

TOWN PLANNING BOARD

**TPB Paper No. 10243
For Consideration by the
Town Planning Board on 25.1.2017**

**DRAFT THE PEAK AREA OUTLINE ZONING PLAN NO. S/H14/12
CONSIDERATION OF REPRESENTATIONS
NO. TPB/R/S/H14/12-R1 TO R1479, R1481 TO R1497 AND R1499 TO R1640
AND COMMENTS NO. TPB/R/S/H14/12-C1 TO C40**

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Subject of Representation	Representers (No. TPB/R/S/H14/12-)	Commenters (No. TPB/R/S/H14/12-)
Amendment Item A - Rezoning of a site opposite 23 Coombe Road from “Green Belt” (“GB”) to “Residential (Group C)6” (“R(C)6”)	Total : 1,638 <u>Support (1)</u> R1 : Juli May Limited <u>Oppose (1,637)</u> R2 : CHAN Ka Lok (Past Legislative Councillor (2012-2016)) R3 : WONG Wang Tai (Wan Chai District Councillor) R4 : Joseph CHAN (Central & Western District Councillor) R5 : World Wide Fund for Nature Hong Kong R6 : Hong Kong Bird Watching Society R7 : Kadoorie Farm and Botanic Garden R8 : Designing Hong Kong Limited R9 : Alliance for a Beautiful Hong Kong R10 : Aberdeen Country Park Concern Group R11 : Hon. Tanya CHAN (Legislative Councillor)	Total : 40 <u>Related to R2 to R1479, R1481 to R1497 and R1499 to R1640</u> C1 : Juli May Limited <u>Support R4</u> C2 : Joseph CHAN (Central & Western District Councillor) <u>Support R10, Object to R1</u> C29 : Alliance for a Beautiful Hong Kong <u>Object to R1</u> C32 : World Wide Fund for Nature Hong Kong <u>Support R10, Object to R1</u> C3 to C28, C30, C31 & C33 & C36 : Individuals <u>Object to R1</u> C34, C35, C37 to C40 : Individuals

Subject of Representation	Representers (No. TPB/R/S/H14/12-)	Commenters (No. TPB/R/S/H14/12-)
	<p>R19 : Central & Western Concern Group</p> <p>R12 to R18 : 7 individuals (Name of representers shown at Attachment A of Annex VII)</p> <p>R20 to R1479, R1481 to R1497 and R1499 to R1634 : 1,613 individuals with representation made in Standard Format A (Name of representers shown at Attachment A of Annex VII)</p> <p>R1635 to R1640 : 6 individuals with representation made in Standard Format B (Name of representers shown at Attachment A of Annex VII)</p>	

Note : A CD-ROM containing all representers' and commenters' submissions is enclosed at **Annex X** [*for TPB Members only*]. The names of all representers and commenters can be found at **Attachments A and B of Annex VII** or at the Board's website at http://www.info.gov.hk/tpb/en/plan_making/S_H14_12.html. A full set of the representers' and commenters' submissions is also deposited at the Secretariat of the Board for Members' inspection.

1. Introduction

1.1 On 29.4.2016, the draft The Peak Area Outline Zoning Plan (OZP) No. S/H14/12 (**Annex I**) was exhibited for public inspection under section 5 of the Town Planning Ordinance (the Ordinance). The amendments are set out in the Schedule of Amendments at **Annex II** and opportunity has also been taken to update the Notes and Explanatory Statement of the OZP to reflect the latest planning circumstances. The major amendment involves the following:

- Item A – Rezoning of a site opposite 23 Coombe Road (the representation site) from “Green Belt” (“GB”) to “Residential (Group C)6” (“R(C)6”) with a maximum plot ratio (PR) of 0.5 and maximum building height (BH) of 2 storeys including carports and not exceeding 260mPD

- 1.2 During the two-month exhibition period, a total of 1,638 representations¹ were received. On 5.8.2016, the Town Planning Board (the Board) published the representations for three weeks for public comments. Forty comments, all related to the representations for Amendment Item A, were received.
- 1.3 On 24.10.2016, the Board agreed to consider all the representations and comments collectively in one group. This paper is to provide the Board with information for consideration of the representations and comments. The representers and commenters have been invited to attend the meeting in accordance with section 6B(3) of the Ordinance.

2. **Background**

- 2.1 There is a Grade 1 historic building at 23 Coombe Road, namely ‘Carrick’, which by definition is a building of outstanding merit where every effort should be made to preserve if possible. Carrick was built in 1887 and was graded as Grade 1 in 2011. A historic building appraisal of Carrick provided by the Antiquities and Monuments Office (AMO) of the Leisure and Cultural Services Department (LCSD) (extracted from MPC Paper No. Y/H14/4A) and the site photos of Carrick are attached as **Annex III** and **Plans H-9 to 12**.
- 2.2 Amendment Item A is to take forward the decision of the Metro Planning Committee (MPC) of the Board to partially agree to the rezoning application No. Y/H14/4 under section 12A of the Ordinance to facilitate the non-in-situ land exchange proposed by the land owner of 23 Coombe Road (the owner) (i.e. **R1**), i.e. to surrender 23 Coombe Road (the Carrick Site) to the Government for preservation of Carrick and to develop a two-storey house within the representation site in return.
- 2.3 The representation site is a piece of Government land on a vegetated slope with an area of about 1,100m² (**Plans H4 to H6**). The owner proposed under the aforesaid application to rezone the site from “GB” to “R(C)6” with a maximum PR of 0.51 and a maximum BH of 2 storeys including carports and not exceeding 260mPD. The indicative scheme submitted by the owner under the application No. Y/H14/4 is extracted on **Annex IV** for reference. The application and another section 12A application No. Y/H14/5 submitted by the Aberdeen Country Park Concern Group (ACPCG) (i.e. **R10**) in response to the owner’s application with two counter-proposals², including an

¹ R1480 and R1498 confirmed with the Secretariat of the Board that they did not submit any representation in respect of the draft The Peak OZP No. S/H14/12, and thus, should be considered as invalid.

² The two counter-proposals submitted by ACPCG included:

- (i) Option 1 – to rezone the Carrick Site from “R(C)2” to “OU” annotated “Historic Building Preservation and Residential Development” to facilitate in-situ preservation of Carrick while allowing the owner to erect next to it an additional house, subject to the same gross floor area of Carrick and a maximum BH of four storeys including carports, within the same site; and
- (ii) Option 2 – to rezone the Carrick Site from “R(C)2” to “OU” annotated “Historic Building Preservation” for heritage conservation only and rezone the Northern Site from “GB” to “R(C)2”, subject to a maximum PR of 0.5 and a maximum BH of four storeys including carports, as a substitute site for Carrick.

in-situ preservation cum development option and a non-in-situ land exchange option for another piece of vegetated Government land, also zoned “GB”, to the north of the Carrick Site (the Northern Site) (**Plans H-7 & H-8**). Both applications were considered by MPC at the same meeting held on 6.11.2015.

2.4 After the deliberation of the two applications together by assessing the pros and cons of all the three options, MPC generally agreed that:

- (i) it was appropriate to preserve Carrick, which was a Grade 1 historic building, from the land use planning point of view;
- (ii) the owner’s proposal to develop a house at the representation site was acceptable from land use point of view as appropriate mitigation measures to minimise its impacts would be taken; and
- (iii) the owner’s proposal was the preferred option in striking a balance among various considerations, including land use, visual, landscape, heritage conservation, public interest and respect for private development rights.

Hence, MPC partially agreed to the application No. Y/H14/4 to rezone the representation site to “R(C)6”, with a maximum PR of 0.5, instead of 0.51 proposed by the owner, and a maximum BH of 2 storeys including carports and 260mPD so as to achieve consistency with the development in the surroundings and taking into account the overall visual quality of the area. The application No. Y/H14/5 itself was rejected mainly on the technical grounds³. Extract of the minutes of the MPC meeting held on 6.11.2015 is attached at **Annex V** for reference.

2.5 On 8.4.2016, MPC agreed to the proposed amendments to the approved The Peak Area OZP No. S/H14/11 which were mainly to take forward its decision on application No. Y/H14/4 and some other technical amendments to the Notes of the OZP. The draft OZP was exhibited under section 5 of the Ordinance on 29.4.2016 for public inspection. The relevant MPC Paper No. 4/16 and the minutes of the MPC meeting are deposited at the Board’s Secretariat for Members’ inspection and are also available at the Board’s website.

³ The rejection reasons for the s.12A application No. Y/H14/5 include:

- (i) Option 1 – fails to demonstrate that the proposed development within the same site would not affect the structural stability of the Grade 1 historic building therein; would not undermine the setting and environment of the historic building, and in turn, its heritage value; would not have significant adverse technical impacts; and; as the applicant has failed to demonstrate the technical feasibility and impacts of the proposed Option 1, it is pre-mature to consider the proposed “OU” annotated “Historic Building Preservation and Residential Development” for the Carrick Site.
- (ii) Option 2 – fails to demonstrate that the impacts on the existing trees on the Northern Site would not be unacceptable; would not have significant adverse technical impacts; and as the applicant has failed to demonstrate the technical feasibility and impacts of the proposed Option 2, it is pre-mature to consider the proposed rezoning of the Northern Site from “GB” to “R(C)2” nor the Carrick Site from “R(C)2” to “OU” annotated “Historic Building Preservation”.

3. Consultation with Wan Chai District Council

- 3.1 Upon the publication of the draft OZP on 29.4.2016, the Wan Chai District Council (WCDC) was consulted on 17.5.2016. Members of WCDC generally did not support the rezoning proposal on the grounds that the proposed land exchange was not on a 'like-for-like' basis; it was unfair to allow the owner to gain a more superior site overlooking panoramic sea views and profit through the land exchange; the proposal would bring about adverse traffic, environmental, ecological, visual and landscape impacts on the surrounding areas, particularly the nearby Aberdeen Country Park (ACP); inappropriate use of public money to finance road widening for private residential development; and the rezoning application will set an undesirable precedent. There were also concerns on the future adaptive reuse of Carrick; adverse impacts on the overall historic ambience of Carrick and its surrounding areas; improper consideration of public views by the owner and the Government; and queries on the heritage conservation policy. Extract of the minutes of the WCDC meeting on 17.5.2016 is at **Annex VI** (in Chinese only).
- 3.2 During the two-month OZP exhibition period, a WCDC member had submitted a representation on the draft OZP, which is incorporated in paragraph 4 below.

4. The Representations

4.1 Subject of Representations

- 4.1.1 Among the total 1,638 representations, one representation (**R1**) supported and the remaining 1,637 representations (**R2 to R1479, R1481 to R1497 and R1499 to R1640**) objected to Amendment Item A. The supporting representation was submitted by Juli May Limited (**R1**), i.e. the owner of the Carrick Site. The opposing representations were submitted by a Legislative Councillor (Hon. Tanya Chan) (**R11**), a past Legislative Councillor (2012-2016) (Mr Chan Ka Lok) (**R2**), a Wan Chai District Councillor (Mr Wong Wang Tai) (**R3**), a Central & Western District Councillor (Mr Joseph Chan) (**R4**), World Wide Fund for Nature Hong Kong (**R5**), Hong Kong Bird Watching Society (**R6**), Kadoorie Farm and Botanic Garden (**R7**), Designing Hong Kong Limited (**R8**), Alliance for a Beautiful Hong Kong (**R9**), ACPCG (**R10**), Central & Western Concern Group (**R19**) and members of the public. A summary of the representations and the Planning Department's (PlanD) responses, in consultation with government departments, is at **Annex VII**.

4.2 Supportive Representation

The major grounds of the supportive representation (**R1**) are summarized below:

- 4.2.1 The designated "R(C)6" zone of the representation site aims to facilitate the permanent preservation of Carrick for public appreciation

through land exchange to allow the owner to surrender the Carrick Site and develop the representation site into a single house development with the same PR.

- 4.2.2 It is a win-win solution for preserving the heritage for public benefits without compromising private property rights.
- 4.2.3 The proposed “R(C)6” zoning is a planning tool to implement the land exchange scheme and is hence supported.

4.3 Adverse Representations

The major grounds of the adverse representations (**R2 to R1479, R1481 to R1497 and R1499 to R1640**) are summarized below:

Not in Line with the Planning Intention of “GB” Zone

- 4.3.1 Amendment Item A is not in line with the government policy in respect of rezoning “GB” for development, in which the representation site is not de-vegetated, deserted or formed. (**R6, R10, R13, R15, R18, R19 to R1479, R1481 to R1497 and R1499 to R1634**)
- 4.3.2 The decision to rezone the representation site from “GB” to “R(C)6” for residential development is not made under exceptional circumstances as the possible alternatives to preserve Carrick have not been fully explored or been rejected with no sound reasons. The justifications for preferring the representation site have not been clearly provided. (**R6, R8, R10, R12, R13, R18, R69, R691 and R1101**)
- 4.3.3 The representation site was originally an integral part of the remaining “GB” zone and rezoning it to “R(C)6” is not in line with the Town Planning Board Guidelines No. 10 for Application for Development within “GB” Zone under Section 16 of the Town Planning Ordinance (TPB-PG No. 10) in that there is a general presumption against development in the “GB” zone and residential development thereat will involve extensive clearance of existing natural vegetation. (**R6 to R8, R10, R18, R42, R52 to R54, R327, R695, R905 to R906, R910, R1112, R1311, R1318, R1326, R1383 and R1386 to R1388**)
- 4.3.4 Furthermore, the function of the original “GB” zone as a buffer zone for ACP will be affected by rezoning part of it for residential development. This will undermine the integrity and connectivity of the forest habitat in the Peak and Aberdeen areas and reduce the habitat quality of the adjacent woodland, leading to an irreversible ecological impact of the area. (**R2, R5, R6, R8 to R14, R16 to R17, R19 to R1479, R1481 to R1497 and R1499 to R1634**)

Not in Line with the Government's Heritage Conservation Policy

- 4.3.5 The land value of the representation site far exceeds that of the Carrick Site. The proposed exchange of the two sites is not in line with the government's heritage conservation policy in that the non-in-situ land exchange should proceed on a 'like-for-like' basis. **(R6, R8, R10, R13, R14, R18 to R1479, R1481 to R1497 and R1499 to R1634)**
- 4.3.6 The representation site is a well-vegetated natural slope situated at the periphery of ACP and is of moderate to high ecological value, which should not be used in exchange for the preservation of Carrick. The 'like-for-like' land exchange for the Carrick Site should be kept within residential zonings of low ecological value while the representation site should be retained as green belt buffer. Some representers consider it necessary to preserve historic buildings but have reservation on using a natural slope site in land exchange. Heritage preservation and environmental conservation should not be a trade-off and the Government should come up with a win-win solution. The subject land exchange is not justified as no 'exceptional merit' has been demonstrated. **(R2 to R4, R6 to R8, R10, R11, R13, R14, R17 to R1479, R1481 to R1497 and R1499 to R1634)**
- 4.3.7 The heritage setting and ambience of Carrick would be destroyed by the proposed residential development at the representation site, in particular that its surrounding landscape would be adversely affected and its view towards ACP would be blocked. **(R9, R10, R18 and R20)** The proposed development would also violate the internationally accepted principles of heritage conservation such as the Burra Charter 2013. **(R10)**
- 4.3.8 The previous land exchange arrangement for King Yin Lei should not be adopted as a precedent to justify the approval of the subject rezoning as the historical value of Carrick is lower than that of King Yin Lei. Unlike King Yin Lei, Carrick is just an old historic building and not too known to the public. Besides, the land exchange site for the King Yin Lei case was a man-made slope and significant adverse impacts on the amenity, natural green environment and visual quality of that area were not anticipated. **(R2, R3 and R8)** As the adaptive re-use values of King Yin Lei have already been difficult to realize, the public gain of preservation of Carrick will be further reduced. **(R8)**

Inadequate Considerations for the Rezoning

Technical aspects

- 4.3.9 Residential development at the representation site will have adverse impacts on various technical aspects. Such rezoning has failed to strike a balance among land use, visual, landscape, heritage preservation, environmental and ecological conservation, recreational value, public interest and private property right. Some representers consider that the proposed residential development is technically

infeasible. The proposed residential development would also destroy the connection between Carrick and the water resources of the Aberdeen Reservoir system. Some representers are worried about the adverse impacts on the water catchment area of the Aberdeen Reservoir and the roost of the Black Kite which is of regional importance. **(R2, R4 to R6, R8, R10 to R14, R16, R33, R41, R61, R72, R141, R293, R501, R629, R688, R700, R717, R911, R1300, R1307, R1308, R1310, R1313, R1314, R1320, R1322, R1324, R1325 and R1639)**

4.3.10 Both the Chief Town Planner/Urban Design & Landscape (CTP/UD&L) of the Planning Department (PlanD) and the Agriculture, Fisheries and Conservation Department (AFCD) have reservation on the rezoning in respect of the buffer function of the green belt, landscape and tree preservation aspects. The landscape assessment provided by the owner is insufficient in demonstrating the real impacts on the landscape and the existing trees. **(R2, R8, R11, R13, R18 to R1479, R1481 to R1497 and R1499 to R1634)**

4.3.11 The construction of the proposed residential development at the representation site will involve large-scale slope stability and structural works, which will have adverse ecological, environmental, traffic, road safety and noise impacts. **(R3, R6, R10, R16, R630, R891 and R1635 to R1640)** R16 requests setting out the comprehensive planning and building regulations for the future developer of the representation site to carry out professional analysis on the affected ecology and to implement relevant mitigation measures.

4.3.12 There is no overriding development need for the rezoning. The proposed residential development at the representation site cannot provide enjoyment and benefit for the public. Rezoning the representation site for luxury residential development instead of affordable public housing is contrary to the public interest which has no public planning gain. **(R3, R4, R6, R8, R12 to R15, R18 to R1479, R1481 to R1497 and R1499 to R1634)**

4.3.13 The possible traffic, environmental and ecological impacts on ACP arising from the proposed residential development at the representation site have not been assessed. There are also concerns about the loss of public amenity as the representation site is a main gateway to ACP. **(R8, R10, R12, R55, R108, R300, R661, R806, R810 and R1267)** R12 considers that the proposed development at the representation site should be considered by the Country and Marine Parks Board (CMPB).

Selective consideration of comments

4.3.14 The comments of the relevant government departments, the District Council and the public had been disregarded or not fully considered. **(R2, R3, R8, R11, R13, R18 to R1479, R1481 to R1497 and R1499 to R1634)**

Inadequate Planning Control to Preserve Carrick

- 4.3.15 Amendment Item A is a favourable treatment to the owner bowing to blackmail in demolishing Carrick. As such, there is suggestion to reduce the threat of demolition of Carrick by rezoning the Carrick Site for preservation. **(R13, R14, R18 to R1479, R1481 to R1497 and R1499 to R1634)**
- 4.3.16 Procedurally, there should be a contemporaneous rezoning of the Carrick Site for historic building preservation before the land exchange. However, the current OZP has not provided any measure to protect Carrick. It is considered that the Board erred in law by approving the rezoning application and the town planning regime offered no protection for the historic building, but destroyed the vegetation on the representation site. **(R10 and R56)**
- 4.3.17 The future use of Carrick has not yet been confirmed and the environmental and traffic implications of such use have not been assessed. It is uncertain whether the future use would have adverse technical impacts and would be acceptable to the community. Commercial use of Carrick will put the residential character of the area at risk. **(R8)**

Undesirable Precedent

- 4.3.18 The proposed amendment will set an undesirable precedent for other residential development proposals in the area/other development proposals of privately-owned Grade 1 historic buildings, which will lead to further encroachment onto “GB” zones and Country Parks, leading to a general degradation of the natural environment. **(R2, R3, R5, R7, R8, R13, R18, R579, R633, R651, R667 and R1635 to R1640)**

Lack of Transparency in the Land Exchange Negotiation Process and Public Engagement

- 4.3.19 The rezoning for the land exchange is only beneficial to the owner. The negotiation process of the premium of the representation site between the Government and the owner will be conducted privately. There is no open bidding or tendering for such a prime site. **(R3, R9, R19 to R1479, R1481 to R1497, R1499 to R1634 and R1638)**
- 4.3.20 There is no active engagement of stakeholders and the general public in the land exchange process. **(R9, R60 and R251)**

Representers’ Proposals

- 4.4 The representers’ proposals are as follows:

- 4.4.1 **R10**, i.e. ACPCG, submitted two alternative options (with justifications,

additional technical information on tree survey and ecology, geotechnical and structural engineering, architectural drawings and images, a heritage assessment and a comparison of the proposed house development at the representation site and the two alternative options (**Plans H-7 & H-8 and Drawings IX-1 to IX-17 at Annex IX**) to demonstrate that the representation site is not suitable for residential development and it could be reverted back to “GB” without affecting the preservation of Carrick as there are alternatives. The two alternative options are mainly based on Option 1 and Option 2 previously submitted under application No. Y/H14/5. A summary of the two alternative options is as follows:

(a) Option 1

- (i) to retain the “GB” zone of the representation site;
- (ii) to rezone the Carrick Site from “R(C)2” to “Other Specified Uses” (“OU”) annotated “Historic Building Preservation and Residential Development”, under which any demolition of, or addition, alteration and/or modification to an existing building (except restoration works coordinated or implemented by Government and those minor alteration and/or modification works which are ancillary and directly related to the always permitted uses) requires planning permission from the Board under s.16 of the Ordinance;
- (iii) a maximum gross floor area (GFA) of 549.98m² in addition to the existing GFA of Carrick to compensate the loss of GFA and maximum BH of four storeys including carports; and
- (iv) a setback requirement of 10m from Carrick above 252mPD under the Notes of the OZP to avoid blockage of the northern façade.

(b) Option 2

- (i) to retain the “GB” zone of the representation site;
- (ii) to rezone the Carrick Site to “OU” annotated “Historic Building Preservation”, under which any demolition of, or addition, alteration and/or modification to an existing building (except restoration works coordinated or implemented by Government and those minor alteration and/or modification works which are ancillary and directly related to the always permitted uses) requires planning permission from the Board under s.16 of the Ordinance; and
- (iii) to rezone the Northern Site, i.e. a piece of Government land

of the same size to the north of Carrick on which a refuse collection point (RCP) is located, from “GB” to “R(C)2” subject to a maximum PR of 0.5 and a maximum BH of four storeys including carports. This site is considered to be a suitable alternative for the proposed land exchange. Compared with the Option 2 under s.12A application No. Y/H14/5, the boundary of the Northern Site has been amended to cater for geotechnical and tree preservation concerns (**Plan H-7 and H-13**). The proposed building is positioned relatively closer to the cul-de-sac of the public open-air carpark at Coombe Road so as to avoid most of the trees on site.

- 4.4.2 Some representers propose to rezone the Carrick Site for heritage preservation and/or upgrade Carrick from a Grade 1 historic building to a Declared Monument to prevent demolition and ensure preservation. (**R13 and R18**)
- 4.4.3 All representers, except **R1**, propose to retain the representation site as “GB” zone.

5. **Comments on Representations (C1 to C40)**

Among the 40 comments on representations received, one comment (**C1**) supported and the remaining 39 comments (**C2 to C40**) opposed to the amendment item. The supporting comment was submitted by Juli May Limited (**C1**). The remaining 39 opposing comments were submitted by the Central & Western District Councillor (Mr Joseph Chan) (**C2**), Alliance for a Beautiful Hong Kong (**C29**), World Wide Fund for Nature Hong Kong (**C32**) and members of the public. They generally supported **R10** and objected to **R1** on similar grounds as the opposing representations. A summary of the comments and the PlanD’s responses, in consultation with relevant government departments, is at **Annex VII**.

6. **Planning Consideration and Assessment**

- 6.1 **The Representation Site and its Surrounding Areas (Plans H-1, H-2 & H-7, aerial photo on Plans H-3 & H-8, site photos on Plans H-4 to H-6)**

The Representation Site

- 6.1.1 The representation site is a piece of Government land on a steep slope covered by dense vegetation with well wooded and native trees. Part of it has some retaining structures within registered feature No. 11SW-D/C1759 maintained by the Lands Department (LandsD).

The Surrounding Areas

- 6.1.2 To the west and north-west of the representation site are mainly low to medium-rise residential developments along Coombe Road.

- 6.1.3 To the north across Coombe Road is the Carrick Site, and to the further north is natural vegetated slope zoned “GB”.
- 6.1.4 To the east is a vegetated slope zoned “GB” and to the further east are Coombe Road Children’s Playground, Police Museum and Wan Chai Gap Park.
- 6.1.5 To the south across Aberdeen Reservoir Road lies the vast stretch of vegetated slope within ACP.

6.2 Planning Intention

- 6.2.1 The planning intention of the “R(C)” zone is intended primarily for low-rise, low-density residential developments. Developments in this zone are subject to both PR and BH restrictions in order not to overload the local road system, to maintain the existing character and amenity of the Peak Area and to preserve public view and the Peak Ridgeline.
- 6.2.2 The planning intention of “GB” zone is primarily for the conservation of the existing natural environment amid the built-up areas/at the urban fringe, to safeguard it from encroachment by urban type development, and to provide additional outlets for passive recreational activities. There is a general presumption against development within this zone.

6.3 Responses to Grounds of Representations

General

- 6.3.1 Amendment Item A is to take forward the MPC’s decision made on 6.11.2015 to rezone the representation site from “GB” into “R(C)6” after thorough deliberation of the two s.12A applications, including all the three development options submitted to preserve Carrick while providing space for construction of a new house with the same GFA of Carrick. MPC generally agreed that the heritage value of Carrick was high and it was appropriate to preserve the historic building from a land use planning point of view. MPC also agreed that the owner’s option to develop a house at the representation site was acceptable from land use point of view as appropriate mitigation measures to minimise its impacts would be taken and was the preferable option in striking a balance among various considerations, including land use, visual, landscape, heritage conservation, public interest and respect for private development rights. However, MPC did not accept the PR restriction of 0.51 for the subject “R(C)6” zone as proposed by the owner but adopted a PR restriction of 0.5 to achieve consistency with the “R(C)2” sites in the vicinity of the representation site.

Supportive Representation

- 6.3.2 The supportive comments from **R1** (i.e. the owner) on Amendment Item A are noted.

Adverse Representations

Not in line with the Planning Intention of “GB” zone

- 6.3.3 As mentioned in paragraph 6.3.1 above, Amendment Item A is to take forward the MPC’s decision on the relevant section 12A application (No. Y/H14/4) in which all the relevant factors such as the technical feasibility, environmental impacts and potential implications on the integrity and functions of the wider “GB” zone etc, had already been duly considered.
- 6.3.4 While some representers are concerned about the adverse impact on the original buffer function of the representation site between the urban development and ACP arising from the rezoning proposal, there are still a strip of “GB” zone and Aberdeen Reservoir Road serving as a buffer with a width of about 10 to 20m from ACP. As for the tree felling, mitigation measures are also proposed under the rezoning application to address the landscape impacts including transplanting 20 trees and retaining three existing trees; the tree loss to be compensated at a compensatory planting ratio of 1:1; the eight *Artocarpus hypargyreus* surrounding the representation site would not be affected; vertical greening and some tree planting along the site boundary would be provided to screen the proposed development and minimize its visual impact to the surroundings.
- 6.3.5 While the TPB PG-No. 10 sets out the main planning criteria for consideration of application for development within “GB” zone under section 16 of the Ordinance, it is not applicable to the amendments to the OZP.

Not in Line with Government’s Heritage Conservation Policy

Heritage Conservation Policy and Practice

- 6.3.6 According to the Government’s heritage conservation policy promulgated since 2007, the Government seeks “to protect, conserve and revitalise as appropriate historical and heritage sites and buildings through relevant and sustainable approaches for the benefit and enjoyment of present and future generations. In implementing this policy, due regard should be given to development needs in the public interest, respect for private property rights, budgetary considerations, cross-sector collaboration and active engagement of stakeholders and the general public”. In preserving privately-owned historic buildings, the Government recognises that on the premise of respecting private property rights, there is a need to offer appropriate economic incentives to compensate private owners for their loss of development rights, with a view to encouraging or in exchange for private owners to conserve historic buildings in their ownership. A proper balance between preservation of historic buildings and respect for private property rights is to be struck. Given individual circumstances, the requisite economic incentives to achieve the policy objective would be

considered on a case-by-case basis.

- 6.3.7 In formulating the appropriate economic incentives, factors to be taken into account generally include the heritage value of the historic building concerned, the development potential and value of the site where the building is located, the space provided by the site from the planning perspective, the wish of the owner, the land and financial implications on the Government, as well as the anticipated public reaction. As far as the offer of land exchange is concerned, under the prevailing policy, it is applicable to both monuments and Grade 1 historic buildings.
- 6.3.8 The Government has established an internal mechanism to monitor any demolition of/alterations to declared monuments/proposed monuments or graded buildings/buildings proposed to be graded. Under the mechanism, the Buildings Department, Lands Department and Planning Department will alert the Commissioner for Heritage's Office (CHO) of the Development Bureau and the Antiquities and Monuments Office (AMO) of the Leisure and Cultural Services Department regarding any identified possible threat which may affect privately-owned sites of archaeological interests, monuments and historic buildings that have been brought to the departments' attention through applications and enquiries received and in the normal course of duty such as regular inspections.

Application of Heritage Conservation Policy and Practice in the Case of Carrick

- 6.3.9 In accordance with the Buildings Ordinance, the Building Authority approved a set of general building plans (GBPs) to redevelop Carrick into a residential building in 2010 and an application for demolition (demolition permit) of Carrick in 2011. This triggered the internal mechanism detailed in paragraph 6.3.8. CHO and AMO started discussion with the owner on the possible preservation-cum-development options for Carrick and possible economic incentives in exchange for the owner's agreement to preserve it according to the heritage conservation policy.
- 6.3.10 Factors underlined in paragraph 6.3.7 have been taken into account in formulating the appropriate economic incentives. For example, Carrick's heritage value has been reflected by its Grade 1 status. In line with the prevailing policy to compensate private owner's loss in development rights (in preserving Carrick), the option of transferring the permitted PR to another lot owned by the owner was explored (i.e. one of the factors underlined above, namely "development potential and value of the site", was considered). It was found infeasible as the owner has no other landholding in the area with potential unutilised gross floor area (GFA) to absorb the permitted GFA from the Carrick Site. Having considered the space provided by the Carrick Site (another factor underlined above), the option of adding a new house adjacent to Carrick was considered but found undesirable as, amongst

others, the new house would undermine the heritage ambience (including blocking one of the façades of Carrick, the main entrance). More importantly, it was not the will of the owner (another factor underlined above). After the consideration of various options, which were all found infeasible, the owner eventually informed CHO and AMO that the only viable preservation option which the owner might consider would be land exchange. The owner had considered a couple of replacement sites following the Government's principle that the replacement site for non-in-situ land exchange should be in proximity to the heritage site such that they will be of similar land value or development potential. Subsequently, the owner proposed to pursue a non-in-situ land exchange by surrendering the Carrick Site to the Government for conservation in exchange for the representation site. The above demonstrates how the provision of economic incentives in the form of non-in-situ land exchange is justified in the case of Carrick, based on case-specific situations.

Heritage Value of Carrick

- 6.3.11 Carrick is a Grade 1 historic building, which by definition is a building of outstanding merit where every effort should be made to preserve if possible. Under the prevailing historic building grading mechanism, the heritage value of a building is assessed based on six criteria, namely the historical interest, architectural merit, group value, social value and local interest, authenticity and rarity. The evaluation system and the selection principles for historic buildings are derived from the systems and principles adopted in overseas countries as well as the established international documents on heritage conservation, including *Burra Charter* (The Australia ICOMOS Charter for the Conservation of Places of Cultural Significance). The actual situation of Hong Kong is also a crucial factor that has been taken into consideration. However, the frontal and external views from Carrick, such as its view towards ACP, are beyond the grading exercise of Carrick. Under the prevailing grading mechanism, the proposed residential development at the representation site will not affect the outstanding merit of Carrick in terms of its heritage value. Furthermore, mitigation measures to minimise the landscape impact have been proposed and no significant adverse impact of the rezoning on the visual amenity of the surroundings is anticipated.

Development Parameters and Land Premium

- 6.3.12 In accordance with the prevailing practice, the original development parameters of the site with historic building (i.e. site area of 1,100m², PR of 0.5 and BH of 2 storeys for the subject case) should be applied to the new site after land exchange, as a reasonable economic incentive. In addition, full market value premium to be assessed by LandsD will be payable by the private owner for any difference in land value between the original site and the new site. These principles would be applied in the subject case.

6.3.13 In view of the above, the rezoning proposal is in line with the government's heritage conservation policy.

Inadequate Consideration for Rezoning

Technical aspects

- 6.3.14 In order to support the section 12A application No. Y/H14/4, relevant technical assessment reports were submitted to address the possible impacts of the proposed residential development at the representation site in respect of heritage, environment, drainage, water supplies, geotechnical landscape and visual aspects. Concerned government departments, including AMO, the Transport Department (TD), the Drainage Services Department (DSD), the Water Supplies Department (WSD), the Environmental Protection Department (EPD) and the Geotechnical Engineering Office (GEO), had no objection to/no adverse comment on the rezoning taking into account the findings of those assessment reports. CTP/UD&L, PlanD also considered that the rezoning would have no significant adverse impact on the visual amenity of the surroundings.
- 6.3.15 TD advised that as there will be a single house development only within the representation site, traffic trips to be generated/attracted will be minimal and a traffic impact assessment (TIA) is not required for a single house development normally. While TD had no objection to the rezoning provided that the owner would widen the section of Coombe Road outside the representation site to provide a 5.5m carriageway and a 1.5m footpath at the owner's own cost, TD also requested the owner to submit a TIA for the construction traffic at a later stage but prior to commencement of construction.
- 6.3.16 Whilst AFCD and CTP/UD&L, PlanD have some reservation on the rezoning from landscape and tree preservation point of view, the owner had proposed mitigation measures to minimise such impacts as mentioned in paragraph 6.3.4 above.
- 6.3.17 The country park visitors in general would enter ACP mostly via Aberdeen Reservoir Road, which is located outside the representation site. It is unlikely that there would be loss of amenity in the country park area due to the proposed residential development. Furthermore, the representation site does not fall within the country park area and direct impact of the proposed development on ACP is not envisaged at this stage, hence consultation with CMPB is not considered necessary.
- 6.3.18 Regarding the concerns of some representers on the Black Kites found in the area, AFCD advises that the Black Kites are common raptors in Hong Kong and are known to use the ACP and the area of Magazine Gap in particular. There is no information to demonstrate that the representation site is of particular importance to the Black Kites. As the representation site only constitutes a fraction of the extensive woodland habitat in the area, the loss of the representation site to

development is unlikely to significantly affect the Black Kites.

- 6.3.19 Whilst the representation site falls within the Upper Direct Water Gathering Ground (WGG), WSD has no objection to the proposed house development in that any discharge of effluent to WGG should comply with relevant regulations and government requirements; and concerned technical issues will be further considered by WSD in the drainage plan to be submitted by the project proponent at the detailed design stage.
- 6.3.20 While the proposed residential development at the representation site has been subject to the restrictions under the OZP, i.e. maximum PR of 0.5 and maximum building height of 2 storeys including carports and not exceeding 260mPD, the requirements on landscape and tree preservation proposals, surrendering of Carrick to Government as-built and widening of a section of Coombe Road abutting the representation site at the owner's own cost, will be considered by the relevant government departments under the land exchange process. Moreover, the proposed residential development has to comply with the Buildings Ordinance and other relevant legislation and government requirements during detailed design and construction stages.

Selective consideration of comments

- 6.3.21 In processing the zoning amendment, PlanD has followed the established procedures to solicit comments from the general public, as well as WCDC. All the relevant public comments and the departmental comments were submitted to MPC for consideration.

Inadequate Planning Control to Preserve Carrick

- 6.3.22 The future use of Carrick has not yet been determined by CHO and AMO. Flexibility should be allowed so that the direction of the revitalization scheme would be worked out by CHO and AMO upon surrendering of the Carrick Site to the Government. Hence, MPC agreed that the rezoning of the representation site should proceed first before the rezoning of the Carrick Site for preserving the historic building. In order to preserve Carrick, the owner signed an undertaking to AMO on 11.10.2016 that the Carrick Site will be surrendered to the Government together with Carrick in a condition satisfactory to AMO upon completion of the land exchange process.
- 6.3.23 Some representers suggest reducing the development threat of demolition of Carrick by rezoning the Carrick Site for preservation purpose. However, as the owner has already obtained a set of approved GBPs and a demolition permit, they would have the right to proceed with the demolition of Carrick for redevelopment at any time with the Building Authority's consent to commerce works. Such development proposal with building plan approval will not be affected by the subsequent changes to the land use zoning or development restrictions on the OZP, except amendments to the approved GBPs

which are not minor in nature, such as involving a change of use or an increase in development intensity⁴.

- 6.3.24 It was clearly stated in paragraphs 56 and 71 of the minutes of the MPC meeting held on 6.11.2015 (**Annex V**) that while the wish of the owner might be one of the considerations, MPC should consider the merits of each option from land use planning point of view and should not be dictated by the wish of the owner. Hence, the assertion that Amendment Item A is a favourable treatment to the owner bowing to blackmail in demolishing Carrick is not founded.
- 6.3.25 Regarding the allegation that the Board erred in law by approving the rezoning application No. Y/H14/4 without offering protection for the historic building, it should be noted that the application was considered by MPC under the relevant provision of the Ordinance and the corresponding amendments to the OZP are also being processed according to the provision of the Ordinance. The other application No. Y/H14/5 with two counter-proposals was also considered by MPC together with that application at the same meeting. As mentioned in paragraph 6.3.1 above, MPC generally agreed that the heritage value of Carrick was high and it was appropriate to preserve the historic building from a land use planning point of view. The rezoning proposal was the preferred option for achieving the preservation of Carrick.

Undesirable Precedent

- 6.3.26 The rezoning of the representation site would not set an undesirable precedent case for rezoning of “GB” to other zoning as such rezoning must be justified with very strong planning ground. The Board would consider each application based on its own merits.

Lack of Transparency in Land Exchange Negotiation Process and Public Engagement

- 6.3.27 Carrick was confirmed as a Grade 1 historic building by the Antiquities Advisory Board (AAB) in 2011 after public consultation. Grade 1 building is, by definition a building of outstanding merit where every effort should be made to preserve if possible. MPC agreed that the proposed house development at the representation site was acceptable from land use point of view after consideration of the two aforesaid rezoning applications. The land exchange shall be processed through the well-established mechanism and practice of the Government which, however, is beyond the purview of the Board.

⁴ The administrative practice was set out in Practice Note for Professional Persons No. 3/2001, titled “Processing of Amendments to Approved Building Plans in respect of Non-conforming Development Proposals”.

Responses to Representations' Proposals

Two Preservation Options (R10)

- 6.3.28 The planning assessments and considerations on **R10's** proposals are attached at **Annex IX**. In gist, the submission has not yet demonstrated that the representation site is not suitable for residential development nor any change in planning circumstances that would affect the suitability of the site for residential development. In any case, the suitability of the site for residential development had already been duly considered and agreed by MPC having regard to all relevant factors including technical feasibility, environmental impacts and potential implications on the integrity and functions of the wider "GB" zone, etc.
- 6.3.29 As for the two alternative options proposed by **R10**, although the submission has addressed some of the technical issues raised by relevant government departments in processing the application No. Y/H14/5, some concerns including the adverse impacts on structural stability and the overall historical value of Carrick under Option 1, the geotechnical feasibility of both options, and the possible impacts of the existing trees both within and surrounding the development sites under both options have not yet been addressed satisfactorily.
- 6.3.30 The implementation of the alternative options may be affected by other issues, such as the relocation of RCP under Option 2.
- 6.3.31 In view of the responses above and there is no change in planning circumstances, it is considered that there is no strong justification to revert the zoning of the representation site back to "GB" as recommended under the two options. It is also premature to consider the rezoning of the Carrick Site and/or the Northern Site at this stage.

To upgrade Carrick from a Grade 1 historic building to a Declared Monument (R13 and R18)

- 6.3.32 As agreed by AAB, under the prevailing practice, all Grade 1 historic buildings would, given their outstanding heritage value, form a pool of potential candidates for the Antiquities Authority to consider monument declaration under the Antiquities and Monuments Ordinance. CHO/AMO is also prepared to consider declaring a historic building with outstanding heritage value as a proposed monument under the aforesaid Ordinance if there is a demolition threat.

To retain the representation site as "GB" zone (All respresenters, except R1)

- 6.3.33 The responses in paragraphs 6.3.1 to 6.3.31 above are relevant.

6.4 Responses to Grounds of Comments

The grounds of comments are similar to those raised in the representations. The responses to the representations in paragraph 6.3 above are relevant.

7. Consultation

The following government bureaux/departments have been consulted and their comments have been incorporated in the above paragraphs, where appropriate:

- (a) CHO, DEVB;
- (b) District Lands Officer/Hong Kong East, LandsD;
- (c) Commissioner for Transport;
- (d) Commissioner of Police;
- (e) Director of Environmental Protection;
- (f) Director of Buildings;
- (g) Director of Architectural Services;
- (h) Director-General of Civil Aviation;
- (i) Director-General of Communications;
- (j) Director of Leisure and Cultural Services;
- (k) AMO, LCSD;
- (l) Director of Electrical and Mechanical Services;
- (m) Director of Drainage Services;
- (n) Chief Engineer/Construction, WSD;
- (o) Director of Fire Services;
- (p) Director of Food and Environmental Hygiene;
- (q) Director of Agriculture, Fisheries and Conservation;
- (r) Chief Highway Engineer/Hong Kong, Highways Department (HyD);
- (s) Chief Engineer/Railway Development, Railway Development Office, HyD;
- (t) Project Manager/Hong Kong Island and Islands, Civil Engineering and Development Department (CEDD);
- (u) Head (Geotechnical Engineering Office), CEDD;
- (v) Commissioner for Tourism;
- (w) District Officer (Wan Chai), Home Affairs Department (HAD);
- (x) District Officer (Central & Western), HAD; and
- (y) CTP/UD&L, PlanD.

8. Planning Department's Views

PlanD notes the supportive views of **Representation No. 1**. Based on the assessment in paragraph 6 above, PlanD does not support Representations No. 2 to 1479, 1481 to 1497 and 1499 to 1640 and considers that the Plan should not be amended to meet the representations for the following reasons:

- (a) the rezoning of the representation site from “Green Belt” (“GB”) to “Residential (Group C)6” is the preferred option for the preservation of Carrick, which is a Grade 1 historic building, from the land use planning point of view, as it has struck a balance among various relevant considerations, including land use, visual, landscape, heritage conservation, public interest

and respect for private development rights;

- (b) the rezoning of the representation site would be the first step to facilitate the proposed land exchange for the preservation of Carrick and the zoning of the Carrick Site will be considered when the Government has determined its future uses;
- (c) the rezoning of the representation site would not set an undesirable precedent case for rezoning of “GB” to other zoning as such rezoning must be justified with very strong planning ground. The Board would consider each application based on its own merits; and
- (d) the proposed residential development at the representation site is not unacceptable as no insurmountable technical problem is anticipated and the possible impacts will be minimised at the detailed design stage through appropriate mitigation measures as required under relevant legislation, conditions of the government lease and other government requirements.

9. Decision Sought

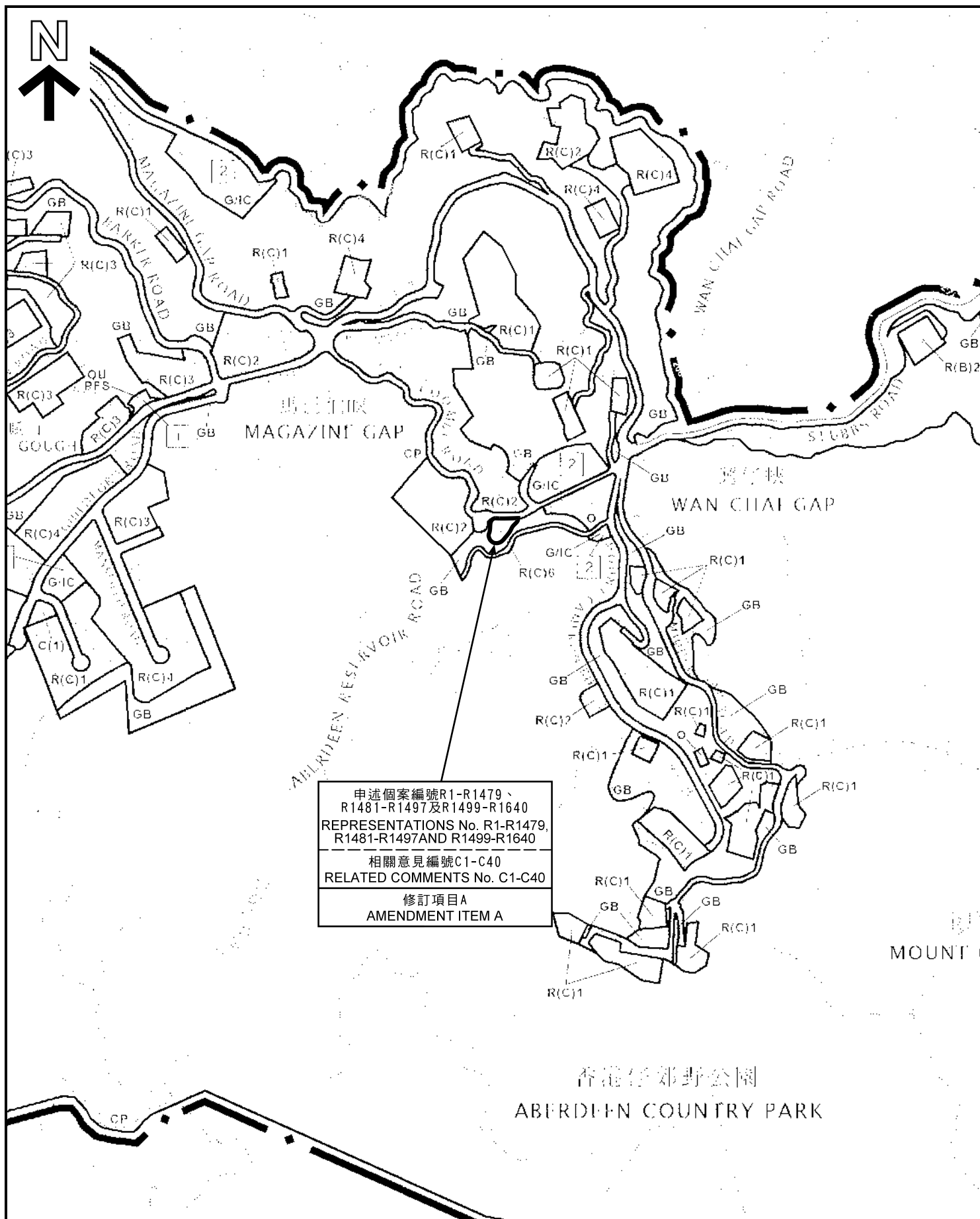
The Board is invited to give consideration to the representations and comments and decide whether to propose/not to propose any amendment to the Plan to meet/partially meet the representations.

Attachments

Annex I	Draft The Peak Area Outline Zoning Plan No. S/H14/12 (reduced size)
Annex II	Schedule of Amendments to the Draft The Peak Area Outline Zoning Plan No. S/H14/12
Annex III	Historic Building Appraisal of Carrick (Extract of MPC Paper No. Y/H14/4A)
Annex IV	Indicative Scheme Proposed under Application No. Y/H14/4
Annex V	Extract of Minutes of the MPC Meeting held on 6.11.2015
Annex VI	Extract of Minutes of WCDC Meeting held on 17.5.2016
Annex VII	Summary of Representations and Comments and PlanD’s Responses Attachment A – List of Representers Attachment B – List of Commenters
Annex VIII	Representation Submission from R10 [<i>TPB Members only</i>]
Annex IX	Assessment of Proposals Submitted by R10

Annex X	CD-ROM of all representations and comments [<i>TPB Members only</i>]
Plan H-1	Location Plan of Representation Site
Plan H-2	Site Plan of Representation Site
Plan H-3	Aerial Photo of Representation Site
Plans H-4 to H-6	Site Photos of Representation Site
Plan H-7	Site Plan of Concerned Sites
Plan H-8	Aerial Photo of Concerned Sites
Plans H-9 to H-12	Site Photos of Carrick
Plan H-13	Site Photos of Northern Site

**PLANNING DEPARTMENT
JANUARY 2017**



申述個案編號R1-R1479、
 R1481-R1497及R1499-R1640
 REPRESENTATIONS No. R1-R1479,
 R1481-R1497AND R1499-R1640
 相關意見編號C1-C40
 RELATED COMMENTS No. C1-C40
 修訂項目A
 AMENDMENT ITEM A

位置圖 LOCATION PLAN

就山頂區分區計劃大綱草圖編號 S/H14/12
 提出的申述個案編號R1-R1479、R1481-R1497及R1499-R1640，
 以及相關意見編號C1-C40作出考慮
 CONSIDERATION OF REPRESENTATIONS
 No. R1-R1479, R1481-R1497 AND R1499-R1640 AND
 RELATED COMMENTS No. C1-C40 TO THE DRAFT
 THE PEAK AREA OUTLINE ZONING PLAN No. S/H14/12
 SCALE 1 : 7 500 比例尺

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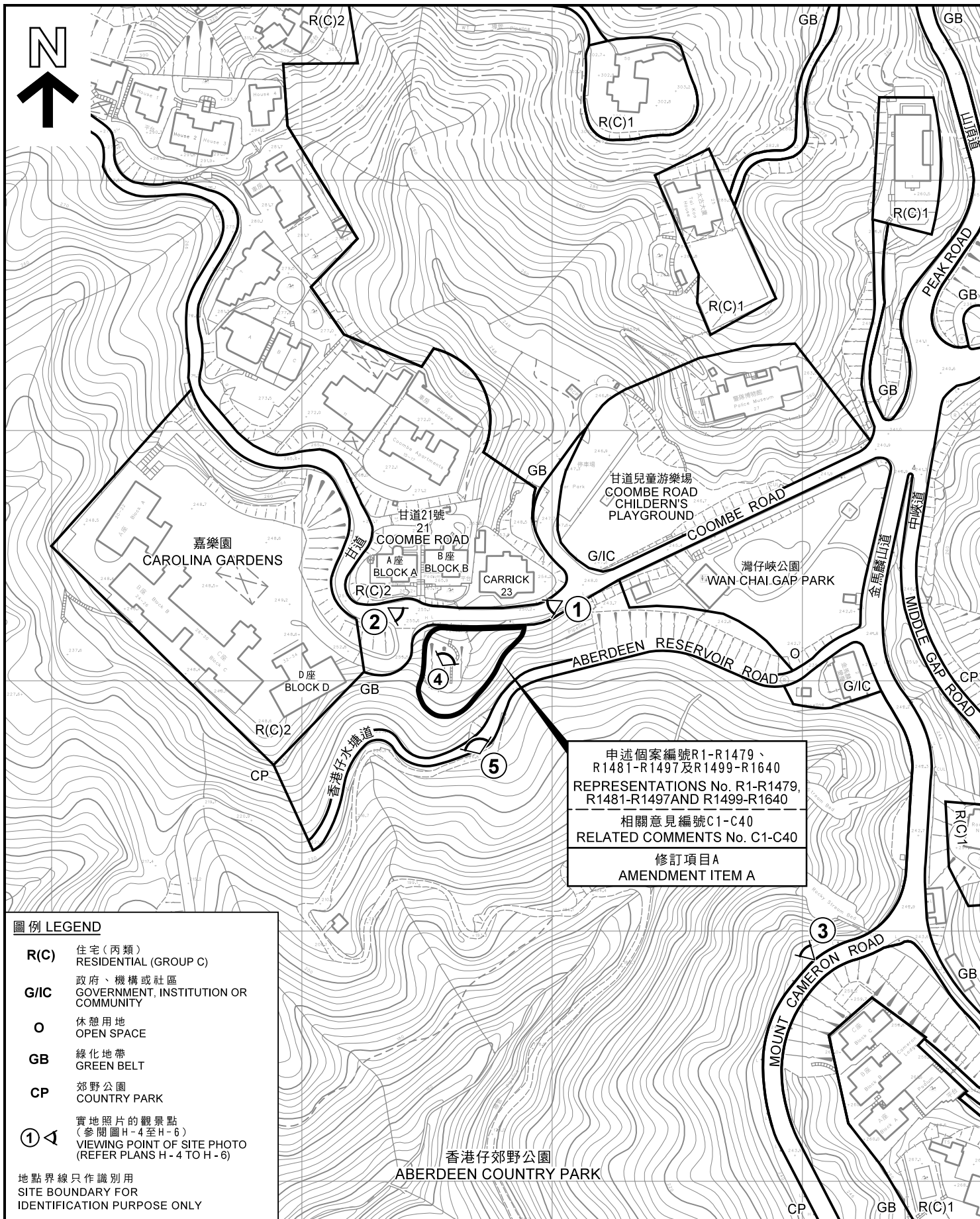
本摘要圖於2017年1月13日擬備，
 所根據的資料為於2016年4月29日
 展示的分區計劃大綱圖編號S/H14/12
 EXTRACT PLAN PREPARED ON 13.1.2017
 BASED ON OUTLINE ZONING PLAN
 No. S/H14/12 EXHIBITED ON 29.4.2016

規劃署
 PLANNING
 DEPARTMENT



參考編號
 REFERENCE No.
 R/S/H14/12

圖 PLAN
 H - 1



圖例 LEGEND

- R(C)** 住宅 (丙類)
RESIDENTIAL (GROUP C)
- G/IC** 政府、機構或社區
GOVERNMENT, INSTITUTION OR COMMUNITY
- O** 休憩用地
OPEN SPACE
- GB** 綠化地帶
GREEN BELT
- CP** 郊野公園
COUNTRY PARK
- ① 實地照片的觀景點
(參閱圖H-4至H-6)
VIEWING POINT OF SITE PHOTO
(REFER PLANS H-4 TO H-6)

地點界線只作識別用
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平面圖 SITE PLAN

就山頂區分區計劃大綱草圖編號 S/H14/12
提出的申述個案編號R1-R1479、R1481-R1497及R1499-R1640，
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SCALE 1:2 000 比例尺

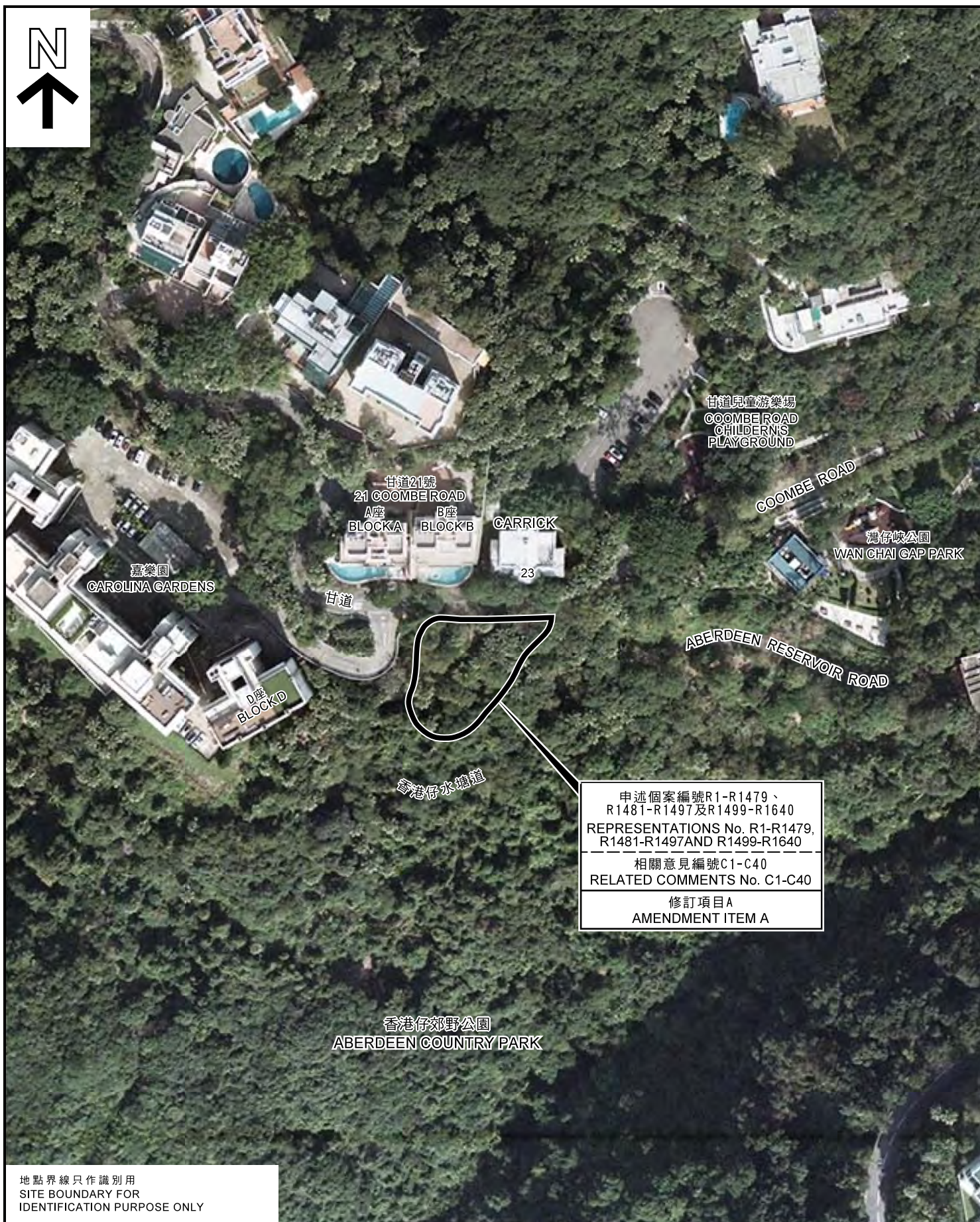
米 40 0 40 80 米
METRES

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PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/H14/12

圖 PLAN
H - 2



申述個案編號R1-R1479、
R1481-R1497及R1499-R1640
REPRESENTATIONS No. R1-R1479,
R1481-R1497 AND R1499-R1640
相關意見編號C1-C40
RELATED COMMENTS No. C1-C40
修訂項目A
AMENDMENT ITEM A

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規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/H14/12

圖 PLAN
H - 3

本摘要圖於2017年1月13日擬備，所根據的
資料為地政總署於2016年1月1日拍得的
航攝照片編號CS62443

EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON AERIAL PHOTO No. CS62443
TAKEN ON 1.1.2016 BY
LANDS DEPARTMENT



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實地照片 SITE PHOTOS

就山頂區分區計劃大綱草圖編號 S/H14/12
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規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/H14/12

圖 PLAN
H - 4

本圖於2017年1月13日擬備，所根據的
資料為攝於2016年11月21日的實地照片
EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON SITE PHOTOS TAKEN ON
21.11.2016

3

嘉樂園D座
BLOCK D
CAROLINA GARDENS

甘道21號A及B座
BLOCK A & B
21 COOMBE ROAD CARRICK

申述個案編號R1-R1479、
R1481-R1497及R1499-R1640
REPRESENTATIONS No. R1-R1479,
R1481-R1497AND R1499-R1640

相關意見編號C1-C40
RELATED COMMENTS No. C1-C40

修訂項目A
AMENDMENT ITEM A

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實地照片 SITE PHOTO

就山頂區分區計劃大綱草圖編號 S/H14/12
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No. R1-R1479, R1481-R1497 AND R1499-R1640 AND
RELATED COMMENTS No. C1-C40 TO THE DRAFT
THE PEAK AREA OUTLINE ZONING PLAN No. S/H14/12

本圖於2017年1月13日擬備，所根據的
資料為攝於2016年11月21日的實地照片
EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON SITE PHOTO TAKEN ON 21.11.2016

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PLANNING
DEPARTMENT



參考編號
REFERENCE No.

R/S/H14/12

圖 PLAN

H - 5



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實地照片 SITE PHOTOS

本圖於2017年1月13日擬備，所根據的資料為攝於2016年11月21日的實地照片
EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON SITE PHOTOS TAKEN ON 21.11.2016

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規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.

R/S/H14/12

圖 PLAN

H - 6



北面用地
(在R10的建議)
NORTHERN SITE
(PROPOSED UNDER R10)

北面用地
(在Y/H14/5的建議)
NORTHERN SITE
(PROPOSED UNDER Y/H14/5)

垃圾收集站
REFUSE
COLLECTION POINT

甘道兒童游樂場
COOMBE ROAD
CHILDREN'S
PLAYGROUND

警隊博物館
POLICE MUSEUM

COOMBE ROAD

灣仔峽公園
WAN CHAI GAP PARK

ABERDEEN RESERVOIR ROAD

CARRICK用地
(在R10及Y/H14/5的建議)
CARRICK SITE
(PROPOSED UNDER
R10 AND Y/H14/5)

香港仔水塘道

申述地點
REPRESENTATION SITE

香港仔郊野公園
ABERDEEN COUNTRY PARK

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IDENTIFICATION PURPOSE ONLY

航攝照片 AERIAL PHOTO

就山頂區分區計劃大綱草圖編號 S/H14/12
提出的申述個案編號R1-R1479、R1481-R1497及R1499-R1640，
以及相關意見編號C1-C40作出考慮
CONSIDERATION OF REPRESENTATIONS
No. R1-R1479, R1481-R1497 AND R1499-R1640 AND
RELATED COMMENTS No. C1-C40 TO THE DRAFT
THE PEAK AREA OUTLINE ZONING PLAN No. S/H14/12

規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.

R/S/H14/12

圖 PLAN

H - 8

本摘要圖於2017年1月13日擬備，所根據的
資料為地政總署於2016年1月1日拍得的
航攝照片編號CS62443

EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON AERIAL PHOTO No. CS62443
TAKEN ON 1.1.2016 BY
LANDS DEPARTMENT



地點界線只作識別用
SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

CARRICK的實地照片 SITE PHOTOS OF CARRICK

就山頂區分區計劃大綱草圖編號 S/H14/12
提出的申述個案編號R1-R1479、R1481-R1497及R1499-R1640，
以及相關意見編號C1-C40作出考慮
CONSIDERATION OF REPRESENTATIONS
No. R1-R1479, R1481-R1497 AND R1499-R1640 AND
RELATED COMMENTS No. C1-C40 TO THE DRAFT
THE PEAK AREA OUTLINE ZONING PLAN No. S/H14/12

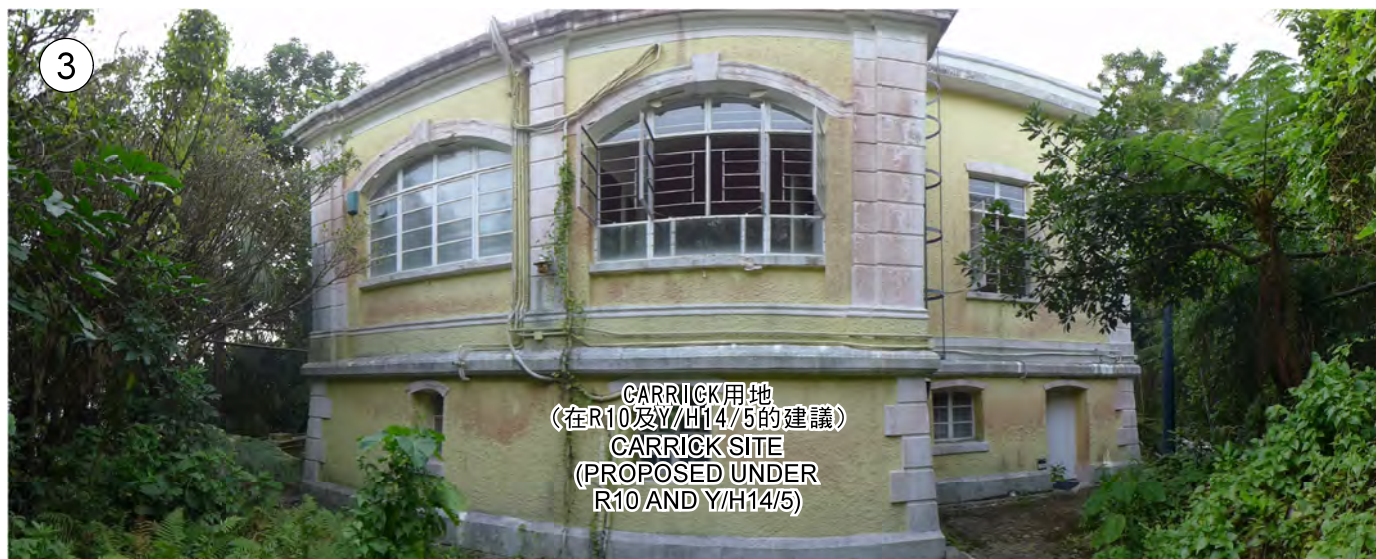
規 劃 署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/H14/12

圖 PLAN
H - 9

本圖於2017年1月13日擬備，所根據的
資料為攝於2015年10月20日的實地照片
EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON SITE PHOTOS TAKEN ON
20.10.2015



CARRICK用地
(在R10及Y/H14/5的建議)
CARRICK SITE
(PROPOSED UNDER
R10 AND Y/H14/5)



CARRICK用地
(在R10及Y/H14/5的建議)
CARRICK SITE
(PROPOSED UNDER
R10 AND Y/H14/5)

本圖於2017年1月13日擬備，所根據的資料為攝於2015年10月20日的實地照片
EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON SITE PHOTOS TAKEN ON
20.10.2015

CARRICK的實地照片 SITE PHOTOS OF CARRICK

就山頂區分區計劃大綱草圖編號 S/H14/12
提出的申述個案編號R1-R1479、R1481-R1497及R1499-R1640，
以及相關意見編號C1-C40作出考慮
CONSIDERATION OF REPRESENTATIONS
No. R1-R1479, R1481-R1497 AND R1499-R1640 AND
RELATED COMMENTS No. C1-C40 TO THE DRAFT
THE PEAK AREA OUTLINE ZONING PLAN No. S/H14/12

規 劃 署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/H14/12

圖 PLAN
H - 10



一樓 1/F



地下 G/F



地下 G/F

CARRICK內部景觀（地下及一樓）
INTERNAL VIEW OF CARRICK (G/F & 1/F)

CARRICK的實地照片 SITE PHOTOS OF CARRICK

就山頂區分區計劃大綱草圖編號 S/H14/12
提出的申述個案編號R1-R1479、R1481-R1497及R1499-R1640，
以及相關意見編號C1-C40作出考慮
CONSIDERATION OF REPRESENTATIONS
No. R1-R1479, R1481-R1497 AND R1499-R1640 AND
RELATED COMMENTS No. C1-C40 TO THE DRAFT
THE PEAK AREA OUTLINE ZONING PLAN No. S/H14/12

本圖於2017年1月13日擬備，所根據的
資料為攝於2015年10月20日的實地照片
EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON SITE PHOTOS TAKEN ON
20.10.2015

規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.

R/S/H14/12

圖 PLAN

H - 11



地點界線只作識別用
SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

CARRICK的實地照片

SITE PHOTOS OF CARRICK

就山頂區分區計劃大綱草圖編號 S/H14/12
提出的申述個案編號R1-R1479、R1481-R1497及R1499-R1640，
以及相關意見編號C1-C40作出考慮

CONSIDERATION OF REPRESENTATIONS
No. R1-R1479, R1481-R1497 AND R1499-R1640 AND
RELATED COMMENTS No. C1-C40 TO THE DRAFT
THE PEAK AREA OUTLINE ZONING PLAN No. S/H14/12

規劃署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.

R/S/H14/12

圖 PLAN

H - 12

本圖於2017年1月13日擬備，所根據的
資料為攝於2017年1月11日的實地照片
EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON SITE PHOTOS TAKEN ON
11.1.2017



地點界線只作識別用
SITE BOUNDARY FOR IDENTIFICATION PURPOSE ONLY

北面用地的實地照片 SITE PHOTOS OF NORTHERN SITE

就山頂區分區計劃大綱草圖編號 S/H14/12
提出的申述個案編號R1-R1479、R1481-R1497及R1499-R1640，
以及相關意見編號C1-C40作出考慮
CONSIDERATION OF REPRESENTATIONS
No. R1-R1479, R1481-R1497 AND R1499-R1640 AND
RELATED COMMENTS No. C1-C40 TO THE DRAFT
THE PEAK AREA OUTLINE ZONING PLAN No. S/H14/12

規 劃 署
PLANNING
DEPARTMENT



參考編號
REFERENCE No.
R/S/H14/12

圖 PLAN
H - 13

本圖於2017年1月13日擬備，所根據的
資料為攝於2017年1月11日的實地照片
EXTRACT PLAN PREPARED ON 13.1.2017
BASED ON SITE PHOTOS TAKEN ON
11.1.2017