed in the 2014 Policy Address that...the Government would take steps to review the Green Belt areas which are **devegetated, deserted or formed** for possible residential use. To meet the pressing need for housing land supply, six sites in Tai Po (Site A, Site C to Site F and Site H) are identified for housing developments and rezoning of these sites for residential purposes is required.”* (para. 3.1, RNTPC Paper No. 6/14). However, in the subsequent paragraph, the description on background for the proposed rezoning was changed and it became *“To meet the pressing need for housing land supply, the Government has undertaken review of Green Belt areas which are **devegetated, deserted, developed or formed or with low conservation values**. In Tai Po, five sites have been identified for housing development (Items C, D, E, F and H below).”* (para. 3.17, RNTPC Paper No. 6/14) We would like to emphasize that, as discussed in Section 4.1, the rezoning of “GB” sites with low conservation value is entirely unjustified and illogical, and should **NOT** be interpreted as the policy objective of the CE.

There are about 2,500 nos. of trees at the Subject Site, however, this number was not stated in the RNTPC Paper No. 6/14. The Paper only stated that *“The site was previously a borrow area which was reinstated and replanted thereafter. DAFC advises that the site is a plantation woodland dominated by exotic tree species such as *Acacia confusa*, *A. mangium*, *Eucalyptus torelliana*, etc.”* (para. 3.39, RNTPC Paper No. 6/14). Without crucial information such as number of trees, as well as condition and species of trees, members of the TPB were not able to fully understand the site context and make an informed decision on the proposed amendment to the Subject Site which involves substantial clearance of existing vegetation.

The decision by the RNTPC on rezoning to R(C)9 were made based on flawed descriptions in the RNTPC Paper. Therefore, the re-zoning of “GB” at the Subject Site should be re-considered.

4.7 AVAILABILITY OF A MORE SUITABLE “GREEN BELT” SITE FOR RESIDENTIAL DEVELOPMENT IN THE VICINITY

In the vicinity of the Subject Site, a “GB” area of about 6 ha was devegetated and formed and have been used for storage of construction materials and other open storage uses since 2000s (Photo 6). The area falls within “GB” on the same Tai Po OZP. Please refer to Figure 4.3 for the location of the concerned open storage area.

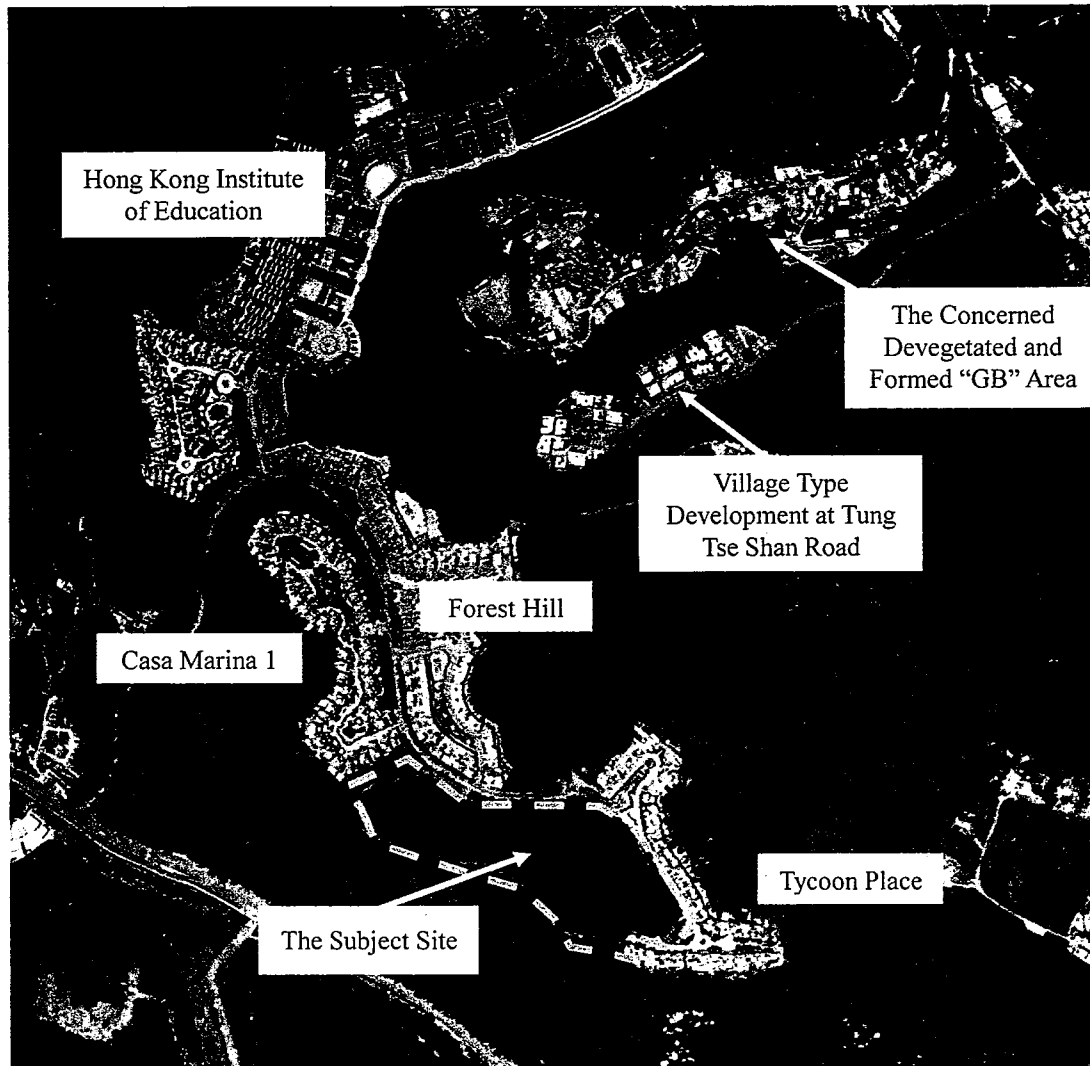
The local community including Hong Kong Institute of Education and residents of Forest Hill have been complaining about the nuisance created by the concerned open storage area for many years. However, although the area was zoned “GB”, there is no provision for planning enforcement under the Town Planning Ordinance as the area was not covered by a Development Permission Area Plan. As a result, the open storage area have been expanding over the past decade.

It is the government’s policy to rezone “GB” areas which are devegetated, deserted or formed for residential use. When compared to the Subject Site, the concerned open storage area could much better meet the criteria for rezoning “GB” for residential uses as set out by the CE in the 2014 Policy Address. Indeed, turning an eyesore and a nuisance generating area into an orderly developed residential development to serve the need of the community will be much desirable and appreciated by local community and the public at large. Moreover, the concerned open storage area (6 ha) is much bigger than the Subject Site (4 ha), and it is located in a valley area where the building height could be much higher than the 5-storey without adversely affecting the visual quality and ridgeline of the area.

Since there is a much better alternative devegetated and formed “GB” site in the vicinity, it is unjust to rezone the Subject Site which is vegetated with mature trees for residential use. The government should make efforts to pursue CE’s policy objective to rezone devegetated, deserted or formed “GB” sites for residential use rather than rezoning the Subject Site which is currently covered with mature trees and dense vegetation.

Instead of destroying the natural landscape, the Government should proceed with site searching for sites in Green Belt areas which are devegetated, deserted or formed, as in line with the Policy Address.

Figure 4.3 Location of a Devegetated and Formed "GB" Area in the Vicinity



4.8 THE PROPOSED TYPE OF HOUSING COULD NOT MEET THE HOUSING DEMAND

According to the RNTPC Paper No. 6/14, the proposed development will have a maximum domestic GFA of 46,200 and it was intended to provide 660 flats at the Subject Site. The average flat size will then be 70m^2 . However, the Subject Site is located in the low-density residential neighbourhood in the mid-level of Tai Po, where the average flat sizes of the nearby residential developments which faces Tolo Harbour are much higher. The average flat sizes of Tycoon Place and Casa Marina 1, which face Tolo Harbour, are about 225m^2 and 215m^2 respectively; while the average flat sizes of Forest Hill and Richwood Park, which face the hill, are about 135m^2 and 100m^2 respectively.

The planned number of flats is unrealistic because it was unlikely that the developer will build housing estates with average flat size of 70m^2 in this prime location with fantastic sea view. If the average flat size of the adjoining sea-facing developments are adopted, the number of flats at the Subject Site would only be

about 200.

CE in his Policy Address mentioned that younger generation should be given more opportunities to purchase their own homes. These big flats/houses/duplex will be far too expensive to meet the pressing housing demand. Furthermore, the vacancy rates of flats with sizes ranging from 70m² to 99.9m², 100m² to 159.9m² and 160m² or above are 4.5%, 8.9% and 11.5% respectively in 2013, which are much higher than the vacancy rates of flats with sizes ranging from 40m² to 69.9m² and less than 40m², which are 3.6% and 3.5% respectively in 2013. Killing a green belt of 2,500 trees and destroying beautiful landscape on the ridgeline only to provide luxurious housing of 200 flats is entirely against the planning guidelines and policy objective.

Destroy a densely vegetated peak at the Subject Site for residential development will not meet the pressing housing demand from the community, therefore it should be reverted back to "Green Belt".

4.9 REZONING OF THE SUBJECT SITE TO "R(C)9" SITE TO TAKE AWAY AN IMPORTANT COMMUNITY GATHERING PLACE IS UNJUST AND BRING FRUSTRATION AND WILL LEAD TO LEGAL ACTION

The Subject Site is frequently used by local community. The elderly come for morning walk, the young people come to exercise and the small children come and play here. Many families also come for walking their dogs every day. This is a lively place for the local community, both socially and environmentally. They all have strong sentiment and attachment to this site. Rezoning the site from "Green Belt" to "Residential (Group C)9" without justifications is unjust and will only induce mistrust and frustration to the Government. Over 6,000 people have raised objection to the rezoning, from all walks of life, including LegCo Councillors, District Board members, planning academics, environmental groups, College students, members of Hong Kong Institute of Education, Hong Kong general public, Tai Po public, residents along Ting Kok Road, and Lo Fai Road residents. Given the unjust procedures, flaws in the presentation to Tai Po District and RNTPC, and the negligence not to consider Green Belt sites which are *devegetated, deserted or formed*, the community will proceed with legal procedure including Judicial Review on the OZP. This may have impact on the sale programme of other rezoned sites.

The local community is frustrated about the unjust rezoning and is determined to protect this Green Belt site being rezoned for residential use. In order to avoid lengthy legal action (including judicial review) which will impact on rezoning of other sales sites, the Subject Site should be reverted back to "Green Belt".

4.10 THE SUBJECT SITE IS A WELL-PLANNED AND MATERIALIZED "GB" AND THE

REZONING OF THE SUBJECT SITE TO “R(C)9” SITE IS AGAINST THE REASONABLE EXPECTATION OF THE SOCIETY

Majority of the Subject Site was zoned “Green Belt” since 1986. It is accessible and frequently used by the public and local community. It is a well-planned “GB” with a footpath around the northern, northwestern and southern periphery of the site so that the natural setting and mature trees could be enjoyed by the Public. The Subject Site fully fulfills its original planning intention as a “GB” by (i) defining the limits of urban and sub-urban development areas by natural features, (ii) containing urban sprawl, and (iii) providing passive recreational outlets. Indeed, the planning and development of this Green Belt zone as defining the urban limit and providing passive open space is part of an integrated and comprehensive planning for the area.

Ever since the construction and population intake of the housing estates, including Tycoon Place, Casa Marina 1 and 2, Forest Hill and Richwood Park, the “GB” zoning of the Subject Site were in place. Since the status of “GB” was statutory and the presumption against development at the Subject Site was clearly stated in the Notes of the OZP, which is statutory in nature, therefore, it is the reasonable expectation from the general public and local community that the Subject Site would maintain its function and zoning as “GB”.

The Subject Site is a well-planned “GB” which fully materialized its planning intention under statutory zoning. Rezoning the Subject Site for housing development that could not cater for the need of the society would only worsen the trust between the Government and the society. Therefore it should be reverted back to “Green Belt”.

4.11 CUMULATIVE IMPACT OF REZONING OF THE SUBJECT SITE AND OTHER “GB” SITES WERE NOT ADDRESSED

The proposed amendments to the OZP involves rezoning a number of “GB” sites for residential purpose. However, there was no assessment on the cumulative impacts on environmental, traffic and community aspect so that members of the TPB could be able to make an informed and conscious decision on the rezoning.

The RNTPC Paper No. 6/14 only gave piecemeal assessments on environmental, traffic and other aspects of rezoning an individual site. Members of the TPB were not given a bigger picture on the cumulative traffic impact (such as the overall impact to traffic network of Tai Po), cumulative environmental impact (such as total numbers of trees to be felled in the whole Tai Po District and how its impact could be mitigated) and cumulative impacts to community facilities (such as the

shortfall of primary school classroom after the increase of population after the proposed rezoning).

Without assessments on the cumulative impacts of the proposed rezoning the "GB" sites, members of the TPB were misled to made decisions based on insufficient information. Therefore, the re-zoning of "GB" at the Subject Site should be re-considered.

5. OUR REQUEST

In view of the above justifications, we sincerely request the favourable consideration from the Board members in upholding our objection to the draft plan and to **revert the Subject Site to its original "GB" zone.**

TPB PG-NO. 10

TOWN PLANNING BOARD GUIDELINES FOR APPLICATION FOR DEVELOPMENT WITHIN GREEN BELT ZONE UNDER SECTION 16 OF THE TOWN PLANNING ORDINANCE

(Important Note :

The guidelines are intended for general reference only. The decision to approve or reject an application rests entirely with the Town Planning Board and will be based on individual merits and other specific considerations of each case.

Any enquiry on this pamphlet should be directed to the Planning Information and Technical Administration Unit of the Planning Department, 17th Floor, North Point Government Offices, 333 Java Road, Hong Kong - Tel. No. 2231 5000.

These guidelines are liable to revision without prior notice. The Town Planning Board will only make reference to the guidelines current at the date on which it considers an application.)

1. Introduction

- 1.1 The planning intention of the "Green Belt" ("GB") zone is primarily to promote the conservation of the natural environment and to safeguard it from encroachment by urban-type developments.
- 1.2 The "GB" zone covers mainly slopes and hillsides, most of which is naturally vegetated. Some "GB" areas are also designated as Country Parks. Most of the land within the "GB" zone is Government land, although there are also small pockets of private land, generally near built-up areas.
- 1.3 The main purposes of the "GB" zone include the following :
 - a. to conserve existing landscape features, areas of scenic value and areas of recognised "fung shui" importance;
 - b. to define the outer limits of urbanized districts and to serve as a buffer between and within urban areas; and
 - c. to provide additional outlets for passive recreational uses.
- 1.4 To preserve the character and nature of the "GB" zone, the only uses which will always be permitted by the Town Planning Board (the Board) are compatible uses which are essential and for public purpose such as waterworks, water catchment areas, nature reserves, agriculture, forestry and certain passive recreational uses. Other uses, including government/institution/community (G/IC), residential development and public utility installations will require planning permission from the Board and each proposal will be assessed on its individual merits. Applications for development will be considered by the Board according to the criteria set out below.

2. Main Planning Criteria

- a. There is a general presumption against development (other than redevelopment) in a "GB" zone. In general the Board will only be prepared to approve applications for development in the context of requests to rezone to an appropriate use.
- b. An application for new development in a "GB" zone will only be considered in exceptional circumstances and must be justified with very strong planning grounds. The scale and intensity of the proposed development including the plot ratio, site coverage and building height should be compatible with the character of surrounding areas. With the exception of New Territories Exempted Houses, a plot ratio up to 0.4 for residential development may be permitted.
- c. Applications for New Territories Exempted Houses with satisfactory sewage disposal

facilities and access arrangements may be approved if the application sites are in close proximity to existing villages and in keeping with the surrounding uses, and where the development is to meet the demand from indigenous villagers.

- d. Redevelopment of existing residential development will generally be permitted up to the intensity of the existing development.
- e. Applications for G/IC uses and public utility installations must demonstrate that the proposed development is essential and that no alternative sites are available. The plot ratio of the development site may exceed 0.4 so as to minimize the land to be allocated for G/IC uses.
- f. Passive recreational uses which are compatible with the character of surrounding areas may be given sympathetic consideration.
- g. The design and layout of any proposed development should be compatible with the surrounding area. The development should not involve extensive clearance of existing natural vegetation, affect the existing natural landscape, or cause any adverse visual impact on the surrounding environment.
- h. The vehicular access road and parking provision proposed should be appropriate to the scale of the development and comply with relevant standards. Access and parking should not adversely affect existing trees or other natural landscape features. Tree preservation and landscaping proposals should be provided.
- i. The proposed development should not overstrain the capacity of existing and planned infrastructure such as sewerage, roads and water supply. It should not adversely affect drainage or aggravate flooding in the area.
- j. The proposed development must comply with the development controls and restrictions of areas designated as water gathering grounds.
- k. The proposed development should not overstrain the overall provision of G/IC facilities in the general area.
- l. The proposed development should not be susceptible to adverse environmental effects from pollution sources nearby such as traffic noise, unless adequate mitigating measures are provided, and it should not itself be the source of pollution.
- m. Any proposed development on a slope or hillside should not adversely affect slope stability.

(修訂版)
大埔區議會
環境、房屋及工程委員會
特別會議記錄

日期：2014年2月13日(星期四)

時間：上午10時正

地點：大埔區議會會議室

出席者：

		<u>出席時間</u>	<u>離席時間</u>
陳笑權先生,MH	主席	會議開始	會議完畢
區鎮樺先生	委員	上午10時55分	會議完畢
陳志超先生,MH	委員	上午10時40分	會議完畢
陳灶良先生	委員	會議開始	上午11時55分
張國慧先生	委員	會議開始	會議完畢
鄭俊平先生,JP	委員	會議開始	會議完畢
關永業先生	委員	會議開始	會議完畢
劉志成博士	委員	會議開始	會議完畢
文春輝先生,MH	委員	會議開始	會議完畢
羅舜泉先生	委員	上午10時20分	會議完畢
譚榮勳先生	委員	會議開始	會議完畢
鄧光榮先生,BBS	委員	會議開始	上午11時15分
鄧友發先生	委員	會議開始	會議完畢
王秋北先生	委員	會議開始	會議完畢
黃碧嬌女士,MH	委員	會議開始	會議完畢
任啓邦先生	委員	會議開始	會議完畢
邱榮光博士,JP	委員	上午11時05分	會議完畢
余智榮先生	委員	會議開始	會議完畢
鍾天培先生	委員	會議開始	會議完畢
李錦松先生	委員	會議開始	會議完畢
李永強先生	委員	會議開始	會議完畢
馬秉芬先生	委員	會議開始	會議完畢
邱仕生先生	委員	上午10時20分	會議完畢
李灝宜女士	秘書	會議開始	會議完畢

列席者：

蘇植良先生,JP	大埔民政事務專員／民政事務總署
邱詩穎女士	大埔民政事務助理專員／民政事務總署
蘇震國先生	沙田、大埔及北區規劃專員／規劃署
劉志庭先生	高級城市規劃師(大埔)／沙田、大埔及北區規劃處／規劃署
容伯煬先生	城市規劃師(大埔 1)／沙田、大埔及北區規劃處／規劃署
王國良先生	工程師(大埔)1／運輸署
劉家麒先生	規劃師 10／發展及建築處／房屋署
梁少強先生	高級行政主任(區議會)／大埔民政事務處／民政事務總署
陳漢鈞先生	高級聯絡主任 2／大埔民政事務處／民政事務總署

缺席者：

林泉先生	副主席
李國英先生,BBS,MH,JP	委員
區鎮濠先生	委員
陳成耀先生	委員
文念志先生	委員

開會詞

主席歡迎各與會者出席會議，並宣布以下事項：

- (i) 李國英先生因事未能出席今次會議，他已向秘書處提交缺席申請。根據《大埔區議會常規》第 51(1)條，區議會只會批准區議員因身體不適、擔任陪審員、代表區議會出席會議／活動、出席立法會會議或行政會議而提出的缺席申請。因此，他的缺席申請不獲批准。

I. 擬議改劃部分大埔區土地作房屋發展用途

(大埔區議會文件 14a/2014 號及 EHW 14b/2014 號)

2. 主席歡迎以下部門代表就是項議程出席會議：規劃署沙田、大埔及北區規劃專員蘇震國先生、高級城市規劃師劉志庭先生及城市規劃師容伯煬先生；房屋署規劃師劉家麒先生；運輸署工程師王國良先生；以及大埔民政事務處高級聯絡主任陳漢鈞先生。

3. 劉志庭先生及容伯煬先生介紹上述文件。
4. 主席請委員備悉環保觸覺、淺月灣二期業主立案法團及聚豪天下一業主分別致函委員會就改劃露輝路土地作房屋發展的建議提出反對。
5. 委員的意見及提問如下：
 - (i) 多位委員支持政府積極覓地建屋，以解決市民對住屋的需求。
 - (ii) 有委員建議規劃署整體規劃八項建議的發展但分階段施工。多位委員亦認為有關部門應先建道路，後建房屋。
 - (iii) 大部分委員支持 A 項建議(即大埔第 9 區及頌雅路旁的選址)，他們希望規劃署先展開有關工程。
 - (iv) 有委員促請規劃署同步規劃 A 項建議發展所需的社區設施及交通配套(包括道路及公共交通設施)。他建議利用富亨邨及頌雅苑附近的土地興建樓高 10 層或以下的社區設施，在方便居民共享設施的同時避免阻擋現有樓宇的景觀。如該署未能回應上述要求，他難以支持 A 項建議。
 - (v) 多位委員認為有關部門必須先行處理頌雅路和汀角路一帶的交通配套問題，以應付日後急增的人流及車流。有委員指出，如不妥善處理新增車流，那打素醫院及大埔醫院的緊急醫療服務或會受到影響。
 - (vi) 有委員希望有關部門藉發展新住宅項目的機會研究如何改善汀角路一帶的交通，尤其是鳳園路的交通樽頸問題。
 - (vii) 有委員指重建大元邨的建議已討論多時。他希望有關部門一併處理該項建議和 A 項建議，好讓大元邨居民在重建期間能獲原區安置。
 - (viii) 多位委員對 B 項建議(即匡智松嶺村以西頌雅路旁的選址)有保留。有委員希望政府擱置該項建議，把有關土地留給匡智會使用。
 - (ix) 有委員認為 B 項建議的選址與亨耀樓太近，對亨耀樓的居民有負面影響。
 - (x) 有委員指頌雅苑及富亨邨居民、南坑村村民、大埔醫院及那打素醫院的救護車均會使用頌雅路及汀麗路，兩條道路的交通因此非常繁忙，亦頻頻發生交通意外。他表示有關方面必須在落實 B 項建議前改善兩條道路的交通設施，否則他反對該項建議。

- (xi) 有委員詢問 B 項建議所涉的土地屬政府還是私人擁有。他續問，政府曾表示不會徵收私人土地興建公屋，如 B 項建議的土地屬私人擁有，那是否代表政策有變；即使政策有變，可建公屋的地點還有很多，政府無需填海或動用郊野公園用地建屋。他指政策改變會令外界覺得政府“盲搶地”，以及質疑政府有否尊重私人業權及就徵收私人土地充分諮詢持分者。此外，他獲悉有發展商申請發展私人住宅項目，所涉土地部分與 B 項建議重疊。
- (xii) 有委員指 A 項和 C 項建議下所建的公屋單位數目多，因此認為 B 項建議無需局限於發展公屋。他不反對公私營房屋平衡發展。
- (xiii) 有委員認為 B 項建議涉及私人和政府土地，這些土地又同時牽涉政府和私人發展商的發展申請，這些因素或為發展項目增添變數。因此，他建議分開處理 A 項和 B 項建議。
- (xiv) 有委員指出，A 項、B 項和 C 項建議(即那打素醫院西面的選址)均是圍繞富亨邨發展公屋，相信會引起富亨邨居民的迴響。他認為有關部門須就發展該處的土地諮詢富亨邨居民及南坑村村民。
- (xv) 有委員支持 C 項建議。
- (xvi) 有委員認為 A 項及 D 項建議(即汀角路近鳳園的選址)毗鄰的鳳園蝴蝶保育區及樹林均具生態價值，必須加以保護。他又要求有關部門在發展前進行仔細的環境評估及採取所須的保育措施，否則他對兩項建議有保留。
- (xvii) 有委員要求規劃署在推行 D 項建議下的發展項目時預留土地供擴闊鳳園一段汀角路至雙程六線行車之用，以解決該處存在已久的交通問題及應付新增車流。有委員認為可增加樓宇高度或層數以作彌補。
- (xviii) 有委員稱過去曾有建議在三門仔段的汀角路興建行車橋連接馬鞍山，但建議胎死腹中。他希望有關部門重新考慮該項建議，以改善汀角路的交通，同時提高往來北區及其他地區的運輸效率。
- (xix) 有委員收到露輝路附近五個屋苑的信件，五者均表示反對 E 項建議(即露輝路的選址)，理由如下：
- 擬建住宅單位總數接近現有五個屋苑單位總數的一倍，有違低密度住宅規劃的原則，道路將不勝負荷，交通會更加擠塞
 - 擬建住宅樓高最高五層，與現有普遍樓高三層的住宅及環境不配合，而 E 項建議的選址處於山頂，擬建住宅落成後會影響現有居所的天然採光、空氣流通以及整個山的外觀
 - 綠化地帶被住宅取代後，居民的健康或受到影響

- 該處的晨運徑及時鐘停車錶位在發展後或不獲保留
 - 該處有多棵數十呎高的大樹和受保護動物出沒，例如貓頭鷹及野豬，發展或會影響牠們的生境
- (xx) 有委員表示支持 E 項建議，但認為交通配套有改善空間。
- (xxi) 有委員認為有關部門既改劃綠化地帶作房屋發展，理應同步開放其他綠化地帶作鄉村式發展。他表示，興建小型屋宇亦有助解決本港的住屋問題。
- (xxii) 有委員認為 F 項建議(即山塘路近荔枝山的選址)下所建的樓宇由西至北包圍盈峰翠邸及龍城堡，這些樓宇高 13 至 16 層，與周邊現有樓宇不配合，除有礙現有樓宇的景觀外，亦影響該處的天然採光及空氣流通。他建議稍移選址至山塘路東，並集中在較接近吐露港公路的位置興建有關樓宇。
- (xxiii) 有委員對 H 項建議(即乾坑近樟樹灘的選址)有保留。他表示 H 項建議的選址涉及樟樹灘村的風水地並鄰近葬區，發展或會影響風水。他要求規劃署在賣地條款中規定發展商須於發展前與村民就風水問題達成共識，以及保證發展不會影響通往葬區的道路。他又提議調低發展的地積比率至 0.6 倍，另規定所建樓宇不得超過三層，以配合環境及現有樓宇的高度。
- (xxiv) 有委員指 H 項建議所涉的土地為陡坡，難於發展，規劃署或需重新估算擬建樓宇的高度。
- (xxv) 有委員贊成擱置改劃北盛街的土地用途，以免阻礙興建廣福行車橋的計劃。
- (xxvi) 有委員支持改劃白石角東部部分土地作房屋發展，以回應市民對房屋的迫切需求。他續指該幅土地已平整。他期望有關部門在短期內落實建議及動工，並提醒有關部門加強該處的公共交通服務。
- (xxvii) 有委員詢問規劃署是否為配合政府的房屋政策而放棄本港長遠的科研及創意產業的發展。他指本港科研及創意產業的較鄰近城市落後。他對改劃上述一幅白石角土地的用途有保留。此外，他認為規劃署不應在特別會議上提出新的改劃建議，避免當區議員缺席會議而未能參與討論。
- (xxviii) 有委員認為沒有即時需要改劃上述一幅白石角土地的用途。他預計該幅土地會發展低密度豪宅，而非惠及基層市民的高密度住宅。因此，他對建議有保留。
- (xxix) 有委員查詢上述文件附件二就個別建議的表達方式為何不同，例如 D 項及 E 項建議只提供擬建樓宇的總樓面面積而非地積比率，D 項、E 項及 G 項建議則只提供擬建樓宇的層數而非主水平基準上的距離。

- (xxx) 除着重保護區內的自然生態，多位委員亦十分重視區內的綠化工作。他們要求規劃署確保有足夠及合適的地方補種因工程關係而被移除的樹木。
- (xxxi) 有委員反對藉填海增加土地供應。他深明有需要盡快解決房屋問題，但認為政府不可因此而忽視環保和保育工作。
- (xxxii) 有委員表示，九龍坑塘坑的土地約八成是政府土地，約兩成是私人土地。他指政府過去否決於該處發展公屋的建議。不過，他認為該處現時適合發展公屋，待附近幾項道路工程完成後，該處便可接通各區，此外亦可增設鐵路站，建立起完善的交通網絡。他希望有關部門考慮在該處發展公屋。
- (xxxiii) 有委員強調，他支持建議的其中一個前提，是大埔區居民(包括已被派往其他地區居住的大埔居民)可優先獲派區內的新公屋單位。

6. 蘇震國先生回覆如下：

- (i) 規劃署積極覓地建屋，目的為應付市民短、中及長期的住屋需要，並非“盲搶地”。
- (ii) 規劃署提出規劃建議時會考慮受影響地區是否有足夠的基建及設施應付新發展。就是次提出的八項規劃建議，該署已諮詢運輸署、渠務署和房屋署(“房署”)等部門，以初步評估各個地點原則上能否發展房屋。有關部門稍後會就個別發展項目進行詳細研究。
- (iii) 房署就 A 項建議進行詳細設計時會確保新屋苑不會對現有屋苑的居民造成顯著不良的影響，而且會盡量提供更多設施，以進一步改善居民的居住環境。該署絕不會忽視他們的需要。
- (iv) 房署正就 B 項建議進行初步交通評估，並會視乎結果考慮是否一併設計所需的新道路及採取相關交通改善措施。
- (v) B 項建議所涉私人土地為農地。政府徵收私人農地作公共房屋發展的做法普遍，但徵收可發展房屋的私人土地作相同用途則較少，但兩者有賠償機制。
- (vi) 有私人發展商提出涉及 B 項建議的選址的規劃申請，相關的土地的用途須改劃，發展商亦須補地價。儘管這樣，在公眾利益的大前提下，規劃署還是決定繼續推出 B 項建議，作公共房屋發展。
- (vii) 有關保留 B 項建議所涉的土地供匡智會使用，分配土地予各機構並非由規劃署決定，但該署會向有關部門反映委員的意見。

- (viii) 鑑於 A 項和 D 項建議的選址接近具保育價值的地帶，房署事前會進行詳細研究及環境評估，在進行詳細設計時如需要亦會制訂保育措施。
- (ix) 政府會研究擴闊鳳園一段汀角路的建議，即使建議可行，亦須待發展項目有詳細設計時才能展開有關設計工作。
- (x) 政府在規劃及賣地時會考慮未來的道路發展，不會因為當前的發展而局限改善或增設交通設施的空間。規劃署與運輸署會研究藉發展項目找出及彌補現有道路的不足。
- (xi) 規劃署會把在三門仔建橋接駁馬 山的建議轉交有關政策局跟進。
- (xii) 規劃署收到露輝路附近四個屋苑反對 E 項建議的信件，該署理解有關居民的關注。露輝路附近現有樓宇的地積比率介乎 0.8 至 1.8 倍。由於 E 項建議所涉的土地並未平整，發展時需考慮較多因素，初步估計該幅土地的發展規模的淨地積比率約為 1.1 倍。
- (xiii) 規劃署會考慮保留或重置受 E 項建議影響的泊位。
- (xiv) E 項建議所涉土地上的樹木為過去工程補種的，並非原生樹木，屬較普遍的品種。規劃署重視綠化，因此把發展密度定得較低，以騰出空間植林。該署會要求發展商進行樹木統計，記錄樹木的品種和樹齡等資料。此外，該署亦會盡量保留原有的樹木。
- (xv) F 項建議下擬在北面興建的樓宇因鄰近高密度的居屋及公屋，加上部分土地已平整，其建議發展密度會較高；擬在南面興建的樓宇因較貼近低密度住宅，其發展規模會較小；夾在南北中間的土地主要用作興建交通設施。整項建議的發展規模的地積比率的約為 3 至 3.6 倍，惟所涉土地因地勢關係在發展上或有困難，其發展規模或會因此而再作微調。
- (xvi) 規劃署理解委員對 H 項建議的憂慮。為配合周邊發展、現有樓宇的高度及環境，該項建議會發展不高於 10 層的樓宇。
- (xvii) 規劃署須與持分者磋商，由於過程需時，故未及於上次會議上提出部分有關改劃白石角(東部)土地用途的建議。為免影響計劃進度，該署遂於是次特別會議上提出上述建議。
- (xviii) 擬改劃用途的白石角土地已準備就緒，工程可隨時展開。該幅土地雖預留作發展科學園第四期之用，但迄今並無詳細規劃。規劃署預計科學園第一、第二及第三期會有空間擴展或重建，應可應付中短期的需要。此外，政府已於古洞北預留土地作科研及有關工作之用，落馬洲河套區亦有不少土地可作科研用途。因此，該署認為改劃該幅土地不會對本地科研發展造成負面影響。政府絕不會忽視科研的發展需要。

Incorrect
Information



- (xix) 規劃署並非只會考慮在所涉九幅土地上發展房屋。若然該署日後就區內其他土地(例如九龍坑塘坑)定出較成熟的發展方案，定當諮詢大埔區議會。
- (xx) 部分土地在發展前需先行平整或預留土地構築道路及興建相關設施。規劃署現時較難準確估算有關土地的大小及可建築範圍，因此才以總樓面面積表示發展規模的上限，以免將來落實發展細節時規模超出預算。在其他情況下，該署均以地積比率表示發展規模。
- (xxi) 根據規劃署的經驗，較高的樓宇的整體高度會因不同的樓層高度而有較大差異，主水平基準上的距離較能準確反映建築物的高度限制。如樓宇較矮或未有足夠資料準確釐訂主水平基準上的距離，該署會以層數表示建築物的高度。

7. 劉家麒先生指大元邨為拆售屋邨，重建工程涉及修改地契，房署亦須在工程進行前與領匯等持分者商討。他續指房署仍在研究有關細節，適當時候會向大埔區議會匯報。此外，他表示房署會根據《香港規劃標準與準則》及有關部門的建議決定 A 項及 B 項擬建公共房屋所需的各項配套設施，待有進一步設計時會諮詢大埔區議會。

8. 主席請規劃署繼續聽取地區人士的意見，並著實規劃各擬建屋苑的社區設施及交通配套，使居民能安居樂業。他亦促請政府公平處理於綠化地帶興建小型屋宇的申請。此外，他表示會就涉及他的選區的規劃建議諮詢持分者。他指委員會後可去信規劃署表達他們對各項規劃建議的意見，以便有關的建議在提交城市規劃委員會考慮前可作出所需修訂。

大埔區議會秘書處

2014 年 5 月

TPB/R/S/TP/25-1639

致城市規劃委員會秘書：

有關的規劃申請編號：S/TP/25 Item E

**強烈反對露輝路綠化地改建住宅
規劃署既欠缺恰當諮詢亦漠視市民強烈反對意見**



毫無誠意諮詢民意：

1. 位於露輝路五屋苑業主立案法團祇於 2014 年 2 月 4 日收到由大埔區議員劉志成博士來函，方首次知道規劃署向大埔區議會已提交將大埔露輝路 E 項地塊改劃為「住宅(丙類)9」用途。直至所謂區議會已原則性地同意前，吾等位處該地段之五屋苑全體業主完全被蒙在鼓裡。
2. 大埔區議員劉志成博士表示，作為大埔區議員的他亦祇於 2014 年 1 月 7 日從報張才知道大埔有八幅土地由綠化地改為住宅用地；然而，規劃署祇於 2014 年 1 月 8 日才首次向大埔區議會轄下之環境、房屋及工程委員會提交該八幅土地的諮詢文件及作討論，並非向大埔區議會大會提交。
3. 劉志成博士即於 2014 年 2 月 7 日與露輝路五屋苑業主立案法團代表開會，會上各代表一致強烈反對規劃署的建議。隨後，露輝路五屋苑業主立案法團代表亦於 2014 年 2 月 13 日向大埔區議會環境、房屋及工程委員會特別會議及規劃署提交強烈反對信件。
4. 劉志成博士表示，於 2014 年 2 月 13 日大埔區議會環境、房屋及工程委員會特別會議上表達了露輝路五屋苑業主及八百多廣業主對規劃署將露輝路 E 項地塊改劃為「住宅(丙類)9」用途就環境、交通、綠化及公共設施而強烈反對的意見。小組主席陳笑權曾敦促*『規劃署繼續聽取地區人士的意見，並著實規劃各擬建屋苑的社區設施及交通配套，使居民能安居樂業。他亦促請政府公平處理於綠化地帶興建小型屋宇的申請。此外，他表示會就涉及他的選區的規劃建議諮詢持分者。他指委員會後可去信規劃署表達他們對各項規劃建議的意見，以便有關的建議在提交城市規劃委員會考慮前可作出所需修訂。』很遺憾的是，規劃署並沒有絲毫的考慮以上種種意見。
*2014 年 2 月 13 日大埔區議會環境、房屋及工程委員會特別會議記(修訂版)
5. 劉志成博士又於 2014 年 3 月 4 日與露輝路五屋苑業主立案法團代表一同前往沙田規劃署會見蘇震國專員，歷時三小時。於會上各代表除一致強烈反對規劃署的建議並要求撤回露輝路 E 項地塊改劃為「住宅(丙類)9」用途。然而，蘇專員却仍然一意孤行、完全漠視民意，並歪曲事實將當區全體強烈反對的意見完全抹去並堅持其原建議向城規會提交，並草率及迅速地於 2014 年 4 月 11 日完成刊憲的繁複程序。這徹底地顯示出規劃署根本從來沒有誠意和關

心受影響的當地居民或議員的反對意見。

6. 於刊憲後，露輝路五屋苑業主立案法團及業主、居民超過 300 多人於 2014 年 4 月 13 日召開反對抗議遊行。又於 2014 年 4 月 30 日向大埔區議會主席表達反對意見。
7. 更有甚者，於 2014 年 5 月 3 日召開居民大會向蘇專員及其他多個政府部門就該問題表達反對意見，當晚參與的居民超過 200 多人，會中提出許多問題，政府官員均未能提出合理的回覆。
8. 及後，露輝路五屋苑業主立案法團及業主、居民亦出席了 2014 年 5 月 8 日大埔區議會大會，再次向大埔區議會及規劃署表達強烈反對意見。席上過半數議員發言，強烈不滿規劃署蔑視市民反對意見和區議會法定諮詢功能及規劃署的官員處事草率、敷衍塞責的態度。有議員動議反對規劃署的改劃建議、及一致強烈要求規劃署必須認真聆聽及考慮市民反對的意見。
9. 市民不禁要質問負責草擬大埔露輝路 E 項地塊改劃為「住宅(丙類)9」用途的規劃署官員為何在沒有充分考慮地區居民和欠缺區議會詳細的研究、討論下，鬼祟及急速地企圖逃避大埔區議會全體大會的討論和聽取全體議員的意見下，祇向大埔區議會轄下委員人數不多和欠缺充份和全面諮詢之環境、房屋及工程委員會內作輕率寥作敷衍了事。

罔顧民意：

於報張報導改劃的消息前，規劃署官員從未就此向居民、大埔區議會作任何諮詢；及至其後向城規會提交前；規劃署官員亦分毫沒有理會市民或法定諮詢組織的大埔區議會及其委員會的議員等眾多和不同的強烈反對意見，規劃署官員堪稱「視而不見、聽而不聞」官僚作風的典範。

從以上負責大埔露輝路 E 項地塊改劃為「住宅(丙類)9」用途的沙田、大埔及北區規劃署及規劃專員不單一直沒有向受影響的當地地區市民作任何的諮詢，更罔顧向具法定效力的區議會作諮詢；上述一切更遑論聽取市民或區議會或任何的表達反對的意見。

更荒謬的莫過於，規劃專員蘇震國於 2014 年 5 月 3 日召開的露輝路五屋苑業主立案法團及業主居民大會上被居民質詢「於向城規會提交規劃建議前『何時、如何和怎樣』地聽取地區市民的意見」時，仍砌詞狡辯稱於地區規劃前已徵詢民意，及以極其推卸責任的態度和口吻地表示該建議已提交城規會及刊憲，已不關規劃署的事，促居民唯有於限期前向城規會表達意見。

然而，他所謂的「地區規劃前已徵詢民意」實有誤導市民之虞，因他所指的即上文第 5 段的：「劉志成博士又於 2014 年 3 月 4 日與露輝路五屋苑業主立

案法團代表一同前往沙田規劃署會見蘇震國專員」。這樣牽強地把「會上各代表一致強烈反對規劃署的建議並要求撤回露輝路 E 項地塊改劃為「住宅(丙類)9」用途。」視為已於「地區規劃前已徵詢民意」實在有強姦民意之嫌。

再者，由蘇專員於 2014 年 3 月 4 日與露輝路五屋苑業主立案法團代表見面，以至規劃署已能原封不動地將其原規劃建議完成所謂的地區諮詢、向城規會提交「詳盡」及完成繁複及迅速於 4 月 11 日完成刊憲程序，這實在令市民質疑其向市民真正諮詢的誠意。當中，當然規劃署及蘇專員根本完全漠視露輝路五屋苑全體業主的強烈反對意見、充耳不聞；更沒有考慮過區議會各議員就此所表達反對的意見。

有違政府的諮詢程序精神及原則：

規劃署為何公報此改變用途前完全沒有諮詢或正式通知本區受影響的居民？政府這樣處理規劃的行為，實屬完全罔顧本區居民利益及漠視民意的鬼崇行為而必須予以譴責。

甚至於，規劃署可能藉以「米已成炊」的俾劣行為達成改變用途而弄虛作假，更可見政府在本土地改變用途項目上，期達瞞天過海之術，逃避應有之態度，凡此種種，實在令市民憤慨；規劃署當中或涉違背正常的程序，整個規劃亦極有可能涉及行政失當。

規劃署是次就大埔露輝路 E 項地塊改劃為「住宅(丙類)9」用途實在有違政府一向秉持完整的諮詢程序和工作精神及原則，期間應該有充裕的時間讓市民大眾、團體又或者是學者、專業人士和利益團體有充份發表意見的機會；及後，政府亦應該提供足夠的理據及於不同的場合向前述市民大眾和人士一一作出交代。觀乎是次規劃署官員處事作風和傲慢的官僚方式實有損特區政府一向尊重及重視民意的施政方針，特區政府有責任正視和糾正這種罔顧民意的歪風和草率官僚處事態度。

致城市規劃委員會

有關反對露輝路E地塊由綠
化地改為住宅用地(S/TP/25)

嘉豐花園業主

PLANNING BOARD

2014 JUN 11 P 5:19

致城市規劃委員會秘書：

有關的規劃申請編號：S/TP/25 Item E

反對露輝路改變土地用途，用作興建住宅

本業主立案法團就上述規劃，提出以下反對的理據：

1. 行政長官應守承諾

特區首長於 2013 及 2014 連續兩年施政報告中，明確指出可改劃的綠化地是「已失去其原有功能的、沒有植被、荒廢及已平整的土地」。露輝路樹林的情況與首長的定義完全相反，露輝路樹林是完全植被、有過千棵大樹的茂密樹林、位處 未被平整的小山崗上。我們要求行政長官信守承諾，保護 完好的露輝路樹林。(見 2013 年施政報告 53 段、2014 年 125 段)

2. 交通不聲負荷

露輝路及汀角路的交通，現已相當繁忙，汀角路沿路未來已落實的發展包括：慈山寺、水療中心、骨灰龕、龍尾泳灘、鳳園新樓盤等；而大埔東消防局亦座落露輝路、汀角路口，交通擠塞將直接影響拯救效率。

3. 現有綠化地是全個露輝路山頭唯一的居民休憩地段

根據規劃條例，政府在規劃土地用途和地積比率時，須照顧居民的休憩和社區設施需要。

估計露輝路山頭的居民、宿生和學生，有萬五人，但卻一處政府休憩設施也沒有，居民爭取多年，政府一直忽視。現 E 地段綠化地，是居民唯一的晨運、跑步和溜狗的地方。剷除綠化地，將迫使居民於全山頭唯一的狹窄的露輝路行人路上溜狗，將對路上的兒童及老人造成危險，並製造大量衛生的和嘈音問題。

4. 屏障附近厭惡性設施

露輝路樹林，一直為附近的厭惡性設施提供天然的屏障：船灣堆填區、污水處理廠、水泥廠、煤氣廠、大埔工業村及繁忙的交通。露輝路樹林位處山頂為五個屋苑及鄰近地方的中心市肺，其屏障功能不可取締！

5. 缺乏廣泛諮詢

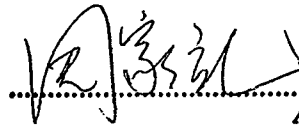
綠化地帶一直是全港各區，尤其是新市鎮的城市規劃的重要元素，行之已久幾十年。政府這次大規模剷除綠化地帶，並未進行全港的廣泛諮詢及共識。香港人熱愛郊野公園，保護綠化環境，是我們的核心價值之一！

6. 政府沒有善用現有土地

我們支持香港的建屋需要，但促請政府先做好棕土發展、活化工廈、善用部份軍營土地及政府空置宿舍，並公報上述荒廢土地的數字；我們也關注發展商屯積土地多年。政府應首先善用以上土地，不應破壞環境及生態去發展。大埔已有多項低密度住宅的積壓和新的供應，達2300單位，連白石角地皮流標，反映大埔對低密度住宅的需求不大。而需要交通方便的「上車盤市民」，一般不會來交通不便的露輝路山頭。所以將露輝路綠化地改建住宅，無助政府重點幫助的「上車盤/青年」和大眾的居住需要。

謹此希望 貴會能認真考慮及聆聽居民的聲音而撤消有關規劃。

For and on behalf of
THE INCORPORATED OWNERS OF FOREST HILL



.....
Authorized Signature(s)

周家礼 (主席)
倚龍山莊業主立案法團

二零一四年六月九日

The Incorporated Owners of Tycoon Place

聚豪天下

TPB/R/S/TP/25-1641

致：城市規劃委員會秘書

有關的規劃申請編號：S/TP/25 Item E

呈

敬啟者：

有關 大埔露輝路 E 地段綠化帶發展計劃

就政府當局更改大埔露輝路 E 地段綠化帶作為住宅用地諮詢公眾，
本屋苑法團特此作出強烈反對，並要求保留該地段為綠化地。本屋
苑法團之反對理由如下：-



(一) 區內交通

本區已為成熟之社區，合共五個住宅屋苑及一所教育學院，且已落成約十多年。各屋苑之主要交通往來亦依靠各屋苑之穿梭巴士或自行駕車。本法團對於區內之交通日益頻繁，及於繁忙時間十分擠擁，令致在與汀角路之交匯處十分擠塞。此外亦因只得邨內之穿梭巴士服務，令本邨居民出入大埔市中心十分不便，故曾於多年前要求加置公共交通設施。這曾與當時本區之區議員盧三勝先生，及大埔區交咨會議員黃碧嬌小姐及其他多名議員會面表達訴求。在會面中，也同時邀請了進智交通代表，以研討可行方案。惟在多方努力下，本區公共交通非但得不到改善，計而更撤去 275 號線巴士。在

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此議題上，政府當局全然就手旁觀，一方面嚴加限制屋苑穿梭巴士行駛班次，上落客點等，逼使本邨居民只得自行駕車，加重露輝路負荷，另一方面完全忽略社區規劃，道路需求，忽視居民生活所需，漠視本苑居民訴求。有基於此，再規劃增加區內住屋，如同火上加油，超出路面負荷，令上班上學時段將原有擠擁之交通更為擠塞。

(二) 社區環境

- 1) 本區之綠化帶，綠樹林蔭，枝葉茂盛，讓多樣野生物種棲息，我們可常見到的包括猴子、蜥蜴、箭豬、穿山甲、莽蛇等。將這茂密之樹林移除，無疑直接摧毀了香港野生動物之家園。
- 2) 再者此綠化地亦同時作為本社區屋苑間之緩衝區；平添了區內的鄉郊氣息；增加了社區寧靜之環境；減低了本區日照時之幅射熱度；緩沖了屋苑間之噪音及燈光滋擾；靜化了街道之空氣。移除了樹林，無疑完整地破壞了本社區環境。
- 3) 良好之城市規劃，應讓社區有充足之公共空間及康樂設施。窺望本社區欠缺公園及任何遊樂設施。慶幸這綠化地乃唯一讓本邨居民可作休憩及閒息。於假期間作散步及晨運等。撤去樹林，無疑要求本邨居民只得困於石屎森林裏。

(三) 對本屋苑之直接影響



本屋苑為低密度住宅區，享有高私隱及寧靜之空間。發展有關綠化地而容許興建較高密度之住宅群，將直接構成本苑之滋擾，這總括如下：-

- 1) 發展如此大型之用地，無論在平整地段、移去樹林或興建期間，對本屋苑之住戶構成極大之滋擾，包括噪音、空氣、私隱等。
- 2) 在發展期間，將嚴重影響區內排水。隣近地方之雨水均必須經本屋苑之大型雨水道排出至黃魚灘。在現地段發展期間至完全發展後，此情況亦不會改變。但移去樹林及植被將嚴重增加雨水排放量，甚至對有關渠道做成淤塞，嚴重危害本屋苑。據記錄，本屋苑在落成初期，樹林未達成熟茂盛時，本邨每大雨天時均經歷雨水從現有樹林山坡沖下本屋苑，引致連場水浸。這決不是危言聳聽，是確切之事實記錄。
- 3) 本邨居民用畢生積蓄，以數以千萬元購置物業乃機於綠化帶的存在。摧毀此地段必影響本邨環境，影響本苑住戶投資及財產。況且有個別單位距離綠化帶只得五至六米。加上擬發展之住宅群嚴重防礙本屋苑之通風，對本邨居民健康構成嚴重影響。

良好之城市規劃，應以改善居住環境為依歸，盲從地將較高密度之住宅群插入已規劃之社區，而沒有考慮居民需要及周邊配套，是極不負責任之行為。政府當局一方面大力宣傳鼓勵種植林木，努力保護郊野，維護社區和諧，建設共融社會，但現卻背道而馳。政府當局漠視本屋苑全體居民之訴求在先，現發展有關地段，摧毀本苑環境，加重本苑居民對政府之抗爭，嚴重違反了原有土地規劃原則，削弱了政府管治方針。故此本苑法團及本苑居民強烈要求 貴會撤回是項規劃。

此致

城市規劃委員會秘書



聚豪天下業主立案法團
主席潘浩勳 啟
二零一四年六月十日

副本：1) 通告箱

2) 全體業戶

THE INCORPORATED OWNERS OF RICHWOOD PARK

嘉豐花園業主立案法團

TPB/R/S/TP/25-1642

致城市規劃委員會秘書：

有關的規劃申請編號：S/TP/25 Item E

反對露輝路「E項地塊」由綠化地帶改劃為「住宅(丙類)9」

本業主立案法團就上述規劃，提出以下反對的理據：

1) 空氣污染嚴重

嘉豐花園住戶擔心綠化地的樹木被斬伐後，整個天然屏障消滅，取而代之是 660 戶高過嘉豐花園的屏風樓，空氣質素變壞，熱島效應將更嚴重。

綠化地是露輝路居民唯一公共設施，此綠化地是給 5 屋苑居民及老人家晨運及散步的唯一地方，是整個露輝路的市肺及緩衝區。

綠化地的樹木被斬伐後，居民亦擔心出現山泥傾瀉的危機。並在動土期間，各項建設所產生的嘈音及泥頭車所引起的塵土飛揚，空氣中的污染物令到居民的呼吸系統出現問題特別是長者、小孩及本身有心臟病或呼吸系統疾病病人的影響尤其嚴重，年老體弱者，死亡風險亦會提高。

2) 缺乏廣泛諮詢

綠化地帶一直是全港各區，尤其是新市鎮城市規劃中重要元素，行之已久幾十年。政府這次大規模剷除綠化地帶，並未進行全港的廣泛諮詢。規劃署為何公報此改變用途前完全沒有諮詢或正式通知本區受影響的居民？政府這樣處理規劃的行為，實屬完全罔顧本區居民利益及漠視民意的鬼崇行為。

3) 學額及社區配套不足

政府建議改劃大埔七幅綠化地帶的規劃文件預計，人口將增加三萬人，規劃卻未有提出社區配套的安排，如醫療、教育及就業等。單是露輝路樹林改劃建議所帶來的 660 伙私樓，預計對小學學額的需求已達 100 個，現時大埔區小學及幼稚園的學額已經不足，規劃文件卻對教育及其他配套隻字不提！我們不能支持如此粗疏的規劃建議！

4) 道路規劃不完善及交通不聲負荷

露輝路是一條斜坡及偏頭路，雙線雙程及全露輝路居民及教育學院師生出入汀角路的唯一通道，加建住宅會加重露輝路使用量。現時若有車停在路邊而需要越線時，常常險象環生，及在下雨天天雨路滑時候，當大部份駕駛者都較平時稍慢已引發長長車龍。

THE INCORPORATED OWNERS OF RICHWOOD PARK

No. 33, Lo Fai Road, Tai Po, N.T.

嘉豐花園業主立案法團

地址：新界大埔露輝路三十三號

綜觀整個露輝路5屋苑加起只有834戶，政府若加建660戶，即增加80%以上戶數共1,494戶，居民質疑露輝路能否承擔此突然增加的負荷量。若有意外而露輝路同時堵塞而不能前進，傷者或病人因而沒有得到適當的救援，誰人又能承擔此責任。

汀角路、大埔火車站及大埔中心在過去十年已很塞車/擠塞，特別在假日。未來又有多項新發展項目落成如慈山寺、水療中心、骨灰龕、龍尾泳灘、鳳園新樓盤1300個單位，若露輝路再起樓，會更塞車，政府目前又沒有安排任何配套。而規劃署將露輝路唯一的公眾停車場也規劃在660戶的土地內，完全漠視區內車位不足的問題，若到訪者將車輛泊在路邊而引致大塞車或交通意外，誰人又能承擔此責任。

謹此希望 貴會能認真考慮及聆聽居民的聲音而撤消有關規劃。



嘉豐花園業主立案法團
第九屆管理委員會主席
林碧瑜

二零一四年六月五日

淺月灣一期業主立案法團

The Incorporated Owners of Casa Marina I

TPB/R/S/TP/25-1643

Ref no.: IOCM1/2014/L003

郵寄及傳真：

城市規劃委員會
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：

大埔露輝路 E 地塊由綠化地改為住宅用地的諮詢文件 (S/TP/25)

得悉城規會的公眾諮詢文件(S/TP/25)提及政府計劃將本苑及聚豪天下之間綠化地改建住宅，預計會興建 660 個單位，樓面面積達 46,200 平方米。以現時五個屋苑共 834 伙計算，此改劃建議預計會增加露輝路人口達 80%。在早前有關反對將綠化地改建住宅的簽名活動中，各露輝路屋苑已收集到共 800 多個簽名，並於 3 月 4 日交給規劃署，證明大部份露輝路的住戶均強烈反對有關改劃建議。有鑑於此，本法團現謹代表本苑的居民向城規會提出下列反對意見：

發展用地過於貼近屋苑：在規劃署會的文件中提及露輝路的發展用地在聚豪天下及淺月灣一期之間，與淺月灣一期只有不足 1 米之隔（見附圖），以此「插針式」興建 660 伙單位，有違規劃署的土地發展原則，嚴重影響地區原有的特色，更遮擋各屋苑的唯一通風口，恐防會造成屏風效應，對地區的空氣流通，質素及採光造成嚴重影響。在發展用地過程中，土地平整、打樁及興建樓宇估計兩個地盤的工程更最少歷時 5-6 年時間。工程進行期間每天地盤沙塵滾滾，噪音頻生，更會有工程車輛來回工地，對在不足 1 米之隔生活的居民會造成嚴重的滋擾。政府在未有進行充足的環境因素評估，便謬然將綠化地發展為住宅用地，對居民的生活會造成巨大的影響。

不可或缺的土地用途：休憩用地有助改善區內陽光照射和空氣流通的狀況。現時露輝路整體是缺乏休憩用地。倘再將土地改為住宅，尤其在社區的人口開始老化，現時居民對附近增闢靜態休憩用的需求日增，政府不但沒有考慮現時的居民需要，更在區內唯一可勉強作為休憩地的小徑上興建住宅，是漠視居民的需要。根據休憩用地的供應標準，鄰舍休憩用地每人最少需要一平方米，並須考慮斜坡修正系數。以現時露輝路五個屋苑有 834 伙，共約 2500 人來計，最少需要 2500 平方米的鄰舍休憩用地。以現時露輝路的公共休閒空間只有中央一條晨運徑，已甚為不足，倘政府再剝奪現有的休憩空間及綠化地，會違反休憩用地的供應標準。如城規會批准改劃建議，區內唯一的晨運徑會被收回，兩幅住宅發展用地內的休憩地相信將來會被圍牆包圍，只供該兩個屋苑內的居民享用，各露輝路的屋苑居民根本無從享用。

地區設施配套全無：在諮詢文件內，規劃署並未提及任何交通、環境、醫療、教育、社區設施配套的評估，原本露輝路五個屋苑共約 2500 人，包括教育學院近萬師生及教職員，本身已欠缺任何地區配套，加上項目會將地區人口增加達 80%，與原先政府的「康樂、休憩用地及綠化」規劃政策相違背。露輝路雖然已是成熟的社區，但

淺月灣一期業主立案法團

The Incorporated Owners of Casa Marina I

一直缺乏齊備的大眾生活設施，包括街市、診所、康樂設施如運動場、兒童遊樂場、緩跑徑。現時只得嘉豐花園內的唯一一間小超市。露輝路及汀角路的居民每天購買生活必需品都需要乘車到大埔中心及沙田其他地方購買日常食品；生病時亦需架車到市中心的診所診治。在本身配套設施嚴重不足的情況下再增加 80%人口。假若計劃最終獲得城規會的通過，之後的詳細規劃也會跟不上進度，計劃明顯沒有作充份考慮。

破壞原有的生活環境：露輝路本身為低密度住宅，大部份的居民均有飼養寵物如狗隻。以淺月灣一期為例，據統計屋苑現時約有 50 隻犬隻，平時住戶會於綠化地中唯一的晨運徑散步及放狗，寵物廁所及公園本已缺乏。倘綠化地改建住宅，晨運徑被移除後，居民將需要在露輝路兩旁放狗。觀乎現時兩旁行人路的路面衛生情況已非常惡劣，偏佈狗糞，日後的情況更會不堪設想，亦帶來嚴重的環境衛生，病菌傳播機會等問題，尤其老年人、小童及長期病患者影響更甚。

公眾車位嚴重不足的問題：現時露輝路五個屋苑有 834 伙，惟只有一個屋苑內有少量的訪客停車位以外，其餘四個屋苑均沒有訪客停車位，而政府的公眾咪錶停車位只有 19 個。因此，部份居民的訪客及惠顧小型超市的居民在無選擇的情況下，只能將車輛泊在路旁，阻擋駕駛者越線。上落的車輛只能越線行車，每日險象橫生。政府只將違泊車的問題交由警方處理，並無考慮根深蒂固的車位不足問題。倘再加上 660 伙單位，只會將情況加劇，問題更難解決。

露輝路及汀角路的交通不勝負荷：現時露輝路出入均為單線行車，倘路面被車輛違泊會造成危險的情況，在違泊問題未解決時再加上 660 伙，估計 80%住戶會以車輛進出，在狹窄的路面上每天增加約 450 部車輛來往，再加項目發展後上地盤的重型車輛以高速行駛傾斜的露輝路，令發生交通意外的機會率大增。至於汀角路方面，情況更為嚴重，多期的渠務工程及路面的狹窄已令路面擠塞的情況多年來為人疚病，在未來多個發展項目如龍尾泳灘、水療中心、骨灰龕、露輝路 660 伙、長實樓盤「嵐山」等完全啟用後，相信擠塞情況會加劇，不但阻塞車輛往返市區，更會令附近的消防及救護車無法出入，危及附近居民的生命財產。

綠化地規劃政策前後矛盾：在 2013 及 2014 連續兩年的施政報告中，明確指出可改劃的綠化地是已失去其原有功能，「沒有植被、荒廢及已平整的土地」，現在露輝路的綠化地是完好及具高度環保屏障功能的，如城規會批准通過，會令事件放大至政府誠信危機。「綠化地」幾十年來一直未被用作大型發展，居民幾十年前入住/窮盡積蓄置業時，也是基於規劃文件清楚列明：「綠化地帶的規劃意向，主要是利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區範圍的擴展，並提供土地作靜態康樂場地。根據一般推定，此地帶不宜進行發展。」現時政策突變，居民無所適從。

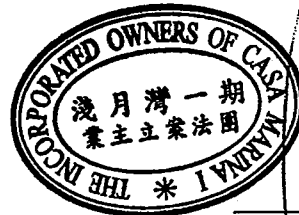
淺月灣一期業主立案法團

The Incorporated Owners of Casa Marina I

規劃過程粗疏及諮詢不足：規劃署急於交數，硬推改劃建議，區議會及居民均表示反對，大埔區議會亦曾發言表達規劃署提供的資料不足，配套不全。規劃備受區議員的評擊，惟計劃依然送交城規會，給城規會的諮詢文件故意淡化居民的反對聲音。另外，規劃署一直堅稱按照法例政府主導的改劃，毋須以信函通知居民，只需刊憲進行公眾諮詢。無論居民透過信函及在居民大會向規劃署官員進行質詢時，只獲得「改劃建議已交給城規會進行公眾諮詢」的公式答案，明顯將責任推卸給城規會，而無視改劃建議最初是由規劃署策動，明顯漠視居民的意見。

謹希望城規會在審議是否批准露輝路的綠化地改建為住宅項目時考慮上述因素，並擱置有關改建計劃。倘對上述事宜有任何疑問或查詢，歡迎致電 2663 4232 與本苑物業服務處黃先生聯絡。

敬希垂注！



李德麟
淺月灣一期業主立案法團
第二屆管理委員會主席
2014年6月9日



淺月灣二期業主立案法團

The Incorporated Owners of Casa Marina II

TPB/R/S/TP/25-1644

新界大埔露輝路一號會所

城市規劃委員會
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：

大埔露輝路 E 地塊由綠化地改為住宅用地的諮詢文件 (S/TP/25)

得悉城規會的公眾諮詢文件(S/TP/25)提及政府計劃將本苑及聚豪天下之間綠化地改建住宅，預計會興建 660 個單位，樓面面積達 46,200 平方米。以現時五個屋苑共 834 伙計算，此改劃建議預計會增加露輝路人口達 80%。在早前有關反對將綠化地改建住宅的簽名活動中，各露輝路屋苑已收集到共 800 多個簽名，並於 3 月 4 日交給規劃署，證明大部份露輝路的住戶均強烈反對有關改劃建議。有鑑於此，本法團現謹代表本苑的居民向城規會提出下列反對意見：

不可或缺的土地用途：

休憩用地有助改善區內陽光照射和空氣流通的狀況。現時露輝路整體是缺乏休憩用地。倘再將土地改為住宅，尤其在社區的人口開始老化，現時居民對附近增闢靜態休憩用的需求日增，政府不但沒有考慮現時的居民需要，更在區內唯一可勉強作為休憩地的小徑上興建住宅，是漠視居民的需要。根據休憩用地的供應標準，鄰舍休憩用地每人最少需要一平方米，並須考慮斜坡修正系數。以現時露輝路五個屋苑有 834 伙，共約 2500 人來計，最少需要 2500 平方米的鄰舍休憩用地。以現時露輝路的公共休閒空間只有中央一條晨運徑，已甚為不足，倘政府再剝奪現有的休憩空間及綠化地，會違反休憩用地的供應標準。如城規會批准改劃建議，區內唯一的晨運徑會被收回，兩幅住宅發展用地內的休憩地相信將來會被圍牆包圍，只供該兩個屋苑內的居民享用，各露輝路的屋苑居民根本無從享用。

地區設施配套全無：

在諮詢文件內，規劃署並未提及任何交通、環境、醫療、教育、社區設施配套的評估，原本露輝路五個屋苑共約 2500 人，包括教育學院近萬師生及教職員，本身已欠缺任何地區配套，加上項目會將地區人口增加達 80%，與原先政府的「康樂、休憩用地及綠化」規劃政策相違背。露輝路雖然已是成熟的社區，但一直缺乏齊備的大眾生活設施，包括街市、醫務診所、康樂設施如運動場、兒童遊樂場、緩跑徑。現時只得嘉豐花園內的唯一一間小超市。露輝路及汀角路的居民每天購買生活必需品都需要乘車到大埔中心及沙田其他地方購買日常食品；生病時亦需架車到市中心的診所診治。在本身配套設施嚴重不足的情況下再增加 80% 人口。假若計劃最終獲得城規會的通過，之後的詳細規劃也會跟不上進度，計劃明顯沒有作充份考慮。

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破壞原有的生活環境及屏障附近厭惡性設施：

露輝路本身為低密度住宅，大部份的居民均有飼養寵物如狗隻。以淺月灣一期為例，據統計屋苑現時約有 50 隻犬隻，平時住戶會於綠化地中唯一的晨運徑散步及放狗，寵物廁所及公園本已缺乏。倘綠化地改建住宅，晨運徑被移除後，居民將需要在露輝路兩旁放狗。觀乎現時兩旁行人路的路面衛生情況已非常惡劣，偏佈狗糞，日後的情況更會不堪設想，亦帶來嚴重的環境衛生，病菌傳播機會等問題，尤其老年人、小童及長期病患者影響更甚。露輝路樹林，一直為附近的厭惡性設施提供天然的屏障：船灣堆填區、污水處理廠、水泥廠、煤氣廠、大埔工業村及繁忙的交通。露輝路樹林位處山頂，其屏障功能不可取締！

公眾車位嚴重不足的問題：

現時露輝路五個屋苑有 834 伙，惟只有一個屋苑內有少量的訪客停車位以外，其餘四個屋苑均沒有訪客停車位，而政府的公眾咪錶停車位只有 19 個。因此，部份居民的訪客及惠顧小型超市的居民在無選擇的情況下，只能將車輛泊在路旁，阻擋駕駛者越線。上落的車輛只能越線行車，每日險象橫生。政府只將違泊車的問題交由警方處理，並無考慮根深蒂固的車位不足問題。倘再加上 660 伙單位，只會將情況加劇，問題更難解決。

政府建議戶數增加近倍，露輝路及汀角路交通不勝負荷：

現時露輝路出入均為單線行車，倘路面被車輛違泊會造成危險的情況，在違泊問題未解決時再加上 660 伙，估計 80% 住戶會以車輛進出，在狹窄的路面上每天增加約 450 部車輛來往，再加項目發展後上地盤的重型車輛以高速行駛傾斜的露輝路，令發生交通意外的機會率大增。至於汀角路方面，情況更為嚴重，多期的渠務工程及路面的狹窄已令路面擠塞的情況多年來為人疚病，在未來多個發展項目如龍尾泳灘、水療中心、骨灰龕、露輝路 660 伙、長實樓盤「嵐山」等完全啟動後，相信擠塞情況會加劇，不但阻塞車輛往返市區，更會令附近的消防及救護車無法出入，危及附近居民的生命財產。

綠化地規劃政策前後矛盾：

在 2013 及 2014 連續兩年的施政報告中，明確指出可改劃的綠化地是已失去其原有功能，「沒有植被、荒廢及已平整的土地」，現在露輝路的綠化地是完好及具高度環保屏障功能的，如城規會批准通過，會令事件放大至政府誠信危機。「綠化地」幾十年來一直未被用作大型發展，居民幾十年前入住/窮盡積蓄置業時，也是基於規劃文件清楚列明：「綠化地帶的規劃意向，主要是利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區範圍的擴

淺月灣二期業主立案法團

The Incorporated Owners of Casa Marina II

新界大埔露屏路一號會所

展，並提供土地作靜態康樂場地。根據一般推定，此地帶不宜進行發展。」現時政策突變，居民無所適從。

規劃過程粗疏及諮詢不足：

規劃署急於交數，硬推改劃建議，區議會及居民均表示反對，大埔區議會亦曾發言表達規劃署提供的資料不足，配套不全。規劃備受區議員的評擊，惟計劃依然送交城規會，給城規會的諮詢文件故意淡化居民的反對聲音。另外，規劃署一直堅稱按照法例政府主導的改劃，毋須以信函通知居民，只需刊憲進行公眾諮詢。無論居民透過信函及在居民大會向規劃署官員進行質詢時，只獲得「改劃建議已交給城規會進行公眾諮詢」的公式答案，明顯將責任推卸給城規會，而無視改劃建議最初是由規劃署策動，明顯漠視居民的意見。

學額及社區配套不足：

政府建議改劃大埔七幅綠化地帶的規劃文件預計，人口將增加三萬人，規劃卻未有提出社區配套的安排，如醫療、教育及就業等。單是露輝路樹林改劃建議所帶來的 660 伙 私樓，預計對小學學額的需求已達 100 個，現時大埔區小學及幼稚園的學額已經不足，規劃文件卻對教育及其他配套 隻字不提！我們不能支持如此粗疏的規劃建議！

我們促請政府，善用現有的荒廢土地去發展，並作詳細平衡的規劃，諮詢和尊重市民的意見，不要急就章去盲搶地。謹希望城規會在審議是否批准露輝路的綠化地改建為住宅項目時考慮上述因素，並擱置有關改建計劃。倘對上述事宜有任何疑問或查詢，歡迎致電 2663 4232 與本苑物業服務處黃先生聯絡。

敬希垂注！



主席：許守成

淺月灣二期業主立案法團

日期：2014 年 6 月 10 日

致城市規劃委員會秘書：

有關的規劃申請編號：S/TP/25 Item E

1. 本區之業主及住戶絕對是因為嚮往本區原本之優靜的環境、空氣的清新和享有附近之綠化樹叢、於沒有噪音或光害等的滋擾而選擇在本區居住，因此，吾等均耗盡畢生積蓄或不惜斥巨資和負擔高昂的樓價購置本區屋宇單位居住，希望能在本區安居樂業。然而，香港政府或規劃署之官員現在卻嚴重破壞本區一直以來上述各種良好的居住環境，損害本區一帶居民及鄰近之香港教育學院全體師生所享有的權益。香港政府或規劃署之官員必須尊重本區居民意願，有必要時就此承擔為受到損害的業主作出賠償。
2. 尤其是以下各點：
 - i. 規劃署為何公報此改變用途前完全沒有諮詢或正式通知本區受影響的居民？政府這樣處理規劃的行為，實屬完全罔顧本區居民利益及漠視民意的鬼崇行為；
 - ii. 政府官員這種敷衍失責，甚至是失實、隱瞞的態度，不當地區覆市民的查詢、蔑視市民的知情權，企圖以拖延手法，以「米已成炊」的俾劣行為達成改變用途而弄虛作假，更可見政府在本土地改變用途項目上，罔顧本區居民利益、期達瞞天過海之術，逃避應該諮詢本區業主之程序，實在令人憤慨；
 - iii. 規劃署當中或涉違背正常的程序，甚至有「偷步」之嫌，整個規劃亦極有可能涉及行政失當；
 - iv. 當中受影響的絕不祇局限於本區居住的業戶，除對本區生態、空氣、和會引致之光害、空氣、噪音滋擾、屏風效應和環境污染等等之外，對本區之交通亦必然造成嚴重擠塞，亦會因此引致彼鄰香港教育學院全體師生、教職員往返校園因交通阻塞而造成極大困擾和不便。
 - v. 因此，這種情況除嚴重影響露輝路及露屏路全體居民外，其隨之而起之影響尚有由汀角路往返大埔市中心或九龍市區，由改變用途後開始即必然對以上各種問題產生極具破壞性的效果。現時每當有重型車輛、巴士或小巴於露輝路行駛時，隨後往往已有多輛汽車緊隨其後以極緩慢速度行駛；又以現時露輝路與汀角路口之交通燈號之流量而言，每每於燈號期間亦已排列多輛汽車等待轉出汀角路或轉入露輝路。相信上述種種情況在改變土地用途和增加興建 660 多住戶之居苑後，此種擠塞情況由動工開始勢必惡化，特別在繁忙時間更甚。為本區原居民及教院師生造成原有優美環境極大之困擾和破壞、亦將引致其他惡劣環境問題的產生、本區樓價亦瞬間急挫等等。有關官員及政府必須就此承擔一切所引起之不良及負面的責任，甚至於須負起一切可能引出的賠償。其他關注政府有關政策之立法會議員、各有關之立法會委員會主席及立法會議員
3. 香港政府或規劃署之官員理應致力為居民尋求改善環境、增加更多美化及綠化土地為己任，而絕非倒行逆施，帶頭肆意破壞原本的綠化環境，或為地產發展商尋找商機而大力破壞本區一直以來的寧靜環境及綠化土地。
4. 香港政府或規劃署之官員如一意孤行、罔顧本區整體業主、住戶及香港教育學院全體師生、教職員之環境、交通利益，必須為此承擔一切所引生之責任。

意見人姓名：

日期：28/5/14

致城市規劃委員會秘書：

有關的規劃申請編號：S/TP/25 Item E

TPB/R/S/TP/25-2402

我是露輝路的居民，我從新聞/居民通訊得知規劃處計劃將露輝路綠化地改建 660 個住宅。我祈望城規會推翻規劃處此建議，原因是：

- 1) 露輝路是一條斜坡及倔頭路，雙線雙程及全露輝路居民及教育學院師生出入汀角路的唯一通道，加建住宅會加重露輝路使用量。現時若有車停在路邊而需要越線時，常常險象環生，及在下雨天天雨路滑時候，當大部份駕駛者都較平時稍慢已引發長長車龍。
- 2) 整個露輝路 5 屋苑加起只有 834 戶，政府若加建 660 戶，即增加 80% 以上戶數共 1,494 戶，我們質疑露輝路能否承擔此突然增加的負荷量。若有意外而露輝路同時劑塞而不能前進，傷者或病人因而沒有得到適當的救援，誰人又能承擔此責任。
- 3) 此外，我們已被很多厭惡性設施包圍：如船灣堆填區、污水處理廠、水泥廠、煤氣廠、大埔工業村及由繁忙的汀角路產生的汽車廢氣等等，因此綠化地對平衡本區環境極其重要。
- 4) 我和鄰居經常聞到污水處理廠/工業村的臭味，剷除露輝路綠化地，沒有了天然屏障，會把臭味問題惡化。
- 5) 再者，汀角路、大埔火車站及大埔中心在過去十年已很塞車/擠塞，特別在假日。未來又有多項新發展項目落成如慈山寺、水療中心、骨灰龕、龍尾泳灘、鳳園新樓盤 1300 個單位，若露輝路再起樓，會更塞車，政府目前又沒有安排任何配套。
- 6) 綠化地是整露輝路居民唯一公共設施，此綠化地是給 5 屋苑居民及老人家晨運及散步的唯一地方，是整個露輝路的市肺及緩衝區。
- 7) 我們亦擔心綠化地的樹木被斬伐後，會出現山泥傾瀉的危機，及在動土期間，各項建設所產生的嘈音及泥頭車所引起的塵土飛揚，會令到居民的呼吸系統出現問題特別是老人及小孩。
- 8) 規劃署將露輝路唯一的公眾停車場也規劃在 660 戶的土地內，完全漠視區內車位不足的問題，若到訪者將車輛泊在路邊而引致大塞車或交通意外，誰人又能承擔此責任。

意見人姓名：

Jason

簽署：

J

日期：

10/6/2014

04336

TPB/R/S/TP/25-1984

致城市規劃委員會秘書：

有關的規劃申請編號：S/TP/25 Item E

反對露輝路改變土地用途，用作興建住宅

一. 政府建議影響露輝路山頭的特色，和對整個大埔區經濟的貢獻

露輝路山勢相當斜，全山都是矮樓建築；低密度規劃，從一開始已是整個地區的特色，並能吸引專人士入住，貢獻大埔多元規劃及經濟；但現改劃建議，已嚴重影響露輝路本區低密度規劃特色。現有五屋苑，三屋苑為獨立/排屋，兩屋苑為最高四層樓高的樓房，一般建築物高度離路地面約十米(因建築凹於地面)，而且越上山，建築物高度越矮。山腰並有教育學院(連師生宿舍)、教院小學和幼稚園，全是矮樓建築。現時政府建議的五層樓高樓房，660 個單位，正處於露輝路山頭的獨立屋地段旁，無論地勢、高度和密度，都大幅超越旁邊的獨立屋屋苑(兩屋苑加起才有百多戶)。

二. 政府建議的新建單位數目，近整個山頭五屋苑總和的雙倍

政府建議的新建單位數目 660 個，較整個露輝路五屋苑總和 834 個，高出 80%!

政府建議的新建住宅樓高五層，較露輝路其他屋苑的伸出地面三層，高出近倍!

政府建議的樓高五層 660 個新單位，假設一梯四伙，即須建出 33 幢樓宇，是鄰近嘉豐花園總數 16 幢樓宇的雙倍!

政府建議對相鄰屋苑的空間、採光、空氣流通，將帶來擠迫影響。

三. 現時 E 地緊貼相鄰兩屋苑的住戶大門口，只有 3 米!

政府建議的住宅用地，與兩獨立屋屋苑之間，並沒有緩衝地帶，聚豪天下最受影響的屋號的門口，距離政府建議的 E 地段只有 3 米! 聚豪天下有 7 成的住戶的大門，都是對正 E 地的，而且距離只有約 3 至 6 米。淺月灣一期受影響的住戶的露台，距離政府建議 re-zone 的 GIC 地，幾乎是零距離! 兩屋苑都是三層樓高的短房，如此近距離起高樓，現屋苑完全不能採光，而且密不透氣。

四. E 地起樓，將封閉現時聚豪天下東西雙通的通風氣流

影響聚豪一半的居民達數百人。

五. 現有綠化地是全個露輝路山頭唯一的居民休憩地段

根據規劃條例，政府在規劃土地用途和地積比率時，須照顧居民的休憩和社區設施需要。

估計露輝路山頭的居民、宿生和學生，有萬五人，但卻一處政府休憩設施也沒有，居民爭取多年，政府一直忽視。現 E 地段綠化地，是居民唯一的晨運、跑步和溜狗的地方。剷除綠化地，將迫使居民於全山頭唯一的狹窄的露輝路行人路上溜狗，將對路上的兒童及老人造成危險，並製造大量衛生的和嘈音問題

(狗隻在狹路相遇必大吠)，本區特式是差不多家家有狗數隻，估計整個山頭育有上千狗隻，而且大狗相當普遍。

六. 保育及景觀

現綠化地亦是整個露輝路山頭重要的「空氣清新機」，和保育地帶，有巨樹和貓頭鷹。整個山頭，只有這地比較綠油油。居所附近有一點綠，相信是犧牲方便，選擇新界低密度地段的現居民的合理預期。E地段處於山頂，改建稍高住宅也會影響山的景觀，而且也影響從吐露港公路望過來的山線。也影響從吐露港望過去的慈山寺大觀音的整體景觀。

七. 綠化地旁是全個露輝路山頭唯一的公眾停車場

露輝路山頭的居民住宅範圍，完全沒有公共交通工具，而且山勢斜，不能步行，通常家家戶戶都須駕車出入。現綠化地旁的公眾停車場，每晚都不夠用，須予保留。而近年的政府私樓批地條款，停車位與住宅數目比例往往只有 1:4 或更低。但露輝路山頭的住戶特式是每戶都須駕車出入，E 地起建 660 戶額外住宅，相信會令露輝路山頭的停車位短缺，最少達 100 個車位，界時違例泊車將滿布整條露輝路。對途人過路造成危險，也收窄露輝路，引致更塞車。

八. 政府建議戶數增加近倍，露輝路及汀角路交通不勝負荷

山頭唯一的露輝路交通不能負荷不用說，現時上班時段已塞車至山腰，雙倍住戶下，豈不從山頂就塞車？而且車龍阻塞每個屋苑的出入口，屆時將非常混亂！

露輝路口的汀角路是大埔東消防局及救護站所在，現時已有塞車影響緊急車輛不能前進的情況，雙倍的露輝路人口，恐怕會影響整個大埔東的救援效率；而且附近的大尾篤每逢暑假和假日遊人甚擠，八仙嶺每年冬天都有天然山火，地區規劃確保救援效率能照顧遊人和山火，非常重要！

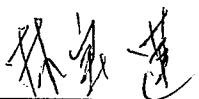
留意交通的預算要計入未來龍尾泳灘、大佛、洞梓、鳳園、工業村骨灰龕，和政府新要求的多幅大埔住宅地的數萬的新人流車流。

而且露輝路起樓的五至七年內，每天相信數近百的車輛駕次的重型泥頭、運輸車進出又窄又斜的露輝路，恐怕更影響露輝路及汀角路交通和大埔東消防局的救援效率。

九. 露輝路山附近新樓宇供應大

大埔已有多項低密度住宅的積壓和新的供應，達 2300 單位（天賦海灣、比華利山、富盈門、嵐岸等），連白石角地皮流標，反映大埔對低密度住宅的需求不大。而需要交通方便的「上車盤市民」，一般不會來交通不便的露輝路山頭。所以將露輝路綠化地改建住宅，無助政府重點幫助的「上車盤/青年」和大眾的居住需要。

意見人姓名：



簽署：



日期：

18-5-2014

我們是年青人，我們期望香港作可持續的發展〔Sustainable Development〕，剷走樹林去起樓，並不乎合本港及世界的可持續發展原則。我們反對政府把露輝路綠化地改劃作住宅用途，理據如下：

一) 政府沒有善用現有土地

我們支持香港的建屋需要，但促請政府先做好棕土發展、活化工廈、善用部份軍營土地及政府空置宿舍，並公報上述荒廢土地的數字；我們也關注發展商屯積土地多年。政府應首先善用以上土地，不應破壞環境及生態去發展。

二) 綠化地帶的重要貢獻

植物對於改善城市空氣質素，及緩和熱島效應等有重要作用，而綠化地帶亦是郊野公園及城市間的重要緩衝，補充著郊野公園的功能；露輝路樹林更是郊野公園外圍重要綠化地之一。剷除綠化地，會令香港的環境、空氣質素、氣溫及生態變壞。這是否我們香港年青人想見到的後果呢！

三) 缺乏廣泛諮詢

綠化地帶一直是全港各區，尤其是新市鎮的城市規劃的重要元素，行之已久幾十年。政府這次大規模剷除綠化地帶，並未進行全港的廣泛諮詢。香港人熱愛郊野公園，保護綠化環境，是我們的核心價值之一！

四) 行政長官應守承諾

特區首長於 2013 及 2014 連續兩年施政報告中，明確指出可改劃的綠化地是「已失去其原有功能的、沒有植被、荒廢及已平整的土地」。露輝路樹林的情況與首長的定義完全相反，露輝路樹林是完全植被、有過千棵大樹的茂密樹林、位處未被平整的小山崗上。我們要求行政長官信守承諾，保護完好的露輝路樹林。（見 2013 年施政報告 53 段、2014 年 125 段）

五) 尊重原有綠化規劃

露輝路樹林，二十多年來的規劃意向，一直是「保育已建設地區或市區邊緣地區內的現有天然環境，利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區擴展，並提供土地作靜態康樂場地。根據一般推定，此地帶不宜進行發展。」二十多年來，汀角路、工業村以致整個大埔，一直高速發展，令本區更需要綠化地帶去平衡由發展帶來的環境破壞。政府此時反而要剷除露輝路樹林，我們認為不可理喻。

六) 屏障附近厭惡性設施

露輝路樹林，一直為附近的厭惡性設施提供天然的屏障：船灣堆填區、污水處理廠、水泥廠、煤氣廠、大埔工業村及繁忙的交通。露輝路樹林位處山頂，其屏障功能不可取締！

七) 影響香港國際聲譽

香港是多項國際環保公約的成員，包括剛於 2011 年加入的多元生態公約 Convention of Biological Diversity。公約訂明，綠化地不可被發展，樹木及各類生態不可因發展而被移除。香港作為簽約地區，為何不遵守這國際公約呢？

八) 交通不聲負荷

露輝路及汀角路的交通，現已相當繁忙，汀角路沿路未來已落實的發展的包括：慈山寺、水療中心、骨灰龕、龍尾泳灘、鳳園新樓盤等；而大埔東消防局亦座落露輝路、汀角路口，交通擠塞將直接影響拯救效率。

九) 學額及社區配套不足

政府建議改劃大埔七幅綠化地帶的規劃文件預計，人口將增加三萬人，規劃卻未有提出社區配套的安排，如醫療、教育及就業等。單是露輝路樹林改劃建議所帶來的 660 伙私樓，預計對小學學額的需求已達 100 個，現時大埔區小學及幼稚園的學額已經不足，規劃文件卻對教育及其他配套隻字不提！我們不能支持如此粗疏的規劃建議！

作為香港的年青人，我們需要住房，但我們不要石屎森林，我們期望居所的環境有適度的綠化；我們也不要犧牲環保、伐樹趕獸去起樓。

我們促請政府，善用現有的荒廢土地去發展，並作詳細平衡的規劃，諮詢和尊重市民的意見，不要急就章去盲搶地。

意見人姓名：

簽署：



日期：18 May 2014

聯絡電話：

電郵：



bpd

TPB/R/S/TP/25-C2

寄件者:

寄件日期:

收件者:

主旨:

25日08月2014年星期一 0:54

tpbpd@pland.gov.hk

反對政府將大埔第九區、頌雅路西面及打素醫院以西「綠化地帶」改劃為住宅用途意見書(S/TP/25 Item:A1項、A3項及C項)

致城市規劃委員會

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反對政府將大埔第九區、頌雅路西面及打素醫院以西「綠化地帶」改劃為住宅用途意見書(S/TP/25 Item:A1 項、A3 項及 C 項)

本人 贊成申述編號 TPB/R/S/TP/25-16 至 TPB/R/S/TP/25-1273。反對政府將大埔第九區、頌雅路西面及打素醫院以西「綠化地帶」改劃為住宅用途理據如下:

1.上述項目之「綠化地帶」是有豐富植被及均生長廿多年的茂密樹林，為大埔富亨居民提供良好綠化生態休憩環境和清新空氣，並非政府所提出「沒有植被、荒廢或已平整」的綠化地帶因而誤導市民。

2.有違政府自 80 年代保護「綠化地帶」的規劃意向，此舉動會令市區和郊野公園之間的失去重要的屏障，嚴重影響富亨居民生活質素，包括景觀及空氣流通。

3.由於上述項目地理位置偏遠並位於山坡上，沒有完善的交通設施，未來急增人口將會加劇大埔區的交通負荷，影響富亨居民出入。

4.根據 2009 年大埔區議會會議文件，當時規劃署助理署長蘇應亮先生已指出上述項目發展住宅的技術困難，包括醫院煙囪對附近民居會構成影響、地盤的地勢過高、地盤遠離市中心而無法獲得配套支援、擬議的公屋發展的人口不足以支持完善的交通服務和社區設施，以及該公屋項目因無法發展為自給自足的社區而會對富亨邨的設施造成壓力等。

(http://www.districtcouncils.gov.hk/archive/tp_d/Document/Agenda,%20Min%20&%20Summary/Min%2009/Mar%2009/EHW-M2%2811.3.2009%29%28revised%29.doc)

5.由改劃項目提出至今，當局及有關部門根本沒有就此向富亨及大埔區居民提供任何公開而正式的全面諮詢，很多居民對此仍一無所知，他們亦因而喪失第一輪城市規劃委員會的諮詢的機會。

本人建議另覓大埔區的棕地作興建房屋以解決市民需求，例如:

- 1.教育學院山谷(洞梓)的八公頃受污染棕土，是最佳的建屋選址，可建中密度上車盤二千單位。
- 2.區議會也兩次向規劃署建議發展九龍坑荒廢農地及棕土，可建高密度公屋、居屋五、六千。
- 3.魚角政府棕土，現作割車場，也應善用。
- 4.大埔中心安邦路多層停車場旁的政府地，已荒廢十年，可建居民千多單位。
- 5.前孔教學院三樂周沕桅學校用地(於大元村內)。

最後本人懇請各位城市規劃委員會委員否決是次修訂，以及要求政府當局公開解釋規劃政策及展開廣泛諮詢。為大埔可持續性發展著想，要求保留大埔第九區、頌雅路西面及打素醫院以西的「綠化地帶」。

tpbd

寄件者: [REDACTED]
寄件日期: 25日08月2014年星期一 15:08
收件者: tpbpd@pland.gov.hk
主旨: 城規會勿做橡皮圖章 應否決綠化地改劃 (S/TP/25 意見書)

TPB/R/S/TP/25-C4

致 城市規劃委員會

就有關修訂大埔分區計劃大綱草圖編號 S/TP/25

本人 贊成申述編號 TPB/R/S/TP/25-16 至 TPB/R/S/TP/25-1273 (反對政府將「綠化地帶」改劃為住宅用途。反對的項目包括 A1 項、A3 項、C 項、D2 項、E 項、F 項及 H 項。) 原因如下:

1. 施政報告提出要發展「沒有植被、荒廢或已平整」的綠化地帶，但實際提議改劃的都有豐富植被及茂密樹林。我們認為政府誤導市民；
2. 政府於全港各區大規模改劃「綠化地帶」，是香港規劃政策方向上的重大改變，卻未有深入全面諮詢。現時只「斬件式」於區議會處理，違反程序公義；
3. 是次擬改劃的「綠化地帶」上每一塊都長有茂盛林木，不少樹齡達廿多年，一旦被斬，是環境極大損失，將無法補償及復完；
4. 「綠化地帶」在規劃上對維持市民生活質素十分重要，既可改善景觀及空氣質素，亦能緩和熱島效應；
5. 「綠化地帶」一直為市區和郊野公園之間的重要屏障，絕不可輕易被犧牲；
6. 露輝路地皮已放進勾地表，但城規程序卻只剛開始。城規會應否決申請，不可助長政府先把土地放入賣地表，後向城規會申請改劃的歪風。因為其意在混淆公眾，壓迫城規會委員，非常不尊重城規程序及公眾的意見；
7. 政府至今仍不斷容許市區住宅地皮改劃作酒店用途，出賣珍貴土地資源；卻又以土地不足為由，破壞「綠化地帶」以提供住宅，所作所為前後矛盾，不可接受！

本人請求各位城市規劃委員會委員否決是次修訂，及要求政府當局公開解釋規劃政策及展開廣泛諮詢。

00051



中華人民共和國香港特別行政區
Hong Kong Special Administrative Region of the
People's Republic of China



TPB/R/S/TP/25-C80

大埔區議會 Tai Po District Council

陳笑權議員 CHAN Siu-kuen, MH, DC Member

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

城市規劃委員會主席

周達明先生, JP

2014 年 8 月 8 日

周主席：

有關： 根據《城市規劃條例》(第 131 章) 第 6(1)條就草圖：
S/TP/25 的 E 項作出申述

本人是大埔區議會環境、房屋及工程委員會主席陳笑權先生。

規劃申請編號：S/TP/25 的 E 項土地，自 2014 年 1 月 7 日從報章刊登規劃署有意改劃 E 項土地為住宅，本委員會透過當區區議員劉志成博士收到當區居民意見，尤其是居住在 E 項地塊旁的五個屋苑(聚豪天下、倚龍山莊、嘉豐花園、淺月灣一期及淺月灣二期)，更組成「露輝路關注組」，舉行了一連串遊行、示威等反對 E 項地塊建住宅的行動，媒體亦有廣泛的報導。

2014 年 2 月 13 日上午(即 4 月 11 日刊憲前)，在大埔區議會環境、房屋及工程委員會的特別會議，討論有關擬議改劃部份大埔區土地作為房屋發展用途的事宜，「露輝路關注組」透過劉博士對 E 項地塊的改劃提出強烈反對。

2014 年 3 月 4 日，「露輝路關注組」16 位居民與沙田、大埔及北區規劃專員進行長達三個多小時的直接對話，讓專員聆聽及了解居民的反對意見。會議結束前，居民有要求規劃專員抽起 E 項土地。

2014 年 4 月 30 日，「露輝路關注組」13 位居民與大埔區議會張學明主席及本人會面，聽取居民的反對意見。

2014 年 5 月 8 日，大埔區議會 2014 年第三次會議為 E 項地塊的反對意見展開討論。討論結束前，獲得 21 票贊成，零票反對，零票棄權通過以下修訂動議：『大埔區議會要求規劃署及城市規劃委員會就建議修改露輝路土地(E 項地塊)由綠化地帶改劃為「住宅(丙類)9」地帶一事，充分考慮大埔區議會，當區居民和相關持份者的反對意見』。

00001

(第一頁)



中華人民共和國香港特別行政區
Hong Kong Special Administrative Region of the
People's Republic of China



大埔區議會 Tai Po District Council

陳笑權議員 CHAN Siu-kuen, MH, DC Member

居民反對政府把露輝路綠化地改劃為住宅用途，歸納理據如下：

1) 尊重民意

露輝路五屋苑合共 834 戶，收到 800 多戶簽名反對信，佔 90% 的地區民意基礎。反對簽名信已於三月頭送交沙田、大埔及北區規劃專員存檔。

2) 行政長官應守承諾

行政長官於 2013 年及 2014 年連續兩年施政報告中，明確指出可改劃的綠化地是「已失去其原有功能、沒有植被、荒廢及已平整的土地」。露輝路樹林的實況與首長的定義完全相反。露輝路樹林是完全植被，有 2500 棵大樹的茂密樹林，位處未被平整的小山崗上。要求行政長官信守承諾，保護完好的露輝路樹林。(見 2013 年施政報告 53 段及 2014 年 125 段)

3) 交通配套不勝負荷

改劃露輝路住宅用地面積為 4.13 公頃，擬建單位數目 660 戶，比現時五屋苑共 834 戶多出 80% 及鄰近香港教育學院每天亦有近萬人流，加上沿汀角路已落實的未來發展項目，包括：慈山寺、水療中心、12,000 個骨灰龕位、龍尾泳灘及鳳園新樓盤等，勢必導致露輝路及汀角路的交通相當繁忙，不勝負荷。約五年後新增 660 戶，塞車情況更為嚴重，而大埔東消防局座落於汀角路/露輝路口，交通擠塞將直接影響拯救效率。

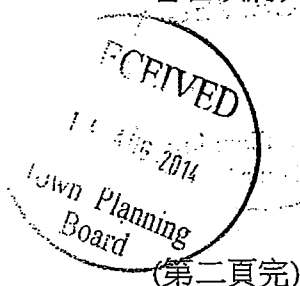
4) 尊重原有綠化規劃

露輝路樹林是該區於 1994 年整體規劃的一部份，利用天然地理環境作為市區和近郊發展區的界線，以抑制市區擴展，並提供晨運徑作靜態康樂場地，根據一般推定，此地帶不宜進行發展。此綠化規劃一直為附近的厭惡性設施提供天然屏障，包括：船灣堆填區、水泥廠、污水處理廠、煤氣廠、大埔工業村及繁忙的交通。露輝路樹林位處山頂，其屏障功能不可取締。

5) 錯估低密度住宅的需求

大埔已有低密度住宅供應達 2,300 個單位 (嵐山、富盈門、天賦海灣等)，空置率甚高。三月白石角地皮賣地流標。五月尾白石角地皮成交標價低市價 50%。現時有近 28 萬市民排隊上公屋，興建公屋和居屋才能有效解決一般市民面對的住屋問題。

鑒於居民強烈反對意見及大埔區議會的修訂動議，本委員會懇請城市規劃委員會否決將大埔露輝路綠化地帶改劃為住宅用地。



陳笑權先生, MH

環境、房屋及工程委員會主席

from
Acc
D80/S
26/1/14
→ C/P

大埔區議會

新界大埔

鄉事會街8號

大埔綜合大樓四樓

傳真號碼：2654 6624

本區編號 Our Ref (34) in HAD TPDC 13/30/30/1/14 (2)

來函編號 Your Ref.

電話 Tel: 3183 9434



TAI PO DISTRICT COUNCIL

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規劃署署長

凌嘉勤先生, JP

凌署長：

《大埔分區計劃大綱核准圖》S/TP/24 的修訂

D1 項：把近鳳園的一塊用地由「政府、機構或社區」地帶改劃為「住宅(丙類)10」地帶，以及訂明該「住宅(丙類)10」地帶的建築物高度限制；及

D2 項：把近鳳園的一塊用地由「綠化地帶」改劃為「住宅(丙類)10」地帶，以及訂明該「住宅(丙類)10」地帶的建築物高度限制

大埔區議會環境、房屋及工程委員會曾在 2014 年 5 月 14 日的會議上討論標題所述對《大埔分區計劃大綱核准圖》S/TP/24 所作修訂中的 D1 項及 D2 項，即分別把近鳳園的一塊用地由「政府、機構或社區」地帶及「綠化地帶」改劃為「住宅(丙類)10」地帶，以及訂明該「住宅(丙類)10」地帶的建築物高度限制。會上多位委員對有關修訂發表意見，相關的會議記錄節錄在附件一。

現將修函向規劃署傳達大埔區議員及委員會委員對這項修訂的意見及關注。我們希望城市規劃委員會在審議這項修訂時，能重視及認真考慮這些意見及關注。

大埔區議會
環境、房屋及工程委員會主席

陳笑樞

連附件

副本送：城市規劃委員會 ←

2014年8月19日

附件一

摘錄自大埔區議會環境、房屋及工程委員會
2014年5月14日的會議記錄

III. 大埔分區計劃大綱草圖編號 S/TP/25 的修訂項目
(大埔區議會文件 EHW 34/2014 號)

18. 委員就 D 項建議(鄰近鳳園的用地)提出以下意見及問題：

- (i) 多位委員要求在 D 項建議下預留土地擴闊汀角路。
- (ii) 有委員建議平整香港創藝學會附近的山坡，用作擴闊汀角路(往大英督方向)、單車徑及行人路。
- (iii) 有委員表示，他於本年 2 月去信規劃署，要求在 D 項建議所涉用地內貼近汀角路的位置預留約 10 米乘 150 米的土地，供日後擴闊汀角路之用。他指政府可將該幅約 10 米乘 150 米的土地劃出賣地範圍，或可仿效慈山寺或雅景花園的做法，在出售近鳳園的用地時規定發展商保留約 10 米乘 150 米的土地，以便將該段汀角路擴闊至六線行車，所需費用由發展商支付，工程完成後把有關路段交還政府管理。他認為這樣做有助應付日後新增的車流，亦可減省政府需投放的資源，加上建議只用上 4.8 公頃土地中的小部分，相信不會影響整個用地的發展潛力。他續指汀角路沿路在未來五年相繼有多個發展項目落成，汀角路名義上四線雙程行車，但過去 10 年有多項工程在汀角路動工，以致部分路段經常封閉，交通擠塞成常見之事。他表示，根據《說明書》第 11.2.2 段，鳳園的渠務工程預計到 2020 年才會完工，由此可見，汀角路的交通會繼續受工程影響。他要求運輸署提供交通影響評估報告及長遠解決汀角路交通擠塞的方案。他又要求以大埔區議會的名義去信城規會，提出在近鳳園的用地預留約 10 米的土地供擴闊汀角路之用的要求。
- (iv) 有委員指汀角路的交通已經非常擠塞，他擔心再在近鳳園的用地發展住宅會進一步加重汀角路的交通負荷。他不認同運輸署稱擬建住宅所帶來的新增人口不會影響附近交通的說法。他要求運輸署擴闊汀角路。另外，他指《說明書》第 6 段所載大埔區的人口數字有誤。
- (v) 有委員擔心 D 項建議會導致汀角路交通負荷過重。
- (vi) 有委員表示有條件支持 D 項建議，他促請政府先處理有關交通問題，並在賣地時加入條款規定發展商預留足夠地方供擴闊汀角路之用。他又建議興建新道路打通大埔第 33 區，將工業區內的車輛分流。

(vii) 有委員支持擴闊汀角路，並請規劃署向有關部門轉達委員會的關注事項及建議。

19. 蘇震國先生表示，規劃署會再次向運輸署轉達大埔區議會要求擴闊汀角路。

20. 主席總結，委員會有條件支持 D 項建議，並要求預留 10 米闊地近汀角路的土地作日後擴闊道路之用。

TPB/R/S/TP/25-C89

HOBMAN COMPANY LIMITED

c/o 5/F, WHEELLOCK HOUSE, 20 PEDDER STREET, CENTRAL, HONG KONG
TEL: 2118 2668 FAX: 2118 2032

19 August 2014

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

(Fax: 2877 0245 or 2522 8426;
or email: tpbpd@pland.gov.hk)

Dear Sirs,

**Comment on Representations under Section 6A of
the Town Planning Ordinance in relation to
the Draft Tai Po Outline Zoning Plan (OZP) No. S/TP/25**

We refer to the Draft Tai Po Outline Zoning Plan (OZP) No. S/TP/25 gazetted on 11.4.2014. A total no. of 6,288 representations were received. Various concerned groups, legislative councilors and district councilors have lodged objections to the rezoning amendments in particular to Item E, a site at Lo Fai Road near Tycoon Place.

It is the public aspiration to rezone those existing brownfield sites or devegetated, deserted or formed "Green Belt" sites for residential development instead of rezoning those "Green Belt" sites with densely vegetation and mature trees.

Similar comments were found in the representation made by Lo Fai Road Green Belt Concern Group (TPB/R/S/TP/25-1638), Tai Po District Councilor Ms. Wong Pik Kiu (TPB/R/S/TP/25-1636), Legislative councilor Mr. Ronny Tong (TPB/R/S/TP/25-1631), and Legislative Councilor Mr. Cheung Chiu Hung (TPB/R/S/TP/25-1629). (See details in **Appendix 1**) They indicated a site as shown in red dotted line below in Tung Tsz is suitable for residential development (hereinafter referred to as "The Site").

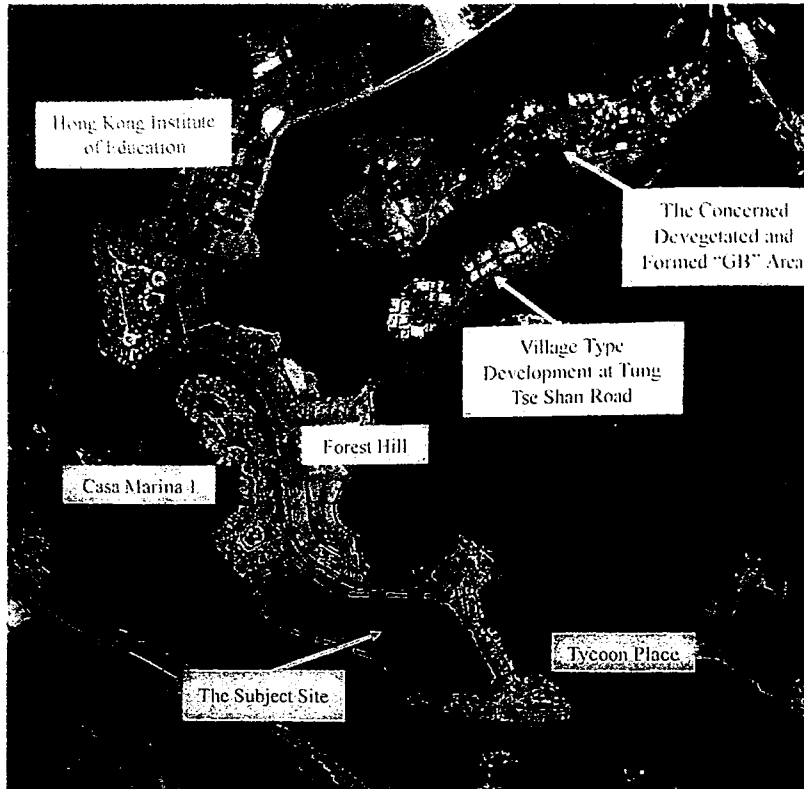
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-2-



Extract from representation no. TPB/R/S/TP/25-1638 – Figure 4.3

As the major land owner of the abovementioned Green Belt site, we would like to make use of this opportunity to start constructive dialogues with relevant Government Departments and the public to solicit in-principle support of residential development at the concerned Green Belt site.

Optimizing use of land for residential development

The Site is located in a valley area on the western side of Tung Tze Road with vehicle access from a slip road branching off from Tung Tsz Road. The Site is about 9ha with great potential for residential development. It is a brownfield site and is currently devegetated which no longer serves the intended Green Belt function.

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-3-

In line with Policy Address and established planning guideline

In fact, to rezone Green Belt areas which are devegetated, deserted or formed for residential use is advocated in the 2014 Policy Address. The Site perfectly fits the requirements that the Government set for identifying Green Belt sites for housing development.

Meanwhile, The Site is located in the fringe of developed land, close to existing transport infrastructure, and with a relatively low conservation value, it is considered that housing development is compatible with the character of surrounding areas.

Residential development on The Site does not involve extensive clearance of natural vegetation nor would it cause adverse visual impact on the surrounding environment. The Site is a suitable housing site for meeting the housing demand.

Meeting the Housing Demand

The site could provide over 3,500 housing units which is substantial compared to 660 units proposed at Item E. With due respect to the existing height profile of the adjacent Hong Kong Institute of Education (HKIEd) campus and the good design practice, plot ratio of 2-3 is considered suitable. As such, minimum 3,500 units with average flat size about 50 m² could be provided for meeting the acute housing demand in the district and the territory.

Through a proper land exchange exercise, there will also be an opportunity to consolidate the Government land within the site and release its development potential. The consolidated Government land could potentially be used for the development of Government subsidized housing.

It is expected the earliest date for first population in-take would be 2019 if TPB approved the said residential development in 2014.

Our Stance

It is obvious that The Site no longer serves the intended Green Belt function. Without destroying existing densely vegetated site and to optimize the use of scarce land resources, it is definitely a better alternative location for residential development.

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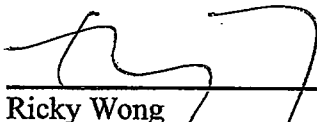
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Residential development proposal is under preparation and we are preparing to submit a planning application for residential development at the subject site for TPB's consideration.

We keep an open mind towards the development options for The Site and there are plenty of rooms for discussion with relevant Government departments and the public in order to gain a consensus over development options and serves wider public interest.

Thank you for your attention.

Yours faithfully
For and on behalf of
Hobman Company Limited


Ricky Wong



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
email address : tpbpd@pland.gov.hk

TPB/R/S/TP/25-C405

有關的規劃申請編號：S/TP/25 Item E

反對露輝路改變土地用途，用作興建住宅

本業主立案法團就上述規劃，提出以下反對的理據：

1. 行政長官應守承諾

特區首長於 2013 及 2014 連續兩年施政報告中，明確指出可改劃的綠化地是「已失去其原有功能的、沒有植被、荒廢及已平整的土地」。露輝路樹林的情況與首長的定義完全相反，露輝路樹林是完全植被、有過千棵大樹的茂密樹林、位處 未被平整的小山崗上。我們要求行政長官信守承諾，保護 完好的露輝路樹林。（見 2013 年施政報告 53 段、2014 年 125 段）

2. 交通不聲負荷

露輝路及汀角路的交通，現已相當繁忙，汀角路沿路未來已落實的發展包括：慈山寺、水療中心、骨灰龕、龍尾泳灘、鳳園新樓盤等；而大埔東消防局亦座落露輝路、汀角路口，交通擠塞將直接影響拯救效率。

3. 現有綠化地是全個露輝路山頭唯一的居民休憩地段

根據規劃條例，政府在規劃土地用途和地積比率時，須照顧居民的休憩和社區設施需要。

估計露輝路山頭的居民、宿生和學生，有萬五人，但卻一處政府休憩設施也沒有，居民爭取多年，政府一直忽視。現 E 地段綠化地，是居民唯一的晨運、跑步和溜狗的地方。剷除綠化地，將迫使居民於全山頭唯一的狹窄的露輝路行人路上溜狗，將對路上的兒童及老人造成危險，並製造大量衛生的和嘈音問題。

4. 屏障附近厭惡性設施

露輝路樹林，一直為附近的厭惡性設施提供天然的屏障：船灣堆填區、污水處理廠、水泥廠、煤氣廠、大埔工業村及繁忙的交通。露輝路樹林位處山頂為五個屋苑及鄰近地方的中心市肺，其屏障功能不可取締！

5. 缺乏廣泛諮詢

綠化地帶一直是全港各區，尤其是新市鎮的城市規劃的重要元素，行之已久幾十年。政府這次大規模剷除綠化地帶，並未進行全港的廣泛諮詢及共識。香港人熱愛郊野公園，保護綠化環境，是我們的核心價值之一！

6. 政府沒有善用現有土地

我們支持香港的建屋需要，但促請政府先做好棕土發展、活化工廈、善用部份軍營土地及政府空置宿舍，並公報上述荒廢土地的數字；我們也關注發展商屯積土地多年。政府應首先善用以上土地，不應破壞環境及生態去發展。大埔已有多項低密度住宅的積壓和新的供應，達2300單位，連白石角地皮流標，反映大埔對低密度住宅的需求不大。而需要交通方便的「上車盤市民」，一般不會來交通不便的露輝路山頭。所以將露輝路綠化地改建住宅，無助政府重點幫助的「上車盤/青年」和大眾的居住需要。

謹此希望 貴會能認真考慮及聆聽居民的聲音而撤消有關規劃。

For and on behalf of
THE INCORPORATED OWNERS OF FOREST HILL


Authorized Signature(s)

周家礼 (主席)
倚龍山莊業主立案法團

二零一四年八月二十日



倚龍山莊業主立案法團地址：大埔露輝路31號倚龍山莊會所

電話：2662 1495

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tpbpd

TPB/R/S/TP/25-C436

寄件者: 民協社區關係 [community@adpl.org.hk]
寄件日期: 26日08月2014年星期二 14:46
收件者: tpbpd@pland.gov.hk
主旨: 支持保留露輝路樹林

露輝路個案: S/TP/25 Item E

本議員為大埔可持續性發展，支持保留露輝路綠化樹林：

於露輝路綠化樹林建屋，將會永久失去以下重要資源：

- 1) 2400 棵大樹，樹齡過 20 年，樹高 10 多米，是重要市肺。
- 2) 全區唯一公共休憩地
- 3) 大埔東空氣質素
- 4) 4500 市民對政府的支持，露輝路是今於大埔改劃建議中，反對聲音最強的一項。
- 5) 大埔區議會、及新界東立法會議員的意向
- 6) 政府自 80 年代起保護綠化地帶的法定規劃意向
- 7) 樹林對工業村內六大厭惡性設施的重要屏障，包括污水處理廠及堆填區。
- 8) 整段露輝路山頂山脊線，影響背後的八仙嶺及旁邊的大觀音兩項重要公眾景觀

卻只能換來以下並非重點的建屋目標：

- 1) 660 個低密度精品豪宅，售價過千萬，對香港房屋供應全無幫助！
X - 低密私樓在大埔已有太多供應，白石角地皮也流標兩次！

X - 低密私樓並非長策報告的建屋目標！

本區教育學院山谷(洞梓)的八公頃受污染棕土，是更佳的建屋選址，可建中密度上車盤二千單位。大埔區議會也兩次向規劃署建議發展九龍坑荒廢農地及棕土，可建高密度公屋、居屋五、六千。

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是次改劃過程也有程序公義的問題：

- 1) 綠化地帶的法定規劃意向是不宜發展，城規會一直傾向拒絕私人的發展申請。現政府帶頭改劃綠地，嚴重影響公眾對香港規劃制度的信心。
- 2) 政府今次擬在大埔改劃 7 幅綠化地，但據悉還陸續有來，卻未曾向區議會及市民交待總共的對環境、交通、配套等的影響。
- 3) 年初未過區議會、未入城規會，已放入本年度賣地表，不尊重程序。
- 4) 規劃署的資料雖然顯示地盤面積是 4 公頃，但因山勢原因，可用面積只有 2.9 公頃，令淨地積比率達 1.6，（密度近似比華利山別墅），遠高於相鄰屋苑的 0.8；但大埔區議會房屋及發展委員會 1 月 8 日會議記錄卻顯示，規劃署以「1.1 地積比率」回答議員的提問，涉誤導及對區議會不誠實！

請城規會尊重民意、區議會，長策報告建屋目標，保護綠化的公共資源，不可斬樹起豪宅！

立法會議員馮檢基
(社區關係主任何鴻興 代行)

Extract of Minutes of EHWC meeting held on 8.1.2014

- (iii) 委員區鎮樺先生因病缺席委員會第一次會議。他已在會前知會秘書處，並已在本年 1 月 3 日向秘書處提交醫生證明書。根據《大埔區議會常規》第 51(1)條，委員會議決接納他的缺席申請，並請秘書處修訂第一次會議記錄的相關內容。
- (iv) 李國英先生及羅舜泉先生因身體不適未能出席委員會今次會議，他們已向秘書處提交缺席申請。根據《大埔區議會常規》第 51(1)條，區議會只會批准區議員因身體不適、擔任陪審員、代表區議會出席會議／活動、出席立法會會議或行政會議而提出的缺席申請。因此，他們的缺席申請獲批准。

I. 通過環境、房屋及工程委員會 2014 年 1 月 2 日第一次會議記錄
(大埔區議會文件 EHW 1/2014 號)

2. 秘書處沒有收到修訂建議，席上亦無委員提出修訂。上次會議記錄按上述有關區鎮樺先生缺席申請的議決修訂後獲通過作實。

II. 採納《大埔區議會常規》及《大埔區議會議員及區議會轄下委員會成員操守指引》

3. 主席請委員備悉及遵守《大埔區議會常規》和《大埔區議會議員及區議會轄下委員會成員操守指引》。

III. 採納《大埔區議會撥款守則》

4. 主席請委員備悉《大埔區議會撥款守則》。

IV. 擬議改劃部分大埔區土地作房屋發展用途
(大埔區議會文件 EHW 10/2014 號)

5. 主席歡迎以下部門代表就是項議程出席會議：規劃署高級城市規劃師劉志庭先生及城市規劃師容伯煬先生；房屋署規劃師劉家麒先生；以及運輸署工程師王國良先生。

6. 劉志庭先生及容伯煬先生介紹上述文件。

7. 劉家麒先生補充，房屋署(“房署”)初步估計上述文件 A 項所述的土地可建造樓高 30 至 40 層的公營房屋，合共提供約 5 400 個單位。他指房署仍在進行技術評估，預計本年內會有評估結果及完成初步設計，屆時會再諮詢委員會。

8. 委員的意見及提問如下：

- (i) 大部分委員支持 A 項建議(即第 9 區及頌雅路旁的選址)。
- (ii) 有委員稱亨耀樓互助委員會支持 A 項建議。
- (iii) 多位委員認為有必要改善頌雅苑及富亨邨一帶的交通配套，亦有必要加建社區設施(例如街市、社區會堂、圖書館及供私家車和大型車輛使用的公共停車場)，以應付新增人口的需要。他們認為靠馬路的樓宇不應超過 30 層，以免阻礙現有樓宇的景觀及空氣流通。他們建議規劃署考慮利用馬路兩旁的土地興建設有上述社區設施的綜合大樓。
- (iv) 有委員要求有關部門另外興建新的社區設施供 A 項建議下新建樓宇的居民使用。
- (v) 有委員指擬議住宅項目和松嶺西面的私人住宅發展項目會為頌雅路一帶帶來二萬以上的新增人口，無疑會對附近的交通造成壓力，但該區現時缺乏巴士總站等配套。
- (vi) 有委員樂見文件所載的各項建議。就 A 項建議，他要求房署解釋擬議住宅發展項目會否配合地勢及環境，以及該署如何處理項目對飛機航道的影響。
- (vii) 為更有效諮詢區內持分者及仔細考慮規劃署的建議，多位委員請規劃署及房署提供更多細節。
- (viii) 有委員認為 B 項建議(即北盛街的選址)應覆蓋現有的垃圾收集站，以增加土地面積，利便發展。
- (ix) 有委員詢問規劃署會否重置北盛街現有的公共停車場或把重置工程納入相關賣地條款內。另有委員認為 B 項建議所涉的土地較適合發展設有貨物起卸區的多層公共停車場。
- (x) 有委員認為運輸署應盡快落實興建廣福行車橋的細節及動工日期而不應被規劃署的建議拖慢進度。他又認為有關部門應先建道路，後建房屋。
- (xi) 有委員稱 B 項建議所涉的土地是天光墟的舊址，由大埔七約鄉公所管理，一直沒有發展為住宅。他要求規劃署就是項建議諮詢該鄉公所，以了解有關背景及考慮該處是否適合發展房屋。

- (xii) 有委員認為在林村河畔建 20 層高的住宅會影響區內的空氣流通。另外，她質疑規劃署雙重標準。她指大埔區議會曾建議城市規劃委員會(“城規會”)放寬大埔區內部分土地的 50 米建築物高度限制，該會以避免對區內的空氣流通造成負面影響為理由否決建議，但現在卻因為要推行政策而改說會進行空氣流通評估。
- (xiii) 就 C 項建議(即乾坑的選址)，有委員提醒規劃署考慮擬議發展高度與該區現有房屋是否相配，以免出現鳳園私人住宅發展項目“嵐山”與周邊環境格格不入的情況。
- (xiv) 有委員稱 C 項建議涉及樟樹灘村的風水地，規劃署須就發展該處的土地諮詢村民。
- (xv) 有委員贊成 E 項建議(即露輝路的選址)。他建議規劃署保留原有的公共停車場及增加單車停泊處。
- (xvi) 有委員認為 F 項建議(即那打素醫院西面的選址)所涉的土地面積較小，發展居屋會較為合適。
- (xvii) 就 G 項建議(即山塘路的選址)，有委員促請規劃署仔細評估興建 18 層高的住宅對附近樓宇和整個區域的景觀及空氣流通的影響。他又建議政府在出售該幅土地作私人房屋發展時加入限制及提出港人優先或只限港人購買的要求，以免發展項目淪為投機商品。
- (xviii) 多位委員關注 H 項建議(即鳳園的選址)對毗鄰的鳳園蝴蝶保育區及樹木的影響。他們促請有關部門在發展前進行評估。
- (xix) 有委員詢問 H 項建議是否發展低密度住宅。
- (xx) 有委員查詢規劃署會否重置鳳園遊樂場。
- (xxi) 不少委員指大埔區議會討論汀角路的交通問題已多時。他們認為興建中的“嵐山”住宅項目加上擬議住宅項目會令鳳園人口大幅增加，交通問題會更趨嚴重。他們強烈要求運輸署正視問題，藉發展新住宅項目的機會制訂長遠的解決方案(例如擴闊汀角路及利用香港園藝學院的土地擴闊鳳園路的路口)。
- (xxii) 有委員指規劃署為配合政府施政主動建議將綠化地帶的土地改劃為住宅用地，但城規會及有關部門對村民申請於綠化地帶興建小型屋宇卻諸多要求甚或否決他們的申請。他認為政府施政應一視同仁，故應同時開放綠化地帶發展小型屋宇。
- (xxiii) 多位委員指過去不少大埔居民被派往其他地區的公屋居住。他們認為大埔居民(包括已被派往其他地區的大埔居民)應優先獲派區內的新公屋單位，這樣，區內的長者則可得到家人照顧，人口老化問題亦得以紓緩。

- (xxiv) 有委員預料大埔區未來還會有住宅發展項目，屆時區內的人口會大幅增加，對區內的交通配套及公共設施造成壓力。他認為規劃署必須宏觀規劃大埔區的發展，設立交通交匯處(例如在第 24 區)及提供完善的交通網絡尤其重要。
- (xxv) 有委員提醒有關部門諮詢受影響鄉郊的鄉事委員會及村民。
- (xxvi) 有委員認為頌雅路西面土地適合發展公營房屋，建議政府考慮。亦問及如頌雅路西面土地發展作公營房屋，其發展參數大約為何。

9. 劉志庭先生回覆如下：

- (i) 規劃署明白委員對區內交通配套的關注(包括汀角路及頌雅路的交通負荷和露輝路的私家車及單車泊位)。該署會與運輸署研究如何規劃及改善有關交通配套設施。
- (ii) 規劃署對頌雅路西面土地的規劃持開放態度，該署對其發展現時只有初步構思，若現時或未來規劃的基礎建設(包括交通、排水、排污等設施)及有關技術評估認為可行，該署或會將之納入未來的發展項目內。
- (iii) 規劃署會優先處理 A 項建議的發展項目。
- (iv) 規劃署會就 B 項建議能否覆蓋附近的垃圾收集站及有關土地是否適合發展住宅諮詢有關部門。擬議建築物高度限制及地積比率會以現時大埔墟邊緣的公營房屋為參數。該署除進行空氣流通評估外，亦會檢討有關設計。
- (v) C 項建議的建築物高度限制以該區附近的建築物為參數，或會因應發展項目的設計而修改。
- (vi) H 項建議會發展低層及低密度住宅，較諸“嵐山”，有關項目的樓宇高度較低。

10. 王國良先生表示，運輸署會與規劃署合作，以期妥善規劃交通配套。他指運輸署會與地政總署商討如何制訂賣地條款內有關交通設施的部分，亦會要求有關部門在發展時盡量重置車輛停泊設施。

11. 劉家麒先生表示，以 A 項建議的建築物高度限制及總地積比率套用在頌雅路西面土地上發展公營房屋，估計建成的房屋樓高 30 至 40 層，合共會提供 1 000 至 2 000 個單位(數字只供參考)。

12. 邵陽龍先生指房署會依既定程序分配公屋單位。他會向總部轉達委員所提出優先分配大埔新公屋單位予大埔居民的要求。

13. 主席總結指委員會原則上支持規劃署的建議。他請該署充分諮詢持分者，包括相關鄉事委員會、鄉公所、村民／居民代表等。他又請該署考慮委員會的意見並修訂規劃內容，稍後再諮詢委員會。

V. 《大灘、屋頭、高塘及高塘下洋發展審批地區草圖編號 DPA/NE-TT/1》
(大埔區議會文件 EHW 5/2014 號)

14. 主席歡迎規劃署高級城市規劃師吳育民先生及城市規劃師李寶均先生就是項議程出席會議。另外，他請委員備悉西貢北約鄉事委員會(“西貢北約鄉委會”)及村代表致函委員會就上述草圖提出反對。

15. 李寶均先生介紹上述文件。

16. 有委員反對上述草圖。他認為草圖所示的鄉村式發展地帶只覆蓋現有小型屋宇的範圍，做法與 1972 年新界小型屋宇政策指鄉村周圍 300 呎的地方可發展小型屋宇不符。

17. 主席總結，委員會尊重西貢北約鄉委會及村民的意見，並且不支持上述草圖。

VI. 《土瓜坪及北潭凹分區計劃大綱草圖編號 S/NE-TKP/1》
(大埔區議會文件 EHW 11/2014 號)

18. 吳育民先生表示，規劃署已在本年 1 月 3 日就上述草圖諮詢西貢北約鄉委會，該會認為草圖所示的鄉村式發展地帶不足，因此加以反對。

19. 有委員反對上述草圖。他贊成擴大鄉村式發展地帶，以及放寬鄉村式發展地帶的發展限制。他不滿城規會現時對鄉村發展諸多限制。他特別批評有關部門並無計劃在土瓜坪及北潭凹設置排污系統，把保護水質的責任推到原居民身上。

20. 主席總結，委員會尊重西貢北約鄉委會及村民的意見，並且反對上述草圖。

Summary of Discussion of the 2nd Meeting in 2014
of the Environment, Housing and Works Committee (EHWC)
on 8 January 2014

I. Confirmation of the minutes of the 1st meeting in 2014 of the EHWC on 2 January 2014

The minutes of the 1st meeting in 2014 of the EHWC on 2 January 2014 were confirmed subject to the amendment concerning the resolution on the leave application of Mr. AU Chun-wah.

II. Adoption of the Standing Orders of Tai Po District Council and the Code of Conduct of District Council Members and Members of Committees under Tai Po District Council

2. The Chairman asked Members to observe the Standing Orders of Tai Po District Council and the Code of Conduct of District Council Members and Members of Committees under Tai Po District Council.

III. Adoption of the Guidelines on TPDC Funds

3. The Chairman asked Members to note the Guidelines on TPDC Funds.

IV. Proposed revision to the approved Tai Po Outline Zoning Plan No. S/TP/24

4. The representatives of the Planning Department (PlanD) briefed the meeting on the proposed revision to the approved Tai Po Outline Zoning Plan No. S/TP/24.

5. Most members supported suggestion A (i.e. the site next to Chung Nga Road in Area 9, Tai Po). The main points of discussion are summed up as follows:

- (i) the service facilities for transportation in the vicinity of Chung Nga Court and Fu Heng Estate should be improved and more community facilities should be provided there. The housing blocks to be built on the site near the road should not be higher than 30 floors lest the view and air circulation of nearby existing buildings would be affected;
- (ii) suggestion B (i.e. the site on Pak Sheng Street) should cover the existing refuse collection point in order to enlarge the size of the land for development;
- (iii) whether the existing public car park on Pak Sheng Street would be relocated and if yes, whether the relocation work would be included in the land sale conditions;

- (iv) the Transport Department (TD) should confirm the details and commencement date of the construction of a vehicular bridge on Kwong Fuk Road as soon as possible. The project should not be delayed because of the suggestions of the PlanD;
- (v) the PlanD should consult the village office of Tsat Yeuk on suggestion B;
- (vi) regarding suggestion C (i.e. the site in Kon Hang), the PlanD should see if the proposed development height was compatible with the height of the existing housing blocks in that area and consult villagers of Cheung Shue Tan as the suggestion involved some of their Fung Shui land;
- (vii) the area of land covered by suggestion F (i.e. the site to the west of the Nethersole Hospital) was comparatively small and it would be more appropriate to develop Home Ownership Scheme units on the land;
- (viii) regarding suggestion G (i.e. the site in Shan Tong), the government should consider introducing restrictions when putting the site for sale, demanding that priority be given to Hong Kong people to purchase the residential units to be built or that only Hong Kong people could buy the units;
- (ix) the TD should see the new residential developments in the district as an opportunity to devise long-term solutions to alleviate the traffic of Ting Kok Road (e.g. by broadening Ting Kok Road and making use of the land of the Hong Kong Gardening Society to broaden the junction on Fung Yuen Road);
- (x) despite that the PlanD had recommended the rezoning of some green belts to residential zones, the Town Planning Board and the departments concerned had placed much restrictions on the construction of small village houses in such green belts or even refused villagers' applications;
- (xi) Tai Po residents, including those who had been allocated public housing units (PHUs) in other districts, should be given priority to take up new PHUs in Tai Po District;
- (xii) the PlanD should plan a public transport interchange (e.g. in Area 24, Tai Po) and a comprehensive transport network in Tai Po District; and
- (xiii) the government should consider developing PHUs on the land to the west of Chung Nga Road.

6. The representative of the PlanD replied as follows:

- (i) the PlanD and the TD would study on ways to plan and improve service facilities for transportation in Tai Po District;
- (ii) the Plan D was open about the planning of the land to the west of Chung Nga Road;

- (iii) the PlanD would deal with suggestion A on a priority basis;
- (iv) the height restriction and plot ratio of the buildings to be constructed under suggestion B would be set by reference to those of the existing PHUs in the fringe of Tai Po Market;
- (v) the height restriction of the buildings to be constructed under suggestion C would be set by reference to that of the existing buildings in the vicinity of Kon Hang; and
- (vi) the buildings to be constructed under suggestion H would be lower than Mont Vest.

7. The representatives of the Housing Department (HD) responded as follows:

- (i) assuming the height restriction and total plot ratio of the PHUs to be built on the site to the west of Chung Nga Road would follow those of the PHUs to be built under suggestion A, the housing blocks to be constructed would have 30 to 40 floors, providing 1 000 to 2 000 PHUs; and
- (ii) the HD would allocate PHUs to applicants in accordance with established practice and Members' demand for prioritised allocation of PHUs in Tai Po District to Tai Po residents would be referred to the HD.

8. The Chairman concluded that the EHWC supported the PlanD's suggestions in principle. He requested that the PlanD fully consult the stakeholders, including rural committees, village offices, villagers/resident representatives concerned.

V. Draft Tai Tan, Uk Tau, Ko Tong and Ko Tong Ha Yeung Development Permission Area Plan No. DPA/NE-TT/1

9. The Chairman remarked that the Sai Kung North Rural Committee and village representatives concerned had written to the EHWC to raise objection against the captioned draft. He concluded that the EHWC respected their opinions and did not support the draft.

VI. Draft To Kwa Peng and Pak Tam Au Outline Zoning Plan No. S/NE-TKP/1

10. The Chairman remarked that the Sai Kung North Rural Committee and villagers concerned were against the captioned draft. He concluded that the EHWC respected their opinions and objected to the draft.

(修訂版)

大埔區議會

環境、房屋及工程委員會

特別會議記錄

日期：2014年2月13日(星期四)

時間：上午10時正

地點：大埔區議會會議室

出席者：

		<u>出席時間</u>	<u>離席時間</u>
陳笑權先生,MH	主席	會議開始	會議完畢
區鎮樺先生	委員	上午10時55分	會議完畢
陳志超先生,MH	委員	上午10時40分	會議完畢
陳灶良先生	委員	會議開始	上午11時55分
張國慧先生	委員	會議開始	會議完畢
鄭俊平先生,JP	委員	會議開始	會議完畢
關永業先生	委員	會議開始	會議完畢
劉志成博士	委員	會議開始	會議完畢
文春輝先生,MH	委員	會議開始	會議完畢
羅舜泉先生	委員	上午10時20分	會議完畢
譚榮勳先生	委員	會議開始	會議完畢
鄧光榮先生,BBS	委員	會議開始	上午11時15分
鄧友發先生	委員	會議開始	會議完畢
王秋北先生	委員	會議開始	會議完畢
黃碧嬌女士,MH	委員	會議開始	會議完畢
任啓邦先生	委員	會議開始	會議完畢
邱榮光博士,JP	委員	上午11時05分	會議完畢
余智榮先生	委員	會議開始	會議完畢
鍾天培先生	委員	會議開始	會議完畢
李錦松先生	委員	會議開始	會議完畢
李永強先生	委員	會議開始	會議完畢
馬秉芬先生	委員	會議開始	會議完畢
邱仕生先生	委員	上午10時20分	會議完畢
李灝宜女士	秘書	會議開始	會議完畢

列席者：

蘇植良先生,JP	大埔民政事務專員／民政事務總署
邱詩穎女士	大埔民政事務助理專員／民政事務總署
蘇震國先生	沙田、大埔及北區規劃專員／規劃署
劉志庭先生	高級城市規劃師(大埔)／沙田、大埔及北區規劃處／規劃署
容伯煬先生	城市規劃師(大埔 1)／沙田、大埔及北區規劃處／規劃署
王國良先生	工程師(大埔)1／運輸署
劉家麒先生	規劃師 10／發展及建築處／房屋署
梁少強先生	高級行政主任(區議會)／大埔民政事務處／民政事務總署
陳漢鈞先生	高級聯絡主任 2／大埔民政事務處／民政事務總署

缺席者：

林泉先生	副主席
李國英先生,BBS,MH,JP	委員
區鎮濠先生	委員
陳成耀先生	委員
文念志先生	委員

開會詞

主席歡迎各與會者出席會議，並宣布以下事項：

- (i) 李國英先生因事未能出席今次會議，他已向秘書處提交缺席申請。根據《大埔區議會常規》第 51(1)條，區議會只會批准區議員因身體不適、擔任陪審員、代表區議會出席會議／活動、出席立法會會議或行政會議而提出的缺席申請。因此，他的缺席申請不獲批准。

I. 擬議改劃部分大埔區土地作房屋發展用途

(大埔區議會文件 14a/2014 號及 EHW 14b/2014 號)

2. 主席歡迎以下部門代表就是項議程出席會議：規劃署沙田、大埔及北區規劃專員蘇震國先生、高級城市規劃師劉志庭先生及城市規劃師容伯煬先生；房屋署規劃師劉家麒先生；運輸署工程師王國良先生；以及大埔民政事務處高級聯絡主任陳漢鈞先生。

3. 劉志庭先生及容伯煬先生介紹上述文件。
4. 主席請委員備悉環保觸覺、淺月灣二期業主立案法團及聚豪天下一業主分別致函委員會就改劃露輝路土地作房屋發展的建議提出反對。
5. 委員的意見及提問如下：
 - (i) 多位委員支持政府積極覓地建屋，以解決市民對住屋的需求。
 - (ii) 有委員建議規劃署整體規劃八項建議的發展但分階段施工。多位委員亦認為有關部門應先建道路，後建房屋。
 - (iii) 大部分委員支持 A 項建議(即大埔第 9 區及頌雅路旁的選址)，他們希望規劃署先展開有關工程。
 - (iv) 有委員促請規劃署同步規劃 A 項建議發展所需的社區設施及交通配套(包括道路及公共交通設施)。他建議利用富亨邨及頌雅苑附近的土地興建樓高 10 層或以下的社區設施，在方便居民共享設施的同時避免阻擋現有樓宇的景觀。如該署未能回應上述要求，他難以支持 A 項建議。
 - (v) 多位委員認為有關部門必須先行處理頌雅路和汀角路一帶的交通配套問題，以應付日後急增的人流及車流。有委員指出，如不妥善處理新增車流，那打素醫院及大埔醫院的緊急醫療服務或會受到影響。
 - (vi) 有委員希望有關部門藉發展新住宅項目的機會研究如何改善汀角路一帶的交通，尤其是鳳園路的交通樽頸問題。
 - (vii) 有委員指重建大元邨的建議已討論多時。他希望有關部門一併處理該項建議和 A 項建議，好讓大元邨居民在重建期間能獲原區安置。
 - (viii) 多位委員對 B 項建議(即匡智松嶺村以西頌雅路旁的選址)有保留。有委員希望政府擱置該項建議，把有關土地留給匡智會使用。
 - (ix) 有委員認為 B 項建議的選址與亨耀樓太近，對亨耀樓的居民有負面影響。
 - (x) 有委員指頌雅苑及富亨邨居民、南坑村村民、大埔醫院及那打素醫院的救護車均會使用頌雅路及汀麗路，兩條道路的交通因此非常繁忙，亦頻頻發生交通意外。他表示有關方面必須在落實 B 項建議前改善兩條道路的交通設施，否則他反對該項建議。

- (xi) 有委員詢問 B 項建議所涉的土地屬政府還是私人擁有。他續問，政府曾表示不會徵收私人土地興建公屋，如 B 項建議的土地屬私人擁有，那是否代表政策有變；即使政策有變，可建公屋的地點還有很多，政府無需填海或動用郊野公園用地建屋。他指政策改變會令外界覺得政府“盲搶地”，以及質疑政府有否尊重私人業權及就徵收私人土地充分諮詢持分者。此外，他獲悉有發展商申請發展私人住宅項目，所涉土地部分與 B 項建議重疊。
- (xii) 有委員指 A 項和 C 項建議下所建的公屋單位數目多，因此認為 B 項建議無需局限於發展公屋。他不反對公私營房屋平衡發展。
- (xiii) 有委員認為 B 項建議涉及私人和政府土地，這些土地又同時牽涉政府和私人發展商的發展申請，這些因素或為發展項目增添變數。因此，他建議分開處理 A 項和 B 項建議。
- (xiv) 有委員指出，A 項、B 項和 C 項建議(即那打素醫院西面的選址)均是圍繞富亨邨發展公屋，相信會引起富亨邨居民的迴響。他認為有關部門須就發展該處的土地諮詢富亨邨居民及南坑村村民。
- (xv) 有委員支持 C 項建議。
- (xvi) 有委員認為 A 項及 D 項建議(即汀角路近鳳園的選址)毗鄰的鳳園蝴蝶保育區及樹林均具生態價值，必須加以保護。他又要求有關部門在發展前進行仔細的環境評估及採取所須的保育措施，否則他對兩項建議有保留。
- (xvii) 有委員要求規劃署在推行 D 項建議下的發展項目時預留土地供擴闊鳳園一段汀角路至雙程六線行車之用，以解決該處存在已久的交通問題及應付新增車流。有委員認為可增加樓宇高度或層數以作彌補。
- (xviii) 有委員稱過去曾有建議在三門仔段的汀角路興建行車橋連接馬鞍山，但建議胎死腹中。他希望有關部門重新考慮該項建議，以改善汀角路的交通，同時提高往來北區及其他地區的運輸效率。
- (xix) 有委員收到露輝路附近五個屋苑的信件，五者均表示反對 E 項建議(即露輝路的選址)，理由如下：
- 擬建住宅單位總數接近現有五個屋苑單位總數的一倍，有違低密度住宅規劃的原則，道路將不勝負荷，交通會更加擠塞
 - 擬建住宅樓高最高五層，與現有普遍樓高三層的住宅及環境不配合，而 E 項建議的選址處於山頂，擬建住宅落成後會影響現有居所的天然採光、空氣流通以及整個山的外觀
 - 綠化地帶被住宅取代後，居民的健康或受到影響

- 該處的晨運徑及時鐘停車錶位在發展後或不獲保留
 - 該處有多棵數十呎高的大樹和受保護動物出沒，例如貓頭鷹及野豬，發展或會影響牠們的生境
- (xx) 有委員表示支持 E 項建議，但認為交通配套有改善空間。
- (xxi) 有委員認為有關部門既改劃綠化地帶作房屋發展，理應同步開放其他綠化地帶作鄉村式發展。他表示，興建小型屋宇亦有助解決本港的住屋問題。
- (xxii) 有委員認為 F 項建議(即山塘路近荔枝山的選址)下所建的樓宇由西至北包圍盈峰翠邸及龍城堡，這些樓宇高 13 至 16 層，與周邊現有樓宇不配合，除有礙現有樓宇的景觀外，亦影響該處的天然採光及空氣流通。他建議稍移選址至山塘路東，並集中在較接近吐露港公路的位置興建有關樓宇。
- (xxiii) 有委員對 H 項建議(即乾坑近樟樹灘的選址)有保留。他表示 H 項建議的選址涉及樟樹灘村的風水地並鄰近葬區，發展或會影響風水。他要求規劃署在賣地條款中規定發展商須於發展前與村民就風水問題達成共識，以及保證發展不會影響通往葬區的道路。他又提議調低發展的地積比率至 0.6 倍，另規定所建樓宇不得超過三層，以配合環境及現有樓宇的高度。
- (xxiv) 有委員指 H 項建議所涉的土地為陡坡，難於發展，規劃署或需重新估算擬建樓宇的高度。
- (xxv) 有委員贊成擱置改劃北盛街的土地用途，以免阻礙興建廣福行車橋的計劃。
- (xxvi) 有委員支持改劃白石角東部部分土地作房屋發展，以回應市民對房屋的迫切需求。他續指該幅土地已平整。他期望有關部門在短期內落實建議及動工，並提醒有關部門加強該處的公共交通服務。
- (xxvii) 有委員詢問規劃署是否為配合政府的房屋政策而放棄本港長遠的科研及創意產業的發展。他指本港科研及創意產業的較鄰近城市落後。他對改劃上述一幅白石角土地的用途有保留。此外，他認為規劃署不應在特別會議上提出新的改劃建議，避免當區議員缺席會議而未能參與討論。
- (xxviii) 有委員認為沒有即時需要改劃上述一幅白石角土地的用途。他預計該幅土地會發展低密度豪宅，而非惠及基層市民的高密度住宅。因此，他對建議有保留。
- (xxix) 有委員查詢上述文件附件二就個別建議的表達方式為何不同，例如 D 項及 E 項建議只提供擬建樓宇的總樓面面積而非地積比率，D 項、E 項及 G 項建議則只提供擬建樓宇的層數而非主水平基準上的距離。

- (xxx) 除着重保護區內的自然生態，多位委員亦十分重視區內的綠化工作。他們要求規劃署確保有足夠及合適的地方補種因工程關係而被移除的樹木。
- (xxxi) 有委員反對藉填海增加土地供應。他深明有需要盡快解決房屋問題，但認為政府不可因此而忽視環保和保育工作。
- (xxxii) 有委員表示，九龍坑塘坑的土地約八成是政府土地，約兩成是私人土地。他指政府過去否決於該處發展公屋的建議。不過，他認為該處現時適合發展公屋，待附近幾項道路工程完成後，該處便可接通各區，此外亦可增設鐵路站，建立起完善的交通網絡。他希望有關部門考慮在該處發展公屋。
- (xxxiii) 有委員強調，他支持建議的其中一個前提，是大埔區居民(包括已被派往其他地區居住的大埔居民)可優先獲派區內的新公屋單位。

6. 蘇震國先生回覆如下：

- (i) 規劃署積極覓地建屋，目的為應付市民短、中及長期的住屋需要，並非“盲搶地”。
- (ii) 規劃署提出規劃建議時會考慮受影響地區是否有足夠的基建及設施應付新發展。就是次提出的八項規劃建議，該署已諮詢運輸署、渠務署和房屋署(“房署”)等部門，以初步評估各個地點原則上能否發展房屋。有關部門稍後會就個別發展項目進行詳細研究。
- (iii) 房署就 A 項建議進行詳細設計時會確保新屋苑不會對現有屋苑的居民造成顯著不良的影響，而且會盡量提供更多設施，以進一步改善居民的居住環境。該署絕不會忽視他們的需要。
- (iv) 房署正就 B 項建議進行初步交通評估，並會視乎結果考慮是否一併設計所需的新道路及採取相關交通改善措施。
- (v) B 項建議所涉私人土地為農地。政府徵收私人農地作公共房屋發展的做法普遍，但徵收可發展房屋的私人土地作相同用途則較少，但兩者有賠償機制。
- (vi) 有私人發展商提出涉及 B 項建議的選址的規劃申請，相關的土地的用途須改劃，發展商亦須補地價。儘管這樣，在公眾利益的大前提下，規劃署還是決定繼續推出 B 項建議，作公共房屋發展。
- (vii) 有關保留 B 項建議所涉的土地供匡智會使用，分配土地予各機構並非由規劃署決定，但該署會向有關部門反映委員的意見。

- (viii) 鑑於 A 項和 D 項建議的選址接近具保育價值的地帶，房署事前會進行詳細研究及環境評估，在進行詳細設計時如需要亦會制訂保育措施。
- (ix) 政府會研究擴闊鳳園一段汀角路的建議，即使建議可行，亦須待發展項目有詳細設計時才能展開有關設計工作。
- (x) 政府在規劃及賣地時會考慮未來的道路發展，不會因為當前的發展而局限改善或增設交通設施的空間。規劃署與運輸署會研究藉發展項目找出及彌補現有道路的不足。
- (xi) 規劃署會把在三門仔建橋接駁馬 山的建議轉交有關政策局跟進。
- (xii) 規劃署收到露輝路附近四個屋苑反對 E 項建議的信件，該署理解有關居民的關注。露輝路附近現有樓宇的地積比率介乎 0.8 至 1.8 倍。由於 E 項建議所涉的土地並未平整，發展時需考慮較多因素，初步估計該幅土地的發展規模的淨地積比率約為 1.1 倍。
- (xiii) 規劃署會考慮保留或重置受 E 項建議影響的泊位。
- (xiv) E 項建議所涉土地上的樹木為過去工程補種的，並非原生樹木，屬較普遍的品種。規劃署重視綠化，因此把發展密度定得較低，以騰出空間植林。該署會要求發展商進行樹木統計，記錄樹木的品種和樹齡等資料。此外，該署亦會盡量保留原有的樹木。
- (xv) F 項建議下擬在北面興建的樓宇因鄰近高密度的居屋及公屋，加上部分土地已平整，其建議發展密度會較高；擬在南面興建的樓宇因較貼近低密度住宅，其發展規模會較小；夾在南北中間的土地主要用作興建交通設施。整項建議的發展規模的地積比率的約為 3 至 3.6 倍，惟所涉土地因地勢關係在發展上或有困難，其發展規模或會因此而再作微調。
- (xvi) 規劃署理解委員對 H 項建議的憂慮。為配合周邊發展、現有樓宇的高度及環境，該項建議會發展不高於 10 層的樓宇。
- (xvii) 規劃署須與持分者磋商，由於過程需時，故未及於上次會議上提出部分有關改劃白石角(東部)土地用途的建議。為免影響計劃進度，該署遂於是次特別會議上提出上述建議。
- (xviii) 擬改劃用途的白石角土地已準備就緒，工程可隨時展開。該幅土地雖預留作發展科學園第四期之用，但迄今並無詳細規劃。規劃署預計科學園第一、第二及第三期會有空間擴展或重建，應可應付中短期的需要。此外，政府已於古洞北預留土地作科研及有關工作之用，落馬洲河套區亦有不少土地可作科研用途。因此，該署認為改劃該幅土地不會對本地科研發展造成負面影響。政府絕不會忽視科研的發展需要。

- (xix) 規劃署並非只會考慮在所涉九幅土地上發展房屋。若然該署日後就區內其他土地(例如九龍坑塘坑)定出較成熟的發展方案，定當諮詢大埔區議會。
- (xx) 部分土地在發展前需先行平整或預留土地構築道路及興建相關設施。規劃署現時較難準確估算有關土地的大小及可建築範圍，因此才以總樓面面積表示發展規模的上限，以免將來落實發展細節時規模超出預算。在其他情況下，該署均以地積比率表示發展規模。
- (xxi) 根據規劃署的經驗，較高的樓宇的整體高度會因不同的樓層高度而有較大差異，主水平基準上的距離較能準確反映建築物的高度限制。如樓宇較矮或未有足夠資料準確釐訂主水平基準上的距離，該署會以層數表示建築物的高度。

7. 劉家麒先生指大元邨為拆售屋邨，重建工程涉及修改地契，房署亦須在工程進行前與領匯等持分者商討。他續指房署仍在研究有關細節，適當時候會向大埔區議會匯報。此外，他表示房署會根據《香港規劃標準與準則》及有關部門的建議決定 A 項及 B 項擬建公共房屋所需的各項配套設施，待有進一步設計時會諮詢大埔區議會。

8. 主席請規劃署繼續聽取地區人士的意見，並著實規劃各擬建屋苑的社區設施及交通配套，使居民能安居樂業。他亦促請政府公平處理於綠化地帶興建小型屋宇的申請。此外，他表示會就涉及他的選區的規劃建議諮詢持分者。他指委員會後可去信規劃署表達他們對各項規劃建議的意見，以便有關的建議在提交城市規劃委員會考慮前可作出所需修訂。

大埔區議會秘書處

2014 年 5 月

Summary of Discussion of the Special Meeting
of the Environment, Housing and Works Committee (EHWC)
on 13 February 2014

I. Proposed rezoning of some sites in Tai Po for housing development

The Chairman reported that the Green Sense, the owners' corporation of Casa Marina 2 and a resident of Tycoon Place had written to the EHWC, raising objection against the proposed rezoning of a site on Lo Fai Road for housing development.

2. Members put forward their views and questions on the various planning suggestions made by the Planning Department (PlanD), main points of which were as follows:

- (i) The government's endeavours to search for land to develop housing to meet people's needs were worthy of support. However, it should not do so blindly. Neither should it reclaim land or use country park land for housing development when there was still other usable land.
- (ii) Departments concerned should construct new roads before building the houses. They should improve the service facilities for transportation in the vicinity of Chung Nga Road and Ting Kok Road first to meet additional pedestrian and traffic flow to be brought by related housing development.
- (iii) Most Members supported Suggestion A (i.e. the site next to Chung Nga Road in Area 9, Tai Po). They hoped that the PlanD embark related works first and plan for related community facilities.
- (iv) The proposal relating to the redevelopment of Tai Yuen Estate and suggestion A should be taken forward together so that households affected could be rehoused in the district.
- (v) Some Members had reservations over suggestion B (i.e. the site next to Chung Nga Road to the west of Hong Chi Pinehill). They hoped that the suggestion be shelved and the site be reserved for the use of Hong Chi Association. A Member said that he would not support the suggestion unless the traffic on Chung Nga Road and Ting Lai Road was improved.
- (vi) A Member asked if suggestion B involved private land. He pointed out that the government had once indicated that it would not resume private land for public housing development. He commented that a change in its land policy might make the public think that it was snatching land blindly.
- (vii) Suggestions A and C would provide a large number of public housing units (PHUs). Therefore, suggestion B should not be restricted to the development of public housing.

- (viii) Suggestions A, B and C involved the development of public housing around Fu Heng Estate. Therefore, departments concerned should consult the residents of Fu Heng Estate and Nam Hang Village nearby on the suggestions.
- (ix) With respect to suggestions A and D (i.e. the site on Ting Kok Road near Fung Yuen), detailed environmental assessments should be conducted and appropriate conservation measures should be taken to protect Fung Yuen Butterfly Reserve and the plantations nearby, which were of significant ecological value.
- (x) In taking forward suggestion D, the PlanD should consider reserving some land to convert the section of Ting Kok Road near Fung Yuen to a dual six-lane carriageway.
- (xi) Five residential estates near Lo Fai Road had written to a Member to raise objection against suggestion E. They were mainly concerned about the traffic, environmental and ecological problems likely to be caused by the housing development. A Member thought that suggestion E was worthy of support provided that there would be better service facilities for transportation.
- (xii) Given that the government had rezoned some green belts for housing development, it should also allow the development of village houses in other green belts.
- (xiii) The housing blocks to be built under suggestion F (i.e. the site on Shan Tong Road near Lai Chi Shan) would block the view of the Paramount and JC Castle, affecting the lighting and ventilation in the vicinity. The Plan D should consider moving the site slightly to the east of Shan Tong Road.
- (xiv) Suggestion H (i.e. the site in Kon Hang near Cheung Shue Tan) might affect the fung shui of Cheung Shue Tan Village. The PlanD should include terms in the conditions of sale to make the developer reach a consensus with the villagers over the fung shui issues before embarking the works and ensure that the roads leading to the burial grounds in the vicinity would not be affected.
- (xv) While a Member supported the rezoning of a site in Pak Shek Kok East for housing development, a Member expressed reservation over the proposal. He asked if the PlanD was giving up the long-term development of the local creative industry and scientific researches to align with the government's housing policy. Another Member worried that the site would be used to develop low-density luxury housing, which would not benefit the grassroot.
- (xvi) Departments concerned could consider developing public housing in Tong Hang upon completion of a number of road projects there, which would connect Ton Hang with other areas.
- (xvii) A Member remarked that he would support the various planning suggestions provided that Tai Po residents (including former Tai Po residents who had been allocated PHUs in other districts) would be given priority to take up new PHUs in the district.

3. The representative of the PlanD replied as follows:

- (i) The PlanD was actively searching for land to develop public housing to meet people's short-term, medium-term and long-term housing needs. However, it was not snatching land blindly.
- (ii) When making planning suggestions, the PlanD would consider whether the infrastructures and facilities of the areas concerned could cope with the needs to be brought by the new developments;
- (iii) In coming up with the detailed design of the housing blocks to be built under suggestion A, the housing Department (HD) would make sure that they would not make any adverse impact on the existing buildings there. It would also strive to provide as many facilities as possible.
- (iv) The HD was conducting a preliminary traffic assessment on suggestion B. Depending on the results of the assessment, the HD would consider whether it was necessary to design new roads and adopt traffic improvement measures. Suggestion B involved private farmland and while it was common for the government to resume such land for public housing development, it was less common for the government to resume private land that could be used to develop housing for the same purpose. In either case, a compensation mechanism had been put in place. A private developer had submitted a planning application in respect of the site of suggestion B. For the sake of public interest, the PlanD decided to proceed with the development of public housing on the site.
- (v) The sites of suggestions A and D were close to areas of conservation value. Apart from conducting detailed studies and environment assessments, the HD would also consider setting down some conservation measures at the detailed design stage.
- (vi) The government would examine the proposed extension of the section of Ting Kok Road near Fung Yuen. The PlanD and the Transport Department (TD) would seize the opportunity of new developments to recognize and overcome inadequacies of the existing roads.
- (vii) The PlanD received objection letters from four residential estates near Lo Fai Road regarding suggestion E and noted their concerns.
- (viii) Regarding suggestion E, the PlanD would ask the developer to record information about the trees on the site, e.g. species, age etc. The PlanD recognized the importance of greening and would reserve areas for greening and preserve those trees as far as possible.
- (ix) With respect to suggestion F, while the development density to the north of the site would be higher due to proximity to high-density public housing blocks and completion of site formation of some of the land there, the development density to the south of the site would be lower because of nearness to low-density residential blocks. The land between south and north of the site would be used for the provision of transport facilities.

- (x) The PlanD understood Members' worries over suggestion H. The housing blocks to be constructed under the suggestion would not be higher than ten floors.
- (xi) Construction could begin anytime on the site in Pak Shek Kok East. Although the site was originally reserved for developing Science Park Phase IV, there was no detailed planning up till the present moment. The PlanD believed that Science Park Phase I, II and III should have space for extension or redevelopment to meet short-term to medium-term needs. The government put great emphasis on scientific researches and had reserved land in Kwu Tung North for this purpose.

4. With respect to the proposed redevelopment of Tai Yuen Estate, the representative of the HD explained that some units of Tai Yuen Estate had been sold and thus, redevelopment would necessitate amendments to the land leases and negotiations with stakeholders such as the Link. He added that the HD would decide on what kinds of services facilities were to be provided under suggestions A and B in accordance with the Hong Kong Planning Standards and Guidelines and decisions of departments concerned. The PlanD would consult the Tai Po District Council in due course.

5. The Chairman requested that the PlanD continue to listen to Tai Po residents' views and make better planning for community facilities and service facilities for transportation for the public housing estates to be built under the various planning suggestions. He also asked that the government deal with applications for construction of village houses in green belts fairly. He added that Members could air their views on the planning suggestions to the PlanD so that it could amend the suggestions, where appropriate, before submitting them to the Town Planning Board.

Tai Po District Council

May 2014

(二) 反對大埔露輝路土地由綠化地帶改劃為“住宅(丙類)9”地帶
(大埔區議會文件 31/2014 號)

66. 關永業先生贊成政府積極覓地興建房屋。但觀乎這次政府“盲搶地”事件中，除了大埔區，其他地區亦出現不少反對聲音，他認為規劃署在諮詢區議會的安排上出現問題。他表示，規劃署在本年2月13日環房會的特別會議上突然加入一、兩幅之前未曾提交環房會討論的土地，在該特別會議上討論，他在會上即時對這安排作出批評。他表示，由於特別會議並非預先安排的會議，未必所有委員都能出席，規劃署在該次特別會議上加入一些新的討論事項，對環房會的委員不公平。此外，他亦詢問規劃署有否嘗試把改變土地用途的建議提交區議會大會討論。他指出，由於並非所有區議員都有加入環房會，因此部分區議員在今次會議上才首次接觸這討論議題。

67. 關先生續表示，在改變土地規劃用途的事宜上，他會從以下的方向作出考慮：

- (i) 房屋的需求：以大埔醫院後山的一幅土地為例，他指該幅土地遠離民居，在不曾引起附近居民提出較大反響的情況下，他會考慮是否支持該建議。
- (ii) 綠化地帶和土地原規劃是否真的失去原有價值而須改作住宅用途：他曾在環房會會議上反對將白石角一幅規劃作科學園用地的土地改為房屋發展之用。他已聯同區鎮樺先生和任啟邦先生向區議會提交文件，反映天賦海灣居民的關注，在是次會議稍後討論。
- (iii) 地區的反應：考慮到露輝路一帶居民對改變露輝路綠化地帶用途的反應，他認為規劃署應撤回該項建議。他表示，除顧及地區和諧之外，亦應關注當區居民受到的影響。對於剛才劉志成博士提出的疑問、困擾和難題，他認為規劃署應予以考慮，不應強行改變有關土地的用途。

68. 關先生希望規劃署以至政府更高層部門體察民意，不要將好事變成壞事。他認為現時特區政府和行政長官梁振英的民望低迷，如果這件關乎民生的事件令行政長官的民望跌至更低，或令一些原本對政府沒有特別意見的市民對政府投下不信任的一票，他相信這不是國家主席習近平希望見到的。他續表示，曾有露輝路居民向他查詢，假若規劃署或城規會不聆聽區議會的意見，該如何是好，他會建議居民以較激烈的手法(即佔據或佔領露輝路)作公民抗命。

69. 陳志超先生表示，房屋是香港市民非常關注的問題，現屆政府已清楚表示解決現時樓價高昂和房屋供應不足的問題的決心。他提出以下意見：

- (i) 微觀而言，任何地區發展均涉及當區居民的利益。他理解剛才劉志成博士所指露輝路居民的苦況，亦察覺其中涉及溝通的問題，而很多地方亦需要從善如流。
- (ii) 剛才運輸署署長在較早前的議題總結發言時表示大埔區的交通並無大問題。他相信區議員會拭目以待該署如何解決相關交通問題。
- (iii) 劉志成博士的文件就露輝路綠化地帶的情況提出多個論點(例如地勢、綠化和貓頭鷹的居所等)，所涉的範圍並非區議員的專業。他希望規劃署好好聆聽當區居民的聲音。
- (iv) 雖然香港是一個面積只有 1 100 平方公里的小城市，但是其綠化比例在亞洲城市中卻屬數一數二。從宏觀角度，他支持政府檢討綠化地帶的用途。他認為應從土地是否“無植被、荒廢、無保育價值”的角度檢視政府所提出的數幅土地。
- (v) 從房屋供應的角度而言，他支持規劃署和城規會定期檢討不同土地的用途，相信這樣做有利香港的整體利益。他認為在檢討的過程中，交通、排污、空氣流通和其他基建設施是非常重要的考慮因素。此外，他建議加入“增值”的元素，即是在對居民有影響的計劃內加入例如社區設施等增值設施，以彌補居民的損失。
- (vi) 政府在不同地區均有發展綠化土地的建議(例如沙田和元朗區)。他建議政府因應綠化土地保育價值的高低定出發展優次。
- (vii) 他贊同其他區議員的建議，認為區議會應向規劃署轉達露輝路居民的意見。

70. 區鎮樺先生提出以下意見：

- (i) 規劃署在整個諮詢區議會的過程中並不尊重區議會。規劃署倉猝向區議會提交改變區內土地的用途的建議(尤其是其中一、兩項建議)，沒有給予充足時間讓區議員研究和考慮有關建議，區議員只能在會議上基於規劃署文件所載的資料作考慮和提供意見，該署便以沒有委員在委員會會議上提出特別意見和重大反對為理由，把建議視為得到整個區議會通過或支持，此舉並不尊重區議會。
- (ii) 在本年 2 月舉行的環房會特別會議上，委員會議決要求規劃署尊重當區居民的意見，希望該署派員落區聆聽居民的聲音。不過，根據劉志成博士剛才所言及他從天賦海灣居民口中得知，規劃署並無主動派員到地區聽取居民的意見，直至當區議員主動籌辦居民大會或當區居民提出抗議時，該署才派員到地區講解相關的規劃建議。規劃署並無主動聆聽居民的意見，亦視區議會的議決如無物，處理手法完全漠視區議會。

- (iii) 現時政府覓地建屋的大前提是解決香港市民的住屋需要。現時社會的低下階層的住屋需要最大，其中不少市民希望購買 300 至 400 平方呎的大型屋苑單位，以組織一個“小蝸居”的家庭，但現時規劃署建議改作建屋用途的土地多是用以興建樓價較高的中低密度住宅，並不能滿足市民大眾的需要。因此，雖然他並非要求政府將所有建議的土地用作興建公屋，他完全不認同現時的建議能解決市民的住屋需要。他希望政府不要本末倒置。
- (iv) 現時仍有不少土地可作房屋發展，雖然當中可能涉及收地或其他政策問題，以致過程較為複雜和需時。無論如何，他認為政府應先考慮所有可作房屋發展的土地，之後才考慮以改劃綠化土地的用途和填海等方法增加土地供應。
- (v) 政府和相關部門在採取任何行動前，必須充分考慮這些行動會否影響市民對整個政府或相關部門的支持度，亦須充分考慮與區議會的合作關係。

71. 譚榮勳先生表示，政府早前公布更改大埔區內數幅土地規劃的建議加上大型的住宅發展項目，會令大埔區的人口在可見的將來急劇膨脹。他以早期的屯門及現在的將軍澳和天水圍為例，指地區人口急劇膨脹但其他社區配套未有完善的調整和規劃會衍生很多問題。他認為應按部就班，不宜操之過急。他表示，按照政府的建議，大埔第九區的土地(即大埔醫院旁的土地)會發展大型公營房屋項目，他希望相關部門集中精神先做好該項目，令普羅大眾和基層市民受惠。他認為現時香港主要欠缺供基層市民居住的公屋單位、“上車盤”和居屋單位，政府應集中精力增加這些單位的供應，而非將一些綠化地帶或土地用作發展豪宅。他希望政府“停一停，想一想”，不要為一棵樹而放棄整個森林。

72. 林泉先生表示，他曾在環房會的特別會議上強烈表示，在改變一幅土地的用途或土地周邊的環境時，配套設施是非常重要的。對受影響的居民或持份者，有關部門必須充分徵詢和了解他們的意見。在建議改變露輝路綠化土地用途一事上，他認為規劃署必須更充分和全面地進行諮詢，這樣才能在推行政策解決問題時顧及居民意見，取得平衡。然而，觀乎政府早前提出更改大埔區內八幅土地規劃的建議中，北盛街項目已遭擱置，露輝路和白石角的項目遇到反對，亦有人就荔枝山項目提出其他意見，令他關注到在現時社會對房屋有殷切需求的情況下，如何在需求和供應之間找到平衡點。他指出，社會上有人反對填海，有人對改變綠化地帶的用途和興建屏風樓持不同意見，亦有受影響居民為個人利益提出不同意見，而他自己亦居於汀角路，清楚明白在該幅土地興建房屋會增加該區的人口，道路和交通工具使用者會增多，建屋地盤亦有可能影響附近的環境和污染空氣，但他仍認為個人利益和應整體社會需要取得平衡。他表示自己並非為政府說好話，並重申個人利益和社會需要之間必須取得平衡。最後，他建議為達到長遠房屋策略諮詢文件所提出在未來 10 年提供 47 萬個住屋單位的目標，政府在爭取增加房屋供應的過程中必須聽取居民的意見，諮詢工作要做得更充分和更完善。他相信政府汲取今次的教訓後，將來的工作會更加順利。

73. 文春輝先生提出以下意見：

- (i) 在今次會議和早前的環房會會議上，區議員對規劃署提交的改變土地用途建議提出了不少意見。每一幅土地均面對不同持份者的意見和訴求，如何取得平衡是一個課題。
- (ii) 現時政府的房屋政策是解決房屋需求的燃眉之急，但政府在覓地建屋方面遇到相當大困難。各區均要求增加區內的房屋供應，但當政府提出選址時卻提出不同的反對理由及意見，令政府覓地建屋的工作寸步難行。
- (iii) 同樣地，香港市民均認同要增加本地房屋供應，以配合將來的發展，但不同持份者各有意見，這正正反映社會的需求和矛盾。
- (iv) 假若能時光倒流二十年，當時各項工程由政府主導，覓地建屋較現時容易。現時政府重視民意和不同持份者的意見，亦顧及民生的需要，因此面對的困難較過去大。
- (v) 因應不同地區和環境，持份者各有不同的需求和意見，有關當局須考慮當區居民和不同持份者的意見。因此，他敦促有關部門做好包括交通、環境和設施等各方面的評估和諮詢工作，平衡各方面的訴求，真正做到有商有量，達致社區融和。

74. 文先生就劉博士的動議提出以下修訂：“大埔區議會要求規劃署及城市規劃委員會就建議修改露輝路土地(E 項地塊)由綠化地帶改劃為“住宅(丙類)9”地帶一事，充分考慮大埔區議會及當區居民和相關持份者的意見。”修訂建議獲林泉先生和陳灶良先生和議。

75. 劉志成博士表示，他理解根據議事規則其他區議員可就他的動議提出修訂，但作為原動議的動議人，他不希望其動議被修改。他認為文春輝先生提出的修訂動議與他提出的原動議有很大的分歧。他指原動議是反對規劃署改變露輝路綠化地帶用途的建議，但文先生的修訂動議則是要求當局“充分考慮大埔區議會、當區居民和相關持份者的意見”，當中包括正面和反面的意見，較為籠統。他希望修訂文先生提出的修訂動議，改為“…充分考慮大埔區議會(或區議員)、當區居民和相關持份者的反對意見”。他表示，他鄭重提出這項要求，是基於當區居民希望區議會聆聽他們的反對聲音，並將他們的反對意見原原本本記錄在案，或由區議會去信規劃署和城規會表達他們的反對意見。居民希望有關方面尊重他們的反對意見。

76. 主席表示，區議員可提出對修訂動議再作修訂，亦可由提出修訂動議的區議員在聽取其他區議員的意見後修改其修訂動議的內容。他指文春輝先生的修訂動議中所指的區議會、當區居民和相關持份者的意見已包括反對和支持兩方面的意見。而根據劉博士的建議在修訂動議的用字上更明確要求有關方面聽取區議會、當區居民和相關持份者的反對意見亦屬合理，重點是希望規劃署如實反映區議員的意見。在進行表決前，他先讓文先生考慮是否接納劉博士的建議，修改他的修訂動議。

77. 黃容根先生表示，他在會上未有聽見區議員支持改變露輝路綠化土地的用途，區議員均認為建議有不少地方值得商榷。他表示他雖非環房會的委員，但認為規劃署對區議會的諮詢工作有問題。他指改變區內八幅土地的規劃的建議是一重大事件，規劃署把建議提交環房會前理應先知會區議會正副主席，聽取他們的意見。規劃署事前沒有這樣做，難聽點說是陷區議會於不義，要區議會承受居民的反對意見。他指出，假若區議會贊成規劃署的建議，便會成為眾矢之的，但反對建議又會被視為不支持政府，造成這情況的責任在規劃署。他要求該署詳細考慮區議會和各方面的意見，然後再把建議提交區議會討論。在有商有量和反映市民的意見的前提下，他建議文先生考慮按劉博士的建議修改他的修訂動議。

78. 文春輝先生表示，由於每件事情均有正反兩面意見，所以他以較溫和的手法要求規劃署和城規會聆聽持份者的意見。他認為政府現正積極解決香港的房屋問題，區議會理應支持規劃署的建議，但該署必須就有關建議充分進行諮詢。他續稱，正如黃碧嬌女士剛才所言，有關部門經常將簡單的事情複雜化，過去他和不少區議員亦曾多次與城規會周旋。他指出，在他剛才提出的修訂動議中，“充分考慮大埔區議會、當區居民和相關持份者的意見”包括支持和反對意見。經考慮其他區議員的意見後，他同意把該修訂動議修改為：“大埔區議會要求規劃署及城市規劃委員會就建議修改露輝路土地(E 項地塊)由綠化地帶改劃為“住宅(丙類)9”地帶一事，充分考慮大埔區議會及當區居民和相關持份者的反對意見。”經修改的修訂動議獲林泉先生和議。

79. 主席引導區議會就文春輝先生提出的修訂動議進行表決。經表決後，該項修訂動議獲 21 票贊成，零票反對，零票棄權(主席未有投票)。主席宣布修訂動議獲得通過。由於修訂動議獲得通過，區議會無須處理劉志成博士的原動議。

80. 主席表示，由於區議會剛才通過的修訂動議要求規劃署及城規會充分考慮大埔區議會、當區居民和相關持份者的反對意見，他希望秘書處如實記錄區議員在會上的發言，連同修訂動議的表決記錄交給城規會。區議會同意這安排。

Objection against rezoning of a green belt on Lo Fai Road, Tai Po to “Residential (Group C) 9”

15. The Chairman remarked that a Member had written the TPDC Secretariat to put forward a motion on the captioned subject before this meeting, which read “The Tai Po District Council objects to the rezoning of a green belt on Lo Fai Road (plot E) to “Residential (Group C) 9” as proposed by the Planning Department (PlanD) and the Town Planning Board.”

16. The Member who put forward this motion pointed out that the PlanD had not taken the initiative to consult the residents concerned, who were strongly against the rezoning proposal. He read out a letter from the Concern Group on Objection to the Rezoning of Lo Fai Road for Residential Development and a letter from the Environmental Conservation Society of the Hong Kong Institute of Education at the meeting.

17. The views of other Members are summarised as follows:

- (i) the government’s efforts to find land to develop housing were worthy of support and regular reviews on the use of different land plots would be beneficial to the overall interest of Hong Kong. However, plot E on Lo Fai Road did not belong to the category of “devegetated, deserted or formed” green belt sites suitable for rezoning to residential use as spelled out in the 2013 Policy Address. The issue of rezoning of green belts should be dealt with carefully in view of their ecological importance and their functions as buffers for preventing urban sprawls and green open space for the public to enjoy. The government should consider land plots that could be used to develop housing first before resorting to rezoning of greenbelts and reclamation;
- (ii) out of some 800 households on Lo Fai Road, 800 were against the rezoning proposal. The PlanD should respect their views and properly consult the TPDC on the matter;
- (iii) the government should listen more to people’s views in its quest for land to develop housing, balancing different views along the way. Apart from improving its consultation work, it should also conduct related traffic and environmental assessments and plan ahead for the facilities required;
- (iv) the new population to be brought by the proposed development of some 600 residential units on the green belt on Lo Fai Road would put extra load on the already busy local traffic and call for more community facilities. The PlanD should come up with some plans for service facilities for transportation and

community facilities to meet residents' needs;

- (v) the Town Planning Board (TPB) should consider raising the height restriction of buildings in Tai Po Market to 80 m or even 110 m. By doing so, it was estimated that more than 3 000 residents units could be developed; and
- (vi) instead of public housing, most of the land plots proposed to be rezoned to residential purpose by the PlanD this time would be used to develop medium to low density housing, which could not benefit the grassroots.

18. A Member proposed to revise the motion to "The Tai Po District Council (TPDC) asks that the PlanD and the Town Planning Board fully consider the views of the TPDC and the residents and stakeholders concerned on the proposed rezoning of the green belt on Lo Fai Road (plot E) to "Residential (Group C)9". After further discussion, the revised motion was amended to "The Tai Po District Council (TPDC) asks that the PlanD and the Town Planning Board fully consider the dissenting views of the TPDC and the residents and stakeholders concerned on the proposed rezoning of the green belt on Lo Fai Road (plot E) to "Residential (Group C) 9", and it was passed by the TPDC with 21 votes in favour, zero vote in opposition and zero vote in abstention.

19. The Chairman requested that the TPDC Secretariat make a record of all points made by Members on this subject and submit the record together with the motion passed by the TPDC to the TPB.

Demand for withdrawing the proposal on the rezoning of a piece of land in Pak Shek Kok (East) (Pak Shek Kok (East) Draft Outline Zoning Plan No. S/PSK/12) and retaining its use by the Science Park as originally plan

20. The Chairman remarked that a Member had written to the TPDC Secretariat to put forward a motion on the captioned subject, which read "The Tai Po District Council asks that the PlanD deal with the concerns of the residents of Providence Bay, withdraw its proposal on the rezoning of a piece of land in Pak Shek Kok (East) (Pak Shek Kok (East) Draft Outline Zoning Plan No. S/PSK/12) and retain its use by the Science Park as originally planned."

21. The Member who put forward this motion criticised the PlanD for not consulting the residents of Providence Bay until they convened a meeting to discuss the matter. He further commented that the PlanD had failed to answer all questions raised by the residents at the said meeting and the information set out in the paper submitted by it to the TPB could not reflect the actual needs of the residents of Pak Shek Kok. He said that the residents were looking for support from the TPDC. He remarked that retaining the use of

I. 通過環境、房屋及工程委員會 2014 年 2 月 13 日特別會議記錄
(大埔區議會文件 EHW 35/2014 號)

2. 主席表示，秘書處在會前收到修訂建議，有關建議載於上述文件。席上並無委員提出其他修訂建議。上次會議記錄按有關建議修訂後獲通過作實。

II. 通過環境、房屋及工程委員會 2014 年 3 月 12 日第三次會議記錄
(大埔區議會文件 EHW 38/2014 號)

3. 主席表示，秘書處沒有收到修訂建議，席上亦無委員提出修訂。上次會議記錄無須修訂，獲通過作實。

III. 大埔分區計劃大綱草圖編號 S/TP/25 的修訂項目
(大埔區議會文件 EHW 34/2014 號)

4. 主席歡迎沙田、大埔及北區規劃專員蘇震國先生及城市規劃師容伯煬先生就是項議程出席會議。另外，他請委員備悉露輝路關注組致函(附件一)委員會就改劃露輝路土地作房屋發展的建議提出反對。

5. 沙田、大埔及北區規劃專員蘇震國先生介紹上述文件。就 D 項建議(即近鳳園用地)，規劃署已就擴闊汀角路的建議諮詢運輸署，運輸署回覆指汀角路現時的設計及安排足夠應付現時及未來的交通流量，該署會與新住宅項目的發展商跟進交通安排的詳情(包括從汀角路進出鳳園的路口)。關於 E 項建議(即露輝路的用地)，他指規劃署在本年 3 月會見當區居民後，得悉他們強烈反對該項建議，該署已將他們對交通及綠化等事宜的意見徵詢有關部門，以審視該項建議是否可行。另外，他指在露輝路用地進行的樹木統計結果顯示，在為數約 2 500 棵樹木中，有六成以上為非原生的相思樹，另約 188 棵為枯樹，由於這些樹木均屬本港常見品種，加上健康情況參差，漁農自然護理署認為沒有很大的保留價值。蘇先生續指，規劃署亦認為露輝路的綠化用地有景觀價值，但面對本港對住宅用地的殷切需求及為配合政府的房屋政策目標，該署必須作出取捨，而在平衡各方利益後，該署建議改劃露輝路的綠化地帶作住宅用途，用地面積約 4 公頃，佔大埔分區計劃大綱草圖(“草圖”)內約 1 200 多公頃綠化地帶的小部分。他表示，規劃署希望在整體上不為當區居民帶來負面或不可接受的影響的前提下，提供土地以滿足本港對住宅用地的需求。他續表示，露輝路的居民可在本年 6 月 11 日前就大綱草圖向城市規劃委員會(“城規會”)提出申述，亦可在草擬申述內容有疑問時與有關部門聯絡。

6. 主席表示，由於大埔區議會已在本年 5 月 8 日的會議上就露輝路用地通過修訂動議，即“大埔區議會要求規劃署及城市規劃委員會就建議修訂露輝路(E 項地塊)由綠化地帶改劃為‘住宅(丙類)9’地帶一事充分考慮大埔區議會及當區居民和相關持分者的反對意見”，因此他不建議在是次會議上再作詳細討論或表決。委員對此沒有異議。此外，他指白石角(東部)土地的改劃建議不在草圖的範圍內。他請規劃署向城規會轉達大埔區議會對改劃露輝路及白石角(東部)土地的意見。

7. 蘇震國先生承諾向城規會轉達規劃署收集到由大埔區議會、區議員及居民提出的意見。

8. 委員就 A 項建議(即頌雅路東、西及大埔第九區的用地)提出以下意見及問題：

- (i) 有委員詢問有關單位數目較規劃署在本年 2 月 13 日委員會特別會議上建議的減少的原因。
- (ii) 多位委員關注頌雅路的交通安排。
- (iii) 有委員指出，頌雅路是連接頌雅路東、大埔第九區及區內兩所醫院的唯一行車道。他擔心未來新增的人口及車流會加重頌雅路的負荷，致使緊急車輛服務受到影響。他促請有關部門做好交通影響評估、妥善規劃道路，以及提供足夠車位。此外，他指早前新鴻基地產申請在頌雅路西發展私人住宅但遭城規會否決，他憂慮新鴻基地產會申請司法覆核。他又擔心政府在徵收私人土地時會遇上困難，令擬議興建公屋的工程受到影響甚至被拉倒。基於以上原因，他不建議一併處理頌雅路東、西及大埔第九區的用地。
- (iv) 有委員認為在大埔醫院旁的匡智園用地興建 Y 型樓宇會阻擋亨榮樓及亨耀樓的景觀，長條型的設計應會較佳。他指現時富亨邨的四百多個車位不敷所需，經常有大型車輛違例停泊在頌雅路。他續指若然擬建公屋只設百餘個車位，根本不足以應付需求。他強調，頌雅苑、富亨邨及第九區均依賴頌雅路，若該路被車輛堵塞，影響將會很大。
- (v) 有委員認為應分開處理頌雅路東、西及大埔第九區的用地。他指多位委員在上述特別會議上表示反對 A3 項建議(即頌雅路西用地)，南坑村的居民亦提出反對。他指相對已遭否決的頌雅路西低密度私人住宅規劃申請，擬建公屋密度較高，而且遮擋山脊及包圍富亨邨及頌雅苑，阻礙空氣流通。因此，他認為該幅用地不適合發展公屋。他要求規劃署諮詢當區議員、居民及南坑村居民。
- (vi) 有委員查詢有關擬建公屋的道路規劃和交通流量等詳情。

- (vii) 有委員對規劃署沒有就各項改劃建議主動諮詢居民表示遺憾。他不滿該署只多番複述草圖的書面申述期而漠視大埔區議會的意見。他支持興建小學，但認為區內不僅擬建公屋的新增人口需要小學學位。他建議有關部門善用區內現有的資源，例如現時實施小班教學的學校校舍及空置校舍，以增加學位供應。他續指家長普遍對新開辦的學校欠缺信心，兩間擬建小學可能會因為收生不足而須停辦。他提醒房屋署詳細考慮擬建公屋需要甚麼配套設施，避免因配套不足而惹來反對。他提議只興建一間小學，另擬用來興建一間小學的用地則改為提供社會服務設施。此外，他查詢有關方面會否闢建新道路供緊急車輛使用，以及會否擴闊現有通往第九區的道路或增設交通設施，以應付新增車流。如有關部門經評估後認為無須闢建緊急車輛通道，他要求有關部門向委員會作出詳細的解釋及提出理據。
- (viii) 有委員指擬建公屋不僅影響頌雅路的交通，亦會令區內其他繁忙道路(例如完善路、南運路及太和路)的車流增加。他要求有關部門審視東鐵線的承載能力會否不勝負荷，以及改善現時各種車輛(包括邨巴、大埔工業邨的穿梭巴士及校巴等)在大埔墟鐵路站外停站以致交通秩序混亂的問題。
- (ix) 有委員要求增加擬建公屋所設的車位數目，以及加闊頌雅路東和西的道路。他不贊成在頌雅路西建屋。他認為有關土地應用作發展社區設施，這樣居民會更易接受公屋發展計劃，他們日後亦無須競爭資源，社區關係得以保持和諧。
- (x) 有委員認為不應在現有通往大埔第九區的道路鋪設地下公共設施，以減低日後有關設施進行維修或一旦發生突發事故(例如爆水管)時對附近交通及居民的影響。此外，他對興建兩間小學有保留。他表示，擬建公屋會帶來一萬新增人口，當中有多少學生仍是未知之數，區內部分小學現已收生不足，加建兩間小學或令情況惡化。
- (xi) 有委員質疑討論文件附件 II《說明書》(“《說明書》”)第 6 段所載的大埔區人口數字是否正確。她指根據社會福利署的資料，大埔區現時人口已達 30 萬，與規劃署聲稱未來總規劃人口只有約 28 萬相距甚遠。她續表示，大埔區約有 3 000 個私人住宅單位快將入伙。她表示，露輝路的用地位於進出香港教育學院的通道的路口，毗鄰該學院的香港教育學院賽馬會小學受地勢所限未能擴建以增加班數。她質疑是否必須將露輝路的綠化用地改劃為住宅用地。她建議規劃署考慮將該幅用地改劃為“政府、機構或社區”用地。此外，她非常不滿《說明書》第 9.2.7 段只陳述政府單方面的立場。她指大埔區議會多次反對規劃署將大埔墟的建築物高度限制定在主水平基準上 55 米，亦不認同區內的公共運輸設施及車位充足，但這些意見均未有載於《說明書》內。

- (xii) 有委員指政府規劃土地用途時應聆聽及了解地區意見，亦應作出回應。他支持持續發展，並贊成發展局檢視全港的土地，並發展已失去保育價值的土地。
- (xiii) 有委員建議規劃署考慮利用大埔區內的空置校舍，以增加小學學位供應。他希望規劃署多聆聽大埔區議員及居民的意見。

9. 蘇震國先生回應如下：

- (i) A 項建議的公共房屋用地內已預留地方闢建不同的社區及配套設施，佔發展的地積比率約為 0.5 倍。房屋署正就擬建頌雅路公屋進行詳細設計，完成後會諮詢大埔區議會。
- (ii) 房屋署正就擬議公屋發展計劃進行交通影響評估，評估不僅考慮新增人口的需要，亦會研究整個社區的道路設計、公共交通服務、車位供求情況等問題並提出建議，並會由運輸署審視以確保公屋發展計劃不會對居民造成嚴重影響。房屋署就公屋發展項目會適時諮詢大埔區議會，並詳細交代有關交通安排。
- (iii) 教育局告知規劃署大埔區欠缺約 100 個課室(即三間小學)，故在公屋用地內增加預留約 6 000 平方米的土地，使提供的小學由一間增加至兩間建屋數量因而減少。
- (iv) 與頌雅路西用地的私人發展項目的設計相比，房屋署的設計優勝之處包括於最貼近富亨邨及近山坡的位置用作興建小學，不會有高樓住宅，以回應居民的關注。有關私人發展項目在計算地積比率時將非建築土地(例如斜坡及空地)包括在地盤內，予人一個較低地積比率的印象，計算方法與房屋署有異。如運用相同的計算方法，兩者得出的地積比率相若。
- (v) 就私人發展商可能提出司法覆核，規劃署已徵詢法律意見。他強調，所涉土地主要為農地，在公眾利益的大前提下，該署不希望私人發展建議影響公屋供應，導致難以滿足市民大眾的需求。
- (vi) 至於人口數字的差異，可能在於大綱草圖上的總規劃人口只包括草圖範圍(即大埔新市鎮)內的人口，而其他部門的估算則基於大埔區，包括汀角等的周邊地區。如委員有進一步查詢，他可於會後再作解釋。

10. 主席期望擬議公屋工程順利進行。他不希望一部分土地的問題影響整項計劃。他表示，委員會支持 A 項建議，但認為政府應先發展頌雅路東及大埔第九區的用地，之後再處理頌雅路西用地的規劃事宜。

11. 蘇震國先生感謝委員提出務實的建議，並承諾向城規會加以轉達。

12. 主席支持 B 項建議(即匡智松嶺村用地)。他表示，匡智會改建後可為大埔區提供更多社會服務。委員沒有就 B 項建議提出意見或問題。

13. 委員就 C 項建議(即那打素醫院以西的用地)提出以下意見及問題：

- (i) 有委員表示，擬建頌雅路公屋及那打素醫院以西的擬建住宅會完全包圍富亨邨及頌雅苑，因此他非常反對 C 項建議。他指規劃署早前就改劃建議於富亨邨張貼告示，但事前未有諮詢大埔區議會。
- (ii) 有委員建議在該幅土地上發展居屋，但若然當區議員或居民反對，他會尊重他們的意見並收回建議。
- (iii) 有委員非常不滿規劃署多次回應指草圖已刊憲，以及委員可直接向城規會作出申述。他認為該署未有尊重大埔區議會。他認同有需要在大埔增建公屋，但強調改劃土地用途必須獲得大部分持分者支持。他指區議員可幫助該署與提出反對的持分者協商，然而，如當區議員反對建議，規劃署應凍結建議。他重申，擬建住宅建築物高度及密度頗高，有關規劃必須考慮日後入住單位的居民的需要，以及發展項目對社區的影響。
- (iv) 有委員表示，規劃署並無就 E 項建議在附近屋苑張貼告示，亦沒有去信諮詢居民。他指規劃署解釋，該署不會就政府提出的改劃建議在區內張貼告示，此展示方式一般只適用於私人住宅或小型屋宇的規劃申請。他認為有關諮詢程序有問題，惟一直沿用至今。他指若有委員以規劃署沒有諮詢居民為由要求凍結 C 項建議，他亦以相同理由要求凍結 E 項建議。

14. 蘇震國先生回應如下：

- (i) 對於委員指摘規劃署未有諮詢大埔區議會便以張貼告示的形式在富亨邨展示改劃土地用途的建議，他請當區議員提供詳情，以便該署跟進。他表示，該署並不會在附近屋苑展示大綱圖上改劃土地用途的建議，但會就規劃申請在位於申請範圍約 100 呎內的樓宇展示申請內容。
- (ii) 草圖根據《城市規劃條例》(第 131 章)向公眾展示，為期兩個月。所有市民均可就草圖作出申述，城規會會舉行聆訊，作出申述或提出意見的人士可出席聆訊表達意見，此諮詢過程公平及公開。居民如對改劃建議有意見，可循此途徑向城規會表達意見，確保城規會得悉並考慮他們的意見。

- (iii) 規劃署尊重大埔區議會的意見，亦一定會向城規會加以轉達。規劃署是次向城規會提交改劃土地用途建議前，已先諮詢大埔區議會，並已將有關意見及露輝路居民的意見包括在呈交城規會的文件內，以獨立段落陳述，以便城規會在考慮改劃建議時可得知大埔區議會及地區人士的意見。迄今規劃署已兩度就是次提出的絕大部分改劃建議諮詢大埔區議會。
- (iv) 應當區議員要求，他與露輝路居民於本年 3 月會面，草圖於同年 4 月刊憲前，規劃署曾就交通、基建及社區設施等事宜諮詢有關部門，以再一次審視改劃建議的可行性，之後才將建議呈交城規會考慮。

15. 有委員指出，根據過往經驗，如委員會沒有就建議作出明確的表決，規劃署便會視委員會支持建議，並會向城規會報告。他認為委員會應明確表示支持或反對建議。

16. 主席回應，即使區議員也不能完全代表居民的意見，加上規劃署是次提出的改劃建議欠缺交通和配套設施等規劃詳情，委員的意見或未夠深入。他認為該署必須直接接觸居民，徵詢他們的意見，而不是在聽取他們的意見前便將改劃建議呈交城規會及刊憲。他指改劃建議一旦刊憲，區議會難再要求該署到地區諮詢，兩者之間亦容易形成對立局面。他認為有需要檢討現有的諮詢程序。他促請該署及有關部門盡早就建議主動徵詢居民的意見，給予他們充足時間了解建議及發表意見。委員對此沒有意見。

17. 主席總結，當區議員及一位委員反對 C 項建議，其餘委員亦已於會上充分表達意見。

18. 委員就 D 項建議(即近鳳園的用地)提出以下意見及問題：

- (i) 多位委員要求在 D 項建議下預留土地擴闊汀角路。
- (ii) 有委員建議平整香港園藝學會附近的山坡，用作擴闊汀角路(往大美督方向)、單車徑及行人路。
- (iii) 有委員表示，他於本年 2 月去信規劃署，要求在 D 項建議所涉用地內貼近汀角路的位置預留約 10 米乘 150 米的土地，供日後擴闊汀角路之用。他指政府可將該幅約 10 米乘 150 米的土地劃出賣地範圍，或可仿效慈山寺或雅景花園的做法，在出售近鳳園的用地時規定發展商保留約 10 米乘 150 米的土地，以便將該段汀角路擴闊至六線行車，所需費用由發展商支付，工程完成後把有關路段交還政府管理。他認為這樣做有助應付日後新增的車流，亦可減省政府需投放的資源，加上建議只用上 4.8 公頃土地中的小部分，相信不會

影響整幅用地的發展潛力。他續指汀角路沿路在未來五年相繼有多個發展項目落成，汀角路名義上四線雙程行車，但過去 10 年有多項工程在汀角路動工，以致部分路段經常封閉，交通擠塞成常見之事。他表示，根據《說明書》第 11.2.2 段，鳳園的渠務工程預計到 2020 年才告完工，由此可見，汀角路的交通會繼續受工程影響。他要求運輸署提供交通影響評估報告及長遠解決汀角路交通擠塞的方案。他又要求以大埔區議會的名義去信城規會，提出在近鳳園的用地預留約 10 米的土地供擴闊汀角路之用的要求。

- (iv) 有委員指汀角路的交通已經非常擠塞，他擔心再在近鳳園的用地發展住宅會進一步加重汀角路的交通負荷。他不認同運輸署稱擬建住宅所帶來的新增人口不會影響附近交通的說法。他要求運輸署擴闊汀角路。另外，他指《說明書》第 6 段所載大埔區的人口數字有誤。
- (v) 有委員擔心 D 項建議會導致汀角路交通負荷過重。
- (vi) 有委員表示有條件支持 D 項建議。他促請政府先處理有關交通問題，並在賣地時加入條款規定發展商預留足夠地方供擴闊汀角路之用。他又建議興建新道路打通大埔第 33 區，將工業區內的車輛分流。
- (vii) 有委員支持擴闊汀角路，並請規劃署向有關部門轉達委員會的關注事項及建議。

19. 蘇震國先生表示，規劃署會再次向運輸署轉達大埔區議會要求擴闊汀角路。

20. 主席總結，委員會有條件支持 D 項建議，並要求預留 10 米闊貼近汀角路的土地作日後擴闊道路之用。

21. 關於 F 項建議(即荔枝山的用地)，主席表示，他已經與大埔鄉事委員會(“大埔鄉委會”)主席及相關村代表會面，而他身為當區議員，他亦已諮詢盈峰翠邸、龍城堡、大埔寶馬山及山塘村的居民。他補充，盈峰翠邸管理處表示規劃署沒有接觸該屋苑。

22. 有委員查詢 F 項建議的用地有否包括認可鄉村範圍土地。他又查詢有關交通規劃的詳情。他要求規劃署徵詢持份者及居民的意見。

23. 蘇震國先生回覆指，F 項建議的用地全屬政府土地，不涉及認可鄉村範圍土地或葬區。他續指倘若推展計劃時遇上計劃所涉土地與鄉村範圍土地連接的情況，該署會與當區議員、大埔鄉委會主席及村民就詳細道路設計再作商討。他補充，該署樂意與居民及村民會面，彼此交換意見。

24. 主席表示，規劃署沒有交代道路規劃，因此他對建議有保留。他指有居民向他表示規劃署完全沒有徵詢他們的意見。他請規劃署務必到地區諮詢，並將收集到的意見納入呈交城規會的文件內。

25. 主席對 G 項建議(即近逸遙路的用地)有保留。他請規劃署主動諮詢居民。委員並沒有就 G 項建議提出意見或問題。

26. 委員對 H 項建議(即乾坑的用地)提出以下意見及問題：

- (i) 有委員表示，早前當區議員安排相關村代表與規劃署代表會面，但規劃署並沒有採納村代表對地積比率及建築物高度的意見。他指乾坑的用地位於樟樹灘鄉的風水龍脈重點保護區域，絕對不能搬遷該處的鎮山石，否則會影響風水，危害整個鄉，加上附近有葬區，故村民非常關注規劃內容。大部分樟樹灘鄉的村民都不反對改劃建議，但認為樓宇太高會影響風水。他們提出下列三項要求：

- 調低建築物高度限制
- 把地積比率降低至 0.4 至 0.6 倍之間
- 把最高建築物層數限制在四層

他擔心將來在乾坑發展住宅時會影響通往葬區的道路，或會有居民要求搬遷葬區。他希望規劃署審慎規劃交通，不要對樟樹灘路造成負面影響。他請政府在賣地前與樟樹灘鄉兩條村的村代表及村民商討有關安排，以緩減對風水文物的影響。他又請政府在賣地時加入條款，規定發展商就風水事宜與村民達成協議。另外，他詢問將來新住宅入伙後，乾坑的用地會否被劃出鄉村範圍。最後，他認為將綠化地帶土地改劃為住宅用地的建議可以接受，但政府應放寬對在其他綠化地帶興建小型屋宇的限制。

- (ii) 有委員表示，村民為配合發展需作出犧牲。他希望規劃署及城規會認真考慮村民的意見。

27. 主席總結，委員會重視及尊重村民的意見。他呼籲政府放寬綠化地帶建小型屋宇的限制，以增加可建小型屋宇的土地，回應龐大的住屋需求。

28. 委員對 J1 項建議(即寶鄉街的用地)提出以下意見及問題：

- (i) 有委員申報他是香港青年協會獅子會大埔青年空間諮詢委員會的主席(沒有委員反對他就 J1 項建議發言)。他感謝委員共同爭取將該協會大埔青年宿舍的地積比率提高至 6 倍，令單位數目得以增加 15 個。他希望規劃署接納委員會的意見，放寬大埔墟的建築物高度及地積比率限制。

(ii) 有委員支持 J1 項建議。

(iii) 有委員表示，青年宿舍可真正幫助年青人。對於規劃署只把地積比率提高至 6 倍，他感到遺憾，但仍支持該項建議。

29. 主席總結，就草圖內各項修訂，委員已充分表達意見。

IV. 大埔滘發展審批地區草圖編號 DPA/NE-TPK/1
(大埔區議會文件 EHW 30/2014 號)

30. 主席歡迎規劃署高級城市規劃師吳育民先生、城市規劃師譚大偉先生及城市規劃師何文瑛女士就是項議程出席會議。

31. 高級城市規劃師吳育民先生介紹上述文件。

32. 有委員解釋，上述草圖範圍內接近大埔尾的土地應稱作綠湖，是大埔尾的附屬鄉村，村民自古在綠湖耕作，多年前已遷出，所以該處現時沒有屋宇，但土地仍屬原居民所有，他表示村民反對上述草圖。他認為與牛湖托相比，綠湖的保育價值較低，該處有大型發展項目的機會不高，故沒有為綠湖制訂審批地區草圖的需要。如必須制訂草圖，他要求將綠湖的私人土地劃為農地，取代非指定用途。他建議更改草圖名稱為“大埔尾綠湖”及不應將牛湖托包括在同一張草圖內。

33. 有委員反對上述草圖。他指土地被劃作非指定用途後，在該土地上耕作亦須先向城規會申請，令土地失去原有價值，但政府並無作出任何賠償，他認為這做法對土地使用者及業權人不公平。他要求將現時為農地的私人土地正式劃作農業用途。如劃作非指定用途，土地日後被納入郊野公園範圍，便不能用於耕作或被發展，他指郊野公園的相關條例令村民非常困擾。

34. 吳育民先生解釋，農業用途為非指定用途土地的經常准許的用途，如使用者或業權人在該區作農業用途是無須先向城規會申請。

35. 主席總結，委員會尊重村民、持分者及委員的意見。

Summary of Discussion of the 4th Meeting in 2014
of the Environment, Housing and Works Committee (EHWC)
on 14 May 2014

I. Confirmation of the minutes of the special meeting of the EHWC on 13 February 2014

The minutes of the special meeting of the EHWC on 13 February 2014 were confirmed subject to the amendments set out in TPDC Paper EHW 35/2014.

II. Confirmation of the minutes of the 3rd meeting in 2014 of the EHWC on 12 March 2014

2. The minutes of the 3rd meeting in 2014 of the EHWC on 12 March 2014 were confirmed without amendments.

III. Amendments in the Draft Tai Po Outline Zoning Plan No. S/TP/25

3. The District Planning Officer (Sha Tin, Tai Po and North) of the Planning Department (PlanD) briefed the meeting on the captioned subject. Regarding the proposed extension of Ting Kok Road under suggestion D (i.e. the site near Fung Yuen), he said that according to the Transport Department, the existing design and traffic arrangements of the road should be able to cope with both the present and future traffic flow. With respect to suggestion E (i.e. the site on Lo Fai Road), he said that while the PlanD noted the objection of local residents and recognized the landscape value of the green belt on Lo Fai Road, it thought that a tradeoff had to be made between environmental protection and housing development to meet the strong public needs. He remarked that the PlanD hoped to implement the suggestion without making adverse or unacceptable impact on the residents as a whole.

4. The Chairman suggested not to go over suggestion E in detail again as the Tai Po District Council (TPDC) had already passed a motion on it. Members agreed with the Chairman.

5. The meeting discussed some of the amendments in the draft plan. Main points of discussion were as follows:

Suggestion A (i.e. the sites to the east and west of Chung Nga road and the site in Area 9)

Members' views

- (i) the new population and traffic flow would put further strain on Chung Nga Road and might affect emergency vehicular services as the road was the only local vehicular access leading to

the two hospitals in the district;

- (ii) the Y-type public housing estate (PHE) proposed to be built on the site next to the Tai Po Hospital would obstruct the view of some of the units of Fu Heng Estate and affect air circulation in the vicinity. The number of parking spaces to be set up in the proposed PHE was also not enough;
- (iii) the two proposed primary schools might be under-enrolled. One of two sites marked for this purpose should be used to provide social services facilities instead; and
- (iv) the site to the west of Chung Nga Road should be used to develop community facilities instead of housing.

The District Planning Officer (Sha Tin, Tai Po and North)'s reply

- (i) community and service facilities would also be developed on the site marked for the construction of the proposed PHE. The Housing Department (HD) was conducting a traffic impact assessment in relation to the proposed PHE development project and would consult the TPDC and explain to it detailed traffic arrangements; and
- (ii) the Education Bureau informed the PlanD that Tai Po District needed 100 more classrooms (i.e. 3 primary schools). The PlanD thus set aside some 6 000m² of land from the site marked for the development of the proposed PHE for the construction of two primary schools. To address the concerns of the residents of Fu Heng Estate about the potential blockage to their units' view, the PlanD choose to construct the two primary schools instead of high-rise blocks on the part of the site closest to Fu Heng Estate.

In conclusion, the Chairman remarked that the EHWC supported suggestion A but hoped that the government could develop the site to the east of Chung Nga Road and the site in Area 9 first and then deal with the planning issues relating to the site to the west of Chung Nga Road.

Suggestion B (i.e. the site near Pinehill Village of the Hong Chi Association)

The Chairman supported the suggestion. Members raised no comments or questions in particular.

Suggestion C (i.e. the site to the west of the Nethersole Hospital)

Members' views

- (i) together with the proposed PHE on Chung Ngai Road, the housing blocks to be built under suggestion C would completely seal off Fu Heng Estate and Chung Nga Court;

- (ii) more public housing should be developed in Tai Po to meet people's needs and the site might be used to develop Home Ownership Scheme flats; and
- (iii) any rezoning suggestions must have the support of the stakeholders. The PlanD should consult the residents concerned as well as the TPDC and respected their views.

The District Planning Officer (Sha Tin, Tai Po and North)'s reply

- (i) the PlanD respected the views of the residents and the TPDC. It had included their views in its submissions to the Town Planning Board (TPB). In fact, it had consulted the TPDC on most of the rezoning suggestions concerned on two occasions.

In conclusion, the Chairman remarked that the members of the constituency concerned and another Member objected to suggestion C. He urged the PlanD and other departments concerned to take the initiative to consult residents on the rezoning suggestions.

Suggestion D (i.e. the site near Fung Yuen)

Members' views

- (i) a 10m-wide area should be reserved for broadening Ting Kok Road in the future to cope with the increasing traffic flow brought by the development items in the area. The government might include terms in the conditions of sale to require the developer to reserve land for this purpose; and
- (ii) the suggestion would make Ting Kok Road even more congested. The TD should find long-term solutions to the problem.

The District Planning Officer (Sha Tin, Tai Po and North)'s reply

- (i) the PlanD would forward the TPDC's demand for the broadening of Ting Kok Road to the TD.

In conclusion, the Chairman remarked that the EHWC supported suggestion D on the condition that a 10m-wide area be reserved for broadening Ting Kok Road in the future.

Suggestion F (i.e. the site in Lai Chi Shan)

Members' views/questions

- (i) the Plan D should consult stakeholders and residents concerned on the suggestion; and

- (ii) whether the site involved approved village areas.

The District Planning Officer (Sha Tin, Tai Po and North)'s reply

- (i) the site involved government land only. The PlanD would discuss with the villagers and members of the constituency concerned as well as the Tai Po Rural Committee if the site happened to be adjoining with village areas.

The Chairman remarked that he had reservations over the suggestion as the PlanD did not explain on any road planning. He added that some villagers told him that the department had not consulted them on the suggestion.

Suggestion H (i.e. the site in Kon Hang)

Members' views

- (i) most villagers of Cheung Shue Tan Heung did not object to the suggestion. However, they thought that building high-rise blocks would affect the Fung Shui there. They demanded that the building height restrictions be tightened, the plot ratio be reduced to a level between 0.4 to 0.6 and the maximum number of floors be limited to four;
- (ii) the PlanD should make careful road planning and ensure that access to burial grounds would not be affected. It should discuss with the villagers on ways to minimize the impact on local Fung Shui; and
- (iii) the government should loosen up the restrictions on the development of small village houses on other green belts as well.

The Chairman concluded that the EHWC respected the villagers' views. He requested that the PlanD and the TPB loosen up the restrictions on the development of small village houses on other green belts to address people's strong housing needs.

IV. Draft Tai Po Kau Development Permission Area Plan

6. A Member remarked that villagers concerned objected to the captioned plan.
7. A Member raised objection against the captioned plan. He remarked that once the land was designated for "unspecified use", its value would be lost as users/land owners had to apply to the TPB if they were to farming on it and the government would not offer any compensation to them, which was just unfair.

Provision of GIC Facilities and Open Space in Tai Po

Type of Facilities	Hong Kong Planning Standards and Guidelines (HKPSG)	HKPSG Requirement based on original planned population (based on planned population after proposed rezoning)	Provision			Surplus/ Shortfall against original planned provision (against planned population after proposed rezoning)
			Existing Provision	Original Planned Provision	Planned Provision after proposed rezoning	
District Open Space	10 ha per 100,000 persons	25.34ha (27.84ha)	42.29	43.54	43.54	+18.2ha (+15.7ha)
Local Open Space	10 ha per 100,000 persons	25.34ha (27.84ha)	49.90	58.57	58.57	+33.23ha (+30.73ha)
Secondary School	1 whole-day classroom for 40 persons aged 12-17	414 classrooms (456 classrooms)	566	596	596	+182 classrooms (+140 classrooms)
Primary School	1 whole-day classroom for 25.5 persons aged 6-11	657 classrooms (724 classrooms)	523	523	589	-134 classrooms (-135 classrooms) 2 additional Schools will be provided in Area 9 and CNRW.
Kindergarten/ Nursery	24 classrooms for 1,000 children aged 3 to 6	164 classrooms (181 classrooms)	225	228	243	+64 classrooms (+62 classrooms) 15 classrooms will be provided in Area 9.
District Police Station	1 per 200,000 to 500,000 persons	1 (1)	1	1	1	0 (0)
Divisional Police Station	1 per 100,000 to 200,000 persons	1 (1)	1	1	1	0 (0)

Type of Facilities	Hong Kong Planning Standards and Guidelines (HKPSG)	HKPSG Requirement based on original planned population (based on planned population after proposed rezoning)	Provision			Surplus/ Shortfall against original planned provision (against planned population after proposed rezoning)
			Existing Provision	Original Planned Provision	Planned Provision after proposed rezoning	
Hospital	5.5 beds per 1,000 persons	1,452 (1,544 beds)	1,469 beds	1,469 beds	1,469 beds	+17 beds (-75 beds)
Clinic/Health Centre	1 per 100,000 persons	3 (3)	2	3	3	0 (0)
Post Office	1 per 30,000 persons	8 (9)	3	3	3	-5 (-6)
Magistracy (with 8 courtrooms)	1 per 660,000 persons	0 (0)	0	0	0	0 (0)
Integrated Children and Youth Services Centre	1 for 12,000 persons aged 6-24	4 (4)	7	7	7	+3 (+3)
Integrated Family Services Centre	1 for 100,000 to 150,000 persons	2 (2)	2	2	2	0 (0)
Library	1 district library for every 200,000 persons	1 (1)	1	1	1	+0 (+0)
Sport Centre	1 per 50,000 to 65,000 persons	4 (4)	5	6	6	2 (+2)
Sports Ground/ Sport Complex	1 per 200,000 to 250,000 persons	1 (1)	1	2	2	+1 (+1)
Swimming Pool Complex - standard	1 complex per 287,000 persons	1 (1)	1	2	2	+1 (+1)

Summary of the representations (Group 2)
on the Draft Tai Po Outline Zoning Plan No. S/TP/25

Major Representation Points		Responses
Representation providing views		
<p>V1. Support the amendments to the OZP which are effective way to increase housing supply and consistent with the Long Term Housing Strategy stated in Policy Address and increase in development density is also an effective way to increase housing supply in the short term.</p>		Noted.
<p>V2. An existing high pressure pipeline is in close vicinity to the new residential development at site under Amendment Item F. The future developer should be requested to conduct risk assessment for evaluating the potential risk and determining the necessary mitigation measures, and to consult the Hong Kong and China Gas Company Limited during construction stages.</p>		Noted. The future developer would be required via land sale conditions to conduct a risk assessment and provide mitigation measures to the satisfaction of Director of Electrical and Mechanical Services (DEMS).
<p>V3. No objection to the zoning amendments to the OZP but notes that the site proposed for a hostel-cum-youth centre development is situated about 10m away from the East Rail. Noise from rail operation could be of concern to the future occupants of the site.</p>		Noted. Building design such as noise tolerant facades facing East Rail, vertical architectural fins, special window designs etc could be effective to reduce noise impact. The proponent shall be required via lease conditions to conduct Noise Impact Assessment (NIA) and provide noise mitigation measures to the satisfaction of Director of Environmental Protection (DEP).
<p>V4. The height of developments in Kon Hang should not be too high and 3 to 4 storeys is acceptable. Besides, feng shui and access to burial ground should not be affected. Request to release more land near Cheung Shue Tan and Tai Po Mei Villages for village type developments.</p>		Noted. The proposed development with appropriate development restrictions on development intensity and building height on the OZP would be compatible with the neighbouring developments. The VA conducted by PlanD indicates that the proposed development would not have adverse visual impact on the surrounding area. Rezoning of the site from "GB" to "R(C)8" would also not affect the existing access to the burial ground. As for the villagers' request for more land around Cheung Shue Tan and Tai Po Mei Villages for Small House developments, the areas concerned are not the

Major Representation Points	Responses
	<p>subject of amendments to the OZP. Should the villagers wish to rezone the area for village development, they could submit planning application to the Board under the s.12A of the Ordinance. Each application would be considered by the Board on individual merits. As for feng shui issue, it is not a planning consideration of the Board.</p>
<i>Adverse Representations - General</i>	
<i>Government Policy</i>	
<p>O1. The proposed rezoning sites are richly covered with vegetation and dense woodlands rather than “devegetated, deserted or formed” as advocated by the Government. The proposed rezoning proposals are not in line with the Government’s Policy Address. The large scale development of “GB” indicates a vital change in Policy without public consultation.</p>	<p>Planning is an on-going process and the Government will continue to review zonings of different sites from time to time so as to provide land to meet the economic and development needs of Hong Kong. The review of “GB” sites (“GB” review) comprises two stages. In the first stage of “GB” review completed in 2012, the Planning Department (PlanD) mainly identified and reviewed areas zoned “GB” that are devegetated, deserted or formed. With the completion of the first stage of “GB” review, the 2013 Policy Address announced that PlanD was conducting the next stage of “GB” review, with the purpose of releasing more sites for housing development. The second stage of “GB” review considered those vegetated “GB” sites with a relatively lower buffer or conservation value and adjacent to existing transport and infrastructure facilities.</p> <p>Various technical assessments/reviews including traffic, sewerage, drainage, water supply, environmental, air ventilation and visual impacts have been undertaken where necessary. It has been confirmed that the amendments would not cause insurmountable problems on traffic and other infrastructural capacity as well as on the environmental, air ventilation and visual aspects. Requirements for submission of tree preservation proposals and landscaping proposals/landscape master plan, where appropriate, will be included in the lease conditions of the housing sites.</p>
<i>Public Consultation and Planning Procedures</i>	
<p>O2. The Government has extensively rezoned “GB” sites all over Hong Kong.</p>	<p>In processing the zoning amendments, PlanD has followed the established</p>

Major Representation Points	Responses
<p>which is an important directional change in Hong Kong's town planning policy. Nonetheless, no in-depth comprehensive consultation has been conducted. At present, the issue is dealt with on a piecemeal basis at District Council level, which is contrary to procedural justice.</p>	<p>procedures including departmental consultation, District Council (DC) and Rural Committee (RC) consultation, Town Planning Board submission, and gazetting under the Town Planning Ordinance. Prior to the submission to RNTPC of the Board, the Environment, Housing and Works Committee (EHWC) of Tai Po District Council (TPDC) was consulted on 8.1.2014 and 13.2.2014. The views collected have been incorporated into the RNTPC paper to facilitate RNTPC's consideration of the rezoning proposal on 4.4.2014. The proposed amendments were published for exhibition on 11.4.2014 for two months until 11.6.2014. Furthermore, EHWC was further consulted at its meeting held on 14.5.2014 on the gazetted amendments.</p> <p>The public have been consulted on rezoning proposals in accordance with the provisions of the Ordinance. The exhibition of OZP for public inspection and the provisions for submission of representations and comments on representations form part of the statutory public consultation process under the Ordinance. The public and stakeholders have been given the opportunity to provide their views and counter-proposals to the proposed amendments. Besides, all representatives/ commenters have been invited to the meeting to present their views under section 6B(3) of the Ordinance. The statutory and administrative procedures in consulting the public on the proposed zoning amendments have been duly followed.</p>
<p>O3. There had been no prior public consultation and/ or the consultation process with TPDC was improper/misleading. The Government should withdraw the amendments and to carry out extensive public consultation afresh.</p>	<p>Rezoning of "GB" sites is one of the multi-pronged approaches to provide land to meet housing and other development needs. The public have been consulted on rezoning proposals in accordance with the provisions of the Ordinance.</p>
<p>O4. The site at Lo Fai Road is already included in the Application List, but the screening procedure of town planning has just begun. The Board should refuse the zoning amendment to discourage the Government's malpractice of putting</p>	<p>Sites included in the application list are indication of future land supply. Availability of land for sale is subject to completion of planning procedures for OZP amendments. Each proposed amendment on the OZP would be</p>

Major Representation Points	Responses
land under the Application List before filing for rezoning. The purpose of so doing is to confuse the public and compel the Board to give in. This totally disrespects the public opinion.	considered by the Board on individual merits.
<i>Breach of Public Expectation and Government's Promise</i>	
O5. The zoning amendments are contrary to public interest and public expectations that the wooded landscapes are to be protected and valued. These amendments will create a bad precedent and cause cumulative adverse impacts in future.	Planning is an on-going process and the Government will continue to review zonings of different sites from time to time so as to provide land to meet the economic and development needs of Hong Kong.
	Land suitable for development in Hong Kong is scarce and there is a pressing need for increasing housing supply. Rezoning of "GB" sites is one of the multi-pronged approaches to meet housing and other development needs. As the sites are suitable for housing development, it is considered appropriate to rezone the sites for residential use to meet the housing needs of the community.
<i>Town Planning Aspect</i>	
O6. Rezoning of "GB" sites is against the planning intention and all established planning guidelines.	See response to O5 above.
O7. The Government has not well utilized the existing land. The Government should develop the brownfield sites and consider redevelopment of under-utilized sites first, rather than devastating the environment and the ecology to give way for development.	Land suitable for development in Hong Kong is scarce and there is a need to optimize the use of land available to meet the increasing housing demand. To increase and expedite housing land supply in the short to medium term, the Government is taking a multi-pronged strategy to increase supply of flats. The brownfield sites could also be considered if found suitable for residential development. Supply of various types of new housing will help meet different needs of the community. The rezoning proposals will contribute to the Government's effort in meeting the pressing need for increase housing land supply to both public and private sectors. It is estimated that the proposed residential sites under amendments would in total produce 10,525 flats, 6,350 for public housing and 4,175 for private housing.
<i>Importance of "GB"</i>	

Major Representation Points	Responses
<p>O8. The proposed rezoning “GB” sites are grown with rich woodland. They play an important role in maintaining the public’s quality of life by improving the landscape and air quality as well as moderating the heat island effect. They have always been a vital buffer between the urban area and Country Park and cannot be sacrificed.</p>	<p>The identified sites, though vegetated, have relatively less buffering effect and low conservation value. Their location in proximity to existing urbanized development and infrastructures also makes them natural candidates for urban expansion. They are considered suitable for residential development to meet the pressing needs for housing.</p>
<p>O9. There is fundamental failure to detail the ecological importance of the rezoning sites. Site visits and ecological survey done by green groups reveal findings very different from those of the Government.</p>	<p>The proposed “GB” sites for rezoning are mostly adjacent to disturbed or developed areas at urban fringe. According to Agriculture, Fisheries and Conservation Department (AFCD), no designated sites of conservation interest are located within or in proximity to the sites. Trees found in these sites are largely trees of exotic or common species. In this regard, it is unlikely that the rezoning would result in significant ecological issues. If tree felling and substantial clearance of vegetation are necessary at the “GB” sites to facilitate residential developments, the Government will carry out tree surveys to ascertain the condition and strive to minimize the impacts on the environment by requiring the developer to carry out appropriate mitigation measures, including preservation or relocation of existing trees with conservation value, or compensatory planting in accordance with the existing guidelines and tree preservation mechanism.</p>
<p>Tree Felling</p>	
<p>O10. The proposal would involve extensive clearance of vegetation. The cumulative impact has not been addressed.</p>	<p>See response to O9 above.</p>
<p>Biological Diversity</p>	
<p>O11. Hong Kong is a signatory to the Convention of Biological Diversity (CBD) but is not complying with its requirements. Biodiversity would be adversely affected.</p>	<p>As advised by DAFC, Hong Kong’s existing nature conservation policy and measures are generally in line with the objectives of the CBD. Existing nature conservation measures include designation of country parks, special areas, marine parks, marine reserves and conservation zonings, and implementation of conservation plans for important habitats and species etc. If the zoning amendments have duly taken into account the protection of important habitats and species of conservation importance, they are deemed</p>

Major Representation Points	Responses
	<p>to be in line with the objectives of the CBD in general. Given that the developer of the rezoning sites would be required to carry out appropriate mitigation measures, including preservation or transplanting of existing trees with conservation value, or compensatory planting in accordance with the existing guidelines and tree preservation mechanism, the development proposals which comply with the relevant requirements would not be considered as contravening the objectives of the CBD. Besides, the requirement for adequate landscape area around the site periphery to serve as buffer would be included in the lease. Significant adverse impacts on biodiversity are not anticipated.</p>
<p><i>Lack of information/technical assessment</i></p> <p>O12. Insufficient technical assessments had been conducted, in particular traffic impact assessment to investigate the potential traffic impact of the rezoning proposal at Lo Fai Road. Some housing sites are distant from the town centre or railway station. Demand on public transport and transport infrastructure would have impacts on existing and future residents as roads in Tai Po are already congested. Various technical assessments should be conducted prior to development.</p>	<p>Technical review were conducted by TD, HyD, Water Supplies Department (WSD), Drainage Services Department (DSD) and Environmental Protection Department (EPD) to assess the feasibility of the new housing sites in Tai Po. They confirm that the proposed residential developments would not induce any insurmountable problems on these various aspects. The proposed rezoning would not have adverse cumulative impacts on the traffic and infrastructural capacities in the Tai Po New Town. Technical requirements can also be included in the lease to guide the design and implementation of the development by future developer.</p> <p>See responses to O14 below.</p>
<p><i>Air Ventilation and Visual Aspects</i></p> <p>O13. The overall living quality of local residents would deteriorate. The proposed residential developments would affect the visual, air ventilation, sunlight penetration and the overall environmental and air quality.</p>	<p>An AVA(E) was commissioned by the PlanD to assess the likely impacts of the proposed housing sites under Amendment Items C (west of Nethersole Hospital) and F (site near Lai Chi Shan). Based on the recommendations of the AVA(E), Non Building Areas have been designated on the OZP for the two sites. According to the Housing, Planning and Lands Bureau Technical Circular No. 1/06 on AVA setting out the guidance for applying AVA for government projects, AVA would only be required for sites over a plot ratio of 5 and exceeding a GFA of 100,000m². The remaining sites do not meet</p>

Major Representation Points	Responses
	<p>the criteria under which AVA would be required. Furthermore, given the size of the sites (all over 1 ha) and they have relatively open exposure to winds from all directions, there would be reasonable scope to accommodate good building design and layout disposition to avoid wall effect of buildings and enhance permeability.</p> <p>To assess the visual impact of the private housing sites VA for the sites were also undertaken by PlanD. Photomontages have been prepared to illustrate the possible visual impacts of the proposed residential developments at the sites. As illustrated in the photomontages, the proposed housing developments in Tai Po would not be incompatible with the surrounding developments and would not impose significant changes to the overall townscape and character. Whilst existing developments located in close proximity to the sites are more likely to experience greater visual changes, it should be noted that private views of buildings could not be guaranteed in the light of the development pace in Hong Kong. It is also not practical to protect private views without stifling development opportunity and balancing other considerations</p>
Impacts on Surrounding Developments	
<p>O14. The rezoning proposals would seriously affect residents of surrounding areas.</p>	<p>Various technical assessments/reviews including traffic, sewerage, drainage, water supply, environmental, air ventilation and visual impacts have been undertaken where necessary. It has been confirmed that the amendments would not cause insurmountable problems on traffic and other infrastructural capacity as well as on the environmental, air ventilation and visual aspects. Requirements for submission of tree preservation proposals and landscaping proposals/ landscape master plan, where appropriate, will be included in the lease conditions of the housing sites.</p> <p>See responses to O13.</p>
O15. Construction works and developments will bring nuisance to the	Regarding the construction impacts of the proposed housing developments,

Major Representation Points	Responses
sensitive receivers.	the proponent/future developer would be required to follow and implement the Recommended Pollution Control Measures for Construction Contract, which are generally good engineering practice to minimize inconvenience and environmental nuisance to nearby residents and other sensitive receivers.
<p>Provision of GIC Facilities</p> <p>O16. Reduction of land for "G/IC" use would affect the welfare of the community in Tai Po. There are not sufficient supporting community facilities such as medical services, education and other community services to serve the increased population. There are concerns over the Tai Po town carrying capacity as the rezoning proposal will bring about an increase of 29,500 residents with more demand for land for infrastructure, commercial and community facilities. At present, primary and kindergarten places are already under provided in the Tai Po district.</p>	<p>The planned provision of major GIC facilities in the district is generally sufficient. There will also be a surplus provision of local open space and district open space in the Tai Po OZP planning area. As for education aspect, two new primary school sites have been reserved in the comprehensive public housing development. Besides, social welfare facilities such as Day Care Centre for the Elderly, Child Care Centre and Early Education and Training Centre would also be provided to serve the local community.</p>
O17. Consideration should be given to reserve the site at Lo Fai Road for the expansion of Hong Kong Institute of Education (HKIEd).	For the proposal to reserve the site for the expansion of HKIEd, suitable site would be identified for tertiary education purpose should such a need arise.
Development Intensity	
O18. Increase in plot ratio would result in pressure on landscape, infrastructure, traffic, air ventilation, geotechnical, environment, community facilities and demand for open space.	The 2014 Policy Address has announced that except for the north of Hong Kong Island and Kowloon Peninsula, which are more densely populated, the Government considers it feasible to generally increase the maximum domestic plot ratio (PR) currently permitted for the other "density zones" in the territory by around 20% as appropriate. In general, the maximum PR for most of Tai Po New Town falls within Density Zone 2 (i.e. PR of 5). To maximize the development potential of housing land as announced in the Policy Address, in general a PR of 6 for Tai Po is proposed for the high-density residential sites identified, which is equivalent to the maximum of Density Zone 2 (i.e. PR 5) with a 20% increase. For the low density zone with PR of less than 1, consideration could be given to increase the PR by

Major Representation Points	Responses
	<p>100% subject to confirmation on traffic and infrastructural capacities and no adverse impact on local characteristics and the surrounding environment.</p> <p>Various technical assessments/reviews including traffic, sewerage, drainage, water supply, environmental, air ventilation and visual impacts have been undertaken where necessary. It has been confirmed that the amendments would not cause insurmountable problems on traffic and other infrastructural capacity as well as on the environmental, air ventilation and visual aspects. Requirements for submission of tree preservation proposals and landscaping proposals/ landscape master plan, where appropriate, will be included in the lease conditions of the housing sites. The planned provision of major GIC facilities in the district is generally sufficient. There will also be a surplus provision of local open space and district open space in the Tai Po OZP planning area.</p>
<p>Inadequate Housing Type</p> <p>O19. The proposed residential development for luxurious housing is not aimed at providing affordable housing to the general public and therefore unable to ease the prevailing pressure on housing supply. There are already large number of vacant housing units in Tai Po and the proposed rezoning for private residential development cannot solve the housing problem.</p>	<p>Land suitable for development in Hong Kong is scarce and there is a need to optimize the use of land available to meet the increasing housing demand. To increase and expedite housing land supply in the short to medium term, the Government is taking a multi-pronged strategy to increase supply of flats. Supply of various types of new housing will help meet different needs of the community. The rezoning proposals will contribute to the Government's effort in meeting the pressing need for increase housing land supply to both public and private sectors. It is estimated that the proposed residential sites under amendments would in total produce 10,525 flats, 6,350 for public housing and 4,175 for private housing.</p>
<p>Specific Grounds on Amendment Item C</p> <p>O20. The area is densely covered with trees and is given the unique name of "green island". There is a big banyan tree in the middle of the site. The construction works would affect a lot of trees, endanger the banyan tree and ruin the green environment. The site is too close to the hospital and the</p>	<p>DAFC advises that the site is a disturbed habitat. According to the tree survey, the eastern part of the site is dominated by common native tree species and the western part is dominated by exotic tree species. The large <i>Ficus microcarpa</i> (細葉榕) is recommended to be preserved. Appropriate</p>

Major Representation Points	Responses
<p>proposed residential development would not be compatible with hospital use. Besides, it would seriously affect Fu Heng Estate's external traffic.</p>	<p>mitigation measures to minimize the impacts on the environment, including preservation or relocation of existing trees with conservation value, or compensatory planting in accordance with the existing guidelines and tree preservation mechanism could be imposed in the lease.</p> <p>The site is about 150m away from the hospital. Area to the west, on the opposite of Chung Nga Road, is Fu Heng Estate. The proposed development with PR of 6 for domestic and 9.5 for non-domestic is considered compatible with the surrounding areas.</p> <p>Tai Po is well served with public transport. To the immediate west of the site is a public transport terminus to serve the need of the local residents. TD will closely monitor the provision of the public transport and liaise with public transport service providers to provide the necessary new services as the development proceeds.</p>
Specific Grounds on Amendment Items D1 and D2	
<p>O21. The shrine of Tai Wong Ye, if affected, would endanger villagers' lives and health.</p>	<p>Zoning shown on the OZP is broad-brush and the shrine is not within the land sale site. As for feng shui issue, it is not a planning consideration of the Board.</p>
<p>O22. Traffic congestion of Fung Yuen would be aggravated. A 10m-wide buffer should be reserved for road widening at Ting Kok Road.</p>	<p>TD advises that Ting Kok Road would be within its operating capacity even with the proposed residential development. C for T further advises that the volume/capacity ("v/c") ratio during peak hours of the section of Ting Kok Road from Tai Po Industrial Estate to Shuen Wan is currently about 0.5 to 0.6, indicating that there is sufficient capacity to cope with the existing and anticipated traffic flow. To reserve 10m-wide buffer for widening of Ting Kok Road is not necessary.</p>
<p>O23. The rezoning proposal would affect the feng shui or 'dragon vein' of</p>	<p>The site is at a distance of about 600m away from the Hong Kong and China</p>

Major Representation Points	Responses
Fung Yuen and the existing buffer from the Hong Kong and China Gas Production Plant.	Gas Production Plant, which is a potential hazardous installation (PHI), in Tai Po Industrial Estate. The developer(s) is required to carry out hazard assessment (i.e. Quantitative Risk Assessment) to assess the risks posed by the PHI in accordance with the HKPSG. Given that the proposed development at the site is a low-density residential development, there should be scope in the proposed site to incorporate appropriate mitigation measure to comply with the requirement of risk assessment. DEMS has no objection to the proposed amendment as far as gas safety is concerned. As for feng shui issue, it is not a planning consideration of the Board.
O24. The site is covered by some secondary woodland patches comprising native tree species, together with abundant shrubs and understorey vegetation which has good potential to become mature woodland. Species of conservation interest are found in the site and an Environmental Impact Assessment (EIA) should be conducted in accordance with the EIA Ordinance. The site should be rezoned to "Conservation Area" ("CA").	LandsD has conducted tree survey on the site. Although some individuals of protected species were found near Fung Yuen, namely <i>Aquilaria sinensis</i> (土沉香), <i>Rhodoleia championii</i> (紅花荷) and <i>Pyrenaria spectabilis</i> (石筆木), the site is a mainly plantation dominated by exotic species, which have much lower plant diversity, simpler structure and lower fauna diversity. There is no strong justification for rezoning the site to "CA". Tree preservation and Landscape Master Plan clauses would be included in the lease conditions.
O25. Two of the villages in Fung Yuen have no village office and the site of should be used for GIC facilities such as a village office or a history museum to serve the local villagers.	According to the OZP, "Village Office" use is always permitted in the "V" zone and there is land available within the "V" zone of Fung Yuen for village office use. The site of Amendment Item D1 is considered suitable for residential development and the government has no plan for development of regional GIC facilities such as a history museum in the area.
O26. Tree felling is required for the new access road hence it would have adverse environmental impact.	A new access road connecting to Fung Yuen Road will be provided by decking over a nullah and widening a short section of the existing access road to Sha Lo Tung. Requirements for submission of tree preservation proposals and landscaping proposals/ landscape master plan, where appropriate, will be included in the lease conditions of the housing sites.

<u>Major Representation Points</u>	<u>Responses</u>
O27. The Site is located adjacent to a popular hiking route. The passive recreational value of "GB" zone and the public interest in the enjoyment of the countryside is being ignored.	The hiking route along Sha Lo Tung Road would not be affected and peripheral tree planting would be provided around the site to enhance amenity.
<i>Specific Grounds on Amendment Item E</i>	
O28. The building height of the proposed development and the overall built form is undesirable from urban design point of view as it contravenes the urban design guidelines set out in the Hong Kong Planning Standards and Guidelines (HKPSG) which promotes the preservation of ridgelines and peaks.	<p>In the highly developed context of Hong Kong, it is not practical to protect private views without stifling development opportunity. In the interest of the public, it is far more important to protect public views, particularly those easily accessible and popular to the public or tourists. The development parameters of the proposed development at Lo Fai Road are comparable to adjacent developments with plot ratios ranging from 0.8 to 1.8 and building heights from 3 to 5 storeys. According to the visual appraisal undertaken by PlanD, the proposed development of 5 storeys would not create adverse visual impact to the surrounding areas.</p> <p>Given the size of the site (over 4 ha) and the low development intensity, there would be reasonable scope to accommodate good building design and layout disposition to avoid wall effect of buildings and enhance permeability. The proposed development is of low-rise and low-density in nature and within a suburban environment surrounded with vegetation, thus urban heat island effect is not anticipated.</p>
O29. There were fundamental flaws in the consultation with TPDC and DC members as they were misled by the information presented that the net plot ratio for the proposed residential development at Lo Fai Road is about 1.1.	It should be noted that on 8.1.2014, it was presented to the EHC of TPDC that the site at Lo Fai Road to be zoned "R(C)9" would be subject to a maximum domestic GFA of 46,200m ² and the relevant information had been clearly stated in the EHC paper no. 10/2014 and included in the Appendix II of the EHC paper no. 14a/2014 considered by EHC on 13.2.2014. Given that the site area covered by the "R(C)9" zone is about 4.13 ha, the development intensity of the site with GFA of 46,200m ²

Major Representation Points	Responses
	(GFA/site area) is equivalent to a plot ratio of about 1.1. The information provided to TPDC is correct and does not involve any misunderstanding.
O30. The planned number of flats is unrealistic because it is unlikely that the developer will build housing estates with average flat size of 70m ² in this prime location with fantastic sea view. If the average flat size of the adjoining sea-facing developments is adopted, the number of flats would only be about 200.	The proposed residential zones will contribute to the Government's effort in meeting the pressing need for increase housing land supply to both public and private sectors. For a residential development, a range of flat size would be provided by the developer taking into account the character and adjacent developments. The assumed average flat size of 70m ² is for estimating the number of potential flat supply.
O31. The existing green zone is the only open space enjoyed by residents living along the hillside of Lo Fai Road. Taking away an important community gathering place is unjust and will lead to legal action.	The residential developments at Lo Fai Road have their own open space and recreational facilities. There is also a general surplus of land for open space use (about 45ha) in Tai Po district compared with the HKPSG requirements. In addition, there are three country parks including Pat Sin Leng Country Park, Plover Cove Country Park and Tai Mo Shan Country Park in the vicinity of Tai Po New Town. As such, there are ample spaces for residents in Tai Po to enjoy the natural environment.
O32. The site is just 3m from the main entrance of the two nearby residential estates. There are wall effect, light, air and noise pollution. Traffic-wise, serious traffic flow problem is envisaged in the area, causing great inconvenience and disruption to staff and students of the neighbouring HKIEd.	Given the size of the site (over 4 ha) and the low development intensity, there would be reasonable scope to accommodate good building design and layout disposition to avoid wall effect of buildings and enhance permeability. The proposed development is of low-rise and low-density in nature and within a suburban environment surrounded with vegetation, thus urban heat island effect is not anticipated. See responses to O35.
O33. The subject "GB" functions as a buffer for the residential developments at Lo Fai Road to the surrounding obnoxious uses.	The Lo Fai Road site is about 500m away from the Tai Po Industrial Estate. Effluents generated from the industrial estate have to comply with the requirements of the relevant Ordinances. Environmental mitigation measures have also been implemented to address the pollutants or wastes including air, water and noise at source if necessary. In this regard, the

Major Representation Points	Responses
	<p>surrounding areas will not be subject to the significant adverse environmental impact of the industrial estate. Director of Environmental Protection (DEP) has no objection to the proposed residential development. Besides, a large piece of land with a width of about 150m between the site and Ting Kok Road is zoned "GB". In this regard, the rezoning of the site from "GB" to "R(C)9" would not pose adverse environmental impact or undermine the environmental quality of its surrounding areas.</p>
<p>O34. Instead of using the Lo Fai Road site, the brownfield site at Tung Tsz near HKIEd should be utilized for private residential development.</p>	<p>Regarding the proposal to develop an alternative "GB" site near HKIEd instead, it should be noted that the land is mostly private land subject to various development constraints. The Government will continue to review zonings of different sites from time to time so as to provide land to meet the economic and development needs of Hong Kong.</p>
<p>O35. The proposed number of new housing units almost doubles the total number of households in the five estates around Lo Fai Road and will overload the nearby road network.</p>	<p>C for T advises that the proposed development at Lo Fai Road will be connected to the existing Lo Fai Road and Ting Kok Road. Lo Fai Road is a local single two carriageway with 2-way capacity of 1400veh/h while that section of Ting Kok Road is dual-two carriageway with 1-way capacity of 2800veh/h respectively. The additional traffic generated from the proposed development will be about 300 vehicle at AM peak hour. Even with these additional traffic, the existing Lo Fai Road and Ting Kok Road will still be operated within its handling capacity. Notwithstanding this, the junction of Lo Fai Road/Lo Ping Road will be modified, if necessary, to cater for the additional traffic on Lo Fai Road.</p> <p>TD will keep monitoring the traffic situations and implement appropriate traffic improvement measures as the proposed development proceeds.</p>
<p>O36. Traffic is already extremely busy at Lo Fai Road and Ting Kok Road. The confirmed development projects along Ting Kok Road include Tsz Shan Monastery, spa hotel resort, columbarium, residential projects at Lung Mei</p>	<p>See response to O35 above.</p>

<u>Major Representation Points</u>	<u>Responses</u>
Beach, Fung Yuen, etc. A holistic transport development plan is required.	
O37. The only public parking at Lo Fai Road will be affected. This is a total neglect of the problem of shortage of parking space in the area.	The public car park at Lo Fai Road affected by the proposed amendment will be re-provisioned as required by TD.
<i>Specific Grounds on Amendments Item F</i>	
O38. The site is well vegetated and covered with woodland. A water course at the northern part of the site may be affected.	According to the tree survey, the site is a disturbed and fragmented habitat generally covered with exotic trees. No OVT or Potentially Registrable OVTs are recorded in the tree survey. The requirement for tree preservation and Landscape Master Plan would be imposed in the lease. Avoidance of impact to natural streams/rivers is recognized. The requirement for protection of natural stream would be subject to relevant technical circular and could be incorporated into the lease conditions as appropriate.
<i>Specific Grounds on Amendments Item G</i>	
O39. The site is well vegetated and ecologically connected to adjacent woodland habitats. A detailed and comprehensive ecological assessment, including a tree survey, should be conducted prior to any development in the area to avoid loss of woodland habitat with ecological value.	The site was previously zoned "R(C)" and already reserved for residential development. The proposed amendment is for up-zoning to a higher development intensity to optimize the development potential of the site. DAFC has no comment on the proposed amendment from the nature conservation point of view. The developer will be required to follow the existing guidelines and tree preservation mechanism to carry out appropriate mitigation measures, including preservation or relocation of existing trees with conservation value, or compensatory planting; and tree preservation clause and submission of Landscape Master Plan would be imposed under the lease.
<i>Specific Grounds on Amendments Item H</i>	
O40. The site is in close vicinity to "CA" zone covered by woodland and has a natural stream course flowing through the northern portion. To compensate for the loss of "GB" due to the rezoning, other wooded areas along Tai Po Road beyond Tai Po Mei Waterfall should be rezoned to "CA".	The subject site consists mainly of village houses, temporary structures, a nursery and interspersed with some common amenity or exotic tree species. It is largely surrounded by woodland in the adjoining "CA" zone and a natural stream course is flowing through its northern portion. According to DAFC, the stream is not an Ecological Important Stream. The technical

<u>Major Representation Points</u>	<u>Responses</u>
	<p>circular on protection of natural stream would be followed. About 1.12 ha of the site is Government Land and is intended for sale for private residential development. A tree preservation clause would be imposed in the lease, the details of which should be subject to the pre-land sale tree survey to be conducted by LandsD.</p> <p>The areas are not covered by any amendment items under the current rezoning exercise. There is no strong justification for rezoning the wooded areas which are mainly zoned "GB" to "CA".</p>
<i>Major Representatives' Proposals</i>	
<i>Specific Proposals on Amendment Items C, D2, E, F and H</i>	
<p>P1. To include the sites into Country Park.</p>	<p>DAFC advises that any proposal to include areas into Country Park should be assessed against the established principles and criteria, which include conservation value, landscape and aesthetic value, recreational potential, size, proximity to existing country parks, land status and land use compatibility, as well as other relevant considerations. Designation of Country Park is under the jurisdiction of the Country and Marine Parks Authority governed by the Country Parks Ordinance (Cap. 208) which is outside the purview of the Board.</p>
<i>Specific Proposals on Amendment Item H</i>	
<p>P2. The "GB" zone should be maintained to serve as a buffer for the adjacent "CA" zone and for the biologically rich natural habitats within the Tai Po Kau Nature Reserve.</p>	<p>Although the site is not far from the Tai Po Kau Nature Reserve to the west, its western portion is mainly a developed area comprising village houses with building entitlement. The proposal to retain the "GB" zoning is considered inappropriate.</p>
<p>P3. To rezone the site to "CA".</p>	<p>"CA" zone is normally designated to conserve areas of high conservation value. However, according to DAFC, the area is not of particular high ecological value which warrants designation of a "CA" zoning.</p>

Major Comments' Grounds	Responses
Q1. Supports R1328 which opposes rezoning of the "GB" site to the west of Nethersole Hospital for residential development.	See responses to O2, O14 and O20 above.
Q2. Supports R16 to R1273 which oppose to the rezoning of "GB" sites for residential developments.	See responses to O1 to O10 above.
Q3. Supports the opposing views on the rezoning of the "GB" site at Lo Fai Road for residential development.	See responses to O1 to O11, O19 and O28 to O37 above.
Q4. Supports the views that a 10m strip of land should be reserved at the site near Fung Yuen for future widening of Fung Yuen Road.	See responses to O22 above.
Q5. Supports the views that the existing brownfield site (near HKIED) should be rezoned for residential development instead.	See responses to O34 above.

Grounds and Proposals of Respective Representation and Comment (Group 2)

Representations Providing Views (R1 – R5)

Representation. No (TPB/R/S/TP/)	Representation Grounds and Proposals, and Responses
R1	V1
R2	V2
R3	V3
R4 & R5	V4

Adverse Representations (Representation No. TPB/R/S/TP/25- R6(Part) to R1273(Part), R1324(Part), R1325, R1326(Part), R1327 to R1624, R1625(Part), R1626 to R6321, R6322(Part))

Representation. No (TPB/R/S/TP/25 -)	Representation Grounds and Proposals, and Responses
R6 (Part)	O5, O8, O11, O14, O15, O16
R7 (Part)	O2, O12
R8 (Part)	O5, O8, O9, O12
R9 (Part)	O1
R10 (Part)	O1
R11 (Part)	O16, O18
R12 (Part)	O2, O7, O19
R13 (Part)	O1, O2, O3, O5, O6, O8, O9, O10, O11, O12, O19, O24, O27, O33, O38, O39, O40
R14 (Part)	O1, O2, O3, O5, O6, O8, O9, O10, O12, O13, O14, O16, O24, O31, O40
R15 (Part)	O8
R16 (Part)	O1, O6, O7, O9, O12, O24, O26, O33
R17 (Part)	O1, O6, O8, O9, O10, O12, O13, O22, O24, O26, O38
R18 (Part)	O1, O3, O6, O8, O10, O11, O14, O24, O26, O27, O39, O40, P2
R19 (Part)	O1, O2, O12
R20 (Part)	O1, O2, O3, O4, O5, O6, O8, O10, O12, O13, O14, O19, O20, O24, O36, O38, O40
R21 (Part)	O7, O8
R22 (Part)	O1, O6, O10, O19, O24
R23 (Part)	O7, O10, O24
R24 (Part)	O10, O11

Representation. No (TPB/R/S/TP/25 -)	Representation Grounds and Proposals, and Responses
R25 (Part)	O8, O9, O19, O24
R26 (Part)	O5, O6, O7
R27 (Part)	O7, O8, O11
R28 (Part)	O1, O11
R29 (Part)	O6, O8, O9
R30 (Part)	O7, O34
R31 (Part)	O5
R32 (Part)	O5, O7, O11
R33 (Part)	O5, O6, O8
R34 (Part)	O8, O10
R35 (Part) - R36 (Part)	O5, O7, O8
R37 (Part) - R38 (Part)	O8
R39 (Part)	O1, O6, O8
R40 (Part)	O1, O2, O3, O4, O7, O8, O10, P1
R41 (Part)	O12
R42 (Part)	O1
R43(Part) – R1078(Part)	O1, O2, O3, O4, O7, O8, O10
R1079(Part)	O1, O2, O4, O7, O8, O11, O12, O36
R1080(Part)	O1, O2, O3, O4, O7, O8, O10
R1081(Part)	O1, O2, O7, O8
R1082 (Part) - R1083(Part)	O1, O2, O4, O7, O8
R1084(Part) – R1086(Part)	O1, O2, O7, O8, O10
R1087(Part)	O1, O2, O4, O7, O8, O10
R1088 (Part)	O1

Representation. No (TPB/R/S/TP/25 -)	Representation Grounds and Proposals, and Responses
R1089 (Part)	O7, O8, O10
R1090 (Part)	O1, O2, O4, O7, O8, O10
R1091 (Part)	O8, O13
R1092 (Part)	O7, O8, O10
R1093 (Part)	O1, O2, O10
R1094 (Part)	O7, O8, O10
R1095 (Part) – R1096 (Part)	O1, O2, O3, O4, O7, O8, O10
R1097 (Part)	O1, O2, O7, O8, O10, O19
R1098 (Part) – R1107 (Part)	O1, O2, O3, O4, O7, O8, O10
R1108 (Part)	O2, O4, O8
R1109 (Part)	O1, O2, O3, O4, O7, O8, O10
R1110 (Part)	O1, O2, O8, O15
R1111 (Part) – R1126 (Part)	O1, O2, O3, O4, O7, O8, O10
R1127 (Part)	O1, O8, O10
R1128 (Part)	O8, O10
R1129 (Part) – R1131 (Part)	O1, O2, O7, O8, O10
R1132 (Part) - R1134 (Part)	O1, O2, O3, O4, O7, O8, O10
R1135 (Part)	O1, O2, O4, O7, O8, O10, O36
R1136 (Part)	O1, O2, O4, O7, O8, O10, O19
R1137 (Part) - R1146 (Part)	O1, O2, O3, O4, O7, O8, O10
R1147 (Part)	O1
R1148 (Part) - R1154 (Part)	O1, O2, O3, O4, O7, O8, O10
R1155 (Part)	O2, O4, O7, O10
R1156 (Part) - R1159 (Part)	O1, O2, O3, O4, O7, O8, O10
R1160 (Part)	O8, O10, O19
R1161 (Part)	O8
R1162 (Part)	O8, O10, O4
R1163 (Part)	O1, O2, O4, O7, O8, O10
R1164 (Part)	O8, O10
R1165 (Part)– R1169 (Part)	O1, O2, O3, O4, O7, O8, O10
R1170 (Part)	O8
R1171 (Part)	O1, O4, O8, O10
R1172 (Part)	O1, O2, O4, O8, O10
R1173 (Part)	O1, O2, O8, O10, O24
R1174 (Part)	O2, O4, O7
R1175 (Part)	O1, O2, O7, O8, O10
R1176 (Part) - R1179 (Part)	O1, O2, O3, O4, O7, O8, O10
R1180 (Part)	O1, O2, O7, O8, O10
R1181 (Part) - R1182 (Part)	O1, O2, O3, O4, O7, O8, O10
R1183 (Part)	O1, O2, O8, O10
R1184 (Part) – R1214 (Part)	O1, O2, O3, O4, O7, O8, O10
R1215 (Part)	O1, O19

Representation. No (TPB/R/S/TP/25 -)	Representation Grounds and Proposals, and Responses
R1216 (Part)	O10, O19
R1217 (Part)	O1, O5
R1218 (Part)	O8, O10
R1219 (Part)	O5, O7, O8, O21,
R1220 (Part)	O1, O6, O8, O21, O24
R1221 (Part)	O3, O19
R1222 (Part)	O5, O7, O8
R1223 (Part)	O5, O8, O10, O19, O24
R1224 (Part)	O8, O10
R1225 (Part)	O2, O3
R1226 (Part)	O2, O3, O8, O9
R1227 (Part)	O1, O3, O4, O6, O8, O9, O10, O24
R1228 (Part)	O1, O6, O8, O9, O10, O24
R1229 (Part)	O1, O6, O8, O9, O10, O19, O24
R1230 (Part)	O8, O9, O19, O24
R1231 (Part)	O2, O3, O8, O19, O24
R1232 (Part)	O1, O19
R1233 (Part)	O8, O9
R1234 (Part)	O2, O3, O8, O9, O19
R1235 (Part)	O1, O3, O4, O7
R1236 (Part)	O8
R1237 (Part)	O1, O2, O3, O4, O5, O6, O7, O8, O9, O13, O14, O15, O28, O31, O32, O33, O34, O26, O36, O37
R1238 (Part)	O1, O2, O3, O4, O5, O6, O7, O8, O9, O13, O28, O31, O32, O33, O34
R1239 (Part)	O8, O10
R1240 (Part)	O8
R1241 (Part)	O1, O6, O8, O9, O10, O24
R1242 (Part)	O8, O9, O19, O24
R1243 (Part)	O9, O10
R1244 (Part)	O9, O10
R1245 (Part)	O8, O9, O10, O19
R1246 (Part)	O1, O4, O6, O7, O8, O12, O13
R1247 (Part)	O1, O2, O6, O7, O8, O9, O24
R1248 (Part)	O1, O2, O3, O4, O8, O9
R1249 (Part)	O1, O19
R1250 (Part)	O8, O9, O10, O19
R1251 (Part)	O5, O8, O9, O19
R1252 (Part)	O1, O2, O3, O4, O5, O7, O8, O9, O14, O15, O31, O33, O35, O36, O37
R1253 (Part)	O1, O2, O4, O7, O8
R1254 (Part)	O1

Representation. No (TPB/R/S/TP/25 -)	Representation Grounds and Proposals, and Responses
R1255 (Part)	O8, O9, O11, O24
R1256 (Part)	O4, O7, O8
R1257 (Part)	O1, O2, O8
R1258 (Part)	O1, O7
R1259 (Part)	O10, O35, O36
R1260 (Part)	O1, O8, O10, O24, O26, O27
R1261 (Part)	O1, O19
R1262 (Part)	O2, O3, O8, O12
R1263 (Part)	O1, O2, O3, O4, O7, O8, O10
R1264 (Part)	O1, O7
R1265 (Part)	O1
R1266 (Part)	O1, O2
R1267 (Part)	O1, O2, O3, O4, O5, O6, O7, O8, O9, O11,
R1268 (Part)	O1, O2, O4, O7, O8, O10
R1269 (Part)	O1, O2, O3, O5, O6, O7, O8, O11, O16, O31, O33, O36
R1270 (Part)	O1, O2, O4, O7, O8, O10
R1271 (Part) – R1273 (Part)	O1, O2, O3, O5, O7, O8, O11, O13, O14, O15, O16, O28, O31, O32, O33, O34, O37
R1324 (Part)	O5, O19
R1325	O8, O10, O15, O19, O20, P3
R1326 (Part)	O21, O22, O23
R1327	O1, O12, O19, O22, O31, O33, O35, O36
R1328	O2, O14, O20
R1329	O13, O21, O22, O23
R1330 – R1624	O21, O22, O23
R1625 (Part)	O6, O10, O16, O21, O22, O23, O24, O25
R1626	O10, O12, O14, O15, O22, O24
R1627	O14
R1628	O1, O6, O10, O12, O24
R1629	O1, O2, O5, O6, O7, O8, O9, O10, O12, O19, O31, O34
R1630	O1, O2, O4, O7, O8, O10, O11, O12, O13, O19, O31, O33, O34
R1631	O1, O4, O5, O6, O8, O10, O12, O19, O31, O34
R1632	O1, O4, O5, O6, O8, O10, O12, O19, O31, O34
R1633	O1, O2, O3, O5, O6, O8, O10, O12, O13, O14, O16, O19, O28, O31, O32, O33, O34, O35, O36, O37
R1634 – R1635	O1, O5, O6, O12, O19, O32, O33, O35, O36
R1636	O7, O16, O17, O33, O34
R1637	O1, O7, O8, O11, O19

Representation. No (TPB/R/S/TP/25 -)	Representation Grounds and Proposals, and Responses
R1638	O1, O5, O6, O8, O10, O12, O28, O29, O30, O31, O33, O34
R1639	O2
R1640	O1, O2, O7, O19, O31, O33, O36,
R1641	O10, O13, O14, O15, O31, O32, O33, O35, O36
R1642	O2, O14, O15, O16, O35, O36
R1643 – R1644	O1, O2, O6, O12, O14, O15, O16, O31, O32, O35, O35, O36, O37
R1645	O1, O10, O14
R1646	O1, O2, O8
R1647	O2, O8, O14, O19
R1648	O8, O12, O31, O36
R1649	O1, O2, O5, O8, O12, O31, O36
R1650	O1, O5, O8
R1651 – R1653	O1, O2, O5, O7, O34
R1654	O7, O19, O34
R1655	O8, O34, O36
R1656	O12, O15, O16, O31, O33, O35, O36, O37
R1657	O1, O2, O5, O7, O8, O11, O16, O33, O34, O35, O36
R1658 - R1659	O8, O10
R1660	O1, O5, O35
R1661	O8, O31
R1662	O8, O14
R1663	O12, O15, O16, O31, O33, O35, O36, O37
R1664	O1, O2, O5, O7, O8, O11, O16, O33, O34, O35, O36
R1665	O1, O5, O10, O11, O19
R1666	O1, O8, O14, O19, O31, O34, O35
R1667	O8, O14
R1668 – R1669	O7, O8
R1670	O10
R1671	O1, O2, O8, O11, O34
R1672	O1, O2, O8, O19
R1673 – R1676	O1, O8, O11, O16, O34, O35
R1677	O12, O15, O16, O31, O33, O35, O36, O37
R1678	O1, O8, O11, O13, O14
R1679	O1, O6, O13, O31,
R1680	O1, O2, O8, O11, O16, O34, O35
R1681	O1, O31
R1682	O1, O8
R1683	O1, O5, O16, O35

Representation. No (TPB/R/S/TP/25 -)	Representation Grounds and Proposals, and Responses
R1684	O12, O14
R1685	O8, O34
R1686	O1, O5, O8, O19, O35
R1687	O2, O12
R1688	O2, O5
R1689	O1, O2, O29
R1690	O19, O36
R1691 – R1983	O2, O5, O14, O32, O36
R1984 – R2043	O8, O13, O19, O28, O31, O32, O35, O36, O37
R2044	O1, O2, O5, O8, O11, O12, O15, O16, O32, O33, O34, O35, O36, O37
R2045 – R2093	O8, O13, O19, O28, O31, O32, O35, O36, O37
R2094 – R2403	O12, O15, O16, O31, O33, O35, O36, O37
R2404 – R2773	O1, O2, O5, O7, O8, O11, O16, O33, O34, O35, O36
R2774	O1, O2, O8, O11, O33, O34
R2775	O8, O13, O19, O28, O31, O32, O35, O36, O37
R2776 – R4361	O1, O2, O3, O6, O7, O8, O10, O11, O33
R4362 - \$4364	O1, O2, O5, O7, O8, O11, O16, O33, O34, O35, O36
R4365 – R5249	O1, O2, O5, O8, O12, O13, O14, O15, O16, O19, O28, O31, O32, O33, O34, O35, O36, O37
R5250 – 5270	O1
R5271	O1, O2, O4, O8, O19, O16, P19
R5272 – R6320	O1
R6321	O19, O31
R6322 (Part)	O16

C80	Q3
C81	Q3, Q5
C82	Q5
C83	Q3
C84	Q3, Q5
C85	Q3
C86	Q3, Q5
C87	Q3
C88 – C90	Q3, Q5
C91 – C406	Q3
C407 – C437	Q3, Q5
C438	Q3
C439	Q3, Q5

Adverse Comments (C1, C2(Part) to C79(Part), C80 to C439)

Comment. No (TPB/R/S/TP/25- C1, C2(Part) to C79(Part), C80 to C439)	Comment on the Representation
C1 (Part)	Q1
C2 (Part)-C3 (Part)	Q2, Q5
C4 (Part) – C55 (Part)	Q2
C56 (Part)	Q2, Q5
C57 (Part) – C79 (Part)	Q2