Annex I of
TPB Paper No. 9585

SCHEDULE OF AMENDMENTS TO APPROVED KOWLOON TONG OUTLINE ZONING PLAN NO. S/K18/16 MADE BY THE TOWN PLANNING BOARD UNDER THE TOWN PLANNING ORDINANCE (Chapter 131)

I. Amendments to Matters shown on the Plan

Item A – Rezoning of a site at Renfrew Road, covering the southern part of the ex-Lee Wai Lee Campus, from "Government, Institution or Community (9)" to "Residential (Group B)".

Item B – Rezoning of a site at the junction of Dumbarton Road and Inverness Road, covering the western part of the Bethel Bible Seminary, from "Government, Institution or Community (3)" to "Residential (Group C)9".

Item C – Rezoning of a site at the junction of Dumbarton Road and Grampian Road, covering the eastern part of the Bethel Bible Seminary, from "Government, Institution or Community (3)" to "Government, Institution or Community (12)".

II. Amendments to the Notes of the Plan

(a) Incorporation of a new set of Notes for the "Residential (Group B)" zone.

(b) Incorporation of a new set of Notes for the "Government, Institution or Community (12)" zone setting out the planning intention for the in-situ preservation of the historic building within the zone.

Town Planning Board

15 February 2013

TPB/R/S/K18/17-9

就規劃申請提出意見
Comments on Planning Application

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

重要提示：意見必須於指定的法定期限屆滿前向城市規劃委員會(委員會)提出。
Important Note : The comment should be made to the Town Planning Board (the Board) before the expiry of the specified statutory period.

致城市規劃委員會秘書：
專人送遞或郵遞:香港北角渣華道 333 號北角政府合署 15 樓
傳真 : 2877 0245 或 2522 8426
電郵: tpbpd@pland.gov.hk

To : Secretary, Town Planning Board
By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong
By Fax : 2877 0245 or 2522 8426
By e-mail : tpbpd@pland.gov.hk

有關的規劃申請編號 **The application no. to which the comment relates** S/K18/17

意見詳情 (如有需要，請另頁說明)
Details of the Comment (use separate sheet if necessary) 請見附件。

「提意見人」姓名/名稱 Name of person/company making this comment 林大輝
簽署 Signature _____ 日期 Date 15/4/2013

08269

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

立法會 LEGISLATIVE COUNCIL
林大輝議員 HON LAM TAI FAI SBS, BBS, JP

R9

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

敬啟者：

意見書
反對前李惠利用地建豪宅

政府當局向城市規劃委員會申請把九龍塘聯福道前香港專業教育學院李惠利分校南面用地的規劃許可用途改為住宅，並就有關申請展開公眾諮詢。本人嚴正反對九龍塘分區計劃大綱草圖編號 S/K18/17－修訂項目 A 項，政府應顧及香港教育發展的需要，不應建豪宅。

由於政府突然改變土地用途，引起社會高度關注，立法會事務委員會於今年 3 月 11 日通過議案，反對政府將「前李惠利用地」撥入賣地表作興建中密度豪宅，要求政府保留該用地作「政府、機構或社區」(GIC)用途，包括作原教育用途。

高等教育用地彌足珍貴，該地一旦永久改為興建豪宅，根本不能解決本港基層的住屋問題，但卻減少了教育用地，對社會造成的損失，無法挽回。

把「前李惠利用地」建豪宅既不合情，也不合理，社會各界亦已表示反對，還望城規會慎重考慮，認真處理公眾諮詢的意見，切勿一意孤行，與社會期望背道而馳。

立法會議員
立法會教育事務委員會主席
林大輝
2013 年 4 月 15 日

立法會議員　　全國政協委員
[redacted]
電話：[redacted]　傳真：[redacted]　電郵：[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
(傳真號碼：2877 0245 或 2522 8426)

城市規劃委員會秘書：

反對修訂「九龍塘分區計劃大綱草圖編號 S/K18/17－修訂項目 A 項」

就特區政府已經把浸會大學鄰近前李惠利校舍南地皮，列入下年度賣地計劃作住宅用途，本人對此表示強烈不滿，原因如下：

1. 當局在該用地的發展規劃仍在諮詢階段，不但沒有確守公正持平的態度，反而企圖僭越程序，向城市規劃委員會表達官方立場，藉以施壓，將該地皮改作住宅用途，這是絕不民主的諮詢方式，完全漠視民意，必須予以強烈譴責。

2. 本港教育用地彌足珍貴，當局不應無故改變土地規劃，尤其用以發展豪宅項目，這將進一步減少本已不足的教育用地，亦無助解決本港基層的住屋問題，對社區和整體社會將造成無可挽回的損失。

為了下一代著想，也從公眾利益出發，本人反對上述修訂項目，並要求當局必須聽取民意，以普羅市民的公眾利益為依歸，將前李惠利校舍南地皮，繼續保留為教育用地。祝

鈞安！

姓名：立法會議員葉建源
日期：2013 年 4 月 15 日
地址或電郵：[redacted]
電話：[redacted]

08267

Annex II-3 of
TPB Paper No. 9585

黃碧雲立法會議員辦事處
Office of Legislative Councilor Helena Wong Pik-wan

致：城市規劃委員會秘書
香港北角渣華道 333 號
北角政府合署 15 樓

TPB/R/S/K18/17-11

日期：2013 年 4 月 12 日

反對「九龍塘分區計劃大綱草圖編號 S/K18/17－修訂項目 A 項」

本人反對上述修訂項目並要求將前李惠利校舍南部的土地保留為「政府、機構或社區(9)」用途。原因如下：

1) 李惠利校舍三面被香港浸會大學(浸大)建築物包圍，可說地處浸大校園的一部分，政府應該依照該幅土地的規劃原意，為下一代着想，及從公眾利益角度，應以教育為先，保留該幅土地繼續用作教育用途。

2) 改變土地作住宅用途後不能逆轉，該地一旦永久改為興建豪宅，根本不能解決本港基層的住屋問題，又減少本已不足的教育用地，對社區和整個社會所造成的損失，無法挽回。

3) 浸大一直爭取政府批出該幅用地作興建學生宿舍和中醫教學醫院之用，既惠及全港市民，亦配合九龍塘大學校園區的規劃發展。這樣，既毋需經過繁複的更改土地用途程序，把握時間善用土地資源，亦比興建豪宅，更能惠及廣大市民。

4) 本人認同，公眾對於中醫藥服務的需求日增，建立全港首家中醫教學醫院，為中醫藥教育提供完備的臨床研究及實習設施，提升本港中醫服務，無論對病人、學生及教研人員均刻不容緩。

5) 本人反對政府見縫插針地追求建屋量，將這幅本可用作拓展高等教育發展的用地，永久改為屏風式豪宅用地。

6) 政府在更改土地用途的諮詢期間，將該地放在賣地表是誤導市民，程序上不公平。

黃碧雲

黃碧雲立法會議員(九龍西)

Address: [redacted]
電話(Tel)：[redacted] 傳真(Fax)：[redacted]

08130

Annex II-4 of
TPB Paper No. 9585

立法會 Legislative Council
陳家洛議員 Hon Chan Ka Lok Kenneth
公民黨 CIVIC PARTY

TPB/R/S/K18/17-12

致：城市規劃委員會

反對更改九龍塘聯福道前香港專業教育學院
李惠利分校土地規劃用途

政府當局擬更改九龍塘聯福道前香港專業教育學院李惠利分校南面土地的規劃用途，由「政府、機構及社區」用途改為住宅用途。近日有關建議已引起社會連串激烈的爭論，經多角度研究後，本人認為該幅土地應繼續其現有規劃用途，故特草擬此意見書，就更改上述土地的規劃用途提出嚴正反對意見。

首先，本人認為上述土地一直均運用作設置教育設施的用途，教育界亦不時反映香港需要更多土地支援教育，特別是高等教育的長遠發展，故政府當局並沒有足夠的理據減少區內的教育設施用地。整個議題的其中一個討論焦點，是我們應不應該在教育用地需求極度殷切的情況下，減少一幅多年來一直作教育用地用途的土地。

本人瞭解政府當局為着回應住宅土地的強大需求，採取多項措施物色土地興建住宅單位，但是前香港專業教育學院李惠利分校用地即使改劃作住宅用途，僅可增加數百個住宅單位，相較於 2013-2014 年度政府預計會有兩萬五千八百個住宅單位的供應量，實在是九牛一毛。政府當局實在沒有必要為着區區數百個住宅單位的土地供應，而犧牲區內乃至全港極為珍貴的教育用地。

另一方面，根據政府的建議，有關土地將會用作興建中密度住宅，意味着有關住宅項目一旦成事，極可能只是另一個九龍塘區的豪宅項目。在環境上，在前香港專業教育學院李惠利分校南面用地興建豪宅項目，與毗連的大學校園和學生宿舍並不配合。大學校園較為樸實的建築風格，與豪宅項目的較華麗的建築風格，將可能大大影響社區內的景觀，產生欠缺協調的效果。本人認為　貴委員會應審慎地從此角度作出考慮政府的申請。

根據香港浸會大學的計劃，該校將會於前香港專業教育學院李惠利分校用地的北面部份，興建學生宿舍以提供超過一千個學生宿位。總結過去不少專上院校在民居附近興建學生宿舍的經驗，若於毗連學生宿舍的地方興建民居，基於大學生的作息時間及大學的活動，居民大有可能會投訴大學對民居構成滋擾。可以預見，若上述土地興建豪宅，有關住宅項目中居民的居住環境，將不可避免地遭受影響。本人認為此情況並不利於在上述土地興建住宅。

香港中[redacted]
電話[redacted]

另一方面，社區內的交通情況亦是審議更改規劃時的重要考慮。現時鑒於前香港專業教育學院李惠利分校土地是作教育用途，來往聯福道的私家車輛並不多，亦致使聯福道的交通流量處於較低水平，大學及附近一帶的教學人員及學生主要以步行方法穿梭各校園區及使用相關行人路。一旦在聯福道增加豪宅數目，將無可避免地增加九龍塘聯福道及其他周邊道路的交通流量，特別是私家車輛的流量。本人認為 貴委員會應充份作出考慮住宅發展將對道路使用習慣和行人安全的影響，以確定更改土地用途會否令社區內的交通情況變壞。

本人十分關注政府當局把前香港專業教育學李惠利分校用地納入 2013-2014 年度賣地計劃的做法，認為此舉是不尊重 貴委員會的做法，讓人感覺 貴委員會僅為政府當局開拓住宅用地的橡皮圖章。本人促請 貴委員會秉持獨立、專業的良好價值，充份考慮社會各持分者的意見，以香港教育事業的長遠發展為念，否決政府當局更改土地規劃用途的申請。

陳家洛
公民黨立法會議員
2013 年 4 月

TPB/R/S/K18/17-7860

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 130410-135334-03211

提交限期
Deadline for submission: 15/04/2013

提交日期及時間
Date and time of submission: 10/04/2013 13:53:34

提出此宗申述的人士
Person Making This Representation: 女士 Ms. 毛孟靜

申述詳情
Details of the Representation :

與申述相關的草圖
Draft plan to which the representation relates: S/K18/17

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**
修訂項目A項（改變前李惠利校舍土地用途）	反對 Oppose	本人反對修改前李惠利校舍土地用途，並要求將其南部的土地保留爲「政府、機構或社區（9）」發展用地。理由如下： 1) 香港教育用地已經嚴重不足，政府應該爲下一代着想，保留該幅土地作教育用途。 2) 改變土地作住宅用途後不能逆轉，該地一旦用作興建豪宅，既不能解決本港基層的住屋問題，又減少本已不足的教育用地，長遠對社區和整個社會造成重大損失。 3) 本人實在不希望政府見縫插針地追求建屋量，將這幅本可用作拓展教育發展的用地，永久改爲屏風式豪宅用地。 4) 本人認爲，政府在更改土地用途的諮詢期間，將該地放在賣地表是誤導市民，程序上不公平，讓市民以爲在城規會作出決定前已有定案。

對草圖的建議修訂(如有的話)
Proposed Amendments to Draft Plan(if any):

7841

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	TPB/R/S/K18/17-13
	Date Received 收到日期	16 MAR 2013

1. The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道333號北角政府合署15樓城市規劃委員會秘書收。

2. 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333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. 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爲不曾提出論。

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*)

SIU LEONG SING 蕭亮聲議員

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*)

LI CHEUK YIN 李卓賢

3. Details of the Representation 申述詳情

Draft plan to which the representation relates 與申述相關的草圖	九龍塘分區規劃大綱核准圖編號 S/K18/16 的修訂

* 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」

4267

Parts 1, 2 and 3 第1、第2及第3部分

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
九龍塘分區規劃大綱核准圖編號 S/K19/16 的修訂	☐ support 支持 ☑ oppose 反對	見附件
	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ 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 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

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

蕭亮聲 九龍城區議員辦事處
Office of SIU Leong-sing, Kowloon City District Councillor

附件

本函檔號 OUR REF : SLS-PR-20130307-HKBU
來函檔號 YOUR REF :

COPY

浸大宿位緊張 政府手段卑鄙
首要解決浸大宿位問題 反對李惠利興建豪宅 保留教育用途

蕭亮聲認為，解決浸大學生宿位問題是首要任務，政府必須先預留充裕空間予浸大興建宿舍。而且，本港的教育用地已經極為罕有，政府無故改變土地規劃實是漠視社會需要，未有平衡各方長遠利益，尤其發展豪宅項目。

故此，蕭亮聲認為前李惠利校舍地皮應繼續保留為教育用地。而且，發展局竟在城規會諮詢階段放棄確守持平的態度，企圖僭越程序，高調宣佈該地皮將納入賣地計劃，如此漠視社會需要的卑鄙手段，實非政府應為之事，可見梁振英政府已不可救藥。

浸大確需有寬闊的校園，但校方必須有長遠規劃，誠然，近年浸大欠缺對未來發展的規劃，每次發展也是「見步行步」，並無一個詳細藍圖、強而有力的論點和精密的規劃來說服社會，浸大校方實應反思不足，讓日後浸大有更多元的空間發展。

聯絡：蕭亮聲議員 電話：

2013 年 3 月 7 日

SIU LEONG SING, KOWLOON CITY DISTRICT COUNCILLOR 蕭亮聲議員辦事處

電話 Tel : 傳真 Fax : 電郵 E-mail :

Form No. S6 表格第 S 6 號

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	TPB/R/S/K18/17-14
	Date Received 收到日期	

1. The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出。填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。

2. 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 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. 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爲不曾提出論。

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 *)

Mr. HO HIN MING
何顯明　　九龍城(九龍塘)區議員

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 *)

3. Details of the Representation
申述詳情

Draft plan to which the representation relates 與申述相關的草圖	

RECEIVED
2013 APR 15 P 3:01
TOWN PLANNING BOARD

* 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」

Parts 1, 2 and 3 第 1、第 2 及第 3 部分

08135

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
S/K 18/17	☐ support 支持 ☑ oppose 反對	反對理由： 1. 部門的出發點不能成立 2. 部門找地的選址不對 3. 選址起住宅與周邊環境不協調 4. 改變土地用途不切實際 5. 漠視區內居民對社區設施的需求 6. 對區內環境的影響 7. 區議會的不贊成意見 * 詳細資料請參閱附件一及二，及圖片 其實政府應該將該土地批出給浸會大學作爲學生宿舍、綜合性中醫院及將其中一部份代爲發展爲社區中心附設室內運動場、長者中心及多用途設施！
	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ 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 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. Plans, 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/繪圖爲彩圖或超過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。

.....

.....

.....

5. Signature 簽署

Signature 簽署 .....

HO HIN MING

Name in Block Letters 姓名（以正楷填寫）

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

.....

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 KOWLOON CITY (KOWLOON TONG) D.C

on behalf of 代表 .....

Company/Organization Name and Chop (if applicable)
公司 / 機構名稱及蓋章（如適用）

Date 日期 15/4/2013

Statement on Personal Data 個人資料的聲明

1. 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:

   (a) 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

   (b) 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：

   (a) 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

   (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. 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。

3. 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，其地址爲香港北角渣華道333號北角政府合署15樓。

* 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」
「✓」at the appropriate box 請在適當的方格內加上「✓」號

附件(一)

致城規會所有委員：

反對 S/K 18/17 所建議的土地改變用途的有關事項 14/04/2013

反對理由：

1. 部門的出發點不能成立－特首曾與十八區區議會正副主席們商討解決建屋土地不足的問題，內容所提的是爲普羅大衆提供上車盤，而並非規劃部門所講的換樓盤！

2. 部門找地的選址不對－李惠利前工業學院的地皮座落於九龍塘的地段。根據記錄，該區的地皮呎价應介乎萬伍至兩萬多元，所以無論發展成爲甚麼類型的私人住宅，都一定成爲豪宅，絕對幫不到普羅大衆上車！其實部門應着眼找一些上車盤的地皮，我相信區內應該有的，就好像九龍城碼頭翔龍灣的地皮，黃大仙杏林街荒廢很久的前消防員宿舍.....等等！

3. 選址起住宅與周邊環境不協調－現時的前李惠利校舍用地三面都被浸會大學的學生宿舍，教學樓及消防局所包圍，如要在此地皮上興建住宅，實對將來入住的居民不公，因已有先例証明大學宿會與豪宅爲鄰是會引起很大的衝突的，如紅磡理工大學宿舍與相鄰的半島豪庭就常出現衝突及消防局對民居的滋擾！

4. 漠視區內居民對社區設施的需求－現時的 GIC 用地已經買少見少，遺憾的是政府部門漠視民意，並未作出諮詢就一揸定音話區內並沒有社區設施的需求！其實只要在區內問一問，區內居民就會向你說，區內並沒有社區會堂、長者中心(私營除外)、室內運動場、只有一所護理安老院(私營除外)、牙科診所(見附件二)和綜合性的中醫院！

5. 改變土地用途不切實際－現政府並不是因爲財赤而急需賣地救急，如果我們能保留此地皮的 GIC 性質，我們還可以有這樣的一個平台去探討將來的使用模式，但如果一旦改變了用途，我們便失去了探討的機會，並且這是不能走回頭路的！另外前李惠利地皮內有一建築物包括了禮堂、室內運動場、多用途課室及活動地方，只需略加改建就可成爲社區會堂及長者中心、這可爲政府節省過億元的建設費、並可舒緩區內的需要！

6. 對區內環境的影響－九龍塘是一個低密度及大量綠化的社區，其主要的作用是可作爲市區中的一個市肺，如果前李惠利地皮轉爲住宅用途的話，發展商一定會用盡地積此例，興建大量的住宅而令該區的人口、教育、空氣、交通和環境衞生大受影響，但如果保留爲 GIC 用地、則教育及社區設施對周邊環境所帶來的影響有限！

7. 區議會的全體反對－在政府部門到區議會的房屋及基礎建設委員會諮詢的會議上，與會的十九名議員無一位議員是贊成將該地皮改變用途的，而代表發言的十三名議員大部份都是支持興建中醫院及加入社區設施，討論內容可到九龍城區議會網頁下的房屋及基礎建設委員會會議錄音及會議紀錄收聽和收看。

****總括而言，政府應該將該土地批出給浸會大學作爲學生宿舍、綜合性中醫院及將其中一部份要求代爲發展爲社區中心附設室內運動場、長者中心及多用途設施！

何顯明
九龍城(九龍塘區)民選區議
房屋及基礎建設委員會主席

Tel: [redacted] Fax: [redacted] email: [redacted]

致：九龍城區議會何顯明議員

附件(二)

我們是一群居於九龍城一帶而關心長者生活壓力的長者，組織了名為“耆英團結組”。我們長者知道世界衛生組織對牙齒的健康標準，80 歲至少應有 20 顆能正常咀嚼食物及不鬆動的牙齒。然而我們香港的長者每天卻要面對『無牙老苦』的困擾。我們與不同區的長者組成了關注長者權益大聯盟，目的是改善長者生活。

因此，我們有以下的建議，期望主席及各九龍城區議員可以明白我們牙齒的苦況，在區議會討論我們的需要，協助我們解決『無牙老苦』的困擾。

1. 全香港 18 區都應設有政府牙科街症診所
2. 政府牙科街症診所應向市民提供牙科全套服務
3. 政府應向全港市民提供全面牙科教育，為長者每年提供最少一次檢查及洗牙服務

謝謝!

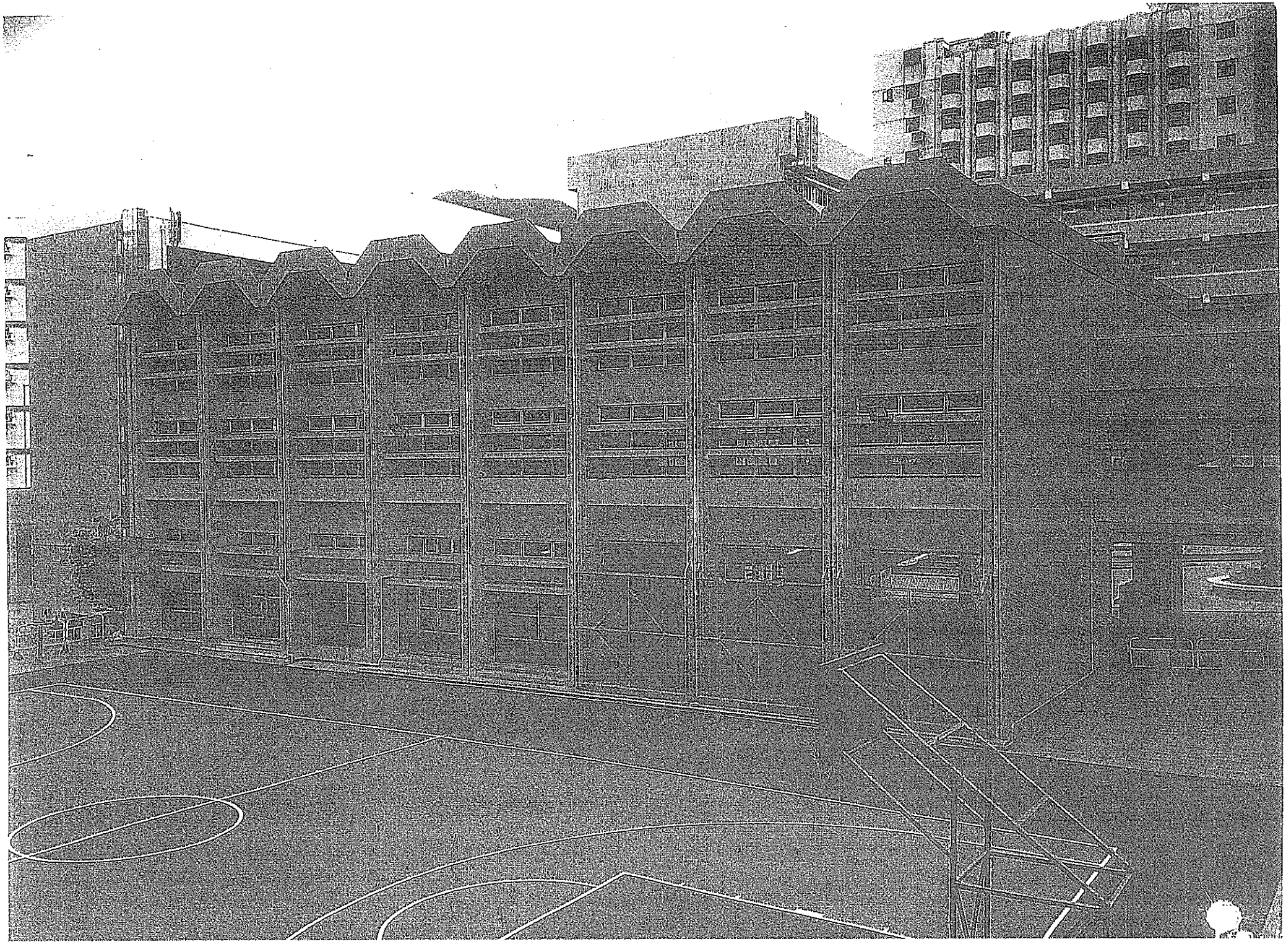
耆英團結組

日期 ： 2013 年 3 月 26 日

聯絡人： 李碧賢女士

地　址 ：[redacted]

25M
25M(s)
消防局
Fire Station
25M
25M(s)
低座校舍
Low Rise Buildings
25M



公民黨 CIVIC PARTY

Annex II-7 of
TPB Paper No. 9585

TPB/R/S/K18/17-15

反對 S/K18/17 修訂項目 A 及修訂項目 B 申請

致城規會委員：

反對修訂項目A：把位於聯福道的一幅函蓋前李惠利校舍南部的土地，由「政府、機構或社區(9)」地帶改劃為「住宅(乙類)」地帶；及
反對修訂項目B：把在延文禮士道和東寶庭道交界的用地由「政府、機構或社區(3)」地帶改劃為「住宅(丙類)」地帶。

理由如下:

1. 反對剝削市民的用地

「政府、機構或社區」地帶的資源本來是屬於每個市民的，而此等「政府、機構或社區」用地的資源本來非常罕有，若將此用地改劃為住宅用途，本可被市民使用的土地便被剝削，則本港居民應有的、可以享用的設施，如醫院、學校、社區會堂、和教堂等社區設施會被削減，兩項修訂總共剝削市民的用地約有 10,880平方米*(修訂項目A(約8 810平方米)+修訂項目B(約2 070平方米))*，等同削減市民的福利。

以下三點是政府祇提出牽強的理據：
(1)為了解決本港迫切的房屋問題，要求規劃署檢討後，把36塊「政府、機構或社區」用地改劃作住宅用途；
(2) 修訂項目A中，除郵政局及青少年綜合服務中心外，該區已計劃闢設的政府、機構或社區設施並無短缺；和
(3) 修訂項目A中的政府、機構或社區設施及休憩用地設施也足以應付改劃用途地帶所產生的需求。

反對政府上述理據：
(1) 明顯項目 A「住宅(乙類)」祇提供 495 個單位和項目 B「住宅(丙類)」祇提供 44 個單位，數量少之外，亦不是針對本港迫切的房屋問題 — 公屋和居屋或細型單位短缺問題，而豪宅祇是少數投資者的投資工具而矣，供應少量豪宅，絲毫無解決半點房屋問題；
(2) 政府無計劃闢設該區的政府、機構或社區設施，並不能表示無此等用地的短缺問題，事實上，浸會大學有意在此興建教學中醫院，亦是市民樂於見到本港中醫醫療和學術有提升的機會，比起改劃為住宅，更有利於市民，使更多市民受益，其實政府表面上也認同教學中醫院的必需性，但為何要奪取屬於每個市民的「政府、機構或社區」用地呢？即使要求浸會大學使用其他地區的「政府、機構或社區」，也是要奪取其他地區市民的用地；及
(3) 相信每個市民都都無法相信在同一塊土地中，當住宅用地要增加時，而公共設施（即現時所提的「政府、機構或社區」用地）是可以減少，還硬要說足以應付改劃後的需求。

2. 反對改劃土地祇屬長官意旨

政府祇表達：行政長官會同行政會議是行使《城市規劃條例》第 12(1)(b)(ii)條所賦予的權力，將《九龍塘分區計劃大綱核准圖編號 S/K18/16》發還城市規劃委員會以作出修訂，但沒有提供任何規劃理據，祇提出上述牽強的理據，屬於長官意旨。所以修訂此地帶為豪宅區，根本未有任何規劃意向，明顯將屬於市民可以共享的資源拱手讓予發展商和投資者；並將多數人的利益轉移極少數人的利益。

政府祇表達長官有權，但下列質疑的地方無法解答：

(1) 若為了要解決本港迫切的房屋問題，為什麼不改劃多些土地為公屋地或限尺地，偏要改劃為豪宅地？

(2) 是否不久前《九龍塘分區計劃大綱核准圖編號 S/K18/16》所定或所分配的「政府、機構或社區」地帶與「住宅」地帶的用地比例不正確，所以要修訂？是否現在要減少「政府、機構或社區」地帶而要增加「住宅」地帶，來達至若干的規劃準則？是否「政府、機構或社區」地帶與「住宅」地帶的用地比例的規劃準則突然間有所更改？

(3) 為什麼可以用「社會福利署署長並無要求把該用地作青少年綜合服務中心」簡單回答，便成為剝奪市民應有的「政府、機構或社區」用地的理由？為什麼沒有城規會委員質詢社會福利署署長曾否諮詢其他社福機構要覓地作青少年綜合服務中心呢？理解長官可以有地不用，但不等於民間機構有一樣的意願。同樣，更無理由：教育局局長不喜歡使用此地，也可以不理會其他辦學團體的需要，是否城規會委員也有責任質詢，為市民把關，不能讓屬於市民的用地輕易地被剝削？

3. 反對政府先斬後奏，修訂前將此地帶放入賣地表

政府在修訂 OZP 之前，便將此等地帶放入賣地表，簡直是先斬後奏，如同合和在皇后大道東 QRE Plaza 的改劃申請一樣，不用城規會考慮規劃的需求，便可藉米已成炊為由，強將「休憩」用地改劃為「商業」用地。

政府若確定修訂此地必須改劃為住宅，除了必須要提供足夠理據外，政府理應同時將另一些同等價值的「住宅」用地改劃為「政府、機構或社區」用地，供市民及有關的團體機構選擇，並先諮詢他們的意見，是否願意作交換，尋求共識，而並非割讓其他地區的「政府、機構或社區」用地便了事；更絕不應單方面造成既定事實，逼使城規會做橡皮圖章。

所以，強烈反對分區計劃大綱核准圖的 S/K18/17 的 A 項及 B 項改劃修訂申請！

申述人
公民黨環境及可持續發展政策支部
地址：[redacted]

RECEIVED
2013 APR 15 P 5:09
TOWN PLANNING BOARD

Annex II-8 of
TPB Paper No. 9585

TPB/R/S/K18/17-16

自由黨
LIBERAL PARTY

致：規劃署
凌嘉勤署長，JP

<u>李惠利地皮「未審先決」納入賣地表</u>
<u>漠視民意 破壞城規制度</u>

凌署長閣下：

對於當局日前公佈 2013 年賣地表，把仍處於諮詢規劃階段，並遇上強烈反對意見的九龍塘前香港專業教育學院李惠利分校地皮，納入賣地表的舉措，自由黨深表遺憾！

近年，大部份城市規劃諮詢都遇到重大反對壓力（例如：新界東北發展、西九龍多個臨海屏風樓發展、擴建將軍澳堆填區），原因都是市民不信任城市規劃制度。現時前李惠利地皮事件，政府更「赤裸裸」忽視城規會的諮詢程序，在諮詢未完成前，便強行把地皮納入賣地表，既欠缺令人信服的更改理由，亦完全忽視浸會大學一直爭取在該幅土地上，興建中醫院的合理訴求，做法全不合理。

更何況，現時李惠利地皮，以及九龍塘軍營、浸會大學、聯校運動場和九龍仔公園一帶的「社區用地」GIC，在都市規劃原意上屬於九龍塘一帶住宅的緩衝區，以免住宅密度過高，故沒有理由違反規劃原意，把原屬專上教育用地改爲住宅用地，可見政府已方寸大亂，處事的制度已蕩然無存，發展局必需撥亂反正，並收回建議！

況且，該幅土地的地理位置毗鄰浸會大學，閣下的做法不但會破壞浸會大學善用鄰近土地作教學用途而所衍生的協同效應，亦令新的住宅物業被浸會大學建築群所包圍，無論從社區發展，或城市佈局角度而言，並不協調，並會引起如理工大學宿舍與半島豪庭間相類似的紛爭。

自由黨重申反對將前李惠利校舍土地，由教育用途改爲興建豪宅，與此同時，我們要求政府將該幅地皮從本年度賣地計劃內剔除，以正視聽。自由黨對當局的漠視民意，踐踏城規會諮詢程序的做法表達強烈不滿！

自由黨九龍西地區執行委員會主席何顯明
自由黨青年團主席李梓敬
2013 年 3 月 7 日

801-803 Manhattan Place,
23 Wang Tai Road, Kowloon Bay
九龍灣宏泰道 23 號 801-803 室
Tel 電話 (852) 2869 6833
Fax 傳真 (852) 2533 4238
Email 電郵 liberal@liberal.org.hk
www.liberal.org.hk

tpbpd@pland.gov.hk

TPB/R/S/K18/17-17

寄件者: "markfuhk" <[redacted].com>
收件者: <tpbpd@pland.gov.hk>
傳送日期: 15/04/2013 下午 05:10
主旨: 反對修訂九龍塘分區大綱草圖S/K18/17 要求前李惠利校舍地皮保留教育用途

城市規劃委員會：

反對修訂九龍塘分區大綱草圖S/K18/17
要求前李惠利校舍地皮保留教育用途

本人對於政府提出修訂修訂九龍塘分區大綱圖（OZP），把要求前李惠利校舍地皮改劃爲住宅用途，興建豪宅表示反對，理由如下：

（1）現時李惠利地皮，以及九龍塘軍營、浸會大學、聯校運動場和九龍仔公園一帶的「社區用地」（GIC），在都市規劃原意上屬於九龍塘和樂富一帶住宅的緩衝區，以免住宅密度過高。把原屬專上教育用地改建住宅，有違規劃原則；爲興建豪宅而阻礙大學擴展，城規會委員不應該支持。

（2）如果九龍塘分區規劃，容許社區用地改劃爲住宅，勢必做成極壞先例，引發其他社區土地改爲住宅用途，現有住宅又申請加大發展密度，九龍塘的低密度區會遭到破壞。

自由黨成員
符傳富

8790

Annex II-10 of
TPB Paper No. 9585

tpbpd@pland.gov.hk

TPB/R/S/K18/17-18

寄件者: "Dominic Lee" <[redacted]g.hk>
收件者: <tpbpd@pland.gov.hk>
傳送日期: 15/04/2013 下午 05:18
主旨: 反對修訂九龍塘分區大綱草圖S/K18/17

城市規劃委員會：

反對修訂九龍塘分區大綱草圖S/K18/17
要求前李惠利校舍地皮保留教育用途

本人對於政府提出修訂修訂九龍塘分區大綱圖（OZP），把要求前李惠利校舍地皮改劃爲住宅用途，興建豪宅表示反對，理由如下：

（1）現時李惠利地皮，以及九龍塘軍營、浸會大學、聯校運動場和九龍仔公園一帶的「社區用地」（GIC），在都市規劃原意上屬於九龍塘和樂富一帶住宅的緩衝區，以免住宅密度過高。把原屬專上教育用地改建住宅，有違規劃原則；爲興建豪宅而阻礙大學擴展，城規會委員不應該支持。

（2）如果九龍塘分區規劃，容許社區用地改劃爲住宅，勢必做成極壞先例，引發其他社區土地改爲住宅用途，現有住宅又申請加大發展密度，九龍塘的低密度區會遭到破壞。

自由黨青年團主席
李梓敬
[redacted]
電話：[redacted]

Annex II-11 of
TPB Paper No. 9585

TPB/R/S/K18/17-19

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
(傳真號碼：2877 0245 或 2522 8426)

城市規劃委員會秘書：

反對修訂「九龍塘分區計劃大綱草圖編號 S/K18/17－修訂項目 A 項」

就特區政府已經把浸會大學鄰近前李惠利校舍南地皮，列入下年度賣地計劃作住宅用途，本人對此表示強烈不滿，原因如下：

1. 當局在該用地的發展規劃仍在諮詢階段，不但沒有確守公正持平的態度，反而企圖僭越程序，向城市規劃委員會表達官方立場，藉以施壓，將該地皮改作住宅用途，這是絕不民主的諮詢方式，完全漠視民意，必須予以強烈譴責。

2. 本港教育用地彌足珍貴，當局不應無故改變土地規劃，尤其用以發展豪宅項目，這將進一步減少本已不足的教育用地，亦無助解決本港基層的住屋問題，對社區和整體社會將造成無可挽回的損失。

為了下一代著想，也從公眾利益出發，本人反對上述修訂項目，並要求當局必須聽取民意，以普羅市民的公眾利益為依歸，將前李惠利校舍南地皮，繼續保留為教育用地。祝

鈞安！

姓名：香港教育專業人員協會會長馮偉華
日期：2013 年 4 月 15 日
地址或電郵：[redacted]
電話：[redacted]

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

反對《九龍塘分區計劃大綱核准圖》之 S/K18/17 九龍塘地帶改劃修訂申請

Annex II-12 of
TPB Paper No. XXXX

TPB/R/S/K18/17-20

致城規會委員：

本人反對將前李惠利地帶改為住宅用途。

反對把位於聯福道的一幅函蓋前李惠利校舍南部的土地，由「政府、機構或社區(9)」地帶改劃為「住宅(乙類)」地帶的理由如下:

1. 反對剝削市民的用地

「政府、機構或社區」地帶的資源本來是屬於每個市民的，而此等「政府、機構或社區」地帶的資源本來就不足夠，若將此地帶改劃為住宅用途，本可被市民使用的土地便被剝削，則本港居民應有的，如醫院、學校、社區會堂、和教堂等社區設施被削減，等同市民的福利被削減。

2. 反對改劃土地並非規劃意向，而祇屬長官意旨

行政長官會同行政會議祇是行使《城市規劃條例》第 12(1)(b)(ii)條所賦予的權力，將《九龍塘分區計劃大綱核准圖編號 S/K18/16》發還城市規劃委員會以作出修訂，但沒有提供任何規劃理據，祇屬長官意旨。所以修訂此地帶為住宅，根本是與規劃意向不符，祇是將屬於市民可以共享的資源拱手讓予發展商和投資者；並將多數人的利益轉移極少數人的利益。

3. 反對政府單方面先將此地帶放入賣地表造成既定事實

政府想學效合和在皇后大道東的 QRE Plaza 動作，不用考慮規劃的需求，便可以米已成炊為由，強將 Open Space「休憩用地」改劃為商業地帶。若政府確定修訂此地，必須改劃為住宅，除了要提供足夠理據外，政府理應同時將另一些同等價值的住宅地帶改劃為「政府、機構或社區」地帶，供市民選擇，是否願意以作交換，必須先諮詢市民意見，尋求共識，不要單方面造成既定事實，逼使城規會做橡皮圖章。

4. 反對在不宜居住地方興建豪宅

此地帶的三面被浸大包圍，若興建住宅，則住客與學生的作息時間存在很大差異，容易受學生活動的噪音影響，環境不算是理想，所以此地帶不宜改劃為住宅地帶。

5. 支持興建教學中醫院，維持原本 OZP 的規劃意向

浸大提議興建教學中醫院，有助本港中醫醫療和學術的提升，比起改劃為住宅，更有利於市民，使更多市民受益。

本人強烈反對九龍塘分區計劃大綱核准圖編號 S/K18/16 的 S/K18/17 的 A 項改劃修訂申請！

申述人

吳彥強
HK 重建關注組主席
通訊地址：[redacted]
電郵：[redacted]

RECEIVED
2013 APR 15 P 5:0
TOWN PLANNING BOARD

tpbpd@pland.gov.hk

寄件者: "Debby Chan" <[redacted]om>
收件者: "tpbpd" <tpbpd@pland.gov.hk>; "Paul Zimmerman" <[redacted]om>
傳送日期: 12/04/2013 上午 11:06
附加檔案: OZP_S K18 17_12 Arpil.pdf
主旨: Re: S/K18/17

Dear Sir,

Please see our comment attached.

Best Regards,
Debby Chan
Designing Hong Kong Limited
Tel: [redacted]
Fax: [redacted]
Mail Box: [redacted]ig

8016

創建
DesigningHongKong
香港 .com

Hong Kong, 11 April 2013

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,

Representation regarding the draft Outline Zoning Plan for Kowloon Tong (No. S/K18/17)

We object to the rezone the southern portion of the former Lee Wai lee campus site in Kowloon Tong from "Government, Institution or Community" use to "Residential (Group B)" on the basis that:

1. The government lacks vision in the housing supply strategy in Hong Kong. The most urgent need is for low cost housing for the grass-roots and youngster who cannot afford high rent and property prices. The Government's proposal to develop medium-density residential properties on the former Lee Wai Lee campus site neither reflects prudent long-term planning to ease the need for low price housing.

2. The former Lee Wai Lee site is adjacent to Hong Kong Baptist University (HKBU) that has been liaising with the Government to grant the entire site to the University for its long-term development. The fragmented planning involved in dividing the site fails to make the best use of the land and capitalise on the synergies that would result from HKBU's development of the site as a whole. We are of the view that coherent and integrated planning and design encompassing the LWL site and the main campus of HKBU would create operational efficiencies and avoid exacerbation of commuting which is non-sustainable.

3. HKBU has proposed building a Chinese medicine teaching hospital on the southern portion of the former Lee Wai Lee campus site. Chinese medicine has become increasingly popular in Hong Kong and has had proven results in treating a number of diseases, but Hong Kong lacks a hospital that could provide in-patient Chinese medicine services to people with chronic illnesses. A Chinese medicine teaching hospital operated by HKBU and located on the site would promote synergy between the hospital and HKBU's School of Chinese Medicine as well as its Faculty of Science, facilitating both teaching and learning, treatment of patients and clinical research.

4. Granting the entire former Lee Wai Lee site to HKBU would integrate the stretch of land along Renfrew Road while rezoning the land would only serve to fragment it. In case medium-density housing are built, there is insufficient supply community services for resident. On the other hand, university hostel will bring convenience to HKBU students. We would therefore urge the members of the Town Planning Board to retain the land for "Government, Institution or Community" and consider HKBU's constructive proposals for its future use.

Unit 7, 5/F, Eastern Harbour Centre,28 Hoi Chak Street, Quarry Bay,
Tel: +852 3104 2765 Fax:+852 2187 2305

創建
DesigningHongKong
香港 .com

Hereby we so submit our objection to this rezoning for your consideration.

Designing Hong Kong Limited
April 2013

Unit 7, 5/F, Eastern Harbour Centre,28 Hoi Chak Street, Quarry Bay,
Tel: +852 3104 2765 Fax:+852 2187 2305

Annex II-14 of
TPB Paper No. 9585

環保觸覺
Green Sense
電話：[redacted]
傳真：[redacted]
地址：荃灣郵政信[redacted]
電郵：[redacted]
網頁：[redacted]

Annex II-14 of
TPB Paper No. 9585

TPB/R/S/K18/17-22

致城規會

環保觸覺意見書

反對 S/K18/17 的 A 項

前李惠利校舍應維持作政府、機構及社區用地

本會反對政府將前李惠利校舍改作住宅用途。

請政府不要借增加住宅供應為名，讓發展商興建天價豪宅為實。

是否讓浸大興建中醫院，這可繼續討論；其他的教育用途，也可以討論。但一旦改作住宅用途，這是無法逆轉的。

對於政府近日「盲搶地」的舉措，本會實在需要大力批評。

我們不想大量的綠化地、GIC 地及教育用地，被政府奪去，然後興建一般人負擔不來的豪宅。

說道理，好像對政府沒有用。面對著政府把持的城規會，城市規劃已變成政府的一言堂。

我們深信，良好的城市規劃應該與民共議，以及不應向地產商傾斜。

我們在無可選擇之下，已決定動員在城規會馬拉松式發言。

附上了多個規劃團體聯署的信念書，解釋為何需要馬拉松式發言。

我們不是想癱瘓城規會，我們是真心希望城規會能改革，我們是希望城規會能民主化。

環保觸覺

二零一三年四月十五日

附件：「千人發言撐浸大　城市規劃要民主」信念書

8109

信念書

千人發言撐浸大　城市規劃要民主

反對前李惠利地皮變豪宅

面對強大的社會反對聲音，政府仍然堅持在前李惠利地皮興建豪宅。政府並快刀斬亂麻，將地皮放入賣地表。現時城規會正就政府申請改變用途展開諮詢，但我們對於城規會否決建議，實在不敢寄予厚望。

本港的城規會制度，差不多全被政府壟斷。城規會主席是發展局的常任秘書長，而轄下的「都會規劃小組委員會」及「鄉郊及新市鎮規劃小組委員會」則是規劃署署長。城規會的絕大部份決定，都是依據政府的立場。城規會尚能對私人項目把關，但對於政府的項目，實在和橡皮圖章無異。

城規會的委員由政府委任，本港實在需要有民主成份的城規會，使城規會的決定更符合民情及民意，以及能夠向政府的建議說「不」。

我們需要大家一同在 4 月 15 日或之前向城規會遞交反對書，反對前李惠利地皮建豪宅，並在數個月後的城規會聆訊會議中發言。這次集體行動，有可能使城規會需召開數天甚至數星期的會議，但我們別無選擇，是政府將我們逼上梁山。

這刻，不同的持分者走在一起。浸大的師生及教育界的朋友，要求政府放棄在前李惠利地皮建豪宅，為的是留有足夠土地，讓高等教育持續發展；環保及規劃界的朋友，過去在數之不盡的城規會會議，就不同個案向城規會提供更佳的規劃方案，但城規會的決定往往是維持政府的立場。

說道理，好像對政府沒有作用。城規會，成為政府的橡皮圖章。在城規會馬拉松式接力發言，我們希望突顯城規制度的不合理及不民主。我們的行動，也是唯一可以拖延政府將地皮變豪宅的方法。

城市規劃應是與民共議，不是政府的一言堂。豪宅供應不是住宅供應，政府不能再混淆視聽。需要前李惠利地皮的是教育界，不是地產商!

支持團體

中西區關注組　本土研究社　HK 重建關注組　公民黨　公共專業聯盟
土地正義聯盟　香港教育專業人員協會　浸大學生會　環保觸覺

香港九龍城工商業聯會有限公司
HONG KONG KOWLOON CITY INDUSTRY AND COMMERCE ASSOCIATION LIMITED

檔案編號：KCICA-L13-014

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
（傳真號碼：2877 0245 或 2522 8426
電郵：tpbpd@pland.gov.hk）

TPB/R/S/K18/17-24

敬啟者：

反對「九龍塘分區計劃大綱草圖編號 S/K18/17—修訂項目 A 項」

本人強烈反對上述修訂項目並要求將前李惠利校舍南部的土地還原至「政府、機構或社區（9）」用途。有關理據如下：

- 該地段與浸大中醫藥學院及中醫診所毗連，用於興建中醫教學醫院，既方便浸大師生往來，亦有利病人接受專業治療。
- 愈來愈多市民明白中醫藥對治療中風、痛症及腫瘤等慢性、難治性疾病有效，建議在該地興建的中醫教學醫院有急切建立的需要，以加強中醫藥的服務，讓住院病人接受全面系統的中醫藥治療，惠及病人及其家屬以至全港市民。
- 中醫教學醫院可讓中醫學生在香港實習，現時中醫學生需往內地實習，存在不少問題，例如內地與香港醫療體制不同，學生不能把在內地所學的全部知識和經驗（例如中醫可用西藥和開刀）應用在香港。
- 中醫教學醫院不單供浸大中醫藥學院使用，也歡迎其他院校的中醫學生實習之用。

香港九龍城工商業聯會有限公司

姓名：梁　麟
職位：主　席
機構：香港九龍城工商業聯會
地址：[redacted]
電話：[redacted]
電郵：[redacted]

2013 年 3 月 21 日

6725

永遠會長
[illegible] 博士 工程師 SBS, JP
永遠名譽會長
陳榮燦 先生 BBS, JP
永遠名譽會長暨會董
[illegible] 先生 MH, JP
榮譽顧問
徐耀良 先生 專員 JP
黃燕娥 女士 福利專員
李宗德 先生 SBS, BBS, JP
彭鴻元 先生 SBS, CSDSM
李慧琼 議員 JP
梁美芬 博士 議員 JP
陳耀庄 律師 BBS JP
楊顯中 博士 SBS, OBE, JP
黃富榮 先生 BBS
周振基 博士 SBS, BBS, JP
梁智仁 教授
陳嗣滙 教授
名譽顧問
尹志強 先生 BBS, JP
黃龍德 博士 BBS, JP
蘇沛林 律師 GBS, SBS, OBE, JP
譚新立 博士 MH
黃城雄 博士
陳國超 博士 MH JP
會長暨會董
[illegible] 博士 議員
主席暨會董
梁 麟 博士 MH
副會長暨會董
陳祖鏞 先生　梁榮基 先生
羅志勤 先生　鄧子恒 先生
李炳華 先生　盧治宏 先生
陸偉強 小姐　陳焯基 先生
吳偉新 先生　王紹基 先生
盧祖祥 先生　陳健平 先生
江家智 博士　葉昌財 小姐
李厚輝 先生　唐建興 先生
林振邦 先生　關泉堅 工程師
伍海山 先生　羅汝立 先生
陳泉岳 先生　徐 莉 女士
張浮芳 小姐　張智彥 先生
林 文 先生　李偉庭 先生
副會長
鄧兆明 議員 JP　周振德 先生
王名貴 議員 JP　何建雲 先生
梁振海 先生　梁展邦 先生
曾光華 先生 MH　饒耀榮 先生
劉耀城 先生　李錦雄 先生
李建中 先生　沈 洋 博士
余耀祖 先生　黃頂松 先生
馬振鴻 先生　李承光 先生
黃炳強 拿督　呂民強 先生
張志聰 先生　張曉順 先生
馬庭輝 先生　何焯雄 先生
地區事務顧問
李城威 先生 MH
唐勁恩 先生 MH
李盛白 先生 BH
陸偉剛 先生 BH
李卓福 博士 MH, BH
陳天榮 先生
王文傑 博士
顏均仁 先生
法務法律顧問
蘇婉薇 律師　何幼廷 律師
義務會計顧問
麥立金 會計師
秘書長
周劍鳴 先生
會務秘書
古美娟 小姐

TOWNLAND CONSULTANTS LTD.
PROJECT MANAGEMENT, URBAN AND REGIONAL PLANNING, SOCIAL DEVELOPMENT, DEVELOPMENT CONSULTANCY, MASTER PLANNING, URBAN DESIGN, CONCEPT ARCHITECTURE AND LANDSCAPE ARCHITECTURE

Our Ref.: HKBU/LWLTI/MAG/1
Date 15 April 2013

By Hand Only

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

TPB/R/S/K18/17-25

Dear Sir

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

OBJECTION TO AMENDMENT ITEM A
IN RESPECT OF THE DRAFT KOWLOON TONG
OUTLINE ZONING PLAN NO. S/K18/17

FORMER CAMPUS OF THE HONG KONG INSTITUTE OF VOCATIONAL EDUCATION
(LEE WAI LEE), RENFREW ROAD, KOWLOON TONG

We are instructed by Baptist University of Hong Kong (the "Objector") to lodge this Objection in respect of Amendment Item A of the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17 (the "Draft OZP") under Section 6(1) of the Town Planning Ordinance. A copy of the Authorisation Letter is attached for record.

The Objector is prepared to withdraw this Objection if the Town Planning Board ("TPB") agrees to amend the Draft OZP to revert the ex-LWL Site at Renfrew Road back to G/IC(9) use.

Please find enclosed the completed Form No. S6 together with 90 copies of the Objection Statement in support of the Objector's Proposed Amendments to the Draft OZP.

RECEIVED
2013 APR 15 P 12: 26
TOWN PLANNING BOARD

08200

MAIN HONG KONG OFFICE :
Telephone : [redacted] Facsimile : [redacted]
E-mail address : [redacted] Website : [redacted]
CHINA OFFICE (SHENZHEN) :
[redacted]
INDIA OFFICE :
[redacted]
INDONESIA OFFICE :
[redacted]

ASSOCIATED COMPANIES :
TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)
TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)
TOWNLAND CONSULTANTS (CHENGDU) LIMITED (China)
TOWNLAND CONSULTANTS PVT. LIMITED (India)
PT TOWNLAND INTERNATIONAL (Indonesia)
HOWARD & SEDDON PARTNERSHIP (United Kingdom)

ISO 9001:2008
Certificate No.: CC644

TOWNLAND

Our Ref.: HKBU/LWLTI/MAG/1
Date 15 April 2013

The Secretary, Town Planning Board

Should you have any queries, please do not hesitate to contact the undersigned, Ms Cindy Tsang (Direct Line: [redacted]), Ms Jennifer Gordon (Direct Line: [redacted] or Miss Maggie Wu (Direct Line: [redacted]

Yours faithfully
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED

Keren Seddon
Chief Executive Officer

KRS/CT/JEN/MAG/yc

Enc

cc Client
The Team

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

行政副校長暨秘書長
VICE-PRESIDENT (ADMINISTRATION) & SECRETARY

李兆銓
Andy S.C. Lee

Ref: VPAS13/0307/66
7 March 2013

Townland Consultants Limited
18/F, 101 King's Road
North Point, Hong Kong

Attn.: Ms Keren Seddon

Dear Madam

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

OBJECTION TO THE DRAFT KOWLOON TONG OUTLINE ZONING PLAN NO. S/K18/17

We hereby authorise Townland Consultants Limited (TOWNLAND) as the Planning Consultant to prepare and submit the above Representation on our behalf. TOWNLAND is hereby authorised to liaise, correspond and attend meetings with all relevant Government Departments and other bodies, as necessary, in respect of the Representation.

Yours faithfully

Andy S C Lee
Vice-President (Administration) and Secretary

RECEIVED
2013 APR 15 P 12:26
TOWN PLANNING BOARD

香港 九龍塘 Kowloon Tong, Hong Kong 電話 Tel [redacted] 傳真 Fax [redacted]
電郵 E-mail [redacted] 網址 Website [redacted]

Printed on 100% Recycled Paper

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

1. The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道333號北角政府合署15樓城市規劃委員會秘書收。

2. 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333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. 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爲不曾提出論。

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*)

Hong Kong Baptist University

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*)

Townland Consultants Limited

RECEIVED
2013 APR 15 P 12:22
TOWN PLANNING BOARD

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 Kowloon Tong Outline Zoning Plan No. S/K18/17

* 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」

Parts 1, 2 and 3　第1、第2及第3部分

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
Amendment Item A	☐ support 支持 ☑ oppose 反對	Please refer to the attached Representation Statement
	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ 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。

Revert the zoning of the southern part of the Ex-Lee Wai Lee Campus to "Government/ Institution & Community (9)".

@ 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. Plans, 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/繪圖爲彩圖或超過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 refer to the attached Representation Statement

5. Signature 簽署

Signature 簽署 .....

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

KEREN SEDDON
Name in Block Letters 姓名（以正楷填寫）

Chief Executive Officer
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 MRTPI, RPP

on behalf of 代表 Townland Consultants Limited

Company/Organization Name and Chop (if applicable)
公司/機構名稱及蓋章（如適用）

Date 日期 15 April 2013

Statement on Personal Data 個人資料的聲明

1. 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:

   (a) 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
   (b) 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：

   (a) 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
   (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. 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。

3. 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，其地址爲香港北角渣華道333號北角政府合署15樓。

* 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」
「✓」at the appropriate box — 請在適當的方格內加上「✓」號

REPRESENTATION UNDER SECTION 6 (1) OF THE TOWN PLANNING ORDINANCE (CAP. 131)

OBJECTION TO AMENDMENT ITEM A IN RESPECT OF THE KOWLOON TONG OUTLINE ZONING PLAN NO. S/K18/17

FORMER CAMPUS OF THE HONG KONG INSTITUTE OF VOCATIONAL EDUCATION (LEE WAI LEE), RENFREW ROAD, KOWLOON TONG

- Objection Statement -

TOWNLAND

TOWNLAND CONSULTANTS LIMITED

REPRESENTATION UNDER SECTION 6(1) OF THE TOWN PLANNING ORDINANCE (CAP. 131)

OBJECTION TO AMENDMENT ITEM A IN RESPECT OF THE KOWLOON TONG OUTLINE ZONING PLAN NO. S/K18/17

FORMER CAMPUS OF THE HONG KONG INSTITUTE OF VOCATIONAL EDUCATION (LEE WAI LEE), RENFREW ROAD, KOWLOON TONG

OBJECTION STATEMENT

Representer	Hong Kong Baptist University
Planning Consultant, and Submitting Agent	Townland Consultants Limited

File Reference: HKBU/LWLTI

For and on behalf of Townland Consultants Ltd.

Approved by : _____

Position : Chief Executive Officer

Date : 15 · 4 · 2013

15 April, 2013

CONTENTS

EXECUTIVE SUMMARY

1. INTRODUCTION

1.1 Overview
1.2 Proposed Remedy
1.3 Structure of Objection Statement

2. STRATEGIC PLANNING ISSUES FOR HONG KONG

2.1 Strategic Planning Considerations for the Future
2.2 Chief Executive's 2013 Policy Address
2.3 Hong Kong 2030: Planning Vision and Strategy (HK2030 Study), 2007
2.4 Sustainable Development for the 21st Century: Kowloon Density Study Review, 2003
2.5 The Important Role of Universities
2.6 Summary

3. STATUTORY PLANNING CONTEXT

3.1 Statutory Planning Context
3.2 Reasons for Rezoning
3.3 Planning History
3.4 Non-Statutory Planning Context
3.5 Key Planning Issues

4. EX-LWL SITE APPRAISAL

4.1 Site Location
4.2 Land Status
4.3 Existing and Surrounding Uses
4.4 Accessibility

5. HKBU'S EXPANSION AND PROPOSALS FOR THE EX-LWL SITE

5.1 University Overview
5.2 Growth of the Kowloon Tong Campus Areas
5.3 Future Growth and Development
5.4 Short Term Needs
5.5 Medium Term Needs
5.6 Medium/ Long Term Needs
5.7 Summary

6. PLANNING JUSTIFICATIONS FOR RETENTION OF G/IC USE

6.1 Introduction
6.2 The Government's Assessment of the ex-LWL Site for G/IC Reserve
6.3 Justifications for Retaining ex-LWL Site for G/IC Reserve
6.4 Conclusion

7. PLANNING REASONS NOT TO RE-ZONE PART OF THE LWL SITE FOR RESIDENTIAL USE

7.1 Introduction
7.2 Proposed Residential Scheme
7.3 Incompatibility Concerns
7.4 Piecemeal and Illogical Zoning Pattern
7.5 Urban Design and Land Use Character Implications
7.6 Environmental Quality Implications
7.7 Ex-LWL Site's Limited Contribution to Hong Kong's Housing Need
7.8 Conclusion

8 CONCLUSION AND RECOMMENDATIONS

8.1 Conclusion
8.2 Proposed Recommendations

APPENDICES

A. Extracts of MPC Paper and Minutes for 480th Meeting (21 December 2012)
B. Extracts of MPC Paper and Minutes for 482nd Meeting (25 January 2013)
C. Site Area and Student Numbers of UGC-funded Institutions
D. Letter from UGC (5 February 2013)
E. Letter to the Secretary of Education (25 February 2013)
F. Survey on Public Views on Chinese Medicine Services in Hong Kong (March 2013)
G. Letter to Secretary for Education (17 July 2012)
H. Transcript of HIC Meeting of KCDC on 7 March 2013
I. Transcript of Education Panel Meeting of LegCo on 11 March 2013
J. Coherent University Campus Development in Hong Kong
K. Broad Urban Design Appraisal

EXECUTIVE SUMMARY

Introduction

On the 15 February 2013 the Government gazetted the Draft Kowloon Tong OZP S/K18/17 which incorporated Amendment Item A relating to the rezoning of the southern part of the ex-LWL Campus (i.e. the "**Objection Site**"/ "**ex-LWL Site**") from "Government, Institution or Community (9)" ("**G/IC(9)**") to "Residential (Group B)" ("**R(B)**") with a maximum Plot Ratio ("**PR**") of 4.5 and Building Height ("**BH**") of 50m. Hong Kong Baptist University ("**HKBU**") is objecting to the rezoning of this important G/IC site as it is required for the future needs of the University and, ultimately for Hong Kong as a whole.

The ex-LWL Site was occupied by the Hong Kong Institute of Vocational Education (IVE) (Lee Wai Lee) between 1979 and 2011. The entire ex-LWL Site (1.52 hectares (ha)) is located at Renfrew Road and bounded by HKBU's campus on three sides. The Education Bureau has stated that the southern part of the ex-LWL Site (0.88 ha) is not required for educational use according to existing educational policy and have agreed to release the site for residential development.

Reasons for Objection

The key planning objection relates to the need to retain the southern part of the ex-LWL Site for future provision of G/IC facilities in the District, in particular the expansion plans of HKBU; and the incompatibility of the proposed zoning for the Site and its surrounding area.

The ex-LWL Site is a valuable and strategic G/IC reserve for future provision of G/IC facilities to meet the present and future needs of the community. The future needs of the education and health sectors have been highlighted as growth areas for which future land reserves will be required to accommodate new facilities. However, the Government has not fully considered providing adequate land to cater for the future land requirements of tertiary education institutions – nor other unforeseen future needs.

As prevailing educational policy only assesses spatial requirements of University Grants Committee ("**UGC**")-funded institutes on a triennium basis, the Government has failed to prove that the ex-LWL Site is no longer required to be reserved for any G/IC uses and that its redevelopment for residential use would not adversely affect the provision of G/IC facilities in the district, in particular on a long-term basis.

HKBU's future growth would be thwarted due to the lack of available land. The University has identified a number of medium and longer term proposals for the ex-LWL Site to Government, including a Chinese Medicine Teaching Hospital (**CMTH**); a Complex of Creativity and an International Exchange Centre. Retaining the ex-LWL Site in education use would allow the comprehensive planning of the Objection Site thereby maximising planning benefits and synergy. The adjacent ex-LWL Site is thus fundamental and essential for HKBU to achieve its long term Vision and for the viability of the university.

Further, the northern part of the ex-LWL Campus (0.64 ha), which has been allocated for student residence halls, is insufficient to accommodate committed plans for a 1,700 unit student hostel facility and 2,600 sq.m of teaching facilities. It is understood that the 0.64 ha allocation has been based on only 1,331 UGC-funded hostel places, ignoring the 150 hostel places to be swapped with the Tseung Kwan O Join Hostel and an additional 300 privately-funded hostel places already approved by the UGC. Thus, it has been calculated that a minimum of 0.78 ha is required to meet immediate needs.

The "R(B)" zoning of the ex-LWL Site is out-of-character and incompatible with the immediate area and results in a piecemeal and illogical zoning pattern. The development of private residential housing directly adjacent to over 3,500 student hostel spaces is considered an inappropriate use of land and a cause for potential noise and nuisance complaints from future residents due to the land use conflict.

There is need for a comprehensive planning of the ex-LWL Site, which includes both the northern part confirmed to be released to HKBU and the southern part subject of Amendment Item A. There has been pre-mature carving up and rezoning of the ex-LWL Site without considering all the relevant facts, information and interests from stakeholders.

Kowloon City District Council Housing and Infrastructure Committee (KCDCHIC), by a full majority, did not support the Government's proposed rezoning of the ex-LWL Site from "G/IC" to "R(B)" on 7 March 2013. Further, members of the Education Panel Meeting of LegCo passed a non binding motion on the 11 March 2013 to retain the zoning of the Site as "G/IC". Clearly, the public view is not supportive of the proposed rezoning.

Proposed Amendment to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

The proposed remedy to this Objection is to revert the Site at Renfrew Road, covering the southern part of the ex-Lee Wai Lee Campus (the "**ex-LWL Site**") back to "Government, Institution or Community (9) (**G/IC(9)**) use". Should the proposed remedy be agreed to by the TPB, this Objection will be withdrawn.

行政摘要

（內文如有差異，應以英文版本爲準）

引言

政府在 2013 年 2 月 15 日刊憲，將修訂項目 A 項有關把前李惠利校舍南部用地由「政府、機構或社區（9）」地帶改劃爲「住宅（乙類）」納入在九龍塘分區大綱草圖編號 S/K18/17 內。該地塊的最高地積比率爲 4.5 和最高建築物高度 50 米。香港浸會大學（「浸大」）反對把這塊重要的政府、機構或社區用地改劃，因爲浸大、以至整體香港都需要這塊前李惠利校舍用地以作未來發展。

香港專業教育學院（IVE）（李惠利）於 1979 年至 2011 年之間使用該地塊。整幅前李惠利校舍用地(1.52 公頃) 位於聯福道，三面被浸大校園環抱。教育局已表示根據現時教育政策，前李惠利校舍南部用地(0.88 公頃)不需要保留作教育用途，並同意將它釋出作住宅發展。

反對理據

主要規劃反對理據包括須要保留前李惠利校舍南部用地，以提供政府、機構或社區設施，尤其浸大的校園擴展計劃; 再者，本建議改劃與周邊地區並不協調。

按現時教育政策，政府評估各大學教育資助委員會（「教資會」）資助院校的空間需要時，只以三年爲基礎，所以政府未能提供有力證據證明在長遠規劃上，不需要保留前李惠利校舍用地作任何政府、機構或社區用途。政府亦未能證明重建前李惠利校舍作住宅用途，在長遠規劃上不會影響區內「政府、機構或社區」設施。

前李惠利校舍是珍貴和具策略性重要性的「政府、機構或社區」用地儲備，以滿足現時和未來的社會需要。政府曾強調教育和醫療的未來發展需要，並視之爲新的經濟增長點，因此須要預留土地以興建新設施。儘管如此，政府並未充份考慮提供足夠土地，以滿足高等教育未來的土地需要，包括未預見到的需求。

由於現時缺乏可用的土地，浸大的未來發展將受到嚴重限制。事實上，浸大曾向政府提交了多個有關前李惠利校舍用地的中長期建議，包括中醫教學醫院、電影學院、創意中心、國際交流中心。保留前李惠利校舍用地作教育用途，將可對整塊用地進行綜合規劃，使之能發揮最大的規劃效益和協同效應。要一再強調的是，毗連浸大的前李惠利校舍用地對浸大制定的其長遠願景和其存在發展的空間至關重要。

此外，前李惠利校舍北面用地(0.64 公頃)已預留作學生宿舍用途，但這面積不足以容納浸大所需的 1,700 個宿位的學生宿舍和 2,600 平方米短缺的教學設施。據理解，這 0.64 公頃土地只是基於 1,331 個教資會資助宿位計算，並沒有考慮 300 個已獲教資會支持的額外私人資助宿位和 150 個與將軍澳聯合宿舍互換的宿位。經計算，最小 0.78 公頃土地才能滿足浸大即時的土地需要。

將前李惠利校舍用地改劃的「住宅（乙類）」地帶與鄰近社區的特色完全不協調，並造成零碎和不合邏輯的土地用分布。在超過 3,500 個學生宿舍宿位旁興建私人住宅發展，這安排並不盡恰當。此外，這會引起土地用途衝突，可能對未來的居民造成噪音問題和滋擾，引起投訴。

前李惠利校舍需要一個全面的規劃(包括已確定預留給浸大的北面部分和修訂項目 A 涵蓋的南面部分)。在沒有充分考慮有關事實、資料和持份者的訴求下，便把前李惠利校舍用地一分爲二和改劃，做法甚爲倉卒。

在 2013 年 3 月 7 日九龍城區議會房屋及基礎建設委員會會議上，大部分成員表示不支持政府將前李惠利校舍由「政府、機構或社區」用途改劃爲「住宅（乙類）」。此外，立法會教育事務委員會在 2013 年 3 月 7 日的會議上，通過沒有約束力的動議，要求保留前李惠利校舍作「政府、機構或社區」用途，這已清楚顯示了公眾不支持有關擬議改劃。

建議修訂九龍塘分區大綱草圖編號 S/K18/17

本反對陳述建議將位於聯福道前李惠利校舍南部還原爲「政府，機構或社區（9）」用途。如果建議獲城規會同意，浸大將撤回此反對陳述。

Reference : HKBU/LWLTI/MAG/1
Date : 15 April 2013

TO THE TOWN PLANNING BOARD:

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

OBJECTION TO AMENDMENT ITEM A
IN RESPECT OF THE DRAFT KOWLOON TONG
OUTLINE ZONING PLAN NO. S/K18/17

FORMER CAMPUS OF THE HONG KONG INSTITUTE OF VOCATIONAL EDUCATION
(LEE WAI LEE), RENFREW ROAD, KOWLOON TONG
- OBJECTION STATEMENT -

1. INTRODUCTION

1.1 Overview

1.1.1 We are instructed by Hong Kong Baptist University ("**HKBU**" /the "**University**" / the "**Objector**") to lodge this Objection to Item A of the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17 (the "**Draft OZP**") under Section 6(1) of the Town Planning Ordinance (the "**Ordinance**").

1.1.2 The Draft OZP showing the amendments has been exhibited under Section 5 of the Ordinance for public inspection for a period of two months from 15 February 2013 to 15 April 2013.

1.1.3 The Objection is made with regard to:

Amendment Item A ('the Amendment') – 'Rezoning of a Site at Renfrew Road, Covering the Southern Part of the Ex-Lee Wai Lee Campus (the "Objection Site"/"ex-LWL Site"), from "Government, Institution or Community (9)" ("G/IC(9)") to "Residential (Group B)" ("R(B)").

The nature and reasons for the Objection are detailed in this document (the Objection Statement) and summarised below.

1.1.4 The Objection Statement will clearly demonstrate that:

a) The Government has failed to demonstrate that the ex-LWL Site is no longer required to be reserved for any G/IC uses.

b) The Government has failed to demonstrate that its redevelopment for residential use at the ex-LWL Site would not adversely affect the provision of G/IC facilities in the district on a long-term basis.

c) The ex-LWL Site is a valuable and strategic G/IC reserve for future provision of G/IC facilities to meet the present and future needs of the community. The future needs of the education and health sectors have been highlighted as the growth areas for which land will be required to accommodate new facilities.

d) The loss of the ex-LWL Site would adversely affect the provision of G/IC facilities in the district on a long-term basis. HKBU's future growth would be severely thwarted due to the lack of available land. The University has identified a number of medium and longer term proposals for the ex-LWL Site to Government, including a Chinese Medicine Teaching Hospital ("**CMTH**"); a Complex of Creativity and an International Exchange Centre. The adjacent ex-LWL Site is fundamental and essential for HKBU to achieve its long term vision as a university.

e) The "R(B)" zoning of the ex-LWL site is out-of-character with the immediate area and results in a piecemeal and illogical zoning pattern. The development of private residential housing directly adjacent to over 3,500 student hostel spaces is considered an inappropriate use of land and a cause for potential noise and nuisance complaints from future residents due to the land use conflict.

f) There is need for a comprehensive planning of the ex-LWL Site, which includes both the northern part intended to be released to HKBU and the southern part subject of Amendment Item A. There has been pre-mature carving up and rezoning of the ex-LWL Site without considering all the relevant facts, information and interests from stakeholders.

1.1.5 Notwithstanding the overriding planning objection set out above, the Objector also objects to the Government's lack of prior and ongoing stakeholder consultation on Amendment Item A, which is clearly a matter of public interest. Whilst it is understood that Amendment Item A was gazetted under Section 5 of the Ordinance "*so that the public and the stakeholders could submit representations for the Board's consideration under the provisions of the Ordinance*" (***Para. 74 and Para. 82*** *of 482nd MPC Minutes refers*), there are numerous issues at stake that require continuous and in-depth dialogue with Government Departments. Indeed, the TPB cannot properly decide the case according to its own Guidelines without being with full and balanced facts.

1.1.6 Kowloon City District Council Housing and Infrastructure Committee ("**KCDCHIC**"), by a full majority, did not support the Government's proposed rezoning of the ex-LWL Site from "G/IC" to "R(B)" on 7 March 2013. Further, members of the Education Panel Meeting of LegCo passed a non binding motion on the 11 March 2013 to retain the zoning of the Site as "G/IC". Clearly, the public view is not supportive of the proposed rezoning.

1.2 Proposed Remedy

1.2.1 The proposed remedy to this Objection is to revert the Site at Renfrew Road, covering the southern part (**0.88 hectares (ha)**) of the ex-Lee Wai Lee Campus (the "**ex-LWL Site")** back to "Government, Institution or Community (9) (**G/IC(9)**) use". Should the proposed remedy be agreed to by the TPB, this Objection will be withdrawn.

1.3 Structure of Objection Statement

1.3.1 Following this introductory Section of the Objection Statement, Section 2 outlines the relevant strategic planning issues for Hong Kong and the importance of reserving sites for future educational use, Section 3 sets out the statutory and non-statutory planning context and planning history in relation to the ex-LWL Site, Section 4 provides details of the site appraisal, Section 5 outlines HKBU's alternative proposals for the ex-LWL Site, Section 6 provides an overview of the Government's arguments to rezone the ex-LWL Site from "G/IC(9)" to "R(B)" and sets out the key planning arguments for the retention of the "G/IC(9)" zone for the ex-LWL Site, Section 7 sets out the key planning arguments why the ex-LWL Site should not be zoned for Residential (Group B) ("**R(B)**") use, and Section 8 provides the conclusion and recommendations.

2. STRATEGIC PLANNING ISSUES FOR HONG KONG

2.1 Strategic Planning Considerations for the Future

Overview

2.1.1 Hong Kong has undergone dramatic growth during the last three decades and is now considered as Asia's 'World City'. Major opportunities and changes lie ahead with the continued development and integration with the Mainland, the need to remain economically competitive and projected demographic change. Scarce land resources will make the prioritising of competing land-use demands even more complex in the future. The shortage of housing land is currently high on the Government's agenda of priority issues as is the need to promote economic development. However, strategic long-term planning is required to balance competing needs now and in the future. Remaining competitive in a globalised economy requires the commitment of Government and the necessary investment in higher education. Human capital is Hong Kong's most important asset and the education sector can make a valuable contribution through research, stimulating creativity, and maintaining a well educated work force. In 2009 the HKSAR Government identified the education sector as one of the six strategic industries (*2009/2010 Policy Address, 'Breaking New Ground Together'*). The Government continues to actively promote these industries and provide support for establishing Hong Kong as a 'regional educational hub'. (***Para 102 and Para 136** of 2012/213 Budget Speech refers)*

2.1.2 The following sections outline the key strategic policy documents and the important messages they convey for the future spatial development of Hong Kong and which are relevant to the zoning of the ex-LWL Site in Kowloon Tong.

2.2 Chief Executive's 2013 Policy Address

2.2.1 The annual 'Policy Address' identifies the major priorities and objectives of Hong Kong's Chief Executive ("**CE**") and Government in the coming year. The 2013 Policy Address *'Seek Change, Maintain Stability, Serve the People with Pragmatism'* highlights in an opening paragraph the need for long-term planning when making land use decisions. The CE specifically highlights:

> *"With the wisdom and the will to make the right choices and decisions, and **comprehensive and long-term planning for land use**, we can provide a better living and working environment for the people of Hong Kong." (**Para 4** refers)*

2.2.2 The CE highlights economic development, housing, poverty and people's livelihood as the community's most pressing needs. Promoting economic development is identified as the primary goal of the Government. A top priority is "tackling the housing problem" (***Para 56*** refers) and "... assisting grassroots families in moving into public housing and the middle-income families in buying their own homes" (***Para 57** refers*). With regards to economic development the Government is to be *"appropriately proactive"* to deepen and expand industries and promote industries where Hong Kong enjoys clear advantages, such as innovation and technology (***Para 43** refers*).

Economic Development

2.2.3 Economic development is the driver of growth and prosperity. The Government identified six key industries (originally identified in the 2009/2010 Policy Address), where Hong Kong enjoys clear advantages - **cultural and creative industries**, medical services, **education services**, **innovation and technology**, environmental industries, and testing and certification services. These are the key areas for further advancement.

2.2.4 The Policy Address specifically recognises the important role of universities as a major cradle of innovation and technological development. The Government is committed to work with them to promote their research and development results.

2.2.5 The Government has specifically highlighted the role of cultural and creative industries in Hong Kong and has offered its support to the sector.

> *"I will explore suitable mechanisms to give full support to Hong Kong's cultural and arts activities and promote the development of cultural and creative industries. (**Para 180** refers)*

Land Supply

2.2.6 The Government is pursuing a "multi-pronged" Land Supply Strategy with the aim of increasing the land supply over the short, medium and long–term. It aims to build up an abundant "land reserve" to meet future demand in a timely manner. The CE and the Government state that there will be difficult choices to make but have pledged to work in a pragmatic and proactive manner to deal with problems, engage with the public and rise up to challenges.

2.2.7 The identification and development of 36 G/IC sites (measuring 27 ha in total) for housing development is one of the Government's key short to medium term measures to increase the housing land supply. The CE highlights in the Policy Address that these sites would deliver an estimated 11,900 residential units. He has also acknowledged that the support of the community is required and that District Councils will continue to be consulted. Furthermore, he highlights that the Planning Department ("**PlanD**") will continue to review G/IC zones and other Government sites to identify more suitable land for rezoning. (***Page 23, Para 73 (i)*** refers).

2.2.8 Unfortunately the Government has not consulted formally with the District Councils on the list of 36 G/IC Sites, therefore it is extremely difficult for District Councils to assist the Government in identifying suitable sites.

2.2.9 The Government's policy of putting forward G/IC sites for rezoning has been questioned by several commentators, including Peter Cookson Smith, President of the Institute of Planners and member of the new Commission on Strategic Development who highlights, "*Building a land bank is right...but we shouldn't fill every spare site with high-rises*" (SCMP, 6 March, 'Veteran Planner Can't See Point of New Border Town', Para 9 refers).

2.2.10 As part of the 'multi-pronged' strategy, PlanD has also identified 13 sites in the Green Belt capable of being rezoned for residential use (provision of some 23,000 units – land to be rezoned between 2017 and 2020). A further review of industrial land, with a view to increasing housing land is due to be commenced. (***Page 23 and 24, Para 73 (ii) and (iii)*** *refers*).

2.2.11 The CE states that he has asked the policy Bureaux to "*act decisively to optimise the use of land and, where the original intended use is not required anymore, to convert the land for housing development or other uses that meet the more pressing needs in the community as soon as possible*".(**Page 25, Para (v)** refers).

2.2.12 In the longer term, the need to increase the land supply is being investigated through a series of projects including: the North East New Territories New Development Areas; Hung Shui Kiu New Development Area; Developing the New Territories North, Review of Deserted Agricultural Land in North District and Yuen Long; Development of Lantau Island; Reclamation on an Appropriate Scale Outside Victoria Harbour and Rock Cavern and Underground Space Development. The Financial Secretary in his 2013/2014 Budget Speech highlighted the allocation of $4.5 billion over the next five years for studies and design work and the roll out of the land development projects e.g. relating to reclamation outside Victoria Harbour on an appropriate scale, opening up of new development areas and the development of caverns.

2.2.13 A new committee, the 'Steering Committee on Land Supply' comprising the heads of relevant Bureaux and Departments, will coordinate the overall plans for development and supply of land in Hong Kong. The new Committee will report to CE on a regular basis. (2013 Policy Address, '*Policy Initiatives of Development Bureau*').

2.2.14 It was announced in February 2013 that the ex-LWL Site has been included in the Government's 2013/2014 Land Sale Programme before the expiry of the 2 month period for the public to submit representations to the Proposed Amendment. This is considered presumptuous.

Post Secondary Education

2.2.15 The Government is actively promoting Hong Kong's aspiration of becoming a recognised regional education hub.

2.2.16 The 2013 Policy Address highlights that significant investment has been made in the education sector with significant success in educational attainment and international rankings. The Government expects that by 2015 over one-third of the relevant age cohort will have the opportunity to pursue degree-level education. Taking sub-degree places into account, nearly 70% of young people will have access to post-secondary education.

2.2.17 Attracting international students is also a key element of achieving regional hub status. The 2012/2013 Budget Speech highlighted that there were 18,000 non-local students in 2010/2011 academic year from more than 70 countries or regions in the post-secondary sector in Hong Kong. The number of non-local students had grown to 20,900 non-local in the 2011/2012 academic year, and has more than doubled since 2008/2009.[1]

Healthcare

2.2.18 The Policy Address highlights the rapidly aging population and the corresponding increased demand for healthcare services. The Government will introduce necessary measures to support development of healthcare services including the disposal of land for private hospitals (***Para 168** refers).*

2.2.19 The proportion of the population aged 65 and over is expected to rise markedly, from 13% in 2011 to 30% in 2041. The pace of population ageing is projected to accelerate in the coming 20 years with proportions reaching 19% in 2021 and then further to 26% in 2031 (*'Hong Kong Population Projections 2012-2041'*)[2]. The growing elderly population will require additional healthcare, medical, residential and social and welfare facilities to meet their needs.

2.2.20 The Government is to set up the Chinese Medicine Development Committee to further the development of the Chinese medicine industry.

> *"Key study areas include enhancing the professional standards and status of Chinese medicine practitioners; strengthening research and development of Chinese medicine; promoting treatment with integrated Chinese and Western medicine; expanding the role of Chinese medicine practitioners and Chinese medicine in the public healthcare system; and introducing Chinese medicine in-patient services."* (***Para 169** refers*).

2.2.21 The Chinese Medicine Development Committee held its first meeting on 4 March 2013. The LC Paper No.CB (2)758/12-13(03) *'Development of Chinese Medicine in Hong Kong'*, March 2013, provides an update on activities and actions. The Committee agreed to explore ways to allow Chinese medicine students/graduates to have more opportunities for internship and clinical practice (Para 7 refers) and to study the establishment of Chinese medicine hospitals and measures to facilitate development of Chinese medicine in-patient services (Para 10 refers).

---

1 *Key Statistics on Post-secondary Education' for 2011/12 academic year (updated 3/1/2013)*

2 *http://www.censtatd.gov.hk/press_release/pressReleaseDetail.jsp?charsetID=1&pressRID=2990*

2.3 Hong Kong 2030: Planning Vision and Strategy (HK2030 Study), 2007

2.3.1 Hong Kong's Territorial Development Strategy '*Hong Kong 2030: Planning Vision and Strategy*' (***'HK 2030 Study'***) was published in 2007. It is "a long-term planning strategy to guide future development and provision of strategic infrastructure and to help implement government policy targets in a spatial form". The overarching goal of 'sustainable development' has been adopted.

2.3.2 The HK2030 Study highlights that the long term vision for Hong Kong is to strengthen its position as 'Asia's world city'. It sets out three broad interlocking planning directions and associated themes to be pursued:

- *Quality living environment* It specifically identifies the need to create a sense of place; the smart use of space and the built fabric (thereby not compromising the ability of future generations to meet their needs); improving the environmental quality and ensuring adequate and timely provision of housing land and supporting infrastructure;
- *Enhancing economic competitiveness; and*
- *Strengthening links with the Mainland.*

2.3.3 Of particular relevance is the Study's clear message to society to make sustainable development choices to ensure that future generations have the resources they require. Ensuring that there are sufficient land reserves to meet the changing needs of different economic sectors in the future is specifically highlighted (**Para 6.3.3**).

2.4 Sustainable Development for the 21st Century: Kowloon Density Study Review, 2003

2.4.1 The Kowloon Density Study Review (2003) was undertaken alongside the 'Review of Metroplan' to formulate an up-to-date development strategy for the Metro Area for the period up to 2016 and beyond. The report specifically highlights the issues to be considered when rezoning "under utilised Government sites", which remain entirely relevant today.

> *"Government is continually seeking opportunities to make more profitable use of its land holdings and many "under-utilised" government sites have been proposed for residential use in recent years to meet housing targets. Care needs to be taken, however, to ensure that sites which might be used to reduce shortfalls in essential community facilities are not lost in this way, as opportunities to insert new facilities in the existing dense urban fabric are extremely limited." (**Section 19.4.17**)*

2.5 The Important Role of Universities

2.5.1 As highlighted in the 2013 Policy Address, universities have an important role in driving and diversifying the economy by creating a well educated work force, creating and diversifying 'Cultural and Creative Industries', and research and development.

2.5.2 The Government has set out eight education policy objectives for Hong Kong[3]. The most relevant issues for this report have are summarised below:

- Support the progressive increase in post-secondary education opportunities;
- Further develop Hong Kong as a regional educational hub; and
- Support the development of the self-financing post-secondary sector and promote the diversification of post-secondary education through various support schemes such as the Land Grant Scheme.

[3] *Policy objectives are identified on the EDB website: http://www.edb.gov.hk/en/edu-system/postsecondary/policy-objectives/index.html*

2.5.3 In 2012, universities in Hong Kong moved from a three year to a four year undergraduate curriculum under the Education Bureau's 3-3-4 reforms. This has resulted in significant investment and the provision of additional facilities.

2.5.4 According to the '*Key Statistics on Post-secondary Education*' for 2011/12 academic year (updated 3/1/2013) there are 26 post-secondary educational institutions in Hong Kong of which 15 are degree awarding institutions. There are eight University Grants Committee ("**UGC**") funded institutions, including HKBU. There are 87,000 students enrolled in undergraduate courses and 46,900 students enrolled in postgraduate studies of which 20,900 were non-local students. These numbers are likely to increase, given the growing number of local children/adults in the 15-24 age cohort accessing tertiary education in Hong Kong combined with the policy support for increasing the number of international students to Hong Kong. The number of international students (majority from the Mainland) has more than doubled since 2008/2009.

2.5.5 The global demand for international education is expected to grow to somewhere between 3.7 to 7.2 million by 2025 (Banks et al, 2007; Chow and Marcus, 2008; OECD, 2006). It is predicted that Asia will account for 70% of the demand for international education in 2025.

2.5.6 The UGC Report '*Aspirations for the Higher Education System in Hong Kong, 2010*' identifies strategies for the future development of the education sector. Some of the key messages outlined in the report are:

- "*Hong Kong's higher education sector must look internationally in order to remain competitive*" (***Page 50, Para 4.3*** *refers*);
- "*We reiterate the prediction that in fifteen years time Asia will constitute about 70% of the global demand for higher education.*" (***Page 50, Para 4.20*** *refers*);
- "*UGC-funded institutions should increase their efforts to provide support resources and opportunities for non-local students to integrate them better with the local student body.*" (Recommendation 9) and
- "*The Government, working with the institutions, should increase hostel accommodation for local and non-local students as a matter of urgency.*" (Recommendation 13).

2.5.7 It is therefore critically important for the Government to ensure that the evolution and development of tertiary institutions is encouraged and supported. The scarce availability of land in Hong Kong means that key strategic sites near existing institutions should be protected and reserved to ensure future opportunities are not lost. Sites for education are identified and reserved under the G/IC zone.

2.6 Summary

2.6.1 This section highlights the important strategic issues facing Hong Kong and the Government's key priorities, which include promoting economic development and "tackling the housing issue". Given the scarce resource of land it is imperative that land use planning decisions made now are based on sound sustainable development principles to ensure that future generations have the resources they require.

2.6.2 The education sector has a strategic role to play – it is one of the six strategic industries identified by the Government. Hong Kong is growing in importance as a regional education hub and it has enormous potential to attract more international students, given the projected growth in the Asian market. A key UGC report highlights the need for Hong Kong's higher education sector to look internationally in order to remain competitive. It is therefore critically important to ensure that there are adequate long term land reserves in appropriate locations to accommodate the future growth of this dynamic sector.

2.6.3 The Government is to introduce necessary measures to support development of healthcare services including the disposal of land for private hospitals and has set up a Chinese Medicine Development Committee which will consider the opportunities to develop Chinese Medicine Hospital(s) in Hong Kong and explore ways to allow Chinese medicine students/graduates to have more opportunities for internship and clinical practice.

2.6.4 The Government's 'multi-pronged' Land Supply Strategy has identified 36 G/IC sites to be rezoned for residential as one of the short/medium term measures to address the housing land supply shortage. One of those sites is the ex-LWL Site on Renfrew Road located next to HKBU's Main Campus, the subject of this Objection.

3. STATUTORY PLANNING CONTEXT

3.1 Statutory Planning Context

3.1.1 The ex-LWL Site is covered by the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17 (the "**Draft OZP**") exhibited on the 15 February 2013. Under Amendment Item A of the Draft OZP, the Site is zoned from "**G/IC (9)**" to "**R(B)**" with a maximum Plot Ratio ("**PR**") of 4.5 and Building Height ("**BH**") of 50m (**Figures 1-3** refers).

3.2 Reasons for Rezoning

3.2.1 According to the MPC Paper No. 14/12 and 2/13, the reasons of the proposed rezoning are as follows (**Appendices A** and **B** refers):

a. The Site is not required for higher education use

- *"Education Bureau advised that apart from the Communication and Visual Arts Building completed earlier..., HKBU has also been given approval to use...campus land for a campus development project to redevelop and construct new academic buildings to meet the needs arising from the implementation of new academic structure."* (***Para.4.2 of MPC Paper No. 2/13*** refers);
- *"Furthermore, the Administration has implemented various measures, including the provision of additional facilities to the university, to meet its requirements for academic space."* (***Para.4.2 of MPC Paper No. 2/13*** refers);
- *"EDB has decided to reserve the northern portion of the ex-Lee Wai Lee site for higher education and ancillary use...EDB is of the view that if HKBU can make the best use of the northern portion of the site, it will be able to meet all its outstanding requirements for academic facilities and publicly-funded student hostels under prevailing policies."* (***Para. 4.3 of MPC Paper No. 2/13*** refers);

b. Location of the Chinese Medicine Teaching Hospital

- *"FHB advised that it is not a must to locate the teaching hospital within or close to the university campus" (**Para.5.2 of MPC Paper No. 2/13** refers); and*

c. Provide residential land for meeting housing needs

- *"Having examined the development potential of the returned site, it is considered that the site is suitable for residential development and zoned as "R(B)" to help meet the acute housing demand." (**Para. 4.2 of MPC Paper No. 14/12** refers).*

3.3 Planning History

3.3.1 There is no history of Planning Applications or Objections on the Site.

3.3.2 The following table provides an overview of the key meetings and papers concerning the proposed rezoning of the ex-LWL Site since December 2012. Key extracts of the MPC Papers and Minutes are provided at **Appendix A**.

	Date	Meeting	Relevant Documents
1.	21 December 2012	480th MPC Meeting	MPC Paper No. 14/12 Minutes of 480th Meeting of MPC [Relevant Extracts are provided in **Appendix A**]
2.	25 January 2013	482nd MPC Meeting	MPC Paper No. 2/13 Minutes of 482nd Meeting of MPC [Relevant Extracts are provided in **Appendix B**]
3.	7 March 2013	Housing and Infrastructure Committee Meeting, Kowloon City District Council	Summary/Transcript of Meeting **[Appendix H]**
4.	11 March 2013	Legislative Council Panel on Education	Issue relating to the existing policy on the use of land for education purposes (LC Paper No. CB(4)460/12-13(01)) Summary/Transcript of Meeting **[Appendix I]**

3.3.3 At the 480th MPC Meeting, Members agreed that there was **insufficient information to address Members' concerns** on the rezoning of the ex-LWL Site (Amendment Item A) and that the issue should be deferred and EDB be invited to provide more information on its policy in assessing the expansion needs of HKBU and the justification for releasing the site for other uses.

3.3.4 At the 482nd MPC Meeting, the following was noted in the Minutes:

- After a long deliberation the Chairman put forward two options in relation to proposed Amendment Item A of the Kowloon Tong OZP (extracted from Page 35, Para 74);
  1. *"The Committee could defer making a decision on the rezoning proposal on the subject site but retain its "GIC" zoning so that HKBU or other institutions could continue their liaison with the Government on the use of the site in future, or*
  2. *The subject site could be rezoned to "R(B)" and published under Section 5 of the Ordinance to that the public and the stakeholders could submit representations for the Board's consideration under the provisions of the Ordinance";*
- The MPC Minutes record that ***many Members were not convinced that the ex-LWL Site was not necessary for the GIC uses in future***, particularly in relation to HKBU's proposals, but also in relation to the needs of other institutions. (Paras 75 – 78 refer);
- The Minutes record the receipt of an email from a local group 亞洲中港民生關注組 requesting that the proposed amendment be referred to the full Board and the Development Bureau for consideration. (Page 36, Para 79 refers);
- "*A Member was concerned that the decision of the Committee to gazette the proposed amendment would give the public an impression that a final decision had been made.*" (Page 37, Para 81);
- The Committee decided to gazette the proposed amendment "for public inspection", thereby allowing the views of the members of the public including stakeholders to be heard by the TPB, as provided under the Ordinance." (Page 37, Para 82); and
- The Committee thereby agreed to the proposed amendments to the approved Kowloon Tong OZP, effectively to allow wider public comment on the issue to be heard by the TPB.

3.3.5 HKBU believes that the decision to gazette Amendment Item A was premature given that a number of MPC Members had already expressed in the 25th January 2013 meeting that the Government's arguments were unconvincing. HKBU's concern is that without a full discussion on the options of deferment or refusal of Amendment Item A in the MPC, the direct decision to gazette Amendment Item A has seriously undermined the interests of stakeholders, in particular those of HKBU.

3.4 Non-Statutory Planning Context

Town Planning Board Guidelines

3.4.1 According to the Town Planning Board Guidelines for Application for Development/ Redevelopment within "Government, Institution or Community" Zone for Uses Other than Government, Institution or Community Uses under Section 16 of the Town Planning Ordinance **("TPB PG-No.16"), "the Board might consider rezoning the site to an appropriate zoning if the proponent could demonstrate that all the planning criteria have been met"** (Para. 1.6 **of the TPB PG-No.16 refers). The relevant planning criteria are as follows:**

*2.1 (b) in the case of an undesignated "G/IC" site, the application site is **no longer required to be reserved for any G/IC uses**;*

*2.1 (c) the proposed development/ redevelopment would not adversely affect the provision of G/IC facilities in the district **on a long-term basis**.* [emphasis added]

2.3 The proposed development should be compatible in land-use terms with the G/IC uses on the site, if any, and with the surrounding areas.

2.4 The scale and intensity of the proposed development should be in keeping with that of the adjacent area.

2.5 The scale and design of the proposed development should have regard to the character and massing of the building in the surrounding areas and should not cause significant adverse visual impact on the townscape of the area.

2.8 The proposed development should not cause, directly or indirectly, the surrounding areas to be susceptible to adverse environmental impacts and should not be susceptible to adverse environmental impacts from pollution sources nearby.

Hong Kong Planning Standards and Guidelines (HKPSG), September 2011

3.4.2 Land in urban areas is very scarce and land zoned for G/IC uses is therefore very precious to ensure that the future needs of society are adequately provided for. The Hong Kong Planning Standards and Guidelines (HKPSG) provides general guidelines for ensuring that adequate land is reserved to facilitate social and economic development and provide appropriate public facilities to meet the present and future needs of the community. The list of community facilities highlighted in HKPSG contains amongst others, education, medical and health, arts venues, community halls and social welfare facilities. HKPSG provides a population based formula for the adequate provision of these services. For local services this is calculated at the OZP level, with more strategic facilities assessed on a wider District basis. **The HKPSG does not provide standards or guidelines for universities as these facilities and their locational requirements are subject to separate investigations.**

3.4.3 Some G/IC sites are identified for specific uses, whereas others (including the ex-LWL Site) are zoned G/IC to *"cater for unforeseen future demands and for which no specific G/IC uses have been designated for the time being"*. (TPB PG-No.16, Section 1.1 refers)[4]

3.5 Key Planning Issues

3.5.1 The following planning issues should be considered when determining whether a G/IC Site should be rezoned to other uses:

- Whether there is no long-term need for G/IC uses on the Site;
- Whether rezoning a G/IC site will affect future provision of G/IC facilities in the District;
- Whether the proposed residential zoning for the Site is compatible with its surrounding area in terms of land use, scale and development intensity; and
- Whether the proposed zoning will cause environmental impact to the surrounding area and whether it will be susceptible to adverse environmental impacts from pollution sources nearby.

3.5.2 In the following Sections, the above issues will be discussed in detail to demonstrate why the ex-LWL Site should be retained for G/IC uses and why residential use is not appropriate in this area.

[4] *Town Planning Board Guidelines (TPB PG-No. 16) for Application for Development/ Redevelopment Within "Government, Institution or Community" Zone for Uses Other than Government, Institution or Community Uses Under Section 16 of the Town Planning Ordinance. January 1999, section 1.1.*

SCHEDULE OF AMENDMENTS TO
APPROVED KOWLOON TONG OUTLINE ZONING PLAN NO. S/K18/16
MADE BY THE TOWN PLANNING BOARD
UNDER THE TOWN PLANNING ORDINANCE (Chapter 131)

I. Amendments to Matters shown on the Plan

Item A – Rezoning of a site at Renfrew Road, covering the southern part of the ex-Lee Wai Lee Campus, from "Government, Institution or Community (9)" to "Residential (Group B)".

Item B – Rezoning of a site at the junction of Dumbarton Road and Inverness Road, covering the western part of the Bethel Bible Seminary, from "Government, Institution or Community (3)" to "Residential (Group C)9".

Item C – Rezoning of a site at the junction of Dumbarton Road and Grampian Road, covering the eastern part of the Bethel Bible Seminary, from "Government, Institution or Community (3)" to "Government, Institution or Community (12)".

II. Amendments to the Notes of the Plan

(a) Incorporation of a new set of Notes for the "Residential (Group B)" zone.

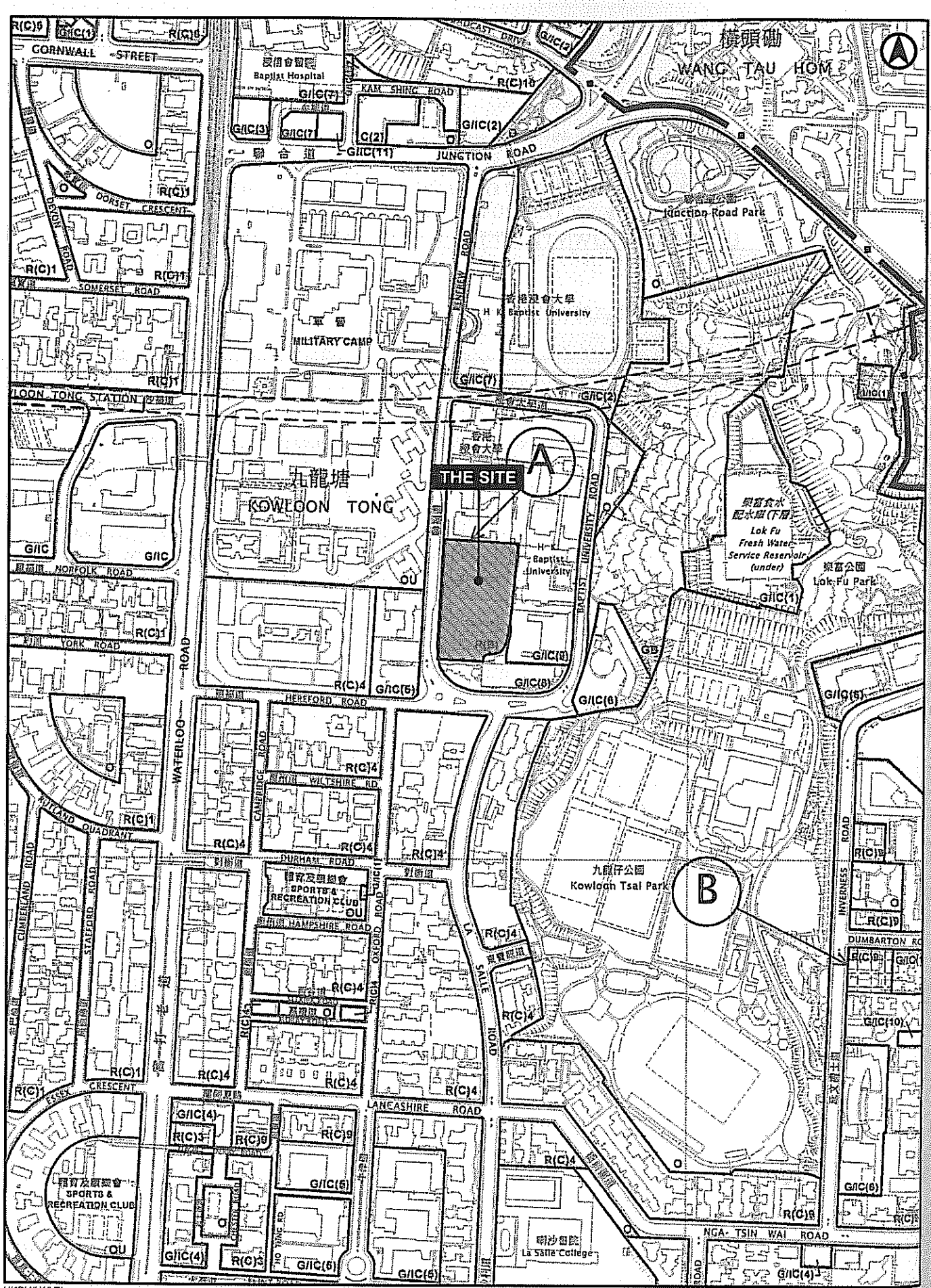
(b) Incorporation of a new set of Notes for the "Government, Institution or Community (12)" zone setting out the planning intention for the in-situ preservation of the historic building within the zone.

Town Planning Board

15 February 2013

HKBU/LWLTI

FIGURE 1 SCHEDULE OF AMENDMENTS TO THE DRAFT KOWLOON TONG OZP NO. S/K18/17



HKBU/LWLTI

FIGURE 2 EXTRACT OF THE DRAFT KOWLOON TONG OZP NO. S/K18/17

SCALE 1 : 5,000

RESIDENTIAL (GROUP B)

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
Flat House Residential Institution Utility Installation for Private Project	Eating Place Educational Institution Government Use Hotel Institutional Use Library Office Place of Entertainment Place of Recreation, Sports or Culture Public Utility Installation Public Vehicle Park (excluding container vehicle) Recyclable Collection Centre Religious Institution School Shop and Services Social Welfare Facility Training Centre

Planning Intention

This zone is intended primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board.

(Please see next page)

HKBU/LWLTI

FIGURE 3 EXTRACT OF THE DRAFT KOWLOON TONG OZP NOTES

RESIDENTIAL (GROUP B) (Cont'd)

Remarks

(1) No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 4.5 and building height of 50m, to be measured from the mean level of Renfrew Road.

(2) In determining the relevant maximum plot ratio for the purposes of paragraph (1) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded.

(3) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio/building height restriction stated in paragraph (1) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

FIGURE 3 (CONT'D) EXTRACT OF THE DRAFT KOWLOON TONG OZP NOTES

4. EX-LWL SITE APPRAISAL

4.1 Site Location

4.1.1 The entire ex-LWL Campus (1.52 ha) is located at Renfrew Road and bounded by HKBU's campus to its north, east and south. There is also a fire station adjacent to the east of the ex-LWL Site (**Figures 4** and **5** refer). The northern part of the ex-Lee Wai Lee Campus (i.e. 0.64 ha) is intended by the Education Bureau to be committed for use by HKBU for proposed campus expansion plans up to 2015.

4.2 Land Status

4.2.1 The southern part of the ex-LWL Campus (i.e. the ex-LWL Site) is a piece of Government land and has an area of about 0.88 ha.

4.3 Existing and Surrounding Uses

Existing Uses (**Figure 4** and **5** refers)

4.3.1 The entire ex-LWL Campus is currently occupied by buildings of the ex-Lee Wai Lee Campus of the Hong Kong Institute of Vocational Education (IVE). The buildings date from 1979. The LWL IVE was relocated to Tseung Kwan O in 2011. The ex-LWL campus is currently being used by HKBU and the Hong Kong Polytechnic University on a temporary basis until the end of 2013 to meet contingency needs during the initial stage of implementation of the new academic structure.

4.3.2 The ex-LWL Campus has therefore been in constant educational use since 1979.

Surrounding Uses (**Figure 4** and **5** refers)

4.3.3 The southern part of the ex-LWL Campus is surrounded by a number of G/IC facilities. These facilities include a G/IC site planned for HKBU student hostel and academic facilities to its north (northern part of the former ex-Lee Wai Lee Campus), an existing HKBU Student Residence Halls and a fire station to its east, as well as the HKBU Communication and Visual Arts Building to its south. The area to the further north and east of the ex-LWL Site within the same street block is part of the HKBU campus, including the Jockey Club School of Chinese Medicine Building.

4.3.4 Located to the west across Renfrew Road include the Asia Women's League Chan Kwan Tung Care & Attention Home for the Elderly, Mary Rose School and Kowloon East Barracks.

4.3.5 Apart from G/IC uses, low-density low-rise residential developments can be found to the south and west of the ex-LWL Site. These residential developments range from two to four storeys.

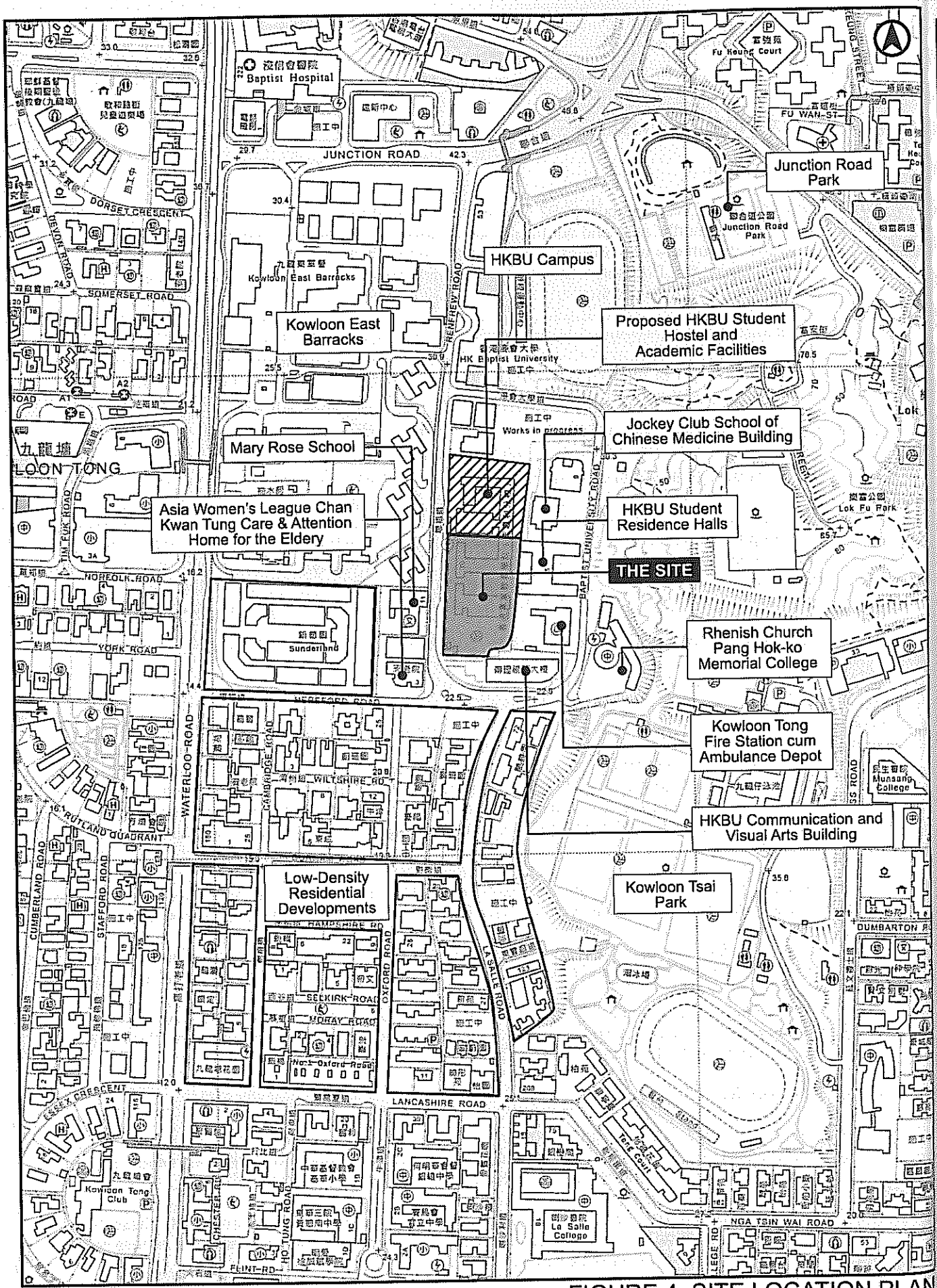
4.3.6 The area to the eastern side of Baptist University Road is mainly open space and green belt. The key open spaces include Kowloon Tsai Park and Junction Road Park. Rhenish Church Pang Hok-ko Memorial College can also be found.

4.4 Accessibility

4.4.1 The ex-LWL Site is located about 400m from the MTR Kowloon Tong Station and 500m from Lok Fu Station. The ex-LWL Site is well-served by franchised buses and minibuses, which connect the ex-LWL Site with other places within Kowloon and Hong Kong Island.

4.4.2 The ex-LWL Site is located about 400m from the Junction Road and Renfrew Road. These roads provide direct access to the strategic road network and other Districts. Vehicular access to the ex-LWL Site currently is available at Renfrew Road.

I TONG
NOTES
Page 16



HKBU/LWLTI

FIGURE 4 SITE LOCATION PLAN

SCALE 1 : 5,000

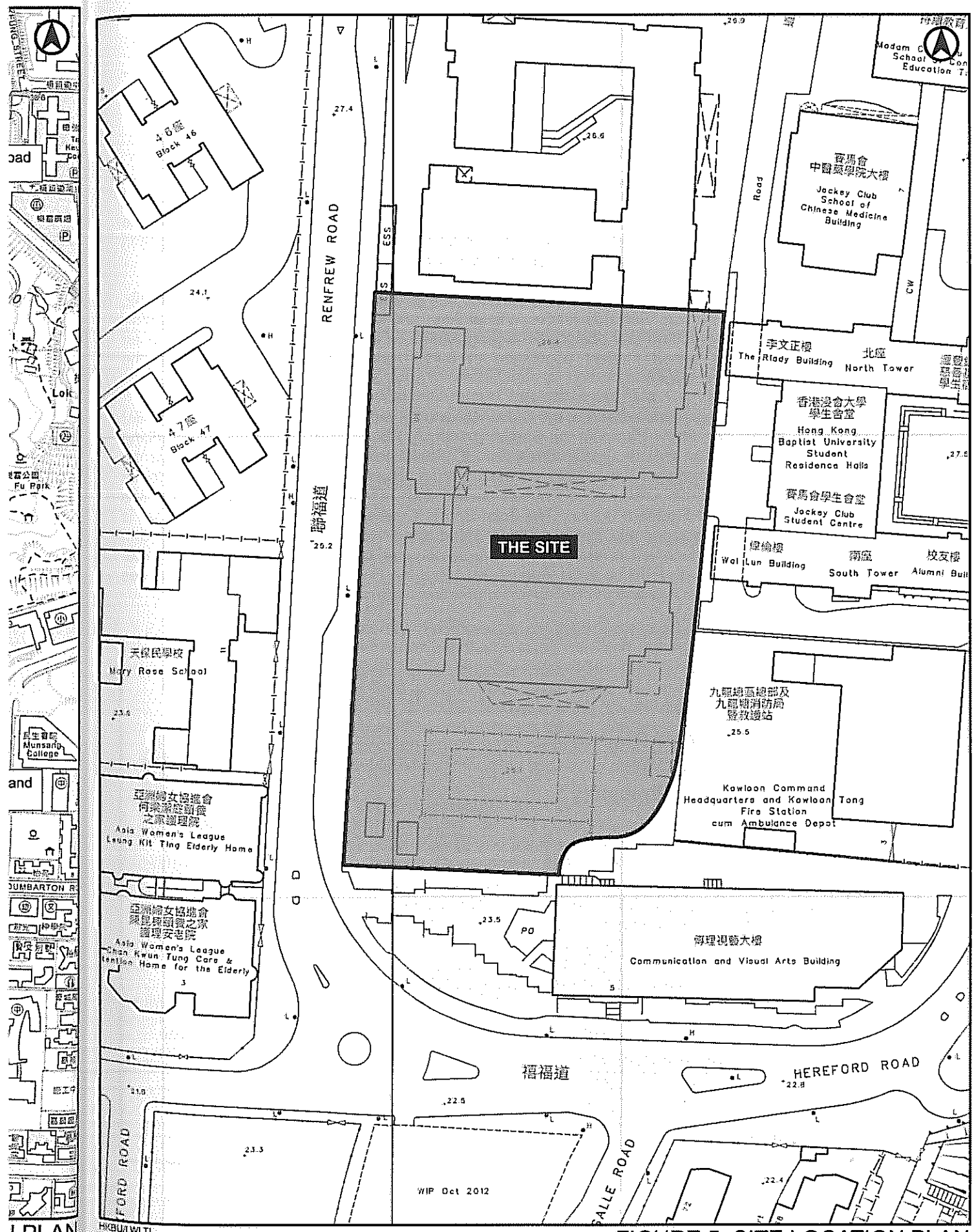


FIGURE 5 SITE LOCATION PLAN
SCALE 1 : 1,000

5. HKBU'S EXPANSION AND PROPOSALS FOR THE EX-LWL SITE

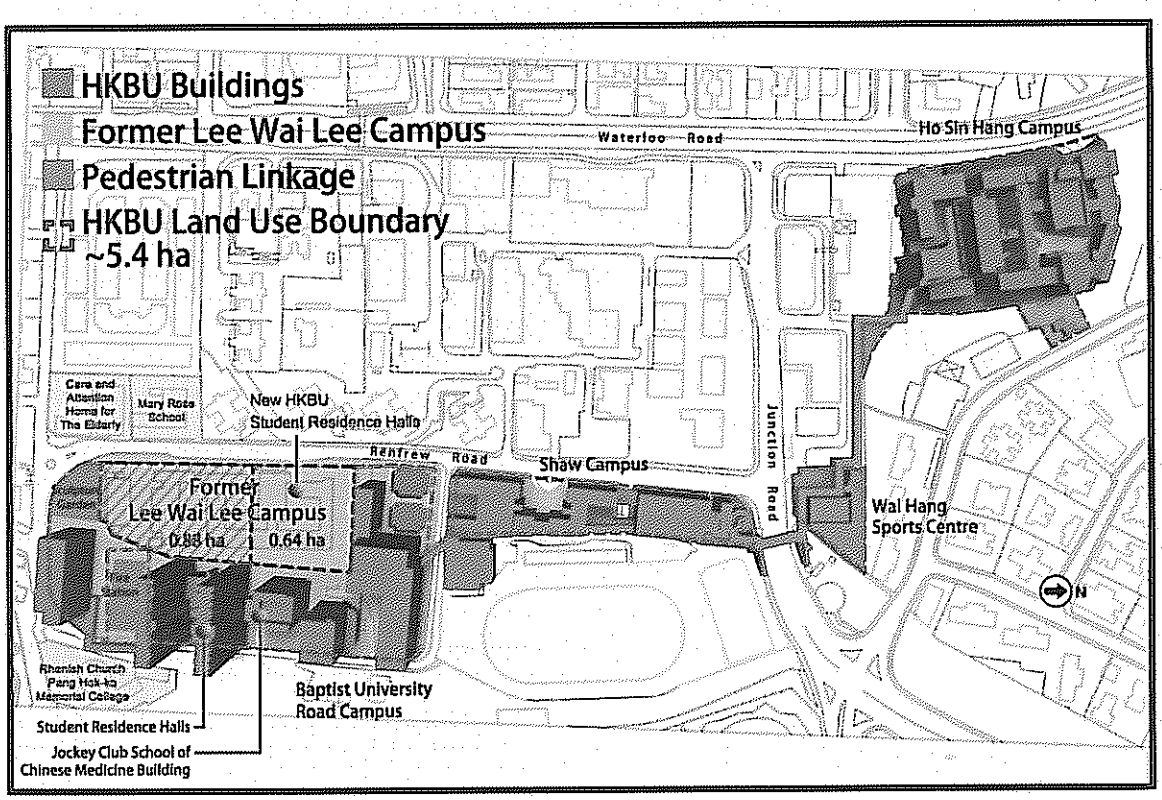
5.1 University Overview

5.1.1 Founded in 1956, the now HKBU has been a fully-funded public tertiary institution since 1983. It achieved University status in 1994. The University is renowned for its School of Chinese Medicine and School of Communication. It has a key role in Hong Kong's tertiary education sector with an emphasis on academic excellence and Whole Person Education.

5.1.2 The University has eight Faculties/Schools/Academy - Arts, Business, Chinese Medicine, Communication, Science, Social Sciences, Visual Arts, and Continuing Education, which offer sub-degree, undergraduate and postgraduate programmes in various disciplines. There was an enrolled university based student population of 8,413 (undergraduate and above) in the 2011/2012 academic year[5].

5.1.3 Kowloon Tong represents the heart of the University and is the location of three of the five HKBU campus areas - the Shaw Campus, the Baptist University Road Campus and the Ho Sin Hang Campus – covering an area of approximately 5.4 ha. Residential facilities on campus include the Dr. Ng Tor Tai International House (223 privately funded hostel places) and Student Residence Halls (comprising 1,629 UGC funded hostel places and 141 temporary hostel places). See **Figure 4** above and **Figure 6** below. The Joint Sports Centre, adjoining the Shaw Campus is jointly owned and managed by City University of Hong Kong, Hong Kong Baptist University, and The Hong Kong Polytechnic University. The other campus areas are the Kai Tak Campus under tenancy agreement with EDB up to 31 August 2013 and the Shek Mun Campus, which houses the Academy of Visual Arts and the College of International Education respectively.

Figure 6 – HKBU Kowloon Tong Campus Plan



5 *HKBU Facts and Figures 2011-2012*

HKBU's Role Within the Wider Community

5.1.4 HKBU is both an integral and intimate member of the local community, providing tailor made services and venues/facilities which are unavailable elsewhere in Kowloon Tong district. The School of Chinese Medicine provides outreach services to the elderly living in nearby residential homes e.g. Grace Nursing Home. The University also provides venues for the hosting of community gatherings and activities. These include the Lam Woo International Conference Centre, Y C Cheng Lecture Theatre and the Academic Community Hall.

5.2 Growth of the Kowloon Tong Campus Areas

Campus Expansion Plan – ""Inspires Creativity for Whole Person Education"

5.2.1 The urgent requirement for new facilitates to compensate the existing shortfall space and implement the 3-3-4 educational reform resulted in the 'The Campus Expansion Plan' ("**CEP**") 2007-2014 with the theme of "Inspires Creativity for Whole Person Education". This included:

- **Phase 1**: Communication and Visual Arts Building
- **Phase 2**: Additional Storey to The Wing Lung Bank Building for Business Studies and David C. Lam Building
- **Phase 3**: Academic and Administration Building, and Madam Kwok Chung Bo Fun Sports and Cultural Centre
- **Phase 4**: Baptist University Road Campus Entrance

5.2.2 HKBU was not allocated any additional land for the 3-3-4 expansion and therefore had to build all additional facilities and floors on the existing site and exhausted all useable space. The expansion was in the form of high-rise development on the existing Shaw and Baptist University Road Campus areas, such as constructing additional storey within the existing building and redevelopment of existing low-rise building. The relocation of the Hong Kong Institute of Vocational Education (Lee Wai Lee) was too late to meet the deadline for new facilities, which had to be ready for the start of the 2012 academic year. HKBU is among the first batch of institutions to have completed its immediate expansion plans.

5.2.3 In preparing for the 3-3-4 curriculum reform other universities in Hong Kong were granted additional land adjacent to their main campus areas, e.g. Hong Kong University (**HKU**), the Hong Kong Polytechnic University (**PolyU**) and the City University of Hong Kong (**CityU**). **Appendix J** '*Coherent University Campus Development in Hong Kong*' provides examples of expansion areas that have been integrated within the wider campus in a coherent and logical manner. Additional facilities have been provided within walking distance of core facilities ensuring that the whole campus is interconnected.

Campus Constraints

5.2.4 The University has successfully integrated an additional net floor area of nearly 27,000 sq m for teaching, administration and amenities use – nearly doubling the existing net floor area[6]. This has been an incredible achievement; however, as a consequence, the HKBU Campus environment is now **cramped and congested**, there is significantly less outdoor space for students, therefore affecting the quality of their learning environment. Significant operational problems have been created due to the increased numbers of students with long waiting times for lifts and with internal circulation problems.

[6] *Hong Kong Baptist University, Campus Master Plan, Retrieved from the World Wide Web on 3 March 2013 at http://cep.hkbu.edu.hk/en-faq.php#a*

5.2.5 There are now around 8,564 students, excluding students under sub-degree programmes on the Kowloon Tong Campus areas, out of which 6,024 students are under UGC-funded programmes (**Appendix C**). The University has now reached **saturation point** on their current Campus areas and no further consolidation of uses or redevelopment is feasible.

5.2.6 HKBU has also had to provide Student Hostel accommodation off-site in shared facilities with the Hong Kong University of Science and Technology ("**HKUST**") in Tseung Kwan O (the "**TKO Joint Hostel**") which necessitates students to travel back and forwards. This is not ideal as hostel life is an integral part of the University's Whole Person Education ethos. Indeed, the 1,700 student hostels in the northern portion of the ex-LWL Site include the provision of 150 hostel places to be swapped with the TKO Joint Hostel.

5.2.7 In comparison with other UGC-funded institutions, the HKBU campus site area is very small (5.4 ha[7]) and the students live and study in cramped conditions. It is less meaningful to compare net operational floor areas ("**NOFA**") as the entire campus area is related to the learning environment. HKBU students occupy an area of approximately **8.96 sq.m** each which is very low in comparison with other Universities where students occupy, for instance, approximately **87.17 sq.m** per student (**Appendix C** provides an overview of the space utilisation at the eight UGC-funded institutions). Furthermore, **Appendix J** found that open space within HKBU's campus is very limited when compared with other UGC-funded institutions. Open space is especially essential to promote whole person education. It allows students and scholars to engage in various activities, thereby developing intellectual, cultural, social and sporting skills. It is apparent that availability of usable space as a live/ work and quality of life indicator is a major disadvantage for HKBU students.

5.3 Future Growth and Development

5.3.1 The last five years has seen significant investment in University curriculum development and capital works throughout Hong Kong in order to implement the Government's 3-3-4 educational reform, which has necessitated the construction of new student hostel accommodation.

5.3.2 If the Government is seriously committed to establishing Hong Kong as a **regional educational hub** it must support and encourage Universities in their pursuit of excellence if they are to remain competitive in a globalised economy. Universities must compete with institutions all over the world to attract the best teachers, researchers and students as well as funding.

5.3.3 Hong Kong's economic future relies on its ability to plan for the medium and long term as well as the short term. It is therefore imperative for the Government to work in partnership with Universities to help them develop and achieve their long term visions and strategies and for land to be reserved for future need.

'Vision 2020: Plan for the Decade'

5.3.4 In 2010 HKBU developed '*Vision 2020*', which is a strategic development blueprint that charts HKBU's development over 10 years since 2010 and states the University's goal as

"*By 2020 the University will be the best regional provider of Whole Person Education inspired by* ***• Quality teaching and learning • Innovative research • Dedicated service to the community***" *(Vision 2020, Strategic Themes and Actions, 2010)*

5.3.5 The 'Vision' is underpinned by a number of strategic themes and actions, which include the establishment of an 'Institute of Creativity', recruitment of world renowned researchers, and the establishment of a first rate Chinese Medicine Teaching Hospital. Details are outlined in sections 5.6 and 5.7 of this statement.

---

7 *The Joint Sport Centre is shared by HKBU, City University of Hong Kong and the Polytechnic University of Hong Kong and therefore excluded from calculation of site area*

Strategic Discussions with Government

5.3.6 HKBU has been requesting the allocation of the ex-LWL Site for its expansion plans since 2005 in order to provide additional facilities and improve the Campus environment for students, staff and visitors. Starting from 2009 various medium and long term options for the ex-LWL Site have been discussed (formally and informally) with various Government Bureaux including a Chinese Medicine Teaching Hospital, a Complex of Creativity and/ or an International Exchange Centre.

Government's Short-term Educational Policies

5.3.7 Securing the medium and long term support of EDB for projects can be difficult as the UGC determines the spatial requirements of UGC-funded institutions based on space standards contained in the '*Hong Kong University Grants Committee: Review of Space Requirement Formulae and Standards*'. Space requirements are broken down into 10 categories, namely classroom, open labs, teaching labs, research labs, offices, study space, library, indoor sports, staff & student amenities and support. The calculation criteria are based on information such as student/ full-time staff, size of research grants, library material collection, etc. collected periodically through the Common Data Collection Format ("**CDCF**"). Further, this spatial assessment is a triennium exercise. The current triennium falls within 2012 to 2015. The next triennium will fall within 2015 to 2018.

5.3.8 Medium and long term planning proposals therefore cannot be formally submitted to Government. It is necessary for Government to acknowledge and take into account universities' strategies and plans beyond the general triennium exercise to ensure long-term needs are identified and supported. With a projected higher proportion of the population accessing higher education by 2030 and an opportunity to increase international students to Hong Kong (up to UGC quota), there is a need to plan strategically and take account of these factors.

5.4 Short Term Needs

Student Hostel Accommodation and Academic Floorspace

5.4.1 The Government's statement released on 4 March 2013 stated that it had reserved 6,400 sq. m of land at the northern portion of the ex-LWL Campus for HKBU's campus development. It goes on to state that, "*If fully utilised, this will fully meet the requirements for some 2,000 square metres of academic floor space and 1,331 student hostel places according to the prevailing policy and calculation formula. As for the southern portion of the site, it is beyond the requirements of HKBU under existing policy. The Government stresses that there is no justification to allocate this portion of the site to HKBU for education purpose under the principle of fairness.*"[8]

5.4.2 It is necessary to clarify that in fact HKBU's capital proposal has been to build 1,700 student hostel complex on the northern section of the ex-LWL Site and it has received the **full support** of the UGC under the 2013 UGC Capital Programme. (**Appendix D** refers). The hostel complex would include 1,400 publicly funded places and 300 privately funded places to meet the acute shortfall of hostel places for students (with the 300 private places to be used for international students, research students and those requiring accommodation beyond their first year). Thus, the 0.64 ha land allocation at the northern part of the ex-LWL Campus is **inadequate** to meet confirmed plans for Student Hostel Accommodation.

---

8 *HKSAR Government Press Release, "Government Statement on Hong Kong Baptist University's request to use former campus of Hong Kong Institute of Vocational Education (Lee Wai Lee)" (4 March 2013), retrieved from the World Wide Web on 4 March 2013 at http://www.info.gov.hk/ gia/ general/ 201303/ 04/ P201303040689.htm*

5.4.3 The minimum required specific site area for a 1,700-bed-place student hostel is calculated at 0.73 ha. In addition there is a projected shortfall of 2,600 sq m Net Operation Floor Area ("**NOFA**") in academic space by the academic year 2014-2015 (excludes Kai Tak Campus). This equates to about 0.05 ha required to build to cover the 2,600 sq m shortfall. The total required minimum site area is thus in the order of 0.78 ha, to be reserved for higher education use in the **short term**. The discrepancy between 0.78 ha and 0.64 ha is significant – in the order of 22% or 0.14 ha. The University has written to the Secretary for Education (letter dated 25 February 2013, (see **Appendix E**) requesting a review of the required site area in the northern portion of the ex-LWL Site.

5.4.4 A proposal for a 13-storey Academic Building measuring 2,600 sq.m (NOFA) to meet the existing spatial shortfall has been submitted to the UGC under the 2014 Capital Programme. The proposed building would adjoin the proposed student hostel complex on its southern section creating an additional wing, and would require a site area of approximately 520 sq.m. The proposed Academic Building will accommodate classrooms, study spaces, teaching laboratories, offices and student/ staff amenities.

5.5 Medium Term Needs

Chinese Medicine Teaching Hospital (CMTH)

5.5.1 HKBU is at the forefront of Chinese Medicine ("**CM**") and was the first local institution offering CM education at the tertiary level in 1998. The University has assumed a prominent role in CM higher education, research and clinical practice in Hong Kong.

5.5.2 HKBU believes that a medicine programme is incomplete without the provision of clinical opportunities provided locally to its students. Students of CM currently have to go to Hospitals in Mainland China for clinical training. Due to the difference in medical and legal systems between the Mainland and Hong Kong, students cannot fully apply what they have learned in the Mainland to Hong Kong. HKBU is proposing to set up a self-financed Non-Governmental Organisation ("**NGO**") CMTH so that a complete CM undergraduate programme can be provided for the benefit of UGC-supported CM students and the wider public in Hong Kong.

5.5.3 The CMTH was originally proposed on the ex-LWL Site in 2009 and it remains the intention of HKBU to develop this facility at the ex-LWL Site. The development of a first rate CMTH is one of the key strategies identified in HKBU's 'Vision 2020' to provide training opportunities for students in the field as well as to satisfy community needs. The proposed CMTH would have 11,639 sq.m in NOFA or 23,278 sq.m in Construction Floor Area ("**CFA**"), providing 200 bedspaces and offering up to 70 internship places for the three Chinese Medicine Schools in Hong Kong. As a self financed NGO the CMTH would offer affordable treatment to the local community and Hong Kong residents.

5.5.4 A recent survey by another institute on public views on Chinese Medicine Services in Hong Kong highlighted the overall support for a CMTH in Hong Kong. Of those interviewed, 54% had visited a Chinese medicine practitioner in the last two years. It was found that there was significant support (81% of interviewees) for the establishment of a CMTH in Hong Kong to train local practitioners. Over 60% of respondents stated that they would be willing to use in-patient services and a further 28% stated that the likelihood was 'fair'. Of those interviewed, 36.6% stated that they felt it was necessary for the CMTH to be located near the University campus and nearly 40% felt that it was a 'fair' requirement. (Further details are provided in **Appendix F**).

5.5.5 The neighbouring 'Grace Nursing Home' is fully supportive of the University's proposal to develop a CMTH as are current residents of the Nursing Home. A current resident has received treatment from the HKBU CM Outreach Services and strongly supports the CMTH proposal and hopes that this can assist in making CM more accessible.

5.5.6 As highlighted in Section 2.2.19 the Chinese Medicine Development Committee (the "**Committee**") held its first meeting on 4 March 2013. The LC Paper No.CB (2)758/12-13(03))[9] highlights that the 'Committee' agreed to explore ways to allow Chinese medicine students/graduates to have more opportunities for internship and clinical practice (Para 7 refers). The 'Committee' will also study the establishment of Chinese medicine hospitals and measures to facilitate development of Chinese medicine in-patient services (Para 10 refers). This area of policy is therefore at an early stage of development and therefore is a relevant issue to be taken into consideration when considering long term land use.

5.5.7 Notwithstanding the above history and the clear aspiration of both the university and the wider public, in a recent press statement (4 March 2013) the Government stated that they "*do not support the development of a private Chinese medicine hospital at the southern portion of the ex-IVE (LWL) site which is a government site.*"[10] The statement was made before the Chinese Medicine Development Committee has an opportunity to consider the matter, and has omitted the reference to "teaching hospital" and mistakenly refers to it as a "private" rather than NGO hospital. Therefore, it appears to be a pre-mature and inaccurate statement.

5.5.8 The CMTH is the University's priority project and one which is a strategically and critically important project for Hong Kong. It is not just important for the training of UGC and non-UGC supported Chinese medicine students, but also important for the clinical research and Chinese medicine industry development. The University's letter to the Secretary for Education (dated 25 February 2013, See **Appendix E**) also puts forth their renewed request for a 200-bed CMTH on the ex-LWL Site.

5.6 Medium/ Long Term Needs

Complex of Creativity / International Exchange Centre

5.6.1 During 2012, alternative medium to longer term options for the ex-LWL Site were discussed at a strategic level with the Government (**Appendix G** refers). A letter setting out the University's aspirations for expansion is provided at **Appendix G**. No response from Government was received. During this time, there was no emphasis on a CMTH on the ex-LWL Site as the Tsim Sha Tsui Kai Fong Welfare Association site had not yet been ruled out as an option. The southern section of the ex-LWL Site was identified as the ideal location for a '**Complex of Creativity**' an integral element of HKBU's Vision 2020 – the Complex of Creativity would provide a hub to encourage creativity and innovation for research and development across all areas of the University. HKBU is also very keen to enhance internationalisation – with ideas to create an '**International Exchange Centre**', as another possible use for the ex-LWL Site. The Complex of Creativity and International Exchange Centre would have a CFA of 18,430 sq,m and 9,684 sq.m respectively.

5.6.2 These are seen as medium to longer term projects, but they demonstrate that the ex-LWL Site has always been planned as an integral part of the University's future since 2005.

5.6.3 The opportunity to integrate the ex-LWL Site within the University campus is logical and desirable from the University's perspective. **Appendix J** *('Coherent University Campus Development in HK')* highlights the experience of other universities in Hong Kong in accommodating growth on adjacent sites. From a land use planning perspective the expansion of the campus will create site cohesion and synergy. It was noted by a representative of the Hong Kong Institute of Architects ("**HKIA**") at the meeting for the Legislative Council Panel on Education on 11 March 2013 that "*it's very difficult to achieve synergy effect and planning gain in this rezoning request*" (**Appendix I** refers)

---

9 *LC Paper No.CB (2)758/12-13(03)) 'Development of Chinese Medicine in Hong Kong', March 2013*

10 *ibid*

5.6.4 HKBU's future programme of improvement and expansion will be severely compromised if the southern portion of the ex-LWL Site is developed for residential use. Any future facilities (including the CMTH in the medium term and/ or the Complex of Creativity and/ or the International Exchange Centre in the medium to longer terms) would have to be provided at an off-site location (even if any) yet to be identified, which does not make practical sense in terms of student travel between classes, access to supporting facilities and providing students with an on-campus life experience.

5.7 Summary

5.7.1 This section provides an overview of HKBU's history and the recent redevelopment of the Campus areas to accommodate new buildings and facilities to meet the 3-3-4 educational reform. The lack of any additional land to facilitate the expansion resulted in high-rise development on the HKBU campus, which has led to cramped and congested conditions. HKBU students occupy the smallest campus area, per student head of population, in comparison to all the other UGC-funded Universities in Hong Kong.

5.7.2 HKBU has been in discussions with Government since 2005 regarding various proposals for the adjacent ex-LWL Site, once it became known it would become vacant. The University has recently secured approval of the UGC to build a 1,700 bed space student hostel on the northern section of the ex-LWL Site and an area of 0.64 ha has been reserved by Government for HKBU. Unfortunately 0.64 ha is insufficient and the University requires 0.78 ha in order to provide the student hostel development and to meet the shortfall of educational floorspace in the **short-term** alone.

5.7.3 The University has a number of medium and longer term aspirations for the ex-LWL Site, including a CMTH; however the Government has stated that under prevailing policies (which only extend to 2015) there is no educational requirement for the site. The prevailing educational policy assessment advice given to other Government Bureaux is therefore fundamentally flawed as it does not take account of the medium and long term growth of institutions.

6. PLANNING JUSTIFICATIONS FOR RETENTION OF G/IC USE

6.1 Introduction

6.1.1 This section sets out the planning background and the main planning arguments as to why the entire 1.52 ha ex-LWL Site should be retained for G/IC uses.

6.1.2 **Section 3** of this report outlines the criteria in TPB-PG-No.16 that should be taken into account when considering the rezoning of a G/IC site. Only two of the TPB-PG-No.16 criteria are relevant in this case as the ex-LWL Site has not been designated for a specific G/IC use. These are: 2.1 (b) and (c), which need to be satisfactorily demonstrated.

(b) Is the site no longer required to be reserved for <u>any</u> G/IC uses? and

(c) Would the redevelopment of the site adversely affect the provision of G/IC facilities in the district on a <u>long-term</u> basis?

6.1.3 While the ex-LWL Site has not yet been identified for a specific G/IC use in the Kowloon Tong OZP, it is necessary to assess future use considers with reference to the need to ***"cater for unforeseen future demands"*** (*TPB PG-No.16, Section 1.1 refers*).

6.1.4 The issues relating to compatibility of the proposed rezoning use within the surrounding area and environmental impact are discussed in more detail in Section 7 of this report.

6.2 The Government's Assessment of the ex-LWL Site for G/IC Reserve

Key Papers and Meetings

6.2.1 The Government's planning assessment justifying why the ex-LWL Site is no longer required for G/IC reserves has been provided in the following MPC Papers and documented in the relevant MPC Minutes, which include:

- MPC Paper No.14/12 for Consideration by the MPC on 21 December 2012;
- The Minutes of the 480th Meeting of the MPC, 21 December 2013;
- MPC Paper No.2/13 for Consideration by the MPC on 25 January 2013; and
- The Minutes of the 482nd Meeting of the MPC, 25 January 2013.

6.2.2 In addition, the Government has given a presentation to the Kowloon City District Council Housing and Infrastructure Committee (**"KCDCHIC"**) on the 7 March 2013 and to the meeting for the Legislative Council Panel on Education on 11 March 2013. In both meetings, District Councillors and Legislative Councillors raised strong objections to the rezoning of the ex-LWL Site from "G/IC(9)" to "R(B)" A copy of the transcript of both meetings are provided at **Appendices H** & **I**.

Government's Arguments for Rezoning and HKBU Rebuttal

6.2.3 The Government's main arguments raised in favour of rezoning the ex-LWL Site are summarised below. Detailed rebuttals against each of these arguments have been put forward. Relevant extracts from the MPC Papers and Minutes are provided in **Appendices A** & **B**.

1. **Low demand for G/IC facilities:** PlanD has commented that there is low demand for G/IC facilities in Kowloon Tong; that there is no deficit of planned G/IC provision (except a post office and an integrated children and youth centre which are not considered suitable in a pure residential development), and that other Government departments do not require the site for G/IC use.

Response:

*(i) PlanD's assessment is based on the advice of EDB and UGC that HKBU's spatial requirements are considered met under existing policy. However, there is a clear mismatch between the timeframes being assessed. Whereas the TPB Guidelines refer to **long-term** need and reserves, spatial requirements for UGC-funded institutes are only determined on a triennium basis. The current assessment, (up to 2015) can only take into account **immediate** needs. It is considered that the provision of required G/IC facilities on an existing G/IC zoned site warrants more investigation and discussion with the affected stakeholders to determine actual future demands and requirements.*

(ii) The very brief assessment by PlanD on future demand for G/IC uses also suggests a lack of commitment to fully investigate options and alternatives to accommodate G/IC facilities on the Site. It appears that the Government has not planned strategically for the community's future needs in these areas – including unforeseen needs. Indeed flexibility for "innovation", which cannot be predetermined, should be a key consideration in planning for tertiary institutions.

(iii) Indeed at the KCDCHIC meeting on 7 March 2013, several Kowloon City District Councillors highlighted the need for additional G/IC facilities in Kowloon Tong District including a publicly-funded elderly home, elderly centre, community centre and community hall. PlanD agreed to consult with relevant departments and stakeholders again in respect of G/IC facilities.

2. **Ex-LWL Site beyond the needs of HKBU**: EDB and UGC, using prevailing short-term policies, have assessed that the ex-LWL Site is beyond the needs of HKBU. They also state that if HKBU can make the best use of the northern portion of the site, it will be able to meet all its outstanding requirements for academic facilities and publicly-funded student hostels under the prevailing policies. EDB argue that HKBU has incorporated an additional 300 privately-funded student hostel places, which is in excess of HKBU's requirements under existing policy, and that consideration should be given to addressing the shortfall in academic facilities required for the UGC-funded sector in the overall development of the hostel complex.

Response:

(i) The "prevailing policies" referred to are short-term policies only extending up to 2015. The Minutes of the 482nd MPC Meeting thus highlights the Government's absence of consideration of medium and longer-term requirements for education facilities. The need to ensure that there are adequate G/IC land reserves to serve the higher education sector beyond 2015 is a fundamental planning issue. HKBU has demonstrated the need for further facilities beyond 2015.

(ii) The 0.64 ha site carved out of the northern part of the ex-LWL Campus has been determined by PlanD to be sufficient to meet UGC-funded student hostel needs and outstanding teaching facilities. However, the assessment has failed to take into account 300 privately-funded hostel places which have already been given support by the UGC. On this point, HKBU has received a letter of support from the UGC for the 1,700 student hostel facility and has written the Secretary for Education to clarify that 0.78 ha is the minimum required to meet the immediate needs of the 1,700 space student hostel and the 2,600 sq m teaching facilities[11]. It is unreasonable and unsustainable to consider providing the 300 privately-funded hostel places at a separate location whilst allocating the southern part of the ex-LWL Campus for private residential uses. The 300 privately-funded hostel places will be used by international students, research students and those students requiring a place beyond their 1st year.

---

11 *Letter to Secretary for Education, 25 February 2013 (see Appendix E)*

(iii) There is a distinct lack of 'joined up thinking' on the Government's part. Although the Government is actively encouraging universities to embrace 'internationalisation' it has not considered providing adequate land to cater for the future land requirements for implementation of this policy. The planning system needs to take account of the projected growth of the education sector, in line with the Government's policy support for internationalisation and important role of universities as a major cradle of innovation and technological development. Growth of the sector will be constrained or even thwarted without adequate future land reserves. The funding mechanism behind the provision of the facilities is not a land use planning issue.

3. **The number of local undergraduate students enrolling in University will not increase significantly in future.** EDB considers that the demand for hostel places and academic facilities will not increase significantly in the future as the age cohort is declining. Even taking into account a higher proportion of the age cohort attending university, EDB maintain that the figure will remain at around 68,000. Hence the existing formula should be able to meet future demand.

Response:

(i) *The Government's projections of future University undergraduate enrolments fails to take into account the targeted as well as predicted (as yet to be quantified) increase in international students attending Hong Kong universities and the corresponding need for student hostel accommodation and facilities (such as HKBU's International Exchange Centre). See point 2 above. Further, recent shortages of primary school places in Hong Kong, due to unplanned demands from Hong Kong-born children living on the Mainland, sheds doubt on EDB's conclusion above.*

4. **Academic facilities (including CMTH) do not have to be located adjacent to existing campus**: FHD and EDB argue that it is not essential for all academic facilities or a CMTH to be located adjacent to the university campus. The Government stated in their 4 March Press Statement that they do not support the development of a private Chinese medicine hospital at the ex-LWL Site as it is beyond established policy.

Response:

(i) *It is preferable for new academic and teaching facilities to be located within or close to the university campus area as it is important for students to feel part of the institution and ensure cohesiveness. In the case of the CMTH, it will be a NGO teaching hospital (not private) within walking distance of the Jockey Club School of Chinese Medicine Building and on-campus hostels. It is also important from an operational perspective as isolated sites cause inefficiencies, undue financial costs and an exacerbation of commuting for students and teaching staff to the main campus, which is non-sustainable.*

(ii) *As illustrated in **Appendix J**, it is common practice for universities to locate new academic buildings/ campus expansion areas adjacent to the main campus. Some universities have gone to considerable effort and devoted significant resources in order to develop their new academic buildings and expansion areas in close proximity. For instance, HKU identified a site adjacent to its western boundary for expansion instead of a plot of land in Western District offered by the Government. The adjacent site was occupied by the Water Supplies Department ("**WSD**") to store fresh water and salt water supplies as well as three buildings of historical interests. In order to obtain the site for its expansion plan, HKU built caverns for the reprovisioned WSD facilities. The three heritage buildings were preserved in-situ and became part of the expanded campus[12]. In the case of PolyU, there is a proposal to develop an expanded campus and student hostel at Ho Man Tin adjacent to Carmel Secondary School. Pedestrian linkages (including staircases, lifts and pedestrian sidewalks) are to be provided to connect the expanded campus with the main campus in Hung Hom and adjacent neighbourhoods.[13] The need to retain a cohesive main campus is a key priority for universities, and off-site locations are not normally a sustainable solution.*

(iii) *The results of a recent survey highlighted the overall support for a CMTH in Hong Kong. Of those interviewed, 36.6% stated that they felt it was necessary for the CMTH to be located near the University campus and nearly 40% felt that it was a 'fair' requirement. (Further details are provided in **Appendix F**). The neighbouring 'Grace Nursing Home' is fully supportive of the University's proposal to develop a CMTH as are current residents. A current resident has received treatment from the HKBU CM Outreach Services and strongly supports the proposal. There is significant public support for the University's proposal for a CMTH at the ex-LWL Site.*

(iv) *The Government has set up a Chinese Medicine Development Committee to investigate the role of Chinese medicine practitioners and Chinese medicine in the public healthcare system and the introduction of Chinese medicine in-patient services in the future. The lack of existing policy to provide individual organisations (particularly NGOs) with government land for private CMTH may be an area of consideration for the Committee, given the significant cross cutting benefits to healthcare, education and clinical care. The Government has also stated that it will introduce necessary measures to support the development of healthcare services including the disposal of land for private hospitals. Government support for the NGO sector is also needed. As such it is reasonable for G/IC sites to be retained to accommodate this use.*

Decision of the MPC in January 2013

6.2.4 The Minutes of 482nd MPC Meeting record that many Members were not convinced that the ex-LWL Site was not necessary for the G/IC uses in future, particularly in relation to HKBU's proposals, but also in relation the needs of other institutions. (***Paras 75 – 78** refer*).

6.2.5 The Minutes of the 482nd MPC Meeting clearly demonstrates Members' inherent understanding of the central issue by their repeated questioning of the EDB and UGC representatives on the long-term needs of HKBU and other institutions. The lack of a long-term assessment of need, which cannot be properly undertaken without stakeholder input, means that Members' questions cannot be properly answered.

---

12 *Centennial Campus, The University of Hong Kong, retrieved from the World Wide Web on 2 April 2013 at http://www4.hku.hk/cecampus/eng/our/message.php*

13 *Discussion Paper of Housing and Infrastructure Committee (HIC) Meeting, Kowloon City District Council (Reference No. 17/13), for HIC meeting on 7 March 2013, retrieved from the World Wide Web on 2 April 2013 at http://www.districtcouncils.gov.hk/klc/doc/tc/committee_meetings_doc/4HIC/KCHIC13_17cp.pdf*

6.2.6 Members did not approve Amendment Item A of the draft Kowloon Tong OZP S/K18/17 because they supported it. Rather, they acknowledged the insufficient evidence, but accepted to gazette the amendment to allow the views of the members of the public, including stakeholders, to be heard by the full Town Planning Board.

6.2.7 The decision to 'approve' Amendment Item A to allow wider consultation on the issue was a disappointment to HKBU, in conjunction with the inclusion of the ex-LWL Site in the Government's 2013/2014 Land Sale Programme before a decision had been made on the rezoning. It is HKBU's opinion that it would perhaps have been more appropriate for Amendment Item A (relating to the rezoning of the Ex-LWL Site) to have been Refused or Deferred at the 25 January Meeting as many of the Members' important questions to justify the rezoning of the site from G/IC(9) to R(B) remained unanswered

6.2.8 On this point, we note that the KCDCHIC, by a full majority, did not support the Government's proposed rezoning of the ex-LWL Site from "G/IC" to "R(B)". Further, members of the LegCo EP passed a non binding motion on the 11 March 2013 to retain the zoning of the Site as "G/IC". Clearly, the public view is not supportive of the proposed rezoning.

6.3 Justifications for Retaining ex-LWL Site for G/IC Reserve

6.3.1 HKBU considers that there is overwhelming evidence to justify the retention of the ex-LWL Site for G/IC uses. The core arguments are outlined below.

1. Clear Inadequate and Insufficient Assessment by Government of Future G/IC Need

a) The Government's initial assessment of future G/IC need appears to only take account of consultations with Government departments. There is a complete absence of wider consultation with stakeholders and the community (including the District Councils) and the platform provided by the current Representation process provides only limited opportunity for 2-way dialogue. This is considered 'out of step' with the CE's pledge to engage with the public. Real public and stakeholder engagement starts at the beginning of the process. The Government's lack of early consultation means that medium and long term G/IC proposals have not been identified. District Councils are effectively paralysed from engaging in the process as confusion surrounds which G/IC sites the Government is actively considering. This could have long term implications not only for the development of education and community facilities in Hong Kong, but to Hong Kong's economic development and global competitiveness as a whole.

b) It was reported by PlanD during the 480th and 482nd MPC Meetings that all of the relevant Bureaux had been consulted on the rezoning proposal, and that "*based on the planned population for the [OZP and wider District] area*" the only required community facilities were a post office and an integrated children and youth centre. These services were not considered appropriate on the site, given the pure residential nature of the proposal. Notwithstanding, there was no assessment of higher educational requirement beyond current policy (i.e. beyond 2015).

c) Insufficient information has been provided by Government on the timescale and population trends being considered when an assessment of "planned growth" is undertaken. The growing elderly population will have major implications for the provision of health, welfare and community services. The proportion of the population aged 65 and over is expected to rise markedly, from 13% in 2011 to 30% in 2041. There is a need to ensure that adequate land is available throughout Hong Kong to provide the necessary services for population change in the **long term**. It is critically important to ensure that core services such as education, health and community services are available within communities.

2. The Projected Growth of the Education Sector will Require Additional Land for New Facilities

a) The education sector is one of the six strategic industries identified by the Government and the Government is keen for the sector to grow and for Hong Kong to become a regional education hub. A key UGC report highlights the need for Hong Kong's higher education sector to look internationally in order to remain competitive. In this regard, Hong Kong's tertiary institutes must be able to innovate and grow in order to attract top staff and students through not only top-ranking programmes and facilities, but a quality living and learning environment.

b) Hong Kong's education sector has enormous potential to grow and become more internationally recognised, given the projected growth in international education and the fact that Asia will account for 70% of the demand[14]. Hong Kong already faces a shortage of land for education use – reportedly 80,000 sq m of operational floorspace. It is therefore critically important to ensure that there are adequate long term land reserves in appropriate locations to accommodate the future growth of this dynamic sector.

c) The Government's projections of future University undergraduate enrolments highlighted in the MPC Meeting fails to take into account the predicted (as yet unquantified) increase in international students attending Hong Kong universities and the need for facilities such as HKBU's proposed 'International Exchange Centre'. There is a distinct lack of 'joined up thinking' on the Government's part: although the Government is actively encouraging universities to embrace 'internationalism' it has not considered providing the prerequisites of land and capital funding to achieve it. Similarly the Government's assessment of future projects runs on a triennium basis. However, many of the future projects being considered by universities are longer term and it is not always possible to provide detailed proposals on long term growth strategies, particularly where innovation is involved. Land reserves are necessary beyond 2020 for unforeseen facilities.

3. HKBU's Future Expansion will be Severely Thwarted if the ex-LWL Site is Rezoned for Residential Use.

a) HKBU has been liaising with Government since 2005 on its short, medium and long term development plans and the strategic importance of the ex-LWL Site for accommodating future growth. The existing HKBU campus is now saturated and there are no alternative opportunities to expand within the campus or nearby.

b) The University has a number of medium and longer term aspirations for the ex-LWL Site, including a CMTH (Medium/ Long Term Need), Complex of Creativity / International Exchange Centre (Long Term Need). These future requirements have all been communicated to Government.

c) The southern section of the ex-LWL Site was identified as the ideal location for a 'Complex of Creativity' an integral element of HKBU's Vision 2020 – the Complex of Creativity would provide a hub to encourage creativity and innovation for research and development across all areas of the University. HKBU is also very keen to enhance internationalisation – with ideas to create an 'International Exchange Centre', as another possible use for the ex-LWL Site.

14 *Banks et al, 2007; Chow and Marcus, 2008; OECD, 2006*

d) HKBU's 'Vision 2020' puts a strong emphasis on providing services that meet community needs, a key aspect of which is to enhance the well being of society. As highlighted in paragraph 5.1.4, HKBU is both an integral and intimate member of the local community, providing tailor made services and venues/facilities which are unavailable elsewhere in Kowloon Tong district. The School of Chinese Medicine provides outreach services to the elderly living in nearby residential homes e.g. Grace Nursing Home. The University also provides venues for the hosting of community gatherings and activities.

e) The benefits of the proposed CMTH therefore not only support education needs but will provide a valuable healthcare resource. As a self financed NGO the CMTH would offer affordable treatment to the local community and Hong Kong residents. The growing elderly population is most likely to benefit from the affordable Chinese Medicine in-patient services proposed by HKBU on the ex-LWL Site.

f) HKBU's important role within the local community is recognised and supported by KCDC and local residents, as highlighted in their positive comments made at the 'Urban Planning and Environment Forum' held on the 10 April 2013 at HKBU. It was pointed out by a District Councillor that the Kowloon Tong community was united in their support for HKBU and the retention of the ex-LWL Site for GIC use. HKBU also has the support of most of its neighbours. The local community will continue to benefit from the sharing of HKBU's facilities.

g) HKBU shared their strong grounds for retaining the site for education use with the immediate neighbours which include: (1) Management Committee of the Incorporated Owners of Sunderland Estate (2) Rhenish Church Pang Hok Ko Memorial College (3) Mary Rose School and (4) Asia Women's League Chan Kwun Tung Care and Attention Home for the Elderly. The issue has also been discussed with (5) the Grace Nursing Home on 20 Durham Road. All of these neighbours have expressed their understanding and (1) and (5) have already sent their objection letters to the TPB.

4. Allowing the ex-LWL Site to be Comprehensively Developed with the HKBU Campus Represents the Most Efficient and Sustainable Development Option.

a) The ex-LWL Site is directly adjacent to the HKBU campus and therefore represents the most logical location for the expansion of HKBU and future facilities. The University is keen to develop a 'Conceptual Masterplan' for the integration of the entire ex-LWL Site into the surrounding HKBU Campus. The ex-LWL Site would offer the opportunity to effectively plan and incorporate current (student hostel) and future facilities within a well connected and integrated campus. Providing new G/IC facilities near the existing campus will also encourage the sharing of resources and greater integration between various facilities, creating synergy.

b) As HKBU has already reached saturation point on its current Campus, any medium to longer term projects (beyond 2015) would be forced to a separate location if the ex-LWL Site is not available for expansion purposes. Thus, lack of strategic planning will force future medium and long term University facilities to more isolated sites, which is more likely to create operational inefficiencies, undue financial costs and an exacerbation of commuting – all of which are non-sustainable. Providing a safe and integrated environment is important to HKBU's commitment to 'Whole Person Education'. Securing the ex-LWL Site is regarded as fundamental to the future growth and development of HKBU and its 2020 Vision.

c) Retention of the Site for G/IC use will have a positive impact on the intermediate and local urban design context. This will have the following positive impacts:

- providing more space for public realm and connectivity;
- creating air paths and pathway for light penetration;
- maximising available viewable area;
- creating visual relief and incorporating human scale features in a coordinated manner; and
- maintaining the character of the neighbourhood which is predominately a G/IC area.

6.4 Conclusion

6.4.1 The Government has failed to justify why the ex-LWL Site is capable of being rezoned based on the two critical criteria identified in the TPB PG-No.16.

- The Government has failed to provide sufficient evidence to prove that the Site is no longer required to be reserved for any G/IC uses. In particular, there is a lack of stakeholder engagement to properly assess need. District Councils have not been formally consulted on the Government's list of 36 G/IC sites that they wish to rezone for residential use. The EDB's prevailing policies extend only to 2015, therefore longer term growth and proposed facilities have not been taken in account when determining future education need.
- The Government has failed to prove that the proposed development/redevelopment would not adversely affect the provision of G/IC facilities in the district on a long-term basis. In fact, the provision of G/IC facilities will be adversely affected in the long-term as HKBU's future growth will be severely compromised due to the lack of available land to expand.

6.4.2 Conversely, there are significant strategic and local planning considerations as to why the ex-LWL Site should remain in G/IC use. HKBU has demonstrated short, medium and long term expansion needs and the adjacent ex-LWL Site is fundamental and essential for HKBU to achieve its long term vision and remain competitive in an increasingly globalised and competitive education market. Retaining the ex-LWL Site in education use would allow the comprehensive planning of the site thereby maximising planning benefits and synergy.

6.4.3 The loss of the ex-LWL Site would represent a significant failure of the Hong Kong planning system to protect a strategic G/IC reserves for longer term needs, giving wayto a high end residential development, which could be accommodated elsewhere in Hong Kong.

7. PLANNING REASONS NOT TO RE-ZONE PART OF THE LWL SITE FOR RESIDENTIAL USE

7.1 Introduction

7.1.1 This section sets out the proposed residential scheme parameters as identified in the MPC Paper No.14/12 and highlights the overriding planning reasons why the ex-LWL Site should not be rezoned for residential use.

7.2 Proposed Residential Scheme

7.2.1 The ex-LWL Site has been identified for medium rise, medium-density residential development. The following scheme parameters for the R(B) zone have been recommended by PlanD (Para.4.7 of MPC Paper No. 14/12 refers).

Building Height	50m
Plot Ratio	4.5
Maximum Gross Floor Area	39,600 sq.m
No. of Flats	495 (Assuming an average flat size of 80 sq.m)

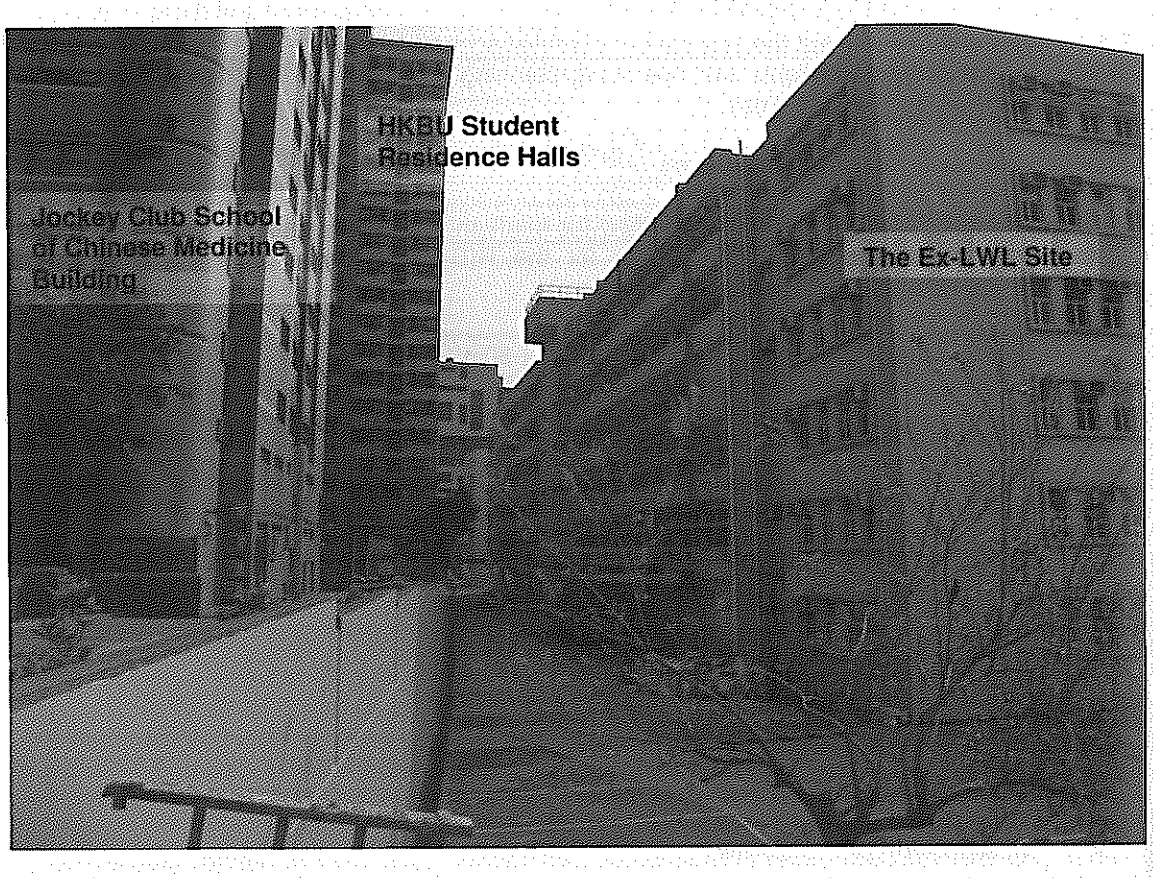
7.2.2 Renfrew Road has a special character due to the concentration of educational uses and quiet tree lined street. **Figures 4** and **5** demonstrate the predominantly low to medium density of residential use on surrounding streets. The proposed residential developments would be developed within a cluster of HKBU buildings adjacent to Renfrew Road.

7.2.3 The proposed residential buildings would be located in very close proximity to HKBU buildings, particularly the hostel accommodation (1,770 and 223 existing places to the east and north of the Site respectively and 1,700 planned places on the northern boundary).

7.3 Incompatibility Concerns

7.3.1 There are a number of concerns regarding the compatibility of locating a (likely) up-market residential block effectively within a university campus area, directly adjacent to two student hostels. As shown in **Figure 7,** the ex-LWL Site is separated from the HKBU Student Residence Halls by only a boundary wall. Moreover, the new HKBU student residence halls will be located to its immediate north. The future residential developments at the ex-LWL Site would be surrounded by a total of over 3,500 hostel places on two sides. It should be recognised that there are often lifestyle differences between students and other groups of the population. University life within student residences is often very communal and students, typically between the age of 17 and 24, may have more flexible routines and a very active social life.

Figure 7 – The Existing HKBU Student Residence Halls is located to the immediate east of the ex-LWL Site. The HKBU Student Residence Halls will likely cause noise nuisance to the nearby residents.



PolyU and HKU Experience

7.3.2 Noise and nuisance complaints are common where student hostel accommodation is located in close proximity to residential developments. In the case of PolyU student residences in Hung Hom, residents of the nearby (up-market) Harbour Place development eventually involved the Police due to regular disturbances in the early hours of the morning from the adjacent student residence halls. PolyU has been forced to implement further sound proofing measures in order to resolve the problem[15]. Harbour Place is not located within the same street block as the PolyU student residence halls and there is a main road separating the residential areas. Members of the KCDCHIC have raised concerns regarding the compatibility of student residences in close proximity to residential developments as they have received a number of complaints from the residential developments in their districts about the noise and nuisance caused by PolyU students (**Pages 5, 13 and 14**, **Appendix H** refers). According to Hong Kong Police Force ("**HKPF**"), 7 (no.) complaints were received in regard to the noise and nuisance caused by the PolyU Student Residence Hall between January 2012 and 22 March 2013.

7.3.3 PolyU has implemented a series of mitigation measures to minimise the noise impact from their students on the surrounding neighbourhood, which have included restrictions on open windows in common activity rooms and the installation of sound-proof curtains. These measures do not completely eradicate all noise and prevent natural ventilation of rooms.

15 *Wenweipo, "理大宿生夜夜喧嘩 鄰廈報警", 24 April 2009*

7.3.4 HKU has also received complaints from nearby residential developments due to the noise and disturbance caused by students living in their student residence halls.[16] HKPF received 24 (no.) complaints in relation to noise and nuisance caused by HKU Student Residence between January 2012 and 25 March 2013.

Renfrew Road Site

7.3.5 The proposed residential developments on Renfrew Road will be much closer to the Student Residence Halls than in the case of PolyU and HKU, thereby increasing the likelihood of conflicts between residents and students. **Figure 7** highlights the existing gap between the student residences on the HKBU Site and the existing buildings on the ex-LWL Site. **Figure 8** highlights a potential re-development scenario, illustrating the very close future proximity between the student residences and private residential scheme.

7.3.6 When questioned by Members at the KCDCHIC meeting, PlanD highlighted that appropriate noise mitigation measures would be adopted by developers of the residential developments at the ex-LWL Site (**Page 13**, **Appendix H** refers). Given that over 3,500 students are likely to be residing in a restrictive environment, it is anticipated that there will be an element of noise disturbance for adjacent residents. The experience of PolyU and HKU suggests that both developments may be prevented from opening windows, which will inhibit natural ventilation, resulting in reduced environmental quality of life for both students and future residents. While these measures may alleviate noise, they cannot completely eradicate it, which is likely to be a source of continued frustration to all parties. No. 1 Broadcast Drive is an example of maximisation of residential development. It is located to the rear of HKBU's Wai Hang Sports Centre which incorporates a root top tennis court. Noise from the tennis court in particular is a source of complaint from residents of the new residential development.

7.3.7 Moreover, the Fire Station / Ambulance Depot is another noise source in the immediate area which will affect the living quality of future residents of the residential developments.

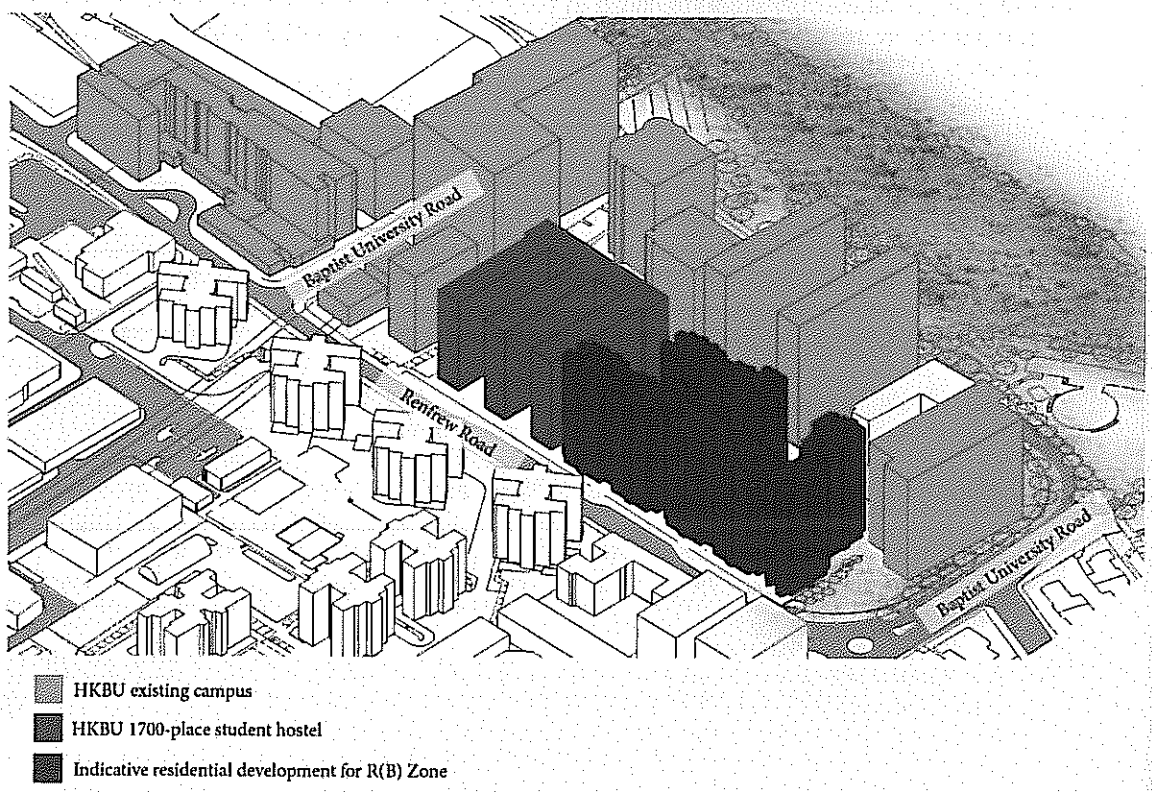
7.4 Piecemeal and Illogical Zoning Pattern

7.4.1 The ex-LWL Site, measuring some 0.88 ha, in the midst of a block used for education uses results in an illogical and irregular shape of the remaining "G/IC" zone. Any residential developments on the ex-LWL Site, being completely segregated from the adjacent HKBU campus, will also result in reduced space and circulation for staff and students (see **Figure 8**). A more detailed analysis on the pedestrian linkages and integration between different buildings in the neighbourhood is provided at Section 5 of **Appendix K**.

---

15 *Legislative Council, "反對香港大學在龍華街興建學生宿舍", Date: 10 December 2007, Ref. No. CB(2)585/07-08(1)*

Figure 8 – Illustration of Likely Impact of Residential Development at the ex-LWL Site



7.5 Urban Design and Land Use Character Implications

7.5.1 An Urban Design Appraisal ("**UDA**") in broad terms has been undertaken. This is provided at **Appendix K**.

7.5.2 The UDA found that rezoning the Site for R(B) use will create a fragmented and piecemeal residential development within the G/IC Hub, thereby limiting opportunities for providing space for public realm and connectivity.

7.5.3 Although the proposed residential blocks will be of a similar height to the existing student residential halls it will be incongruous in a predominantly G/IC area. **Figure 8** illustrates a potential residential development scenario, which maximises the plot ratio, and clearly highlights the **lost opportunity** to create a cohesive site, enhanced connections and diversity of building height and massing.

7.5.4 The residential streets directly adjacent (south and west) to the ex-LWL Site are predominantly low-density low-rise residential area, influenced by the 'Garden City' principles. This general area south and west is zoned R(C)4 in the Draft Kowloon Tong OZP to preserve its unique character.

7.5.5 A high density residential block will be out of character in this location and could lead to developers in nearby streets to lobby for higher plot ratios, thereby eroding the special character of Kowloon Tong in a piecemeal fashion over time.

7.5.6 Alternatively, retention of the Site for G/IC use will have more positive impacts on the intermediate and local urban design context. This includes allowing the Site to be integrated within the Site block to achieve a coordinated and comprehensive layout, which will have the following positive impacts:

- providing more space for public realm and connectivity;
- creating air paths and pathway for light penetration;
- maximising available viewable area;
- creating visual relief and incorporating human scale features in a coordinated manner; and
- maintaining the character of the neighbourhood which is predominately a G/IC area.

7.6 Environmental Quality Implications

7.6.1 The proposed residential developments at the ex-LWL Site are likely to bring additional traffic flow to the area, thereby would have a negative impact on the environmental quality. The additional traffic would drive through Junction Road, Hereford Road, Renfrew Road and the low-density low-rise residential neighbourhood to the ex-LWL Site. Traffic fumes and noise generated by the traffic would result in degradation to the environment of the area. Furthermore, the traffic at Renfrew Road and La Salle Road is busy during peak hours on school days. The additional traffic would likely result in longer traffic queues.

7.6.2 With regards to air ventilation, it is noted in the 480th MPC Paper that "*air ventilation impact arising from the residential developments* [at the ex-LWL Site is] *not expected to be significant*" (**Para 4.10** refers). Notwithstanding, developers of the ex-LWL Site and the G/IC Site to its north are likely to maximise the development potential of each site, thus limiting the opportunities to create air paths through the Site. **Figure 8** highlights the restrictions to creating air flow when the development potential is maximised, An example of where air flow has been severely compromised, but still meets the legal requirements is No. 1 Broadcast Road which has been built extremely close to HKBU's Wai Hang Sports Centre.

7.7 Ex-LWL Site's Limited Contribution to Hong Kong's Housing Need

7.7.1 The 2013 Policy Address highlighted two key priorities in relation to housing, the first was the need to increase the supply of subsidised housing in the short to medium term, and the second was to increase the supply of housing land in the short to medium term. The ex-LWL Site will not contribute towards the first priority, which is to provide affordable housing.

7.7.2 **Section 2.2.2** to **2.2.11** of this Report highlights the Government's multi-pronged approach to increase land supply in Hong Kong. In the short term, G/IC sites, greenbelt and open space sites are being scrutinised to accommodate new housing. These sites will be sold by the Government to housing developers if the rezoning is approved by the TPB. The Government has to date identified 36 G/IC sites that are considered suitable for residential developments. The strategic implications in the long term of their permanent loss should be quantified by Government.

7.7.3 Kowloon Tong is a low density housing area. It is estimated that an 80 sq.m. flat in this area will cost in the order of more than HK$20 million[17]; whereas PlanD has highlighted that the prospective purchasers will be families seeking larger accommodation. The ex-LWL Site is considered too valuable as a G/IC reserve to be developed for high end residential use. Furthermore, given that the residential developments at the ex-LWL site would only provide a total of 495 flats, it will not improve the lives of Hong Kong residents most in need, but instead will also arouse public sentiment against the new residential developments.

[17] *The price was calculated based on the price of various properties of One Mayfair, 1 Broadcast Drive. One Mayfair is the latest residential development in the vicinity of the ex-LWL site. According to centradata (as at 26 March 2013), there were 6 properties sold between Oct and Nov 2012. The price ranged from HKD17,922 per sq. ft to HKD30,750 per sq.ft. Median sale price (per sq.feet) was taken to calculate the estimated price of the housing units at the ex-LWL Site.*

7.8 Conclusion

7.8.1 The planning arguments for not rezoning the ex-LWL Site include the incompatibility of co-locating a residential housing block directly adjacent to two student residential halls. The residential block will be surrounded on three sides by HKBU's campus and there is a strong likelihood of conflict as a result of noise. From a land use planning perspective it would be much more logical to locate G/IC uses on the site, preferably educational uses.

7.8.2 The UDA found that rezoning the Site for R(B) use will create a piecemeal residential development within the G/IC Hub, thereby limiting opportunities for providing space for public realm and connectivity.

7.8.3 Residential development in this predominantly G/IC neighbourhood will increase traffic movements and associated noise, fumes and risk to pedestrian safety.

7.8.4 The ex-LWL Site is considered too valuable as a G/IC resource to be developed for high end residential use, which will not help to increase the supply of subsidised housing in the short to medium term, which is the CE's key housing priority.

8. CONCLUSION AND RECOMMENDATIONS

8.1 Conclusion

8.1.1 This Objection Statement clearly demonstrates the need to reserve the ex-LWL Site (approx 1.52 ha) as a valuable and strategic G/IC reserve for future provision of G/IC facilities in accordance with the Hong Kong Planning Standards and Guidelines ("**HKPSG**") to meet the present and future needs of the community. As the Objection Site has not been identified for a specific G/IC use in the Kowloon Tong OZP, it is important to ensure that any assessment of future use considers the need to **"cater for unforeseen future demands" (TPB PG-No.16, Section 1.1** refers).

8.1.2 The main criteria relevant to this case, which must be satisfied, when assessing whether G/IC sites should be used for alternative development are:

- Is the site no longer required to be reserved for any G/IC uses? and
- Would the redevelopment of the site adversely affect the provision of G/IC facilities in the district on a long-term basis?

8.1.3 **The objection statement highlights the importance of the education sector as a key strategic industry with significant growth potential in the future.** The Government is actively encouraging the education sector to embrace internationalisation and ensure that future academic programmes and facilities can accommodate more overseas students, including those from the Mainland. However, the Government has not considered providing adequate land to cater for the future land requirements for implementation of this policy – including unforeseen needs. Indeed flexibility for "innovation", which cannot be predetermined, should be a key consideration in planning for tertiary institutions. Ensuring that there is an adequate supply of land reserved for future education needs is vitally important.

8.1.4 **The rapidly aging population will result in a corresponding increase in the need for healthcare services.** The Government is to introduce necessary measures to support development of healthcare services including the disposal of land for private hospitals and has set up a Chinese Medicine Development Committee which will consider the opportunities to develop Chinese Medicine Hospital(s) in Hong Kong and explore ways to allow Chinese medicine students/graduates to have more opportunities for internship and clinical practice. The CMTH is the University's priority project and one which is a strategically and critically important project for Hong Kong. Hong Kong's CM program has been in existence for 15 years, however there is no clinical teaching base for UGC-funded students in Hong Kong. Chinese Medicine has been proven to be a popular and successful method of treating age related diseases and ailments. It is therefore important to ensure that adequate land reserves in future take account of this growth area.

8.1.5 **The Government has failed to prove that the Objection Site is no longer required to be reserved for future G/IC uses.** As an example, the EDB's prevailing policies extend only to 2015; therefore longer term growth and proposed education facilities have not been taken into account when determining future education need. **The TPB Guidelines refer to long-term need and reserves.** It is considered that the provision of required G/IC facilities on an existing G/IC site warrants more investigation and discussion with the affected stakeholders to determine actual future demands and requirements

8.1.6 **The loss of the ex-LWL Site would adversely affect the provision of G/IC facilities in the district on a long-term basis.** From an education perspective it has been proven that HKBU's future growth would be thwarted due to the lack of available land. The University has identified a number of medium and longer term proposals for the ex-LWL Site to Government, including a CMTH; a Complex of Creativity and an International Exchange Centre. The adjacent ex-LWL Site is fundamental for HKBU to achieve its long term Vision and remain competitive in an increasingly globalised and competitive education market.

8.1.7 **The 0.64 ha northern part of the ex-LWL Site that has been allocated for student hostel use is insufficient to accommodate the 1,700 committed student hostel facility and the 2,600 sq m spatial shortfall in academic space up to 2015.** It has been calculated that a minimum of 0.78 ha is required.

8.1.8 **The "R(B)" zoning of the ex-LWL site is out-of-character and incompatible with the immediate area and results in a piecemeal and illogical zoning pattern.** The development of private residential housing directly adjacent to over 3,500 student hostel spaces is considered an inappropriate use of land and a cause for potential noise and nuisance complaints from future residents due to the land use conflict.

8.1.9 **There is need for a comprehensive planning of the ex-LWL Site**, which includes both the northern part intended to be released to HKBU and the southern part subject of Amendment Item A. There has been pre-mature carving up and rezoning of the ex-LWL Site without considering all the relevant facts information and interests from stakeholders.

8.1.10 **The ex-LWL Site is considered too valuable as a G/IC reserve to be developed for high end residential use**, which will not help to increase the supply of subsidised housing (the CE's key housing priority).

8.2 Proposed Recommendations

8.2.1 The entire ex-LWL Campus (approximately 1.52 ha) directly abuts HKBU's boundary on three sides. Its location makes it the most logical site for future expansion of the University in the short, medium and long-term. From HKBU's perspective the entire ex-LWL Site is essential to meet the current and future education needs of the University.

8.2.2 The University is keen to develop a 'Conceptual Masterplan' for the integration of the entire ex-LWL Site into the surrounding HKBU Campus. The ex-LWL Site would offer the opportunity to effectively plan and incorporate current (student hostel) and future facilities within a well connected and integrated campus.

8.2.3 The proposed remedy to this Objection is to **revert** the Site at Renfrew Road, covering the southern part of the ex-Lee Wai Lee Campus (the "ex-LWL Site") back to "Government, Institution or Community (9)-(G/IC(9)) use". This will allow for comprehensive planning of the HKBU campus to help meet immediate and long-term needs. Should the proposed remedy be agreed to by the TPB, this Objection will be withdrawn.

Approved by:	Keren Seddon	
Edited by:	Cindy Tsang	
Prepared by:	Jennifer Gordon	
	Maggie Wu	
Date:	15 April 2013	
File Ref:	HKBU/LWLTI	

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

TPB/R/S/K18/17-26

校長
PRESIDENT AND VICE-CHANCELLOR

陳新滋教授
中國科學院院士
Prof. Albert S. C. Chan, Ph.D., J.P.
Member of Chinese Academy of Sciences

檔號編號：PDO/1303/097

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
規劃署副署長（地區）
黃婉霜女士, JP

黃女士：

浸大歡迎九龍城區議會全體發言議員反對前李惠利校舍用地改劃建議

政府於去年年底向　貴會提交九龍塘分區大綱圖修訂建議（《九龍塘分區計劃大綱草圖編號 S/K18/17》），當中修訂項目 A 項擬將位於九龍塘聯福道的前香港專業教育學院李惠利分校校舍（前李惠利校舍）的南面用地，由「政府、機構或社區」用地改劃為「住宅（乙類）」用地。浸會大學作為當區的持份者，一直反對把該幅教育用地改劃為高級住宅用地，認為既不能解決基層的住屋需要，又犧牲了珍貴的教育用地，是雙輸的方案。

九龍城區議會房屋及基礎建設委員會於本年 3 月 7 日舉行會議，討論包括由規劃署提交及介紹的討論文件第 15/13 號《九龍塘分區計劃大綱草圖編號 S/K18/17》，以徵詢議員對建議的意見。當日會議共有 20 位議員出席，當中發言的議員有 13 位，他們全部反對修訂項目 A 項的建議。現將他們的意見（根據區議會的錄音紀錄）歸納及摘錄供參考如下：

(1) 保留前李惠利校舍為 GIC 用地

張仁康議員：「我就覺得前李惠利校舍南部的土地留作 GIC 用地是較改作為住宅用地乙類地帶較為有效益，有公共效益，加上高等教育用地嚴重不足，……所以今次改變 GIC 用地，這個損失是無法挽回，我希望城規會諸君在作出決定的時候必須是要慎之又慎，平衡社會和各持份者的利益，亦都令相關人士包括地區人士在內，覺得這個決定是公道的……。」

黃以謙議員：「……我就想知道如果這幅地是轉不了其他用途，保留作 GIC 用地，那會否是優先給浸大使用呢？如果不是優先給他們用，為何不能呢？因為其實他們說他們不夠土地。」

蕭婉嫦議員：「我們覺得以人為本，實在市民最需要什麼，我們便應該善用這一幅珍貴的土地。」

吳富金議員：「我個人都認為前李惠利校舍應該繼續保留作 GIC 用途。」

劉偉榮議員：「如果這幅地繼續保留作 GIC 用地，你要在這方面努力時，我們有平台有方向有空間，如果你改了它，將來始終是對我們無可估量的損失。」

8000

黃潤昌議員：「這幅本身是 GIC 用地在市區內一定是買少見少的。……當然我建議這刻保留為 GIC 用地，不改變用途，……但如果變土地用途而賣地，這就沒有轉彎的餘地。」

勞超傑議員：「我個人意見始終在現階段政府沒有急切性要將這幅地轉作住宅乙類建豪宅。」

何顯明議員：「我希望發展局聽到今日所有區議員發言都全部……沒有一個會支持你們將這幅地轉作住宅用途，全部都要求規劃署，要求發展局將這幅地保留在 GIC 用途，而之後如何用再慢慢商討，不需要急，我們不想出錯，出錯後不能回頭。」

(2) 反對興建豪宅

陸勁光議員：「我們的估計絕對是一個豪宅的那類建築，……由 GIC 轉去了住宅物業乙類的，……我相信若以附近一個新的樓盤，以最近的賣價可能是說兩、三萬元一呎的……助長了豪宅發展，其實這個已經跟政府的房屋政策有點問題。」

任國棟議員：「今日這個議題會令我更加察覺得到政府是偏重商家豪宅……若你們真的聽我們的意見，我希望你們聽清楚區議會的意見，不希望那裡變成豪宅。」

勞超傑議員：「其實政府部門是應該要開放思維，因為香港人現時的住屋需要，……我相信整體上的需要並非豪宅上的需要，而是基層市民的住屋問題和青少年的置業問題。」「我作出簡單的總結，其實好簡單地說，基本上議員所發言的都不贊成政府將這幅地建豪宅。」

張仁康議員：「我對前李惠利的地皮，南面的地皮由這個政府機構或社區，即 GIC 用地改為住宅乙類，其實就是豪宅來的，豪宅的用地是相當有保留。」

黃潤昌議員：「若用現時這種理由來改變用途，變成住宅用途乙，似乎理據實在不充分。我們普羅大眾現時所欠缺的住宅用地，而不是豪宅用地，我看不到有任何理由是支持李惠利南面部分是住宅用地。」

吳靄金議員：「其實現時將這幅土地改變為住宅用地，只是建了五百個豪宅，對於解決香港現時欠缺住宅用地幫助不大。」

劉偉榮議員：「所以你那麼大動作要去將 GIC 用地去改變來說，應該將目標定得非常清晰……真是為了我們普羅大眾解決住屋問題，我們是支持的。但是很可惜，我是不贊同這個李惠利用地的改變。我是不贊同的。」

何顯明議員：「我們自由黨要求不能建豪宅，在諮詢期未完之前，就要從賣地表出抽出這幅地皮。」

潘志文議員：「規劃署專員所說……你的關注是換樓，我剛聽一些議員說如果手持二千多萬，不一定要買這裡，有很多選擇，你不用理他們換那裡的樓，為何一定要將這幅地作換樓，重中之重是上樓，不是換樓。」

(3) 土地規劃不協調

張仁康議員：「……我區附近有一間大學宿舍，將一個住宅或豪宅放在大學宿舍的隔鄰，將來會有很多問題。我就已經接到很多投訴的個案，不怪得誰，就是噪音問題，學生產生的噪音問題，無日無之，亦都是解決不了。」「專員在說學生宿舍跟豪宅都是住的地方，很輕描淡寫，但我不知道你是否知道當地居民與學生的噪音所造成的反應，曾經……反對它建行人天橋，令到要吊起來的鋼架就在放碼頭上曬太陽曬了數個月，你看多尖銳，所以這個要深思。」

陸勁光議員：「要平衡這個地區的一致性……。」

黃以謙議員：「如這幅地轉了做住宅用地，會不會跟浸大能配合呢？」

任國棟議員：「專員……你竟然說宿舍和住宅是類近，……這張相片是本人辦事處對出的……在上星期的情況，約十二點多，那裡有過百人聚集，我不是要針對學生，他們為同學慶祝生日唱生日歌，後來甚至弄到有衝鋒車來。你跟我說這些情況沒有問題。」「我們部分區議員上星期二曾經去過，除了多邊都是很近浸大之外，我們也親眼看見那裡旁邊就有一個消防局。豪宅併消防局將會十分不開心。……我只可以總結一句，就是你們的建議是一個規劃錯配的建議。」

吳靄金議員：「改變這個土地用途之後，反而會破壞整體社區和諧。」

劉偉榮議員：「在宿舍旁建豪宅對將來豪宅的居民亦不公道。這不是針對大學生生活的問題，而這是難以避免的。我自己的選區已有很多很多無數無數的投訴，深夜時打電話求助和報警，這些事件有很多。……希望城規會要認認真真、審慎行事作出決定。」

(4) 缺乏諮詢和溝通

何顯明議員：「區議會並沒有收到任何諮詢，也沒有問過居民，……另外在諮詢期間，突然間會將這幅地放在貨地表上……。」

陸勁光議員：「……在今次缺乏全面性諮詢下，就作出一個放在勾地表的話，我覺得是有點倉卒和過程中亦不是能夠盡善到在周遭社區上的意見……。」

吳寶強議員：「希望政府聽多一點居民的意見。」

蕭亮聲議員：「你有否問過真正的相關持份者？有否問過學生這幅地其實有沒有需要繼續用作教育用途呢？……你說的諮詢根本就是假諮詢。」

勞超傑議員：「我個人的意見是如果政府未有得到充分的諮詢下就讓它去建豪宅，我覺得普遍市民對你們的做法是有保留。……應該去廣泛諮詢社會的意見，去聽多一點不同的聲音，再去作一個決定。」「所以我認為政府、浸大和兩所有辦中醫的大學應加密聯繫，……教育局和食衞局藉着這個機遇應該主動聯絡有關大學，商討如何將中醫的發展推進得快一點。……浸大方面，我希望政府多跟他們溝通如何發展中醫業，讓普羅大眾的市民受惠。」「至於用途方面，我相信議員認為局方要作出廣泛的諮詢，要聆聽市民的意見，希望發展局要……是要問市民的意見。……希望局方善用這階段廣納民意，從善如流，為全港市民的福祉謀利益。」

蕭婉嫦議員：「我自己覺得政府推出土地的時候，……之前沒有諮詢我們，……政府應該好好的同浸大商討，我覺得大家的溝通十分重要。」

潘志文議員：「你究竟有沒有跟學校那邊進行較深入的溝通？為何目前一間都未有的中醫教學學院，你覺得沒有需要？……你和學校那邊溝通了多少？」「你們在過程之中有些細節應該多跟校方商量。」

吳靄金議員：「現時大家都看到現時對於這幅地改變用途，……社會的反對聲音是非常強烈。即是其實表示政府在改變這個李惠利校舍用地之前根本欠缺一些諮詢。沒有好好的和附近的居民溝通，諮詢附近居民的意見。我覺得如果政府真的是想聽市民的聲音，就不應該事先將這個前李惠利校舍放進寶地表。」

張仁康議員：「我亦認為各位官員應該聽取浸大師生的意見……。」

(5) 支持中醫藥發展

吳寶強議員：「我個人就較支持中醫規劃的發展，因為其實香港的中醫服務和人才都好缺乏，很多慢性病和長期病患更加是需要中醫的照顧和服務。」

蕭婉嫦議員：「我自己來說認為應該支持他們建中醫醫院。……我十分支持中醫的研究。」

劉偉榮議員：「……希望政府應該大力推動中醫的發展，……中醫是對香港市民來說是不可缺少的。」

何顯明議員：「既然我們沒有中醫院或者如浸大所說的綜合性的中醫院，這件事應是有優先的次序的。……居民們都十分支持中醫發展。」

張仁康議員：「……覺得中醫藥或中醫院在政府來說是要大力推動……。」

勞超傑議員：「我想強調本身的個人意見是非常支持中醫藥的發展，而我亦了解特首的方向是支持中醫發展……。」

黃潤昌議員：「政府真的要在中醫政策上加倍努力，表示支持。……浸大為全港最大的中醫教育機構，我覺得既然大學有承擔，是否政府都應該配合呢？」

我深信大家都同意，區議員是市民與政府之間的溝通橋樑，有責任就區內人士關注的事項為他們發聲。上述的議員發言摘錄充分反映市民的心聲，敬希　貴會詳加考慮，在全面諮詢公眾對土地用途規劃的意見後，作出公平合理的決定。

香港浸會大學校長

陳新滋 敬上

陳新滋　謹啟

2013 年 3 月 21 日

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

校長
PRESIDENT AND VICE-CHANCELLOR

陳新滋教授
中國科學院院士
Prof. Albert S. C. Chan, Ph.D., J.P.
Member of Chinese Academy of Sciences

檔號編號：PDO/1304/113

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
規劃署副署長（地區）
黃婉霜女士, JP

RECEIVED
2013 APR -8 P 5:42
TOWN PLANNING BOARD

黃女士：

立法會教育事務委員會通過
「反對政府將前香港專業教育學院李惠利分校的教育用地改變用途」議案

政府於去年年底向城市規劃委員會提交九龍城分區大綱圖修訂建議（《九龍塘分區計劃大綱草圖編號 S/K18/17》，修訂項目 A 項），擬將位於九龍塘聯福道的前香港專業教育學院李惠利分校校舍（前李惠利校舍）的南面用地，由「政府、機構或社區」用地改劃為「住宅（乙類）」用地。浸會大學一直反對把該幅教育用地改劃為高級住宅用地，認為既不能解決基層住屋的需要，又犧牲了珍貴的教育用地，是雙輸的方案。

立法會教育事務委員會於本年 3 月 11 日舉行會議，議程中的第 IV 項為「使用土地作教育用途的現行政策相關事宜」，所有議員均獲邀參與討論這事項。除了委員會的主席及副主席外，該會議共有 10 名議員出席，另有分別代表教育局、食物及衞生局和發展局的政府官員列席，以及多名來自香港浸會大學、香港建築師學會、香港規劃師學會及香港城市設計學會的專業人士獲邀出席。在會上並無議員支持將前李惠利校舍改劃為住宅用地，委員會並通過議案：「反對政府將前香港專業教育學院李惠利分校的教育用地改變用途，撥入賣地表作興建中密度豪宅，並要求政府保留前香港專業教育學院李惠利分校校舍用地，作『政府、機構或社區』（GIC）用途，包括作原教育用途」。

對於上述議案獲得通過，我們深表歡迎。現將他們的意見（根據當天會上的錄音紀錄）歸納及摘錄如下，以供 閣下參考：

(1) 要求保留前李惠利校舍為教育用地，反對改劃為豪宅用地

張超雄議員：「這幅用地多年是屬所謂的 GIC，即政府及公共設施用途的土地，而多年來都是作教育用途。我們不明白政府有何特別的理據要將這幅土地撥入賣地表之中，申請改變用途，將它改變成中密度的住宅。」

「我們想政府告訴我們有何理據，你要將一幅多年來作教育的用地改成一個中密度豪宅呢？迫切性何在？如何去滿足正如文件所說的在教育上的用地是相當渴求？」

Printed on 100% Recycled Paper

莫乃光議員：「豪宅建在這幅地上，即是圍着的全是學校，……根本上完全是沒有可能的。」
「現時香港欠了幾多的豪宅供應？而你又要在九龍塘供應多一點的豪宅……」

黃毓民議員：「你說現時土地短缺，都是興建豪宅，這個是十分荒謬的說法，那裡是用作教育用途，……原本是教育和社區用途，無端端將一半的用地用作建豪宅，這已經是一個道德上的問題，這是值得譴責這個政府。」

香港城市設計學會代表吳永順先生：「……況且政府用這幅土地建豪宅，又可以解決到今天樓價高企、劏房問題嗎？」

梁國雄議員：「人家在說的是作為一間大學，它要做一個中醫學院，這幅地本來是教育用地，你會不會讓它做而已。」

黃碧雲議員：「現時三間大學培訓的中醫人才，都欠缺一個臨床實習的醫院給他，這個又是否理想的做法呢？還是你認為與你們無關呢？這個又是否算是教育的用途呢？即是你可有考慮這個都需要教育用地呢？」

(2) <u>欠缺長遠發展規劃</u>

建築師學會代表何文堯先生：「我們覺得政府需要馬上重新整體檢討大學的發展和訂立一個可行的長遠政策，不應藥石亂投，如果不是，我們相信它未必能夠解決住宅短缺的問題，而同時可能引起其他的社會問題。」

何俊仁議員：「其實我的問題就是教育局當你參與這個決定之時，除了你看 UGC 目前考慮的…你們覺得這個需求是否足夠之外，有沒有看它未來發展的計劃，有沒有大家協商，尤其是現在所涉及的中醫發展？這包括到政府一個宏觀的政策和推動中醫的發展？」
「我覺得很驚訝，如果這樣說，大學可遍佈全港九，將來某一個 campus…全個港九新界都可以分散，這個怎會是一個好的規劃呢？」

林大輝議員：「（政府）有沒有考慮到浸大的長遠發展？」
「有沒有徵詢浸大長遠發展是否需要這幅地？」

吳永順先生：「今天我們所做的住宅用地似乎是一個交數式的規劃，只是顧及住宅，而罔顧其他城市規劃必需的一些元素，我們不是只說住宅規劃，城市規劃是需要兼顧很多東西，包括教育、醫療、公共空間的用地。李惠利這幅地是浸會大學三面環繞的，雖然它今天不是屬於浸會大學，但是作為一個大學的發展，我們在說長遠的規劃，不是說今年要不要地，因為這幅地撥給建豪宅，以後就不見了。縱使你說今天浸會沒有即時需要，但為何不能為大學的長遠發展來保留這幅地作教學用地呢？」

「.....根本就是一個藥石亂投的做法，所以我希望議員可以留意我們今天講的純粹是一個規劃的問題，是一個長遠發展的問題。」

梁國雄議員：「.....所以你就說不給浸會，浸會已經夠了，根據現時的規劃。但人家說明是擴充的。根據現時的規劃就一定不給，但人家說明是擴充，擴充的時候就不夠了，是嗎？」

張超雄議員：「如果發展局是有個長遠的規劃，有個遠景和有少少常識的話，政府應該不會容讓這件事情的發生。」

葉建源議員：「另一個問題就是整個教育規劃到了現在已經是非常危險的情況。在今天教育局提供的文件當中，第 12 段說，我們現時將土地交出來，因為已經滿足了浸大現時的需要。剛才的解釋是滿足到 2014 年至 15 年的需要。我們的教育土地失去了，拿了出來就失去了。如果只是滿足到 2014 至 15 的要求，2016 年怎麼辦？2016 年的時候，我們的土地全都失去了。我們尚有一些中小學土地用地，若要滿足現時的土地需要的話，都拿了出來，那我們日後在那兒找地？我們的土地用作教育規劃，怎樣去做呢？如何可以預測到我們短期、中期、長期的需要？若我們說只是純粹到 2014 至 15 的，這個土地規劃方式我覺得是完全沒有辦法接受，也會令香港陷於萬劫不復的境地。」

(3) <u>浸大的需求與客觀環境的配合</u>

毛孟靜議員：「我有點出奇，說來說去都是一幅很小的地，但對大學的意義卻是很大，所說的是 0.64 公頃。」

「就是這幅地，全是被浸大所包圍着。」

「明明是在浸大的地圖內，你爭拗甚麼呢？」

張超雄議員：「我們亦知道這幅地基本上是由浸會大學的校園所包圍，設施基本上都在它的附近。浸會大學多年來渴求進一步有更多土地，包括宿舍和興建中醫院的設施。」

吳永順先生：「.....所以大學要擴展，在鄰近的土地擴建，縱使不是說必然，但是說亦都是合乎常理，一個理所當然的事情。」
「其實你在隔離做發展，是很 common sense 的一件事情.....」

(4) 程序失誤

何文堯先生：「政府在城規會上未根據城規會條例將這個地段改變作住宅用途，就已經將它納入下年度的賣地表，我們覺得這個做法是值得商榷的。同時將這個地皮改為住宅用途，有關的論據和專業判斷，我們覺得是無辦法服人的。」

梁耀忠議員：「你們發展局就無規無矩，城規會未傾過你們就已經將地放在賣地表上，究竟政府是有規有矩，還是無規無矩的呢？」

張超雄議員：「政府公布下年度賣地方面，我們驚奇地發現在 22 幅要撥入賣地表中，其中一幅就是包括了現在非常具爭議性的前李惠利工業學院這幅用地。」

(5) 缺乏諮詢和溝通

張超雄議員：「局方有沒有清楚地徵詢浸大其實它們是否已經足夠用地呢？這個徵詢是何時做和如何做？」
「這裡教育局就說他有諮詢浸大，但浸大的陳校長剛剛，.....亦非常清楚表示沒有，沒有諮詢過。我想教育局你們說清楚，你們究竟有沒有諮詢，現時浸大說沒有諮詢，而你們說有諮詢。請你們提供你們的時、地，何時諮詢？」

梁耀忠議員：「政府做事越來越.....愛做甚麼就做甚麼，就不用理會所謂持份者的想法，亦都不用理會公眾諮詢情況是甚麼樣，要做便做。」

林大輝議員：「秘書長，你的公開諮詢還未結束的。你不會不聽取公眾意見吧？」
「但你已放在賣地表上，你如何能說是建議？你現在是『監人乃後』。」

何俊仁議員：「其實在這個決策的過程中是否純粹是規劃的……發展規劃是全部被牽頭，而教育局方面是完全沒有被諮詢？……我想知道政府部門內有沒有商討和協調？」

葉建源議員：「根據浸大給我們提供的資料，就在上年的10月10日之時，浸大是明確地有一封電子郵件是發給了食衞局，並提及應運用李惠利的校舍作為中醫院的選址。我想證實一下食衞局是否收到封這樣的電郵？」

「我想問清楚，意思是否指他們收到一份建議書，但在10月10日雖然收到一份電子郵件，已經清楚知道浸大的意向，但他們當作看不見，然後正式要待到……2月18日的正式通知，才當作正式通知呢？」

「就是12月21日的時候，將件事交給城規會，突然之間說要把土地用途改變，這個我認為是不可接受的一件事，也是一件很蝕的事。」

(6) 支持中醫藥發展

黃碧雲議員：「我想今日的問題不只是教育的問題，其實問題還涉及政府對於中醫發展的取態是怎樣，因為現根據浸大的建議，希望前李惠利校舍的南部土地是用作建中醫的教學醫院，問題是政府是否支持香港發展中醫？」

「但現時我們看到有幾所大學其實都是有相關的中醫課程出現的，……但就是沒有醫院能讓他們實習中醫的。……一是說政府支持中醫的發展，你便想想為何我們沒有中醫的醫院和中醫的教學醫院，而要我們的學生走到內地，課程、實習和對病人各樣都可能不配套。」

「但似乎從你們的動作來看，就不見得政府是真的很落力的，很認同香港需要發展中醫醫院。現時浸大可算是民間牽頭自己去籌募經費，很可憐的去乞一塊土地回來，不要轉變用途。那現時都很多阻撓。」

毛孟靜議員：「由董建華時代到現在梁振英，施政報告中都會絕對支持中醫港中藥港，我們是沒有中醫的教學醫院，浸大的是要去廣州，……而港大和中大是要到上海實習。」

梁耀忠議員：「但你們政府為中醫做了甚麼？如果沒有一間中醫院，如何發展中醫的研究呢？有沒有想過這個問題呢？……但問題在於研究方面如何發展，有甚麼地方可提供他們研究？有沒有想過這方面的發展？」

「我真的覺得奇怪，高永文……我叫他作醫生，他最近與我談天，他都說是需要有中醫院，但不過要由政府成立一間中醫院是困難的，所以他贊成由大學辦一間中醫院，而現時浸會開始做這個功夫，走出第一步，為何又要處處阻撓？」

何俊仁議員：「究竟教育局是否支持浸會大學是有這個需要是作為繼續因為教育的用途來興建一個新的中醫學院？」

「其實我問題就是教育局當你參與這個決定之時，除了你看 UGC 目前考慮的……你們覺得這個需求是否足夠之外，有沒有看它未來發展的計劃，有沒有大家協商？尤其是現在所涉及的中醫發展？這包括到政府一個宏觀的政策和推動中醫的發展？」

梁國雄議員：「本來是沒有中醫院的，突然有人說做，學校旁有一幅教育用地，它要求你給它做，你就跟人家打官腔。」

我們認為教育是社會發展之本，而教育用地十分珍貴，如前李惠利校舍用地一旦改作住宅用途，將造成不可挽回的損失，上述立法會議員及專業人士的發言摘錄充分說明他們亦認同政府的改劃建議並不可取。立法會議員與民意基礎，他們在社會上的代表性毋庸置疑，懇請　閣下在考慮他們及公眾人士對是項土地用途規劃的意見後，作出明智的決定。

香港浸會大學校長

陳新滋

陳新滋　謹啟

2013 年 4 月 3 日

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

COUNCIL

主席：鄭恩基太平紳士
Chairman: Cheng Yan-kee, JP

27 March 2013

RECEIVED
2013 MAR 28 P 5:10
TOWN PLANNING BOARD

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

Dear Sirs,

Opposition to Amendment Item A to
the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17
in respect of the southern portion of the former campus of
the Hong Kong Institute of Vocational Education (Lee Wai Lee) (LWL)

On behalf of the Council of Hong Kong Baptist University (HKBU), I write to lodge an opposition to the captioned amendment with regard to the rezoning of the southern portion of the former campus of the Hong Kong Institute of Vocational Education (Lee Wai Lee) (the Southern Site) from "Government, Institution or Community (9)" (GI/C) to "Residential (Group B)".

At the HKBU Council meeting held on 19 March 2013, members noted the development of the LWL issue and the chronology of events related to the issue since 2005. Members also noted the opposition views expressed by the local community, in particular by those 13 District Councillors who spoke at the Housing and Infrastructure Committee meeting of the Kowloon City District Council on 7 March 2013, by the Legislative Councillors at the Panel on Education meeting of the Legislative Council on 11 March 2013 and by our University community, including staff, students and alumni.

At that meeting held on 19 March 2013, the Council had an in-depth discussion on the rezoning proposal and came to a consensus on the stance of the Council of the University.

HKBU is grateful to the Government for retaining the northern portion of the LWL Site for higher education to help alleviate the shortage of hostel places for students. However, regarding the Southern Site, we are most keen to engage in a dialogue with the Government in the hope that it would be considered for the long-term development of HKBU including the establishment of a Chinese medicine

香港 九龍塘 Kowloon Tong, Hong Kong 電話 Tel : (852) 3411 7950 傳真 Fax : (852) 2338 7644
電郵 E-mail : ccsecretariat@hkbu.edu.hk 網址 Website : www.hkbu.edu.hk

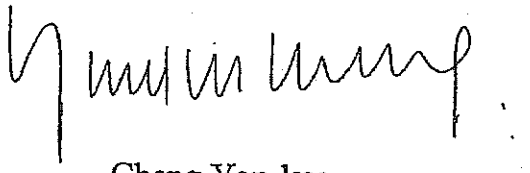
teaching hospital to serve the needs of the public for in-patient Chinese medicine services, offer internships to Chinese medicine students and facilitate clinical research in line with the *Vision 2020 Statement** of the University. We believe this proposal represents the most effective use of such a valuable piece of land.

HKBU is of the view that the rezoning of the Southern Site from GI/C land use to residential development is totally incompatible with a university environment and it should be deferred pending further studies and consultation.

We would be most grateful if the Town Planning Board could consider the views of the HKBU Council as the University is a major stakeholder in this issue and the proposed change of land use of the Southern Site will have an immense impact on the University's future development.

We trust the Town Planning Board would seriously take into consideration the views of the HKBU Council and other concerned stakeholders as well as the general public expressed during the consultation period. We thank the Board in advance for a thorough deliberation on the matter, for exercising its discretion and for considering turning down the rezoning proposal.

Yours faithfully,



Cheng Yan-kee
Chairman of the Council and the Court

* *Vision 2020 Statement* is a strategic development blueprint that charts HKBU's development over 10 years since 2010 and states the University's goal of becoming the best provider of Whole Person Education through a focus on Quality Teaching and Learning, Innovative Research and Dedicated Service to the Community. Each focus area has a number of strategic actions to be taken, which include strengthening research related to health and the establishment of a first-rate Chinese medicine teaching hospital.

cc: Mr. Eddie Ng Hak-kim, SBS, JP, Secretary for Education
Mr. Edward Cheng Wai-sun, SBS, JP, Chairman of University Grants Committee

Annex II-19 of
TPB Paper No. 9585

TPB/R/S/K18/17-28

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

中醫藥學院
SCHOOL OF CHINESE MEDICINE

院長及講座教授(中醫藥):呂愛平教授
Dean and Chair Professor in Chinese Medicine : Prof. Aiping LU, Ph.D.

12 April 2013

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

Dear Chairman and members,

Opposition to Amendment Item A
to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

The School of Chinese Medicine of the Hong Kong Baptist University (HKBU) strongly opposes Amendment Item A to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17.

The rezoning of land is a very serious matter in Hong Kong where land (especially land in the urban area) is scarce; it warrants and requires very careful consideration and wide consultation with all stakeholders. First and foremost, the long-term interests of the local community and the entire city of Hong Kong have to be taken into consideration in making land rezoning decisions. As far as the rezoning of the land occupied by the former campus of the Hong Kong Institute of Vocational Education (Lee Wai Lee) (LWL site) is concerned, we are of the opinion that there has not been adequate consideration of all relevant factors and consultation with all stakeholders. We are aware that the Housing and Infrastructure Committee of the Kowloon City District Council and the Panel on Education of the Legislative Council have opposed the rezoning of the LWL site for residential development. Our School has explained the circumstances of the proposed rezoning to thousands of citizens from all walks of life and succeeded in soliciting their support to write to your Board to oppose the rezoning. We earnestly request your Board to heed to the voices of the large number of people who have decided to speak for the common good.

The School believes that the devotion of the entire stretch of land on Renfrew Road from Junction Road to Hereford Road, including the LWL site, to educational purposes would make the best sense. Education is a long-term investment to nurture talents to

R012

Printed on 100% Recycled Paper

serve the people of Hong Kong and sustain its robust development. In today's knowledge-based economy, it is of paramount importance for Hong Kong to develop itself into an education hub. It would therefore only be logical to devote the land to support the growth of HKBU, which has been nurturing numerous talents for Hong Kong since its establishment back in 1956.

Like western medical education, Chinese medical education entails classroom teaching, laboratory teaching and clinical teaching in a teaching hospital. A medical education without clinical teaching in a teaching hospital is unheard of. A pioneer in the provision of CM programmes funded by the University Grants Committee in Hong Kong, our School has been providing quality education in CM since 1998 but we have not been able to secure a plot to build a CM teaching hospital in Hong Kong to serve as the base of our clinical teaching until now. Without its own CM hospital, the CM education in Hong Kong would not be a systematic CM education. Our proposed CM teaching hospital would not only be the venue to provide clinical training, it would also enable us to conduct clinical research, which would contribute to the advancement of CM, the standardization and modernization of CM as well as the integration of Chinese and western medicine. The CM teaching hospital is long overdue, and the grant of the LWL site to HKBU to build a CM teaching hospital will not only benefit our students but also the development of Chinese medical education and the CM profession and industry in Hong Kong.

A CM teaching hospital is not only urgently needed to support our teaching and research but it will also cater to the needs of our city for CM inpatient and outpatient medical services. We have recently commissioned the Centre for Communication and Public Opinion Survey of The Chinese University of Hong Kong to conduct a survey on public perception towards CM services in Hong Kong. The survey results support our view that there is an urgent and genuine need for a CM teaching hospital, with more than 80% of the people surveyed indicating that Hong Kong needs a CM hospital and 80% of the respondents in favour of setting up a CM hospital with teaching functions in Hong Kong. With an aging population in our city, the demand for medical services is rising sharply. Due to the increasing popularity of CM in Hong Kong, a CM hospital will cater to public needs and complement the services provided by other hospitals.

The LWL site is the ideal site for us to establish the CM teaching hospital. Having the CM teaching hospital next to our School building would save a lot of travelling time and other resources because our CM scholars and experts would be able to teach and conduct research on campus and go to the CM teaching hospital next door to teach clinical classes, supervise the students in their internship, and attend to patients. It is also the convention for medical universities/schools worldwide to have their teaching hospitals near their campuses.

The rezoning of the LWL site for residential development is not in the interests of the community. The construction of residential development in the midst of the HKBU campus would also call into question the compatibility of the two types of land use in close proximity. Once it is decided that the LWL site is rezoned for residential development, the decision is irrevocable—the site will never be available for the proposed CM teaching hospital or any other community facilities.

On behalf of the students, staff and alumni of the School of Chinese Medicine, I would like to convey to you our strong opposition to the rezoning of the LWL site, currently zoned "Government, Institution or Community (9)", for residential use. We trust that the Town Planning Board has the best interests of our city at heart and will make the best decision to benefit many generations of Hongkongers.

Yours sincerely,

Lu Aiping
Dean of Chinese Medicine

香港浸會大學學生會
Hong Kong Baptist University Student Union

香港浸會大學學生會反對更改李惠利地皮土地用途

根據政府所指，浸大現時對樓面教學空間的需求已有 93.6%獲得滿足，是全港市區大學中滿足率第二高的校園，又指浸大獲批接近 12 億公帑擴建校園。但是，浸大的新教學大樓是於校園原址加建，並不如其他大學般獲批額外土地增建。除此之外，浸大雖然獲得 93.6%的校園空間滿足率，但校園總面積及人均面積仍然是八所資助院校中最小，新學制的推行使原本已十分狹小的校園空間更為擁擠。同時，浸大兩幢新建的教學大樓中，傳理及視藝大樓是政府償還浸大欠缺的校園空間，新教學及行政大樓才是為了應付新學制雙倍的學生人數而加建的。因此本會需澄清一個事實，在沒有額外土地作擴建的情況下，無論如何在校內進行任何改建也不能有效改善校園空間不足的問題，而並非如政府所指滿足了教學空間就等於浸大的校園空間足夠。

本港的高等教育界一直存在教育用地不足的問題，當中浸大的情況尤其嚴重。在 334 雙學年下，雖然浸大能夠興建新教學大樓解決燃眉之急，但新教學大樓是於原有的校園土地上加建，使本來的校園空間更加擠逼。因此，浸大極需要額外的土地資源作大學的長遠發展，以及解決校園擠擁的問題。李惠利地皮一直劃分為教育用地，如今政府卻擅自更改教育用地為住宅用地興建豪宅，更辯稱利用李惠利地皮興建住宅能夠解決香港市民的住屋需求，利用房屋供應作凌駕所有社會發展之藉口。在香港市民面對樓價上升而怨聲載道之時，政府一邊拖延興建公屋及居屋，另邊廂不斷將大量土地更改用途供大財團謀取暴利。港府犧牲培育未來棟樑的高等教育發展，強搶教育用地作大財團生財工具，漠視本港高等教育的長遠發展需要，此等做法實在可恥。

政府於二零一三年三月四日的聲明中提到：「政府經評估後，認為前李惠利校舍用地南面部分用地適合改劃作住宅用途，以回應市民對房屋的需求。」根據政府文件，李惠利地皮的土地用途將被改為「住宅用途（乙類）」，用以興建中密度住宅。而李惠利地皮亦有各種建築限制，只能建成 496 個私人住宅單位，根本不能讓普羅大眾受惠。說穿了，政府就是偏幫大財團，讓他們可以藉發展豪宅以牟取暴利。可見香港政府非常短視，為了一時的賣地收入而忽視高等教育界的長遠發展。若李惠利地皮更改土地用途一事獲得通過，本港將會失去一幅適合高等教育界發展的地皮。有一必有二，李惠利地皮的先例一開，政府將可以無視土地分類制度，強搶教育用地、社區用地予地產商牟利，這種做法實在是極為可恥。本會希望香港政府能夠以民為本，權衡高等教育及社會長遠發展的重要性，好好運用本港的土地。

香港政府於聲明中表示，於城規程序完成之先將土地納入勾地表是慣常做法，絕對沒有不公不義。同時，「偷步」勾地亦能壓縮賣地程序，加快土地供應。雖然政府對此等不公平行為習以為常，但習慣並不等於該程序是合理及正確的做法。諮詢期尚未完結時，政府便將李惠利及其他二十餘幅地皮納入新一輪勾地表，欲藉此向城規會施壓。本會認為政府此舉完全忽視市民及區議會意見，並有誤導公眾

之成分！政府在城規程序尚未完結便「偷步」納入勾地表，此舉絕對不符合程序公義，亦無視城規會在事件中所擔當的決策角色，這是對城市規劃程序的不尊重、對社會的不尊重，更是對法治的不尊重！

政府將一幅位於大學建築群內的土地規劃作興建豪宅之用，完全違背城市規劃的原則。李惠利地皮位於大學建築群內，三面被浸大包圍，周邊的社區設施根本未盡完善，不適合興建住宅，可看出政府完全欠缺長遠的城市規劃方針。為了落實特首的「全民搵地」計劃，政府任意把社區、教育用地更改作住宅用地。此先例一開，政府將會將更多社區及教育用地改作住宅用途以興建豪宅，政府能夠為了大財團利益而不顧土地運用的原則，屆時土地分類制度的設立將變得毫無意義。

在此，本會希望城規會能夠重視社會上眾多的反對聲音，拒絕作香港政府的橡皮圖章。以公平、公開及公正的態度審核更改李惠利土地用途一事，同時，亦希望城規會能夠好好運用本港有限的土地資源，以民為本，不再向政府及地產商傾斜，顧及香港社會的長遠發展利益。

香港浸會大學學生會
二零一三年四月十五日

RECEIVED
2013 APR 15 P 5:08
TOWN PLANNING BOARD

就草圖作出申述
Representation Relating to Draft Plan

參考編號
Reference Number: 130415-124938-53405

R29

提交限期
Deadline for submission: 15/04/2013

提交日期及時間
Date and time of submission: 15/04/2013 12:49:38

提出此宗申述的人士
Person Making This Representation: 香港浸會大學學生會

申述詳情
Details of the Representation :

與申述相關的草圖
Draft plan to which the representation relates: S/K18/17

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
S/K18/17	反對 Oppose	根據政府所指，浸大現時對樓面教學空間的需求已有93.6%獲得滿足，是全港市區大學中滿足率第二高的校園，又指浸大獲批接近12億公帑擴建校園。但是，浸大的新教學大樓是於校園原址加建，並不如其他大學般獲批額外土地增建。除此之外，浸大雖然獲得93.6%的校園空間滿足率，但校園總面積及人均面積仍然是八所資助院校中最小，新學制的推行使原本已十分狹小的校園空間更爲擁擠。同時，浸大兩幢新建的教學大樓中，傳理及視藝大樓是政府償還浸大欠缺的校園空間，新教學及行政大樓才是爲了應付新學制雙倍的學生人數而加建的。因此本會需澄清一個事實，在沒有額外土地作擴建的情況下，無論如何在校內進行任何改建也不能有效改善校園空間不足的問題，而並非如政府所指滿足了教學空間就等於浸大的校園空間足夠。 本港的高等教育界一直存在教育用地不足的問題，當中浸大的情況尤其嚴重。在334雙學年下，雖然浸大能夠興建新教學大樓解決燃眉之急，但新教學大樓是於原有的校園土地上加建，使本來的校園空間更加擠逼。因此，

1503

浸大極需要額外的土地資源作大學的長遠發展，以及解決校園擠擁的問題。李惠利地皮一直劃分爲教育用地，如今政府卻擅自更改教育用地爲住宅用地興建豪宅，更辯稱利用李惠利地皮興建住宅能夠解決香港市民的住屋需求，利用房屋供應作凌駕所有社會發展之藉口。在香港市民面對樓價上升而怨聲載道之時，政府一邊拖延興建公屋及居屋，另邊廂不斷將大量土地更改用途供大財團謀取暴利。港府犧牲培育未來棟樑的高等教育發展，強搶教育用地作大財團生財工具，漠視本港高等教育的長遠發展需要，此等做法實在可恥。

政府於二零一三年三月四日的聲明中提到：「政府經評估後，認爲前李惠利校舍用地南面部分用地適合改劃作住宅用途，以回應市民對房屋的需求。」根據政府文件，李惠利地皮的土地用途將被改爲「住宅用途（乙類）」，用以興建中密度住宅。而李惠利地皮亦有各種建築限制，只能建成496個私人住宅單位，根本不能讓普羅大眾受惠。說穿了，政府就是偏幫大財團，讓他們可以藉發展豪宅以牟取暴利。可見香港政府非常短視，爲了一時的賣地收入而忽視高等教育界的長遠發展。若李惠利地皮更改土地用途一事獲得通過，本港將會失去一幅適合高等教育界發展的地皮。有一必有二，李惠利地皮的先例一開，政府將可以無視土地分類制度，強搶教育用地、社區用地予地產商牟利，這種做法實在是極爲可恥。本會希望香港政府能夠以民爲本，權衡高等教育及社會長遠發展的重要性，好好運用本港的土地。

香港政府於聲明中表示，於城規程序完成之先將土地納入勾地表是慣常做法，絕對沒有不公不義。同時，「偷步」勾地亦能壓縮賣地程序，加快土地供應。雖然政府對此等不公平行爲習以爲常，但習慣並不等於該程序是合理及正確的做法。諮詢期尚未完結時，政府便將李惠利及其他二十餘幅地皮納入新一輪勾地表，欲藉此向城規會施壓。本會認爲政府此舉完全忽視市民及區議會意見，並有誤導公眾之成分！政府在城規程序尚未完結便「偷步」納入勾地表，此舉絕對不符

		合程序公義，亦無視城規會在事件中所擔當的決策角色，這是對城市規劃程序的不尊重、對社會的不尊重，更是對法治的不尊重！ 政府將一幅位於大學建築群內的土地規劃作興建豪宅之用，完全違背城市規劃的原則。李惠利地皮位於大學建築群內，三面被浸大包圍，周邊的社區設施根本未盡完善，不適合興建住宅，可看出政府完全欠缺長遠的城市規劃方針。爲了落實特首的「全民搵地」計劃，政府任意把社區、教育用地更改作住宅用地。此先例一開，政府將會將更多社區及教育用地改作住宅用途以興建豪宅，政府能夠爲了大財團利益而不顧土地運用的原則，屆時土地分類制度的設立將變得毫無意義。 在此，本會希望城規會能夠重視社會上眾多的反對聲音，拒絕作香港政府的橡皮圖章。以公平、公開及公正的態度審核更改李惠利土地用途一事，同時，亦希望城規會能夠好好運用本港有限的土地資源，以民爲本，不再向政府及地產商傾斜，顧及香港社會的長遠發展利益。

對草圖的建議修訂(如有的話)
Proposed Amendments to Draft Plan(if any):

April 10, 2013

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

TPB/R/S/K18/17-30

Dear Sir,

Opposition to Amendment Item A
to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

This is writing to oppose the captioned amendment and request that the zoning of the southern part of the ex-Lee Wai Lee Campus be kept for "Government, Institution or Community (9)" purpose.

Since its establishment in 1956, the Hong Kong Baptist University has embraced the unique vision of "Whole Person Education." As a higher education institute of Christian heritage, HKBU has provided high-quality education for youngsters who have later become leaders of society. HKBU is united as well as dynamic, with its staff and students dedicated to their work and striving to be "creative, innovative and excellent in their endeavors." HKBU has grown in academic stature, and achieved international recognition as an institute showcasing "broad-based and creativity-inspiring education, research and scholarship."

In order to continue its mission for excellent education, HKBU has worked to the best of its ability to successfully meet the challenges ahead. One of the indispensable conditions in supporting HKBU to better serve the community in the future is space.

The former Lee Wai Lee Institute site, which is adjacent to HKBU, is geographically an integral part of the University's campus and is crucial to the University's future development.

HKBU hopes to make use of the land to build 1,700 student hostel places and a Chinese medicine teaching hospital.

Being our dire need for student space, we wish to highlight that HKBU currently occupies the smallest site area among the eight University Grants Committee-funded institutions (about 5.4 hectares, compared to 11 hectares to 137 hectares occupied by other institutions). The average site area for each HKBU UGC-funded student (about 8.9m2) is also the smallest among his or her counterparts (ranging from 10m2

to 87m2). Furthermore, HKBU was not allocated any additional space to build relevant facilities in preparation for the implementation of the four-year curriculum. All additional facilities have been developed on the existing sites, severely stretching the capacity of our small campus.

On our need to build a Chinese medicine teaching hospital on the former Lee Wai Lee Institute site, HKBU has explored the feasibility of developing the hospital jointly with a non-profit-making organization on premises in Tsim Sha Tsui. However, after thorough and careful studies, HKBU has found complicated lease conditions and technical problems related to the site that could not be resolved satisfactorily. Hence, HKBU has informed the organization that the University needs to find an alternative site for the project. HKBU considers the former Lee Wai Lee Institute site to be the most suitable space for building the Chinese medicine teaching hospital. The hospital should ideally be located adjacent to the existing campus to synergize with HKBU's teaching, research and service capabilities for the benefit of the long-term development of the Chinese medicine profession.

Thus, we would like to clarify that, since 2005, HKBU has been requesting the Government to allocate the whole site (former campus of the Lee Wai Lee Institute) for its future development. HKBU has neither indicated to the Government nor come to any agreement with the Government that HKBU requires only half of the land and is ready to withdraw its request for the whole plot.

In view of the tremendous contribution of HKBU to education, coupled with its dire need for student space and enormous potential in advancing the development of Chinese medicine in Hong Kong SAR, we would urge you to carefully reconsider your decision on this matter and hopefully grant the entire former Lee Wai Lee Institute site to HKBU.

Yours sincerely,

King-tak Ip

Cindy Yik-yi Chu

Alfred Tan

Staff Representative, Court, Hong Kong Baptist University

c.c. Professor Albert Chan, President & Vice- Chancellor, Hong Kong Baptist University

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

TPB/R/S/K18/17-31

Date: April 15, 2013

Dear Sir,

Opposition to Amendment Item A
to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

I wish to oppose the captioned amendment and request that the zoning of the southern part of the ex-Lee Wai Lee Campus be kept as "Government, Institution or Community (9)". The reasons are provided in the ensuing paragraphs:

Please see the attached sheets.

Yours faithfully,

Name: Hong Kong Baptist University Faculty and Staff Union
Postal Address or Email: [redacted]

Tel No.: [redacted]
Date: April 15, 2013

25864

香港浸會大學教職員工會

Hong Kong Baptist University Faculty and Staff Union

團結 • Solidarity　　自主 • Autonomy　　公義 • Justice

聯合聲明

反對政府改變李惠利學院校舍地皮用途

此聲明由以下個人及團體共同發起：

立法會議員葉建源議員
土地正義聯盟
香港批判地理學會
香港浸會大學學生會
香港浸會大學教職員工會

我們對李惠利學院校舍地皮用途有三點聲明：

（一）政府必須開誠布公，不搞虛假諮詢：事件發展以來，政府沒有聽取民意便擅自提議更動該地皮的用途，城規會未經深入探討便輕易接受政府建議，然後才諮詢民意。怎料民意諮詢期限未屆，政府又急不及待，把該地皮列入本年度賣地表當中。由始至今，政府以其行政霸道，罔顧民意，一再踐踏諮詢程序，破壞土地用途規劃的程序公義。另一方面，政府只顧竟地建屋，卻從不開誠布公，向市民完整交代本港目前閒置地皮的數量、地點和未來用途。民間研究人士早已指出政府有約二千公頃的土地儲備，但在梁班子政府手下卻全部「被消失」，連一公頃也沒交代。社會缺乏資訊，公眾無從了解不同土地用途的供求情況，也難從宏觀視角去評議政府的用地政策，結果不但剝奪了市民的知情權，也助長了政府在土地運用上專斷獨行，甚至抵觸公共利益。

（二）李惠利學院地皮須維持原定用途，不容興建豪宅：在該地皮興建五百個住宅單位，只為有錢人提供更多住屋選擇和投資機會，對解決一般市民的房屋需要毫無幫助。反觀本港高等教育需求殷切，單是學生宿舍便長期供不應求，當局為發展教育產業，竟罔顧本地生的需要，原本供他們住宿的不少宿舍單位，却轉給外地使用。再者，興建中醫醫院的訴求仍未落實，老人服務以至其他社區服務長期不足，當局實有需要維持該地皮的原有用途，以預留公地，供日後教育及社會服務之用。政府若背逆民意，擅自改為豪宅用地，不啻是手段低劣，只求成全地產商利益，而犧牲高等教育及社會服務的未來發展。

（三）以公平、公正、公開的論證決定具體用途，不得黑箱作業：目前社會各界雖然明確反對把李惠利地皮用來興建豪宅，並主張維持原有用途，但各方對該地皮的具體用處意見不一，仍須尋求共識。我們認為，大可以公平、公開、公正的方法，讓大家詳細論述，深入探討，論證利弊，找出服務公眾利益的最佳方案。

Website: [redacted]　E-mail: [redacted]

如有查詢，請與本會主席李建賢([redacted])或發言人杜耀明聯絡[redacted]。

香港浸會大學教職員工會理事會敬啟
二零一三年三月十七日

1. http://www.devb.gov.hk/tc/publications_and_press_releases/press/index_id_7242.html 政府回應立法會提問

2. http://www.devb.gov.hk/filemanager/tc/content_69/P201207040370_0370_96619.pdf 這是18區空置官地的總數表，計了１８區，已規劃作住宅用地的政府空置土地，有 2,153.7 公頃。

香港浸會大學教職員工會

Hong Kong Baptist University Faculty and Staff Union

團結 • Solidarity　　自主 • Autonomy　　公義 • Justice

工會聲明

團結一致，反對政府搶地建豪宅
興建中醫院，以專業服務全港市民

引言

由於香港特區政府急於壓抑樓價，藥石亂投，最近令人髮指的是，發展局局長陳茂波強搶九龍塘前李惠利工業學院之教育及社區用地以興建豪宅。而且不依程序，在城規會還未完成諮詢期，已將該地列入賣地表，可謂一錯再錯。現已引起教育界的反對之聲，包括一直與政府磋商爭取該地作發展的浸大師生。

建宅目標只為豪強，改地用途等同圈地賣港

梁班子政府上任以來，不但公營建屋毫無寸進，私人建宅目標也是好高騖遠，改劃社區土地用途原來是為了豪強建更多豪宅，給中港富豪入貨，這等同圈地賣港，那倒不如不改劃好過！假如梁振英真的想讓市民感受其真心悔改，革面洗心，為人民謀福祉，則應責成陳茂波不要為討好主子而搶民地；為湊夠豪宅單位而篤數！

政府「盲搶社區地」，損市民益霸權

梁班子以浸會大學近年沒有向 UGC 申請李惠利用地作中醫院等理由為藉口，認為將該處變住宅地為理所當然之舉。這是繼房委會將北角邨及山谷道邨地皮無條件交還特區政府後，另一種未經公眾諮詢即改變土地用途，損害全民利益以討好、輸送利益予地產霸權之舉！此種惡例一開，則全港市民必成為最終受害者：市民大眾賴以休憩及獲取服務的社區公園，公共設施，都可以被夷平為將來的豪強駐宅；市民的生活及休憩空間只會被加倍蠶食，而公園學校醫院社區會堂老人宿舍青少年活動中心等的興建便只有更遙遙無期！

沒看管好教育用地，吳克儉欠見識不稱職

根據媒體報導，早於 2005 年浸會大學已向教育局要求全幅李惠利用地留作大學發展，數年來仍時有就此用地進行正式及非正式商討。但教育局竟以官腔稱未收過正式申請為由推卸責任，真箇是官字兩個口！吳克儉胡亂將市區珍貴教育用地雙手奉送上司及地產霸權，再一次証明吳局長對教育欠缺見識及承擔，實應及早鞠躬下臺。

城規會公眾諮詢「走過場」，陳茂波誠「劏港局長」

其實城規會公眾諮詢只是「走過場」。據一月廿五日有份旁聽城規會會議的學生匯報，當日有個別委員已明確表示反對將李惠利用地改劃作豪宅用途，但城規會主席黃遠輝在未有充分討論下，堅持同意陳茂波的改劃用途要求，僅留下所謂「公眾諮詢」作裝飾下臺階。

陳茂波更明目張膽，將還未完成規劃程式的教育及社區用地，公佈為下年度賣地計劃中 22 幅住宅用地的一部分，其手法令人震驚；令城規會仍在進行公眾諮詢的地皮，忽然變成地產商可建豪宅的"事實"，從而影響城規會委員的最後決定，教

城規會被廢「武功」變「誠虧會」。而他的「慣常做法」辯解，只有令城規會變得「更虧」。這再次顯明梁班子政府「上有好者，下必有甚焉」的歪風甚為猖獗。梁振英愛說謊，其身不正；其下屬即有過之而無不及進行強盜行為，晉身為「劏港局長」。

浸會大學申辦中醫醫院合情合理，亦符合社會大眾利益

浸會大學多年來已要求撥地興建學生宿舍及其他高等教育發展設施。浸大計劃建中醫院，不但解決了中醫藥系學生在港實習，不需赴內地的迫切需要，更是對全港市民的建康有百利而無一害的實際行動。

從沒認真發展中醫，歷屆特區政府應受譴責

梁班子政府以現時沒有政策向團體提供官地發展自資中醫院為最後擋箭牌，拒絕浸會大學自資發展中醫院之請求。此種態度正自曝其短！高永文局長更放言若建中醫院也不一定給浸會大學使用，則更無聊並帶懲罰意味！還是請特區政府出錢建成中醫院後才放炮吧！

香港特區政府在回歸十多年來，都不肯正視市民對中醫藥的龐大需求，不將中醫藥的服務及培訓全方位納入公營醫療及教育體系，不肯投入資源，興建中醫院並致力培育中醫人才。如今浸大自願出資建院，為市民及學子出錢出力，卻仍受特區政府百般阻撓，置市民對中醫藥的需求於不顧，簡直匪夷所思！特區政府實愧言回歸、更愧對中華傳統文化，復愚不可及看不透中醫藥在醫療產業上的潛能！梁振英實應責成高永文盡快籌建中醫院而非一味放空炮！

聲明

有見及此，本會為維護教育發展及市民大眾的健康及整體利益，聲明如下：

1) 梁振英政府尤其是發展局應立即停止任何未經真確公眾諮詢的土地改劃。
2) 城規會應改革，引入廣泛的公眾參與及進行真確的公眾諮詢。
3) 譴責吳克儉沒看管好教育用地，應就此事被問責並向公眾道歉。
4) 譴責陳茂波先斬後奏，將公眾諮詢進行中的土地預先納入賣地計劃中，應就此事被問責並向公眾道歉。
5) 譴責歷屆特區政府和食物及衛生局局長對中醫藥服務及培訓的需要視而不見，應就此嚴重疏忽被問責並積極補救。
6) 特區政府應積極與駐港解放軍磋商遷出市區如九龍塘之軍營用地，以供教育及社區發展之用途。

本會重申，支持浸會大學師生合力反對政府強搶九龍塘前李惠利的教育及社區用地建住宅；並呼籲九龍城區議會、立法會議員及各間公私營大學師生校長，市民大眾，基於唇亡齒寒的道理，一同反對此種強搶社區用地的行徑，並籲請城規會委員，撥亂反正，維持該地作社區用途，撥出興建中醫院或其他大學設施，惠及莘莘學子及全港市民！

如有查詢，請與本會主席李建賢([redacted])或發言人杜耀明聯絡[redacted]。

香港浸會大學教職員工會理事會敬啟

二零一三年三月八日

Website: [redacted] E-mail: [redacted]

香港浸會大學校友會有限公司
Hong Kong Baptist University
Alumni Association Limited

TPB/R/S/K18/17-32

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

(郵寄及傳真 2877 0245)

敬啟者

有關「九龍塘分區計劃大綱草圖編號 S/K18/17」中
修訂項目 A（前李惠利校舍）事宜

就香港特區政府向 貴委員會申請將上述土地（下稱 "該地"）用途改為住宅用地事宜，香港浸會大學校友會（下稱 "本會"）提出以下意見：

1. 本會同意特區政府所指：現時基層市民的住屋問題是香港社會面對的重要問題，必須盡快解決。
2. 根據特區政府所提供的資料，該地若改為住宅用地，可提供四百多住宅單位，即每單位平均面積約 800 方呎，參考現時同區新建住宅單位售價計算，每單位約值一千五百萬元，從售價而言，實屬市場所稱的豪宅類別，斷非基層市民能力可以應付，換言之，將該地改變為住宅用途無助解決基層市民的住屋問題。
3. 該地規劃為政府、團體或社區(GIC)用地已有多年，附近缺少日常生活所需設施，將該地改為住宅用地，實難產生協同效益；正如建築師學會副主席何文堯所指:在該地興建住宅欠缺協同效應（synergy effects）及規劃得益（planning benefit），從城市規劃專業的角度而言，實難以服人。
4. 住屋問題固然重要，其他與香港整體發展有關的如社區、體育、交通、文化和教育等設施亦同樣重要；現時政府只顧將土地改為住宅用途，漠視社會均衡發展的大原則大道理，亦是難以服人。
5. 故此，本會反對政府提議將該地改為住宅用途，本會認為將該地變為豪宅用途，不但無助於解決社會基層市民住屋問題，亦浪費包括可作教育用途的 GIC 用地，對整個社會帶來不可挽回的損失，是甚為不智的雙輸方案。
6. 該地位於九龍城區。本年三月七日， 九龍城區議會房屋及基礎建設委員會的會議中，所有發言的委員均反對將該地改為住宅用地。
7. 本年三月十二日， 立法會教育事務委員會會議中，出席議員委員會以 8 票贊成、0 票反對、1 票棄權，通過反對特區政府改變該地長久以來的教育用途。

校友事務處

8. 近期不少媒體就該地的用途進行意見調查，例如經濟日報就以「前李惠利校舍地皮應用作建中醫院、還是作住宅用途呢？」為題，至四月三日的調查結果顯示：71%回應人士贊成建中醫院，而 25%則贊成作住宅用途。從上述數字可見，大部份社會人士都是支持興建中醫院。

9. 本會相信 貴委員會在審議特區政府改變該地用途的提議時，定會參考九龍城區議會、立法會教育事務委員會的取態及市民的意見。

10. 本會知悉， 貴委員會只就特區政府提出的改變用途申請作出裁決；若該地維持 GIC 用途不變，日後的發展及負責團體將由特區政府有關部門決定。惟 貴委員會或已留意，自 2005 年以來，毗鄰該地的香港浸會大學已極力向政府爭取將該地撥交浸大發展之用，浸大的具體建議是在該地興建中醫教學醫院，以完善浸大中醫藥學院十多年來教學所欠缺而又非常重要的教學醫院。

11. 自回歸以來，三位行政長官多番強調發展中醫藥的重要性， 貴委員會專職處理土地規劃事宜，理應配合三位行政長官對中醫藥發展的政策，支持在該地興建全港第一所中醫教學醫院。

12. 就此改變用途一事，特區政府乖離既定程序，強行將該地納入賣地表內， 本會認為 貴委員會實需為此跟進處理，向市民釐清 貴委員會之權責及交待有關程序是否仍然有效。

13. 現時大家面對的困難是土地只有一幅，魚與熊掌，取捨尤為困難，但本會深信： 貴委員會在裁決特區政府的申請時，一定會考慮：a. 增建豪宅和發展教育兩者誰較適合, b. 社會的均衡發展和 c. 議會及市民意見。

14. 本會認同 城規會的制衡功能，也信賴 貴委員會的把關工作。

祝

工作愉快!

香港浸會大學校友會會長

鄧永安

2013 年 4 月 11 日

LWL Concern Group
<[redacted]@gmail.com>

15/04/2013 下午 04:50

To tpbpd@pland.gov.hk
cc
bcc
Subject

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt

致城規會各成員：

有關改變前李惠利地皮土地(S/K18/17 itemA)用途的反對申述

我們是浸會大學學生宿舍的宿生。我們反對政府有意將前李惠利地皮由GIC用地改變爲住宅用地，原因如下：

首先，前李惠利地皮的北面將打算興建新的學生宿舍。一旦將剩餘的地皮改變爲住宅用地，興建豪宅，基於學生和居民的生活習慣有所差異，相信會對雙方構成衝突和不便。加上兩者距離接近，更會加劇兩者的矛盾。以理工大學的學生宿舍爲例，位於紅磡的理大學生宿舍，旁邊是住宅半島豪庭。由宿舍所產生的噪音，經常收到附近居民的投訴，顯示兩者之間的矛盾。由此可以預視，若前李惠利地皮轉爲住宅用地，亦會面對同樣的問題。

第二，環視九龍塘附近的土地，大部分已被發展，只剩少部分仍可作發展之用。前李惠利地皮位於浸大校園的附近，是一塊可予浸大發展的地方。若改變其土地用途，一方面影響了整個浸大校園的整體性，另一方面，浸大亦沒有了這幅珍貴的土地作長期發展之用。

第三，政府聲稱改變了土地用途爲住宅用途，是爲了解決港人的住屋需求。但據測量師估計，該地方將興建呎價約二萬元的房屋。一個八百餘呎的單位，價格便高達二千多萬，而這個價錢是一般基礎市民無法負擔的。最後亦只會淪爲被投機炒賣之用，便宜了地產商家，卻根本無法解決現時的房屋問題。既然如此，政府聲稱爲解決房屋問題的理據根本不成立，所以前李惠利地皮亦不應改變其土地用途。

基於以上的理由，我們堅決反對政府改變前李惠利地皮土地用途的建議，希望各城規會成員能詳細考慮我們的意見。

香港浸會大學學生宿舍楊

振寧堂

香港浸會大學學生宿舍周

樹人堂

香港浸會大學學生宿舍宋

香港浸會大學學生宿舍蔡

二零一三年四月

慶齡堂

元培堂

十四日

Contact person: Chung Kok Hin
Email:[redacted]
Moblie:[redacted]
Date:14-4-2013

opposition letter (hall).docx

致城規會各成員：

有關改變前李惠利地皮土地(S/K18/17 itemA)用途的反對申述

我們是浸會大學學生宿舍的宿生。我們反對政府有意將前李惠利地皮由 GIC 用地改變爲住宅用地，原因如下：

首先，前李惠利地皮的北面將打算興建新的學生宿舍。一旦將剩餘的地皮改變爲住宅用地，興建豪宅，基於學生和居民的生活習慣有所差異，相信會對雙方構成衝突和不便。加上兩者距離接近，更會加劇兩者的矛盾。以理工大學的學生宿舍爲例，位於紅磡的理大學生宿舍，旁邊是住宅半島豪庭。由宿舍所產生的噪音，經常收到附近居民的投訴，顯示兩者之間的矛盾。由此可以預視，若前李惠利地皮轉爲住宅用地，亦會面對同樣的問題。

第二，環視九龍塘附近的土地，大部分已被發展，只剩少部分仍可作發展之用。前李惠利地皮位於浸大校園的附近，是一塊可予浸大發展的地方。若改變其土地用途，一方面影響了整個浸大校園的整體性，另一方面，浸大亦沒有了這幅珍貴的土地作長期發展之用。

第三，政府聲稱改變了土地用途爲住宅用途，是爲了解決港人的住屋需求。但據測量師估計，該地方將興建呎價約二萬元的房屋。一個八百餘呎的單位，價格便高達二千多萬，而這個價錢是一般基礎市民無法負擔的。最後亦只會淪爲被投機炒賣之用，便宜了地產商家，卻根本無法解決現時的房屋問題。既然如此，政府聲稱爲解決房屋問題的理據根本不成立，所以前李惠利地皮亦不應改變其土地用途。

基於以上的理由，我們堅決反對政府改變前李惠利地皮土地用途的建議，希望各城規會成員能詳細考慮我們的意見。

香港浸會大學學生宿舍楊振寧堂
香港浸會大學學生宿舍周樹人堂
香港浸會大學學生宿舍宋慶齡堂
香港浸會大學學生宿舍蔡元培堂
二零一三年四月十四日

Contact person: Chung Kok Hin
Email:c[redacted]m
Moblie:[redacted]
Date:14-4-2013

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

香港浸會大學基金
HONG KONG BAPTIST UNIVERSITY FOUNDATION

主席：王英偉太平紳士
Chairman: Wilfred Y. W. Wong, SBS, JP

RECEIVED
2013 APR -8 P 12: 13
TOWN PLANNING BOARD

5 April 2013

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

Dear Sirs,

Objection to Amendment Item A to
the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17
in respect of the southern part of the former campus of
the Hong Kong Institute of Vocational Education (Lee Wai Lee)

As Chairman of the Hong Kong Baptist University (HKBU) Foundation and former Chairman of the Council and the Court of HKBU (2007-2012) as well as a businessman with experience in a number of sectors, including property development, I am writing to express my opposition to the rezoning of the southern portion of the former Lee Wai Lee Campus (LWL site) from "Government, Institution or Community" to "Residential (Group B)" as proposed by the Government.

Having only recently completed my term as Chairman of the HKBU Council and Court, I can attest to HKBU's great need for the site in question as well as the history of the University's discussions with the Government on the matter. The site is adjacent to the HKBU campus and given that the University has been liaising with the Government over its future use for several years, it is surprising that the Government did not deem fit to discuss its plans to rezone the site with an important stakeholder.

While the shortage of land for housing in Hong Kong is well known, the shortage of land for educational use is of no less concern. According to Government figures, Hong Kong's higher education institutions are in need of 80,000 square metres of operational floor areas. Among them, HKBU has to grapple with the challenge of providing its students with an inspiring learning environment within the constraints of a relatively small site area. In 2007, while I was Chairman of the

7320

Hong Kong Baptist University Foundation 香港浸會大學基金
香港 九龍塘浸會大學道15號 教學及行政大樓10樓1003室
Rm1003, 10/F, Academic and Administration Building, 15 Baptist University Road, Kowloon Tong, Hong Kong
電話 Tel : (852) 3411 7788 傳真 Fax : (852) 3411 5689 電郵 E-mail : hkbuf@hkbu.edu.hk
網址 Website : http://foundation.hkbu.edu.hk

Council, the University launched its campus expansion plan, in anticipation of the extra student numbers due to the implementation of the 3-3-4 academic reforms. In the absence of more land on which to grow, the University was left with no choice but to construct high-rise buildings which have resulted in a less than ideal proportion of outdoor space for students.

Through my years of association with HKBU I have witnessed its admirable growth as well as the immense potential that the institution has built up through its almost six decades of existence. The LWL site is surrounded on three sides by HKBU buildings and would fit seamlessly into the existing campus, giving the University the space needed for developing its existing areas of strength more fully.

One of these areas of strength is Chinese medicine and it is entirely logical that HKBU proposes to set up a self-funded Chinese medicine teaching hospital on the site. HKBU was the first institution in Hong Kong to offer a degree programme in Chinese medicine and since then, its School of Chinese Medicine has gone from strength to strength. However, for 15 years, Chinese medicine students in Hong Kong have had to go to the Mainland for internships, which is far from ideal. In addition to training future Chinese medicine practitioners, the School has been engaging in pathbreaking research and running a number of clinics across Hong Kong that have been welcomed by the communities they serve. A Chinese medicine teaching hospital would bring together and enhance these existing strengths for the benefit of Hong Kong. A teaching hospital located right next to the University would be convenient for both faculty and staff members not to mention the general public and could promote synergies between other departments of the University such as the Faculty of Science.

I must also mention here that during my Chairmanship, I was involved in exploring the possibility of jointly setting up a Chinese medicine teaching hospital with the Tsim Sha Tsui District Kai Fong Welfare Association. But after careful study, it was concluded that owing to the site constraints, building the hospital in Tsim Sha Tsui was not feasible and the LWL site would be the most suitable location for the proposed Chinese medicine teaching hospital.

HKBU has a strong track record in managing special projects that involve using Government land for the benefit of society. The University has been commended for its conservation of the Former Royal Air Force Station at Kai Tak which currently

Hong Kong Baptist University Foundation
香港浸會大學基金
香港 九龍塘浸會大學道15號 教學及行政大樓10樓1003室
Rm1003, 10/F, Academic and Administration Building, 15 Baptist University Road, Kowloon Tong, Hong Kong
電話 Tel : (852) 3411 7788 傳真 Fax : (852) 3411 5689 電郵 E-mail : hkbuf@hkbu.edu.hk
網址 Website : http://foundation.hkbu.edu.hk

houses its Academy of Visual Arts; converting the decommissioned Shek Kip Mei Government Factory Estates into the Jockey Club Creative Arts Centre, which it operates for the benefit of the local arts community; and participating in the Government Revitalising Historic Buildings Through Partnership Scheme to revitalise Lui Seng Chun into a Chinese medicine health centre. The proposed Chinese medicine teaching hospital would be another such socially relevant project that capitalises on the University's expertise for the benefit of the community.

The Government proposes the southern portion of the site be used for a medium-rise private development with around 490 apartments, which, given the location in Kowloon Tong, would inevitably be sold at high prices. A student hostel next door to such a development could cause friction as has been seen in the case of other universities where the lifestyle of students and that of the neighbouring residents do not match. The proposed residential project would not do much to solve Hong Kong's urgent housing crisis for those at the grass-roots either.

Given that this site would provide great benefits to the community of Hong Kong if allocated to a university located right next door, I would strongly urge the members of the Town Planning Board to retain the current "Government, Institution or Community" use of the site so that more consultation and study on the use of the site can be conducted.

Yours faithfully,

Wilfred Wong

Hong Kong Baptist University Foundation
香港浸會大學基金
香港 九龍塘浸會大學道15號 教學及行政大樓10樓1003室
Rm1003, 10/F, Academic and Administration Building, 15 Baptist University Road, Kowloon Tong, Hong Kong
電話 Tel : (852) 3411 7788 傳真 Fax : (852) 3411 5689 電郵 E-mail : hkbuf@hkbu.edu.hk
網址 Website : http://foundation.hkbu.edu.hk

Marianna Tsang
[redacted]
15/04/2013 下午 02:54

To "tpbpd@pland.gov.hk" <tpbpd@pland.gov.hk>
cc
bcc
Subject 反對「九龍塘分區計劃大綱草圖編號S/K18/17」修訂項目A項（改變前李惠利校舍土地用途）。

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt

尊敬的城規會秘書：

茲附上香港浸會大學倘志會之上述函件，祈爲查收，謝謝！

香港浸會大學倘志會會長
曾惠珍

Opposition_HKBUCC.pdf

Hong Kong Baptist University Century Club Limited
香港浸會大學尚志會有限公司

Honorary Presidents
Dr. Daniel C. W. Tse
Prof. C. F. Ng Prof. Albert S. C. Chan
Advisor
Prof. Frank H. K. Fu
Patrons
Allan T. Y. Chan P. S. Lau
William W.C. Leung Sammy C.W. Liu
Dickson T. Y. Shang Marianna W.C. Tsang
N. C. Wong
Past President / Ex-officio Director
Eddie K. W. Ho (Soc)

Board (2012/14)
President
Marianna W. C. Tsang (SM)
Vice-Presidents
Philip S. L. Kan (BM)
P. S. Lau (BM)
Kent K. Y. Tsui (Comm)
Treasurer
Alfred K. C. Tang (Acct)
Secretary
Helen S. M. Kwok (Comm)
Directors
Gilbert Y. S. Chan (Bio)
Samuel K. M. Lau (Econ)
Helen S.H. Siu (Eng)
Agnes L. C. Wong (BM)
Bernard T. L. Wu (Acct)
Honorary Auditor
RSM Nelson Wheeler

名譽會長
謝志偉博士
吳福順教授
陳新滋教授
顧問
傅浩堅教授
贊助人
陳德源 劉百成 梁永祥
廖澤雲 尚達人 曾惠珍 黃雅忠
前任會長 / 當然理事
何錦璋 (社會)

理事會 (2012/14)
會長
曾惠珍 (秘書管理)
副會長
簡兆賢 (工管)
劉百成 (工管)
徐國倫 (傳理)
司庫
鄧寶彰 (會計)
秘書
郭婉雯 (傳理)
理事
陳玉成 (生物) 劉國明 (經濟)
施雪霞 (英文) 王丽珍 (工管)
吳德龍 (會計)
名譽核數師
中瑞岳華(香港)會計師事務所

致： 城市規劃委員會秘書
香港北角渣華道333號
北角政府合署15樓
(email: tpbpd@pland.gov.hk or fax to: 2877 0245 / 2522 8426)

日期：12/04/2013

尊敬的城規會秘書：

反對「九龍塘分區計劃大綱草圖編號S/K18/17」修訂項目A項（改變前李惠利校舍土地用途）。

你好，本會是香港浸會大學一個資深校友組織，對上述修改，表示反對，並要求將前李惠利校舍南部保留爲「政府、機構或社區（9）」發展用地。理由如下：

反對犧牲教育改建豪宅　政府妄顧程序漠視民意

我們強烈反對政府把前李惠利校舍和其他珍貴教育用地改作興建豪宅用途，因爲既無助於解決社會最急切所需的基層市民住屋問題，亦浪費了珍貴的教育用地，對社區、高等教育和整個社會造成不可挽回的損失，是三輸的方案。

我們認爲政府在城規程序的公眾諮詢期未完結便把土地納入賣地表，可引致爲城規會委員帶來壓力，有企圖造成既定事實、漠視民意、誤導市民之嫌。

教育是一項政府和社會的長遠投資，應具備長遠的眼光、願景和策略，政府也需考慮長遠的教育需要，在合適地點保留土地作教育用途，而並非爲應付一時的住宅用地短缺而犧牲重要的教育用地。香港缺乏天然資源，而人才卻是香港的重要資源，爲香港持續發展的支柱之一。我們懇切期望政府真心以教育的長遠效益爲依歸，重新考慮更改土地用途的建議。

.../P.2

c/o Alumni Affairs Office, Hong Kong Baptist University, Kowloon Tong, HK
Tel: [redacted] Fax: [redacted] Email: [redacted]

Honorary Presidents
Dr. Daniel C. W. Tse
Prof. C. F. Ng Prof. Albert S. C. Chan
Advisor
Prof. Frank H. K. Fu
Patrons
Allen T. Y. Chan P. S. Lau
William W. C. Leung Sammy C. W. Liu
Dickson T. Y. Shang Marianna W. C. Tsang
N. G. Wong
Past President / Ex-officio Director
Eddie K. W. Ho (Soc)
Board (2012/14)
President
Marianna W. C. Tsang (SM)
Vice-Presidents
Philip S. L. Kan (BM)
P. S. Lau (BM)
Kent K. Y. Tsui (Comm)
Treasurer
Alfred K. C. Tang (Acct)
Secretary
Helen S. M. Kwok (Comm)
Directors
Gilbert Y. S. Chan (Bio)
Samuel K. M. Lau (Econ)
Helen S. H. Siu (Eng)
Agnes L. C. Wong (BM)
Bernard T. L. Wu (Acct)
Honorary Auditor
RSM Nelson Wheeler
名譽會長
謝志偉博士
吳清輝教授
陳新滋教授
顧問
傅浩堅教授
贊助人
陳德源 劉百成 梁永祥
廖澤鏖 尚達人 曾惠珍 黃雅忠
前任會長 / 當然理事
何銳培 (社會)
理事會 (2012/14)
會長
曾惠珍 (商業管理)
副會長
簡兆麟 (工管)
劉百成 (工管)
徐國倫 (傳理)
司庫
鄧寶彤 (會計)
秘書
郭倩雯 (傳理)
理事
陳玉成 (生物) 劉國明 (經濟)
蕭翠麗 (英文) 王慈珍 (工管)
吳德龍 (會計)
名譽核數師
中瑞岳華(香港)會計師事務所

浸大用地長期短缺

我們感謝政府近年在補足教學空間缺欠上的支持，但我們同時認爲，教育是長遠和長期投資，必須預留空間供未來發展的需要。現時浸大的資助淨作業樓面面積約 76,000 平方米，全部興建在地段面積爲 5.4 公頃的土地上（其他院校的地段面積約 11 公頃至 137 公頃不等），即建築物均向高空發展，造成校園十分擠迫，空地嚴重不足，影響學習素質。事實上，浸大本學年起推行三三四學制，學生人數增加四份之一，但並沒有得到額外撥地進行校園發展計劃，所有設施均在現有校園另建或加建，令校園更加擠迫，影響學習質素，因此，浸大有迫切需要增加地段面積，改善學生學習環境。前李惠利校舍與浸大僅一牆之隔，而且是鄰近唯一可以供浸大持續發展的用地，所以該幅土地對浸大的將來發展是非常重要的。

有關中醫教學醫院

我們認爲，沒有本地臨床實習的醫科課程，是殘缺不全的課程。本港開辦了中醫本科課程 15 年，中醫學生仍需要長途跋涉到國內實習，而兩地體制不同，學習到的難免不完全適合香港。政府沒有把中醫教育列入醫學教育系列之中。多年來不僅沒有按醫學教育原則向中醫學撥款，而是按理科類別撥款（約爲西醫學生的一半），也沒有像其他醫學系列包括牙醫和護士一樣提供教學實習基地等配套，是令人極度失望的。浸大建議自資興建中醫教學醫院，是希望幫助政府完善中醫本科教育機制，造福未來的中醫學生和廣大市民。

有關學生宿舍與附近住宅

政府認爲前李惠利校舍用地南部適合改劃作住宅用途，我們認爲大有商榷餘地。倘若學生宿舍與豪宅項目在同一街區內緊接爲鄰，整項用地規劃將顯得零碎及格格不入。根據友校的經驗，由於舍堂文化與附近居民的生活作息亦有很大差距，可能會引起衝突。事實上，立法會教育事務委員會近年在討論興建學生宿舍議案時，均提到宿舍鄰近住宅對附近居民帶來滋擾的投訴。此外，豪宅項目會帶來額外車流，不但可能造成人車衝突，而且會產生空氣及噪音污染，最終令社區的整體環境質素下降。

.../P.3

c/o Alumni Affairs Office, Hong Kong Baptist University, Kowloon Tong, HK
Tel: [redacted] Fax: [redacted] Email: [redacted]

Honorary Presidents
Dr. Daniel C. W. Tse
Prof. C. F. Ng Prof. Albert S. C. Chan

Advisor
Prof. Frank H. K. Fu

Patrons
Allen T. Y. Chan P. S. Lau
William W.C. Leung Sammy C.W. Liu
Dickson T. Y. Shang Marianna W.C. Tsang
N. C. Wong

Past President / Ex-officio Director
Eddie K. W. Ho (Soc)

Board (2012/14)
President
Marianna W. C. Tsang (SM)

Vice-Presidents
Philip S. L. Kan (BM)
P. S. Lau (BM)
Kent K. Y. Tsui (Comm)

Treasurer
Alfred K. C. Tang (Acct)

Secretary
Helen S. M. Kwok (Comm)

Directors
Gilbert Y. S. Chan (Bio)
Samuel K. M. Lau (Econ)
Helen S. H. Siu (Eng)
Agnes L. C. Wong (BM)
Bernard T. L. Wu (Acct)

Honorary Auditor
RSM Nelson Wheeler

名譽會長
謝志偉博士
吳清輝教授
陳新滋教授

顧問
倉浩基教授

贊助人
陳德源 劉百成 梁永祥
廖澤醫 尚達人 曾惠珍 黃雅忠

前任會長 / 當然理事
何鏡輝 (社會)

理事會 (2012/14)
會長
曾惠珍 (秘書管理)

副會長
施兆輝 (工管)
劉百成 (工管)
徐國勳 (傳理)

司庫
鄧偉彰 (會計)

秘書
郭倩雯 (傳理)

理事
陳玉成 (生物) 劉國明 (經濟)
蕭雪雁 (英文) 王慶珍 (工管)
吳德龍 (會計)

名譽核數師
中瑞岳華(香港)會計師事務所

專家/學者意見

於本年四月十日在浸大舉行的論壇，題目爲“從都市規劃及環境因素出發”，各位專家/學者從多角度，包括環境、社會、地理因素、城市規劃等以理性的方式剖析，均認爲李惠利前校舍不適宜作住宅用地，特別是豪宅。

各界反映民意

3 月 1 日，香港教育專業人員協會刊登聲明，反對政府無故改變土地計劃，並全力支持保留李惠利校舍繼續作爲教育用地。3 月 7 日，九龍城區議會轄下的房屋及基礎建設委員會在會議上討論前李惠利校舍改變爲住宅用地一事，結果所有發言的議員都一致反對有關建議，認爲應保留該地爲「政府、機構或社區」用地。立法會教育事務委員會亦於 3 月 11 日的會議上通過議案，要求政府保留前李惠利校舍用地作「政府、機構或社區」用途，包括作原教育用途。這反映出政府此項更改土地用途的建議並不可取，也不獲民意支持。

總結香港浸會大學尚志會的立場

基於上述理據，站在公眾利益及大學持續發展及教育理念的立場，我們實在不希望一幅珍貴的教育用地，遭永久切割變作另一片豪宅用地及破壞城市整體性計劃。教育爲社會發展之本，特別是香港特區，必須以策略性及長遠視野來推動及扶助而不是以扼殺性處理。以這幅本已在浸大校園區內的用地建設中醫教學醫院，服務全港病人，亦爲學生提供完備的臨床研究及實習設施，絕對符合善用土地的原則。我們認爲我們的建議是對(下一代)教育、社區及社會是三贏方案。

c/o Alumni Affairs Office, Hong Kong Baptist University, Kowloon Tong, HK
Tel: [redacted] Fax: [redacted] Email: [redacted]

Honorary Presidents
Dr. Daniel C. W. Tse
Prof. C. F. Ng Prof. Albert S. C. Chan

Advisor
Prof. Frank H. K. Fu

Patrons
Allen T. Y. Chan P. S. Lau
William W. C. Leung Sammy C. W. Liu
Dickson T. Y. Shang Marianna W. C. Tsang
N. C. Wong

Past President / Ex-officio Director
Eddie K. W. Ho (Soc)

Board (2012/14)
President
Marianna W. C. Tsang (SM)

Vice-Presidents
Philip S. L. Kan (BM)
P. S. Lau (BM)
Kent K. Y. Tsui (Comm)

Treasurer
Alfred K. C. Tang (Acct)

Secretary
Helen S. M. Kwok (Comm)

Directors
Gilbert Y. S. Chan (Bio)
Samuel K. M. Lau (Econ)
Helen S.H. Siu (Eng)
Agnes L. C. Wong (BM)
Bernard T. L. Wu (Acct)

Honorary Auditor
RSM Nelson Wheeler

名譽會長
謝志偉博士
吳清輝教授
陳新滋教授

顧問
傅浩堅教授

贊助人
陳德源 劉百成 梁永祥
廖潭雲 尚達人 曾惠珍 黃雅忠

前任會長 / 當然理事
何鎮堃 (社會)

理事會 (2012/14)
會長
曾惠珍 (秘書管理)

副會長
簡兆輝 (工管)
劉百成 (工管)
徐國倫 (傳理)

司庫
鄧貴彰 (會計)

秘書
郭倩雯 (傳理)

理事
陳玉成 (生物) 劉國明 (經濟)
蕭智燕 (天文) 王麗珍 (工管)
吳德龍 (會計)

名譽核數師
中瑞岳華(香港)會計師事務所

我們衷心希望上述資料能令您更清楚事實和尚志會校友的立場。

敬祝

工作愉快!

香港浸會大學尚志會會長

曾惠珍

曾惠珍 敬啓

c/o Alumni Affairs Office, Hong Kong Baptist University, Kowloon Tong, HK
Tel: [redacted] Fax: [redacted] Email: [redacted]

TPB/R/S/K18/17-36

James Kok
[redacted]
15/04/2013 上午 11:34

To tpbpd@pland.gov.hk
cc
bcc
Subject letter to the secretary of Town Planning Board about Opposition to Amendment Item A to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17.

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt

Dear Sir or Madam,

This is James from the next president of HKBU Postgraduate Association. Attached is the letter to the secretary of Town Planning Board about Opposition to Amendment Item A to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17.

Best Regards,
James

Letter to the secretary of Town Planning Board from the President of HKBU Postgraduate Association.pdf

The Secretary, Town Planning Board
15/F, North Point Government Offices
333 Java Road, North Point
Hong Kong
(Fax: 2877 0245 or 2522 8426)

Dear Sir,

Opposition to Amendment Item A
to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

I wish to oppose the captioned amendment and request that the zoning of the southern part of the ex-Lee Wai Lee Campus be retained as "Government, Institution or Community (9)". The reasons are as follows:

- For the life long development of Hong Kong and competition around the globe, education is one the important issues to deal for the government. Without good education, Hong Kong will have a tough time to compete with the cities in Asia especially Singapore, Shanghai, Beijing, Seoul, Tokyo, and more.

  If the site is for luxury residential purpose instead, it could not solve the shortage of housing for the whole grass-root community in a short and long run. It will definitely increase the price of housing again because the rich could buy more properties and resell to the market. So from the view of HKBUPA (Hong Kong Baptist University Postgraduate Association), we support the site of Lee Wai Lee remains as educational purpose.

Name: Kok Pak Ning, James (President of HKBU Postgraduate Association)
Date: April 15th, 2013
Postal or email address: [redacted]
Tel No.: [redacted]

tpbpd@pland.gov.hk

TPB/R/S/K18/17-37

寄件者: "University Advancement Office" <[redacted]>
收件者: <tpbpd@pland.gov.hk>
傳送日期: 12/04/2013 下午 05:19
主旨: 反對「九龍塘分區計劃大綱草圖編號S/K18/17」修訂項目A項（改變前李惠利校舍土地用途）

致：城市規劃委員會秘書
香港北角渣華道333號
北角政府合署15樓

日期：12/04/2013

尊敬的城規會秘書：

反對「九龍塘分區計劃大綱草圖編號S/K18/17」修訂項目A項（改變前李惠利校舍土地用途）

我反對上述修改，並要求將前李惠利校舍南部保留爲「政府、機構或社區（9）」發展用地。理由如下：

(一) 比較下，浸會大學每年收取入學申請表及收生率都是每年有增無減；原因是其入學門檻相比港大/中大低，而香港學生大多數成績比較中上或以下多，所以每年申請入浸大人數有增無減。

(二) 相信在三三四制度下，浸大每一學系都在計劃增加學位，以面對接納更多新生。

(三)在香港百物騰貴之生活下，並不是每家庭能容易供養子女往外國留學深造；如果大學學位能增多，吸納多些學生，實在能夠解決很多家庭問題及令很多八十後減少憂慮及因而滋生之煩躁問題，令社會可以舒緩一下某些餒氣。

(四) 浸大現址之規劃及附近範圍之配套，相信都能應付現時情況；但未必能夠接納未來增多學生發展。

(五)在現時特區政府領導下，計劃教育，關心青少年未來，是建立未來穩定、健康社會主義之必然。

概括以上(五)點，希望能帶給城規會一些意見，將前李惠利校舍南部保留，用作浸會大學在其未來發展教學用途之用，以做福香港社會。

祝 好！

姓名： 譚華正博士/譚陳書琴女士

Please keep our below email address/address/telephone as confidential.
電郵：[redacted]
地址：[redacted]
電話：[redacted]

cc: President and Vice-Chancellor - Hong Kong Baptist University

8013

Disclaimer

This message (including any attachments) may contain confidential information intended for a specific individual and/or purpose. If you are not the intended recipient, please delete this message and notify the sender and the University immediately. Any disclosure, copying, or distribution of this message, or the taking of any action based on it, is prohibited as it may be unlawful.

In addition, the University specifically denies any responsibility for the accuracy or quality of information obtained through University E-mail Facilities. Any views and opinions expressed in the email(s) are those of the author(s), and do not necessarily represent the views and opinions of the University. The University accepts no liability whatsoever for any losses or damages that may be incurred or caused to any party as a result of the use of such information.

Go Green Print Less

tpbpd@pland.gov.hk

寄件者: "Travis Law" <[redacted]>
收件者: <tpbpd@pland.gov.hk>
傳送日期: 14/03/2013 下午 05:13
主旨: Letter of Opinion to the Town Planning Board (re former HK Institute of Vocational Education Site)

Dear Sir / Madam,

Re: Change of land use of the former Hong Kong Institute of Vocational Education Site

I am writing on behalf of a number of alumni from the Hong Kong Baptist University (the "University") in relation to the proposed change of land use of the former Hong Kong Institute of Vocational Education Site (the "Site").

We are disappointed as to the proposed change of land use of the Site for land use other than educational land use.

We acknowledge the conflict between competing land uses between educational land use and residential land use in such a well developed region as in Hong Kong, especially the lack of supply of residential sites so far as the current Hong Kong Government administration is concerned. However, we would like to raise a number of points as follows:-

1. The Site is surrounded by structures of the University campus. If the Site is to be converted into residential land use and developed into residential estate, it will certainly jeopardize the surrounding area of the University campus, both in terms of traffic flow and walks of life. Compared to students from the former HK Institute of Vocational Education located at the Site, people of all kinds will enter the community of the campus area. Renovation of flats and nuisance from private use of residential estate would create a long term conflict of land use by occupants from the two different types of land use. We strongly advise the responsible officers from the Town Planning Board to conduct a thorough site visit during class period of the University and make a full consideration of the potential conflict to be arisen from the conversion of land use, especially the potential adverse impact to be done on the University community.

2. The long term need for expansion and entirety of the University campus should be taken into account. Compared to other universities such as those located in Kowloon Tong, Hung Hom, structures of the University campus is scattered. The fact is the Site to be granted to the University would certainly enhance its long term development of the campus area such as footbridges among different structures (such as connections between different core buildings in the Polytechnic University and establishment of a podium area at the 3/F). We strongly advise the Town Planning Board to take into account the current campus are of the Kowloon campus of the University when considering any proposed change of the land use of the Site. After all, the proposed change of the land use may have an adverse impact on the neighbouring area, especially when educational land use is concerned.

3. We are doubtful as to the effectiveness of the proposed change of land use in relation to the Site as a means to ease the lack of supply of residential sites in Hong Kong. The Site, if converted into residential land use, would certainly be developed into a high-end residential estate, which the middle-class of Hong Kong (as recently defined by our honourable Financial Secretary Mr. John Tsang) would be unable to afford.

Being the alumni of the University, we certainly wish the use of the Site be granted to the University for its long term use. However, we would take this opportunity to remind ourselves that education is valuable to our next generation. Return from investment in education is slow but essential for the growth of our society. The Hong Kong Government under the Tung administration has made a big mistake by cutting budgets to the tertiary education. We are not to

make such similar mistakes again when education should always be our top priority.

Yours faithfully,
Travis Law
on behalf of many other alumni of the Hong Kong Baptist Univeristy.

WONG PO-YAN
[redacted]

TPB/R/S/K18/17-39

10 April 2013

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

Dear Sir,

Objection to Amendment Item A to
the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17
in respect of the southern part of the former campus of
the Hong Kong Institute of Vocational Education (Lee Wai Lee)

I am writing to express my opposition to the Government's proposal to rezone the southern portion of the former Lee Wai lee campus site from "Government, Institution or Community" use to "Residential (Group B)". While the Government's proposes to rezone the land so that it can be used to build medium-rise apartments, I believe that retaining the land for educational use would enable it to be put to optimum use for the wider benefit of Hong Kong.

The former Lee Wai Lee campus site is surrounded by the Hong Kong Baptist University (HKBU) campus and is the only piece of land available for the University's long-term development near its existing campus. Having served the then Hong Kong Baptist College as a member of the Board of Governors and the Council for three years and as chairman of those bodies for a further three years (1984-1989), I have a thorough understanding of the critical role that land can play in the development of an educational institution.

During my tenure on the Council, the College was brought under the aegis of the University and Polytechnic Grants Committee. In order to develop the campus into a suitable learning environment for degree-seeking students, the re-development of the Waterloo Road campus was initiated as well as discussions with the Government for acquiring the site which now houses the Baptist University Road campus. The development of these two campuses significantly enhanced the teaching and learning experience of staff and students and enabled the College, and later on the University, to provide whole person education in a more comprehensive manner.

8027

WONG PO-YAN
[redacted]

Despite steps to expand the campus to better satisfy the needs of the university community, the site area that HKBU currently occupies is still very limited. The University has great potential to deliver meaningful and fruitful results for the community by providing the younger generation with a world-class education and conducting outstanding research. To enable HKBU to live up to this inherent potential, the Government would be well advised to take a long-term view and consider seriously the future development of the University.

Sacrificing a piece of land that is crucial to HKBU's future development to the commercial interests of the housing market is not constructive or synergistic with the needs of the Hong Kong community. I would therefore urge the members of the Town Planning Board to retain the original use of the land so that it can be used to serve Hong Kong's long-term interests and benefit our future generations.

Yours faithfully

Wong Po-yan, GBM, CBE, JP
Chairman of the Board of Governors and the Council of
Hong Kong Baptist College (1987-89)

澳門大學
UNIVERSITY OF MACAU

Annex II-31 of
TPB Paper No. 9585

謝 Daniel C. W. Tse Ph.D. (Physics)

TPB/R/S/K18/17-40

26 February, 2013

Planning Department
Government of the Hong Kong Special Administrative Region
17th floor, North Point Government Offices
333 Java Road, North Point
Hong Kong

Dear Sirs,

I am President Emeritus of Hong Kong Baptist University (retired in 2001), and presently serving as Chair of the University Council of the University of Macau. As a person who has spent practically his whole career life (1968-2001) for Hong Kong Baptist College/University, I am writing to support the claim that the site of the former Lee Wai Lee Technical College at Renfrew Road is the only practical and logical site available to the Hong Kong Baptist University to meet its urgent needs, and is therefore critical to the health and the future of the Institution. In my own opinion, taking away half of this relatively small site that is marked for educational purposes, and turning it into a site for residential development, is the most short- sighted and unreasonable decision a government can take. Such a decision would permanently hurt the future of a neighboring university that urgently needs the whole of the site for the improvement of its educational facilities. The shortsightedness would also damage the greater good and long lasting benefits a well-run university could bring to the Society of Hong Kong. This strange and irrational proposal of putting the commercial needs above the educational needs when there is a conflict indeed goes against the former policy of the Hong Kong British Government and the professed policy of the present Government of the Hong Kong Special Administrative Region.

As I recall, when the reunification of our City with the Motherland became known as a firm policy in the early 1980's, the British Hong Kong Government saw the need of further upgrading and enlarging the higher education sector to increase its competitiveness in human capital for the future, and the most readily available institution for the upgrading was the Hong Kong Baptist College, along with the two Polytechnics. Once the decision to upgrade HKBC was taken, the Government immediately allocated the whole of the available adjacent site across Junction Road (a former squatter area) to Baptist for the construction of its Renfrew Road Campus. After

中國澳門氹仔偉龍馬百貨公局路 Av. Padre Tomás Pereira, Taipa, Macau, China
電話 Tel: [redacted] 傳真 Fax: [redacted] 電郵 E-mail: [redacted] 網址 Website: http://www.umac.mo

澳門大學
UNIVERSITY OF MACAU

謝志偉 物理學博士
Daniel C. W. Tse Ph.D. (Physics)
G.B.S., C.B.E., J.P.

Baptist College was formally elevated to the University status in 1994, it became obvious that a site of 5.4 hectares (the smallest in terms of land space per student among all UGC funded institutions) was far too small for a sustainable development of a university Institution. Therefore when it was learned in the early 1990's that Lee Wai Lee Technical College was to be relocated elsewhere, a discussion between the former Director Prof. Lee Ngok (李鄂) of Lee Wai Lee and myself immediately took place for the possibility of Baptist taking over the Lee Wai Lee site.

From the above historical sketches, one can see that providing necessary resources (including land) for the development of a public university is a Government responsibility. In the old colonial era, on account of the restricted site of the University of Hong Kong at that time, I was told that the Government had a tacit understanding to reserve adjacent sites for the University whenever they became available. The understanding was truly far sighted and admirable, given the fact that land around that area was (and is) so valuable. The Government of that time was willing to put the sustainable development of HKU above other commercial considerations for the long term good of the Community. After the HK SAR Government was formed, higher education was also clearly stated as one of the pillars sustaining the development of the HK SAR. Therefore, to be consistent with the policies on higher education before and after the Re-unification, and to be in line with the world trend of competing for high quality human resources, there is no reason whatsoever why the whole Lee Wai Lee site should not be given to the Baptist University which sorely needs that additional piece of land to strengthen its academic programs for the sake of the long term benefits of the Community.

Please note that the Baptist University is not asking for the site for the expansion of its size per se. It is asking for the site to meet its urgent needs in student residential accommodation (due to the 3-3-4 change of our educational system) and to complete its development for the School of Chinese Medicine, all within the scope as defined by the UGC. The residential accommodation shortage is well known and doesn't need further justification. I just want to add one statement in support of the construction of a hospital for Chinese Medicine to complete the School of Chinese Medicine development. As is well known, the Baptist University is a pioneer of Chinese Medicine education in Hong Kong (the program was established in 1999 under my Presidency). The School of Chinese Medicine at Baptist is now the largest and the most comprehensive set up in the Territory, including both Chinese medical and medicinal education. But it lacks a training hospital for the medical interns. As Chair of the Preparatory Committee for the

中國澳門氹仔徧仕日昇貿公馬路 Av. Padre Tomás Pereira, Taipa, Macau, China
電話 Tel: +[redacted]16 傳真 Fax: +[redacted]95 電郵 E-mail:[redacted] 網址 Website: http://www.umac.mo

澳門大學
UNIVERSITY OF MACAU

謝志偉 物理學博士
Daniel C. W. Tse Ph.D. (Physics)
G.B.S., C.B.E., J.P.

Development of Chinese Medicine (1995-2001), and the Founding Chair of the Statutory Council for the Development of Chinese Medicine (2001-2006), I think I am qualified to say that the whole of the Chinese Medical Profession and many of the Hong Kong citizens have been yearning to see a hospital of Chinese Medicine established for training and clinical services as a symbol and a necessity to further the development of Chinese Medicine. Since a Chinese hospital is such a missing piece in advancing Chinese Medicine in Hong Kong, denying Baptist University the opportunity to build its teaching hospital on the Lee Wai Lee site is denying the long and ardent wishes of the Chinese Medical profession and the medical needs of a large segment of the Hong Kong Community.

To conclude, I hope your Committee would not view the request of the Baptist University as simply the desire of an institution to expand its scope of operation beyond the existing Government policy for public higher education. It is not! The University needs the whole of the Lee Wai Lee site only to allow it to operate more adequately with the necessary facilities to support the programs it already has, so that the University would function properly and effectively as a respected Institution of Higher Learning worthy of the name of Hong Kong.

Respectfully yours,

Daniel C. W. Tse
PhD., C.B.E., G.B.S. JP

PS: As Chair of the University Council of the University of Macau, I am currently involved in the development of a new campus for the University. The Macao SAR Government has successfully obtained a site of over 100 hectares for the University on the Hengqin Island. The site will be connected to Macao through an underwater tunnel, and will become an integral part of the Macao SAR with no immigration barrier. The Macao Government has spent over10 billion (HK$) for the construction of the campus which will be completed by April this year. I was almost ashamed to tell my Macao colleagues that the campus size of my former institution, the Hong Kong Baptist University, is only 1/20 of the University of Macau new campus size, although I am proud that my Macao colleagues have very high regard for the academic achievements and international standing of the Hong Kong Baptist University.

中國澳門氹仔巴波打古共和國公局路 Av. Padre Tomás Pereira, Taipa, Macau, China
電話 Tel: +[redacted] 傳真 Fax: +[redacted] 電郵 E[redacted] 網址 Website: http://www.umac.mo

tpbpd@pland.gov.hk

40

寄件者: <dcwtse@[redacted]>
收件者: <tpbpd@pland.gov.hk>
傳送日期: 26/02/2013 下午 04:11
主旨: In support of allocating the whole former Lee Wai Lee site to HK Baptist University

Dear Sirs,

I am President Emeritus of Hong Kong Baptist University (retired in 2001), and presently serving as Chair of the University Council of the University of Macau. As a person who has spent practically his whole career life (1968-2001) for Hong Kong Baptist College/University, I am writing to support the claim that the site of the former Lee Wai Lee Technical College at Renfrew Road is the only practical and logical site available to the Hong Kong Baptist University to meet its urgent needs, and is therefore critical to the health and the future of the Institution. In my own opinion, taking away half of this relatively small site that is marked for educational purposes, and turning it into a site for residential development, is the most short-sighted and unreasonable decision a government can take. Such a decision would permanently hurt the future of a neighboring university that urgently needs the whole of the site for the improvement of its educational facilities. The shortsightedness would also damage the greater good and long lasting benefits a well-run university could bring to the Society of Hong Kong. This strange and irrational proposal of putting the commercial needs above the educational needs when there is a conflict indeed goes against the former policy of the Hong Kong British Government and the professed policy of the present Government of the Hong Kong Special Administrative Region.

As I recall, when the reunification of our City with the Motherland became known as a firm policy in the early 1980's, the British Hong Kong Government saw the need of further upgrading and enlarging the higher education sector to increase its competitiveness in human capital for the future, and the most readily available institution for the upgrading was the Hong Kong Baptist College, along with the two Polytechnics. Once the decision to upgrade HKBC was taken, the Government immediately allocated the whole of the available adjacent site across Junction Road (a former squatter area) to Baptist for the construction of its Renfrew Road Campus. After Baptist College was formally elevated to the University status in 1994, it became obvious that a site of 5.4 hectares (the smallest in terms of land space per student among all UGC funded institutions) was far too small for a sustainable development of a university Institution. Therefore when it was learned in the early 1990's that Lee Wai Lee Technical College was to be relocated elsewhere, a discussion between the former Director Prof. Lee Ngok (李鄂) of Lee Wai Lee and myself immediately took place for the possibility of Baptist taking over the Lee Wai Lee site.

From the above historical sketches, one can see that providing necessary resources (including land) for the development of a public university is a Government responsibility. In the old colonial era, on account of the restricted site of the University of Hong Kong at that time, I was told that the Government had a tacit

40

understanding to reserve adjacent sites for the University whenever they became available. The understanding was truly far sighted and admirable, given the fact that land around that area was (and is) so valuable. The Government of that time was willing to put the sustainable development of HKU above other commercial considerations for the long term good of the Community. After the HK SAR Government was formed, higher education was also clearly stated as one of the pillars sustaining the development of the HK SAR. Therefore, to be consistent with the policies on higher education before and after the Re-unification, and to be in line with the world trend of competing for high quality human resources, there is no reason whatsoever why the whole Lee Wai Lee site should not be given to the Baptist University which sorely needs that additional piece of land to strengthen its academic programs for the sake of the long term benefits of the Community.

Please note that the Baptist University is not asking for the site for the expansion of its size per se. It is asking for the site to meet its urgent needs in student residential accommodation (due to the 3-3-4 change of our educational system) and to complete its development for the School of Chinese Medicine, all within the scope as defined by the UGC. The residential accommodation shortage is well known and doesn't need further justification. I just want to add one statement in support of the construction of a hospital for Chinese Medicine to complete the School of Chinese Medicine development. As is well known, the Baptist University is a pioneer of Chinese Medicine education in Hong Kong (the program was established in 1999 under my Presidency). The School of Chinese Medicine at Baptist is now the largest and the most comprehensive set up in the Territory, including both Chinese medical and medicinal education. But it lacks a training hospital for the medical interns. As Chair of the Preparatory Committee for the Development of Chinese Medicine (1995-2001), and the Founding Chair of the Statutory Council for the Development of Chinese Medicine (2001-2006), I think I am qualified to say that the whole of the Chinese Medicinal Profession and many of the Hong Kong citizens have been yearning to see a hospital of Chinese Medicine established for training and clinical services as a symbol and a necessity for the further development of Chinese Medicine. Since a Chinese hospital is such a missing piece in advancing Chinese Medicine in Hong Kong, denying Baptist University the opportunity to build its teaching hospital on the Lee Wai Lee site is denying the long and ardent wishes of the Chinese Medical profession and the medical needs of a large segment of the Hong Kong Community.

To conclude, I hope your Committee would not view the request of the Baptist University as simply the desire of an institution to expand its scope of operation beyond the existing Government policy for public higher education. It is not! The University needs the whole of the Lee Wai Lee site only to allow it to operate more adequately with the necessary facilities to support the programs it also has, so that the University would function properly and effectively as a respected Institution of Higher Learning worthy of the name of Hong Kong.

Respectfully yours

Daniel C. W. Tse PhD., C.B.E., G.B.S. JP

40

PS As Chair of the University Council of the University of Macau, I am currently involved in the development of a new campus for the University. The Macao SAR Government has successfully obtained a site of over 100 hectares for the University on the Hengqin Island. The site will be connected to Macao through an underwater tunnel, and will become an integral part of the Macao SAR with no immigration barrier. The Macao Government has spent over10 billion (HK$) for the construction of the campus which will be completed by April this year. I was almost ashamed to tell my Macao colleagues that the campus size of my former institution, the Hong Kong Baptist University, is only 1/20 of the University of Macau new campus size, although I am proud that my Macao colleagues have very high regard for the academic achievements and international standing of the Hong Kong Baptist University.

北京师范大学香港浸会大学联合国际学院
BEIJING NORMAL UNIVERSITY-HONG KONG BAPTIST UNIVERSITY
UNITED INTERNATIONAL COLLEGE

President 校长
Professor NG Ching-Fai 吴清辉教授

15 March 2013

TPB/R/S/K18/17-41

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

Dear Sir,

Amendment Item A to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17 (Proposed Rezoning)

I am the past President and Vice-Chancellor of the Hong Kong Baptist University and wish to express my grave concern about the Proposed Rezoning. Since 2005, the University had been approaching the Government on the possibility of obtaining the Lee Wai Lee Campus at 30 Renfrew Road, Kowloon Tong (LWL Site) when it was vacated, for the long-term development of the University.

In October 2009, while I was in office, the University made a proposal to the Education Bureau, seeking the entire LWL Site for the establishment of a student hostel complex, a Chinese medicine teaching hospital and an Academy of Film. It is unfortunate that the Bureau has not made any response to the University.

I understand that the current proposal made by the University is to use the LWL Site for the establishment of a student hostel complex and a Chinese medicine teaching hospital, which is a reasonable proposal and logical from the planning perspectives. Geographically, the LWL Site is surrounded on three sides by the campus of Hong Kong Baptist University. The expansion of the University into the LWL Site represents the most efficient use of land and will consolidate the University's activities in one location which allows the University to make improvements to the environment and provide much-needed facilities.

There is a shortage of land for educational purposes in Hong Kong. The Proposed Rezoning would cause a permanent loss of valuable and scarce land resources of the education sector. According to Government statistics, the shortage amounts to 80,000 sq.m. of operational area for the eight institutions funded by the University Grants Committee. In this circumstance, it would be illogical to rezone the LWL Site into residential uses.

/2...

地址: [redacted]
Address: [redacted]
电話/Tel: [redacted] 邮箱/E-mail: [redacted]

My suggestion is to keep the zoning of the LWL Site as "Government, Institution or Community" unchanged, which will allow time for a full dialogue between the Government and the University, (and indeed the community at large), to evaluate the development plan of the University, including the use of the LWL Site for the Chinese medicine teaching hospital.

I sincerely hope that a win-win solution could eventually be reached so that the best interest of Hong Kong SAR would be served.

Yours faithfully,

Professor Ng Ching-fai, GBS
President
BNU-HKBU United International College

地址: [redacted]
Address: [redacted]

电話/Tel: [redacted] 传真/Fax: [redacted] 邮箱/E-mail: [redacted]

tpbpd@pland.gov.hk

TPB/R/S/K18/17-42

寄件者: "WONG WAI YEUNG" <[redacted]>
收件者: <tpbpd@pland.gov.hk>
傳送日期: 18/03/2013 上午 03:30
附加檔案: TPB-Opposition-e WYW wong.pdf
主旨: 反對李惠利用地變住宅

Dear Sir/Madam

I wish to oppose the captioned amendment and request that the zoning of the southern part of the ex-Lee Wai Lee Campus be kept as "Government, Institution or Community (9)".
Please see attached

Thanks
WYWong

Disclaimer

This message (including any attachments) may contain confidential information intended for a specific individual and/or purpose. If you are not the intended recipient, please delete this message and notify the sender and the University immediately. Any disclosure, copying, or distribution of this message, or the taking of any action based on it, is prohibited as it may be unlawful.

In addition, the University specifically denies any responsibility for the accuracy or quality of information obtained through University E-mail Facilities. Any views and opinions expressed in the email(s) are those of the author(s), and do not necessarily represent the views and opinions of the University. The University accepts no liability whatsoever for any losses or damages that may be incurred or caused to any party as a result of the use of such information.

Go Green Print Less

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

Date: 17 March 2013

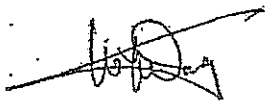
Dear Sir,

Opposition to Amendment Item A
to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

I wish to oppose the captioned amendment and request that the zoning of the southern part of the ex-Lee Wai Lee Campus be kept as "Government, Institution or Community (9)". The reasons are provided in the ensuing paragraphs:

- The rezoning would be an irreversible loss to the community and the society as a whole.
- The development of luxury residential properties fails to address the shortage of housing. It is not necessary to build luxury apartments.
- It is misleading to the public and procedurally wrong to include the site in the Land Sale Programme while the public consultation on the rezoning is still underway.
- The site can be most efficiently used by allocating it to Hong Kong Baptist University for its long-term development.
- Please reserve the land for educational use.

Yours faithfully,



Name: Prof. Wai-Yeung Wong
Postal Address or Email: [redacted]
Tel No.: [redacted]
Date: 17 March 2013

Form No. 30 表格第30號

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	43 TPB/R/S/K18/17-43
	Date Received 收到日期	

1. The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道333號北角政府合署15樓城市規劃委員會秘書收。

2. 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333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. 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 infomation 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爲不曾提出論。

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*)

卞兆祥教授

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*)

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 Kowloon Tong Outline Zoning Plan No. S/K18/17 九龍塘分區計劃大綱草圖編號 S/K18/17

* Delete as appropriate
Please fill "NA" for inapplicable item
* 請刪去不適用者
請在不適用的項目填寫「不適用」

Form No. S6
表格第S 6號

REPRESENTATION RELATING TO DRAFT PLAN UNDER SECTION 6(1) OF THE TOWN PLANNING ORDINANCE (CAP. 131)

根據《城市規劃條例》（第131章）第6(1)條就草圖作出申述

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
Amendment Item A A項	☐ support 支持 ☑ oppose 反對	該幅屬於「政府、機構或社區」用途的土地，緊鄰浸會大學，實難適用於其他用途。建議撥予浸會大學以興建香港中醫教學醫院。 現時全港的中醫學生不能於本港進行臨床實習，因為香港沒有一所中醫教學醫院；因此實習只能前往內地進行；但內地法規制度跟香港的不一樣，對學生的實習效果會有影響。 現李惠利學院原校址三邊皆鄰接浸會大學，有利於教與學，從病人的角度出發，也是一個不錯的選擇。它位處九龍塘，交通網絡四通八達，方便各區的病人求診，而且該區環境較寧靜清幽，綠化度高，是建院的絕佳地點。因此，假如建設中醫教學醫院作育英才，並為市民提供全面的中醫醫療服務，則將造福的不僅是九龍城區民眾，更是全港市民。 (註：其他反對的詳細理據請參閱附件)
	☐ support 支持 ☐ oppose 反對	
	☐ support ☐ oppose	

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。

應還原前李惠利校舍南部的土地為 "政府、機構或社區(9)" 地帶

@ 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. Plans, 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/繪圖爲彩圖或超過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。

.....

.....

.....

5. Signature 簽署

Signature 簽署 .....

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

.....Prof. Bian Zhao Xiang.....
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 .....

on behalf of 代表 .....

Company/Organization Name and Chop (if applicable)
公司 / 機構名稱及蓋章（如適用）

Date 日期 4/3/2013

Statement on Personal Data 個人資料的聲明

1. 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:
   (a) 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
   (b) 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：
   (a) 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
   (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。
2. 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。
3. 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 4 8 6 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，其地址爲香港北角渣華道 333 號北角政府合署 15 樓。

* 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」
「/」at the appropriate box　請在適當的方格內加上「/」號

學醫院，絕對是刻不容緩了。

ii) 社會醫療服務的迫切需要

自特區政府成立以來，特別是近年，公私營機構紛紛開設中醫診所提供中醫藥服務，但診所不同於醫院，中醫藥診所絕對不能替代中醫教學醫院的功能。沒有中醫教學醫院，除在教學方面有嚴重缺陷之外，也限制了中醫藥本身發揮其在臨床醫療服務中的作用；同時，亦剝奪了病人享用系統完善的中醫藥醫療服務的權利。目前，中醫藥的服務範圍只能局限於門診；雖然現時極少一部分的公私營醫院的住院病人可能通過正式或非正式途徑得到中醫藥服務，但是絕大多數的住院病人並不能得到中醫藥服務。只有中醫藥門診服務，沒有中醫住院服務，沒有中醫院，嚴重限制了中醫藥在危重急症中的應用，也嚴重限制了中醫藥與其他治療手段結合。事實上，國內外的多個臨床試驗都證實中醫藥在治療許多慢性複雜性疾病可以發揮積極的治療或輔助作用。沒有中醫院，很難開展中醫、西醫及其他醫療界別的配合服務，很難讓病人在自主選擇的前提下，讓病人得到最優質的醫療服務。

另一方面，雖然目前香港的醫療架構，原則上已涵蓋了各類醫療服務，然而，由於資源有限，政府並不能完全滿足不同病患者的需求，特別是在康復治療服務方面。有鑑於此，浸會大學倡議興建的中醫教學醫院不單是為滿足中醫教育的迫切需要，也能充分配合香港社會對醫療服務的渴求。以中風病人為例，依據衛生署的統計資料，在香港因中風入住本地醫院的個案數目由 1986 年的 14,847 宗上升至 2006 年的 25,991 宗，升幅達 75%。現時每年中風病人的個案數目多達 2 萬宗；假如當中有 20% 病人選擇入住中醫院接受發病後的康復治療，當中住院平均日數以 14 天計算，已佔去中醫院整體床位的 77% (以床位 200 張計算)。一般來說，中風病人發病後半年內是接受復康治療的黃金時間，但礙於本港醫療資源有限，中風病人往往未能充分把握此段時間，繼續接受住院治療。現時中醫服務只限於門診，但舟車勞頓令行動不便的中風患者體力不繼，既不利於康復，亦會增加中風復發的風險。同時其陪同親友及家庭亦增加了接送病者的負擔。若本港設有中醫院，將可為這類病者提供床位，以及有關的護理服務，有利病者的治療及康復。因此，中醫教學醫院，不僅是惠及中醫藥的莘莘學子，也將是造福香港市民，在人口老年化越來越明顯的今天顯得更為重要。

iii) 有利於中醫藥研究的發展

臨床研究是提升臨床療效及安全性的必經之路；任何醫學的發展均須要大量的臨床數據支持，特別在現今以循證醫學為主導的醫學發展潮流中，中醫藥也不例外。在全球一體化的浪潮下，雖然其他地區的臨床研究結果，對於本地的臨床醫療服務有借鑒作用，但考慮到地區、人口、環境等因素的差異，

香港必須進行本地的中醫藥研究。在臨床研究方面，中醫教學醫院是必不可少。如果中醫藥仍停留在診所形式，很難想像可以開展大規模高質量的臨床研究，很難想像本地中醫藥事業能有長久持續的發展。臨床研究是中醫藥教育與中醫藥醫療服務的基石之一；建立中醫院並將其建設成為本港的臨床研究基地，不但可以提高中醫藥教育水平及醫療服務水平，更有助於中醫藥業界水平的提升，有助中醫藥產業及中藥新藥研發工作的推進。

2. 成立中醫教學醫院的可行性

i) 社會認知及政府政策的層面

從社會認知及政府政策來看，香港社會已準備好建立中醫教學醫院。民建聯於 2009 年 9-10 月曾就本地中醫服務進行電話調查，結果顯示普遍市民認同中醫的重要性，更有八成人認為政府推動中醫力度不足，建議興建中醫院。由此可見民間對於中醫藥服務的認同，不單需要中醫住院服務，更是渴求本地中醫院的成立。近年，不少醫療服務機構亦相繼提出開設中醫住院服務的計劃，例如廣華醫院在 2011 年末開始，成立中西醫結合服務團隊，為多個專科的住院病人服務；於 2012 年 6 月，亦向立法會提交設有中醫病房的醫院重建計劃。食物及衞生局局長高永文醫生較早前在接受媒體訪問中，也談及本港成立中醫康復醫院的設想；這證明社會整體已有興建中醫院的共識，這也是中醫藥醫療服務與教育研究的大勢所趨。

ii) 人力資源方面

在人力資源方面，香港亦能滿足建立中醫教學醫院的中醫藥人才需求。自 1998 年香港浸會大學首先開辦中醫學學士及生物醫學理學士雙學位課程以來，多間大學設立中醫藥的全日制與兼讀制課程，為長遠而持續的本地中醫藥人才培養踏出堅實一步。現時，本港共有三所大學提供全日制中醫學位課程，包括香港浸會大學、香港中文大學及香港大學，每年共約有 79 名中醫本科畢業生；此外，尚有部分全日制碩士學位課程的畢業生等。截至目前為止，已累積有近 800 名全日制中醫專科畢業生，加上本地兼讀制學位課程的學生以及從中國內地中醫藥高等院校畢業的學生人數，總數已超過 3,000 名。此外，還有一批早年來港工作的中醫藥專業人才，他們亦是非常重要的一支力量。自《中醫藥條例》實施以來累積計算，現時香港共有註冊中醫師 6,560 名，表列中醫師 2,732 名，有限制註冊中醫師 73 名，是建立中醫教學醫院的人力資源基礎。在中藥專才方面，香港浸會大學設立了全日制中藥學學士學位課程，培養優秀的中藥學專才，為中藥鑑定、驗證、開發、管理等工作注入新動力。除此以外，尚有其他院校設立的中藥學證書課程、文憑課程等等，為業界水平的提升打下穩固的基礎。近十年來，政府還以專才方式從內地引進中醫、中藥專業人才，他們也是香港中醫藥服務的新生力量。這些中醫藥專業人才，是成立中醫院極為重要的人才儲備，亦將是未來中醫院的重要力量。

iii) 浸會大學於中醫住院服務的實踐經驗

對於在香港設立中醫院，香港浸會大學進行了積極的探索與實踐。自 2009 年開始，香港浸會大學與香港防癌會合作，於香港防癌會賽馬會癌症康復中心開設中醫藥服務。此中心除為門診病人提供中醫藥服務，亦為住院的腫瘤病人提供中醫藥到診服務；中醫腫瘤專科醫生與負責住院病房的腫瘤專科顧問西醫生一起，共同協商治療方案，為病人提供中西醫結合的腫瘤治療服務。同時，我們亦於醫院內設立中醫住院病房，為中風、頑固痛證等病人提供以中醫治療為主體的中西醫配合住院治療服務。在開展中醫住院服務初期，我們與醫院管理層、護理人員及駐院顧問醫生等，就中醫藥醫療服務的形式、內容、中西醫及醫護之間的配合等進行了廣泛的交流與討論，讓雙方對診療過程、治療手段、治療結果評估、治療過程中的可能風險等有了深切的了解。然後，我們針對不同的病種，制定了中西醫綜合治療的相關指引。於日常運作上，主診中醫師與顧問醫生每天聯合巡房，就病人的病情進行討論，制定綜合治療方案，並對治療效果進行評估。護理人員亦接受相關中醫藥專業知識的培訓，使中西醫治療方案得以完善實施。在此過程中，我們亦因應住院服務的其他需要，例如：如何處理醫療保險問題、住院病房的危急情況處理、確保醫療操作的安全、及減低醫療風險管理等方面，訂立應對措施。通過這一服務的嘗試，我們深入了解中醫住服院服務的社會需求，積累了與西醫生一起為病人訂立恰當的診斷、治療、預防等綜合方案及其風險管理的經驗，為日後中醫教學醫院的中西醫協作打下良好基礎。

iv) 浸會大學於中醫藥醫療服務的營運管理優勢

在中醫藥醫療服務的營運管理方面，自浸大中醫藥學院成立以來的 10 多年中間，先後開設了多間中醫藥診所，一方面滿足學生見習的需要，同時亦為公眾提供中醫藥診療服務，並推動臨床研究。現時，浸大轄下已有 15 間中醫藥專科診所，其中 8 間為獨立運作，7 間為與醫院管理局及非牟利機構合作建立；所設科別從全科到中醫心血管科、消化科、針灸科、中醫骨傷科、中醫皮膚科、中醫腫瘤科、中醫眼科、中醫婦科、中醫兒科等專科服務類別。在診所日常運作上，我們訂定了一整套的指引及程序，確保病人得到最佳的治療效果。我們亦建立了一支醫療管理專業團隊，對於醫事條例、醫療風險管理、人力資源管理、財務運作管理等均較熟悉，為中醫教學醫院的營運管理積累經驗。

3. <u>香港中醫教學醫院的定位</u>

i) 推動中醫教學與研究

作為一間教學醫院，在為病人提供高質素醫療服務的同時，教學與研究應是其發揮的主體功能之一。這一點與公營或私營醫院現時所建的中醫門診，或

是將要興建的中醫病房以醫療服務為主體不同。教學醫院不單滿足本港市民對中醫藥醫療服務的需要，更為本地培養優秀的中醫藥專才以應未來社會所需，推動香港長遠的中醫藥發展。中醫教學醫院必須肩負教學任務，為教學服務，一方面中醫教學醫院的臨床中醫師及西醫生可從事臨床課的課堂教學；不僅如此，在本地的醫療及法規制度下，中醫教學醫院可為在讀的中醫、中藥學生提供與未來臨床工作環境相符的見習與實習的機會，學員可跟隨帶教老師參與中醫門診與中醫病房的日常診療工作，從而全面掌握中醫藥在門診及住院病人治療中可以發揮的作用，這有助於全面提升學員的臨床能力，有利於學員畢業後在港從事臨床工作，對學員及市民大眾均有所裨益。另一方面，中醫教學醫院亦將成為註冊中醫師持續進修的場所之一，這對整個中醫藥行業的傳承都有益處。

其次，中醫教學醫院亦須以臨床研究為主導，逐步開展以循證醫學為導向的臨床實踐與臨床研究，推進中醫臨床服務，提高臨床治療的效果。循證醫學是臨床中醫藥學的發展方向。中醫教學醫院可針對本港多發、而中醫有較佳治療效果及優勢的疾病，如腫瘤、中風、自身免疫性疾病等，確立重點臨床研究內容，開展大型臨床研究，探討中醫、中西醫配合治療的療效、安全性及其成本效益，為臨床醫師提供中西醫合療的循證醫學證據，並將研究成果與業界分享，將研究結果應用於治療上，為病人謀求最為有效的綜合治療方案。同時，中醫教學醫院亦可成為中藥臨床藥物試驗基地，開展中醫新藥臨床試驗，為新藥的研發提供研究平台。

ii) 中醫為主，西醫為輔，中西醫配合

中醫教學醫院將以中西醫配合為主體。中、西醫治療各有其優勝之處，香港中醫教學醫院將是一所中西醫配合的醫院，讓市民可以同時選用中醫及中西醫配合的醫療服務。在門診服務方面，中醫教學醫院可提供獨立的中醫及西醫門診服務，同時還將提供中西醫合療服務，讓患者有更多的選擇機會。此外，因應中醫教學醫院門診與病房的結合，如病人在門診接受初步診斷後有住院需要，即可馬上收入病房以接受進一步的診治。在住院服務方面，中醫教學醫院可同時提供中醫及西醫的診治手段，及中西醫會診服務。中西醫將根據需要對病人的總體病情進行綜合評估，共同協商並制訂治療方案，以及各自負責中西醫的治療工作，讓病人得到綜合的調理。藉此平台，不單可以建立中西醫配合的治療手段，亦能在臨床中了解中西醫的特點及差異，從而發掘中西醫配合的切入點，更有助中醫與其他醫療行業的配合，並且憑借香港的優勢，將這一經驗向全世界推廣。中醫教學醫院中，臨床治療的主要治療手段，將是以中醫手段為主，配合西醫治療。根據中醫教學醫院的實際需要，可不用設立大型手術室、大型檢查儀器如電腦掃描及磁力共振等，但是為了滿足醫院條例的要求，將需設立小型手術室，由駐院西醫生處理簡單的

門診小手術等。除此以外，中醫教學醫院將安排 24 小時中西醫當值，確保病人於任何時間均可得到適當的急救處理；並與鄰近有急症設備之公立醫院聯絡，如遇需要處理急症個案，將由救護車送往此等公立西醫院處理。香港中醫教學醫院亦將遵循醫院條例的所有規定，當中包括設施設備、風險管理、員工管理、病人權益的保障、處理投訴制度的設立等。

iii) 康復醫院，目標病人以中風、癌症及嚴重痛症病人為主

中醫教學醫院服務的住院病人，將主要考慮有循證證據證明中醫藥確有療效的病種，例如中風、癌症及嚴重痛症等。實踐經驗及臨床研究證明中醫藥可為這類疾病提供較佳的療效，有助控制病情，延緩惡化。中醫教學醫院可通過為病人提供綜合的治療，如中草藥、針灸、推拿、按摩、藥物薰蒸等，並在飲食、生活調理上為病人作出配合，讓病人接受較全面及個人化的治理，彌補現時公營或私立醫院以西醫為主體的醫療服務的不足，減輕現時公私營西醫院的壓力，同時亦為求得更好的治療目標而努力。除此以外，婦科、骨傷科等中醫較具優勢的專科亦可在建院後逐步加入，為更廣泛的病患提供優良的中醫服務。

4. 建立香港中醫教學醫院的關鍵因素

i) 建院資金

興建中醫教學醫院需要投入大量資金。資金的來源可來自政府出資或大學自籌。特區政府於一月公布，本財政年度首 9 個月錄得 400 億元的盈餘。不少學者均指出，政府在考慮全面性「派糖」，提出有針對性的紓困措施外，應投入更多資源予中長期發展的項目。建立中醫教學醫院將長遠有助推動本地高等教育及醫療體制的發展，亦符合特首施政報告中提出的“擴大中醫中藥在公營醫療系統的角色”的理念，配合社會中長期的發展。因此，政府應該考慮撥款興建中醫院。而且，中醫教學醫院的資金投入相比 400 億盈餘只佔一個很少的數目，但日後的回報、對社會影響卻是長久的。基於建立香港中醫教學醫院對整個社會的必要性及迫切性，如果政府出資興建則是最佳的選擇。當然，香港浸會大學也有信心可以通過籌募方式籌集足夠資金建院，為廣大市民謀福祉。但是，兩種情形下的醫院運作模式將會不同。

ii) 建院土地

作為中醫教學醫院，要滿足其長遠的教學及醫療目標，其用地應是永久性的。因此，無論中醫教學醫院是以政府出資或是大學以自籌資金方式興建，我們急切地期盼政府可以因應中醫教學醫院的需求，盡快劃出適當的地方，建立中醫教學醫院。

作為進行大學醫學課程的教學醫院，一般都是建在大學附近，這不僅方便學

生、教授、及醫師，也讓大學的研究能夠與醫療有更緊密的結合。教室、實驗室與病房相鄰，方便學生見習、實習，也方便教授的教學與臨床實踐，從而促進教與學的效果。因此，在醫院選址上，我們非常期望教學醫院能夠與大學鄰近，這樣，教學、臨床、醫療管理等將可更為集中。在三三四學制推行後，中醫課程由原來的五年制改為六年制，目的就是增加臨床見習與實習的時間，提高臨床技能的培訓。在六年的時間內，若學生的實習場地與大學教學設施相近鄰，省下來的時間應可更有效地運用於學習上，否則時間浪費在交通上實在可惜。假設學生每次往返醫院與大學需要 1 小時，則每周將需 3-6 小時，6 年之內單純花在路途上的時間遠遠超過 700 小時。如果這個時間能夠花在實習上或者學習上，則效果相應會完全不同！其實，在大學校區附近建立附屬的教學醫院，已經成為一種常規。以香港為例，香港大學、香港中文大學，其教學醫院也是鄰近大學的所在地。以中國內地歷史悠久的五間中醫藥大學（北京、廣州、南京、上海、成都）為例，各間大學都有超過三間以上的附屬醫院，而且通常有一間在大學的附近；如廣州中醫藥大學有四間附屬醫院，其中廣州中醫藥大學第一附屬醫院緊鄰大學校區；上海中醫藥大學有五間附屬教學醫院，一間鄰近大學校區；另外，台灣的中國醫藥大學，同時設有中醫學院及西醫學院，其附屬中醫教學醫院亦臨近大學校區；韓國慶熙大學，建有南韓最大的韓醫大學校，其附屬醫院也是與大學主校園相連。這種現象在歐美的西醫院校亦比比皆是。

自 2009 年起，香港浸會大學已開始向政府爭取建立中醫教學醫院。其間，浸大曾跟不同團體商討，研究合作建院的可能性，但亦因多種原因不合而未功。早前香港專業教育學院（李惠利）遷出原有校舍，該幅屬於「政府、機構或社區」用途的土地，緊鄰浸會大學，是現時建立香港中醫教學醫院的最佳選擇；它不單有利於教與學，從病人的角度出發，李惠利學院原校址也是一個不錯的選擇。它位處九龍塘，交通網絡四通八達，方便各區的病人求診，而且該區環境較寧靜清幽，綠化度高，是建院的絕佳地點。李惠利地皮三邊皆鄰接浸會大學，隱隱有合圍之勢，實難適用於其他用途。假如建設中醫教學醫院作育英才，並為市民提供全面的中醫醫療服務，則將造福的不僅是九龍塘區民眾，更是全港市民。

因此，我們強烈呼籲政府，以全港市民下一代的整體利益為大前提，停止前李惠利校舍的修改土地用途建議，以免為了應對一時的住宅土地不足而永久犧牲這珍貴的教育用地，對社區規劃、高等教育和全港市民帶來不可挽回的損失。本人期望政府能將李惠利南部土地交予浸會大學，建立首間中醫教學醫院，以完善本港的中醫教育體系，並有利於提供更多的醫療選擇予香港市民，符合整體社會的利益。

申述人：

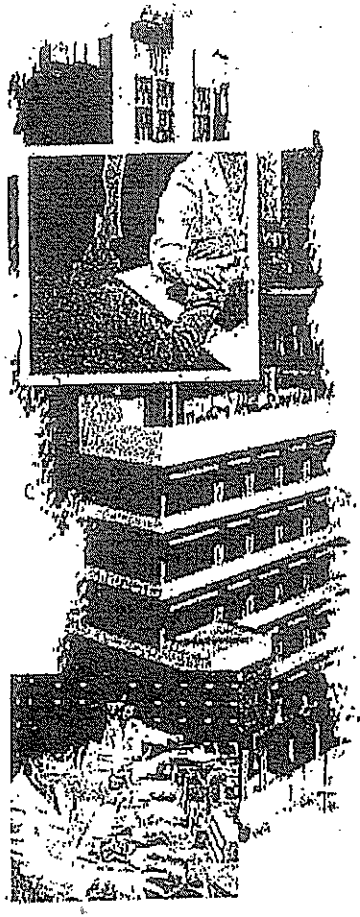
卞兆祥教授
香港浸會大學協理副校長、
臨床部主任

日期：4/3/2013

建中醫教學醫院迫在眉睫

□香港浸會大學中醫藥學院 臨床部主任 卞兆祥教授

自1998年香港特區政府正式資助香港浸會大學開辦中醫學學士及生物醫學理學士雙學位課程，學界已提出建立本地中醫教學醫院的訴求，為莘莘學子提供完整的中醫教育設施。時至今日，本地中醫教學醫院仍未見眉目；早前浸會大學中醫藥學院呂愛平院長提出建立中醫教學醫院刻不容緩，實際上盡快建立香港中醫教學醫院已迫在眉睫。



首先，中醫教學醫院是培養中醫藥人才的必須。

醫學，無論是西醫還是中醫，都是一門實踐性很強的科目，要培養一位優秀的醫生，沒有培訓基地根本無從談起。中學生的培養模式，從二千多年前的「師帶徒」，到今天「基於問題的教學方法」的變革，臨床教學從來是培訓核心。

自上世紀七、八十年代開始，醫學院校包括中醫藥院校都直接將臨床科目的教學場所從課室移到了病床，縮短理論與實踐的距離，大大提高了教學效果。可惜的是：自教統局（現稱為教育局）批准大學開設中醫藥課程至今，香港尚沒有一間中醫教學醫院。在過去的十多年間，浸會大學與本地另兩間大學，均想方設法解決學生的見習（自學生入學後一年級開始，穿插於課堂教學中）及實習（在五年或六年學制的最後一年）問題。

一方面，這些院校都以自負盈虧的方式成立了中醫藥門診，為學員提供見習場所；同時，因為本港沒有中醫院，因此，學生必須到中國內地如廣東、上海等地進行實習。但是，內地的醫療法規制度有別於本港，特別是中國內地中醫師可用西藥，西醫亦可用中藥，而這一點與本港的制度截然不同。學員須適應兩地醫療制度的差異，對學生的學習及回港後的應用都帶來困難。因此，現行以香港的課堂作教學及臨床見習，加上中國內地臨床實習的做法，並不能取得最佳的教學效果。

在近年新高中學制的推行下，中醫課程亦由以前的五年制增至現時的六年制，間接令見習及實習問題加劇。若在本地設立中醫院，則可彌補在課程設置之初的不足，解決上述的實際問題，完善本地的中醫高等教育。學生到中國內地實習的時數亦可獲減少或甚至取消，且能讓學生於本港的醫療制度下汲取經驗，為日後的臨床工作做好準備，對學生及市民大眾均有所得益。

與此同時，中醫教學醫院亦可成為一個培訓基地，為已畢業的醫師提供持續進修的機會，這對於年輕中醫師及整個行業的傳承均極有意義。今天的醫學生，是未來的中醫藥醫療服務的主體力量；為了他們能接受足夠的培訓，為了明天我們的健康，建立香港的中醫教學醫院，我們已極不應該再等，也不能再等。

中醫教學醫院的設立是中醫藥醫療服務的必須。

雖然自特區政府成立以來，特別是近年，公私營機構紛紛開設中醫診所提供中醫藥服務，但診所不同於醫院，中醫藥診所絕對不能替代中醫教學醫院的功能。沒有中醫教學醫院，除在教學方面有嚴重缺陷之外，也限制了中醫藥本身發揮其在臨床醫療服務中的作用；另一方面亦限制了病人享用系統完善的中醫藥醫療服務的權利。

目前，香港尚沒有一間公私營醫院提供中醫住院服務，更沒有中醫院。沒有中醫藥住院服務，中醫藥的服務範圍只能局限於門診；雖然現時極少一部分的公私營醫院的住院病人，可能通過正式或非正式途徑得到中醫藥服務，但是絕大多數的住院病人並不能得到中醫藥服務。只有中醫藥門診服務，沒有中醫住院服務，沒有中醫院，嚴重限制了中醫藥在危重急症中的應用，也嚴重限制了中醫藥與其他治療手段結合。事實上，國內外的多個臨床試驗都證實中醫藥在治療許多慢性複雜性疾病，可以發揮積極的治療或輔助作用。沒有中醫院，很難開展中醫、西醫及其他醫療界別的配合服務，很難讓病人在自主選擇的前提下，讓病人得到最優質的醫療服務。

以中風病人為例，一般多出現半身不遂、舌強不語、吞嚥困難、頸項強痛、手足痿軟無力等症狀，以中藥配合針灸等綜合治療可取得明顯的療效。但礙於現時中醫藥服務僅以門診為主，此類治療效果未能達到應有和最理想效果。若成立中醫教學醫院，則病人有機會於早期接受中醫藥治療；醫院可為病人提供針灸、推拿、藥物蒸蒸等綜合治療，並能給予專業的護理服務、飲食調控及食療等，讓患者可在適切的治理下康復。因此，中醫教學醫院，不僅是惠及中醫藥的莘莘學子，也將是造福民眾，為香港社會謀福祉。

在臨床研究方面，中醫教學醫院更是必不可少。

眾所周知，臨床研究是提升臨床療效及安全性的必經之路；任何醫學的發展均須要大量的臨床數據支持，特別在現今以循證醫學為主導的醫學發展潮流中，中醫藥也不例外。

在全球一體化的浪潮下，雖然其他地區的臨床研究結果，對於本地的臨床醫療服務有借鑒作用，但不足以代替本地進行的中醫藥研究，這不僅僅是因為臨床研究本身需要考慮到地區、人口、環境等因素的差異，臨床研究亦是中醫藥教育與中醫藥醫療服務的基石之一。

除此之外，建立中醫院並將其建設成為本港的臨床研究基地，不但可以提高中醫藥教育水平及醫療服務水平，亦有助於中醫藥業界水平的提升，有助於中醫藥產業及中藥新藥研發工作的推進。如果我們仍然猶豫不決，仍然裹足不前，中醫藥仍停留在診所形式，很難想像可以開展大規模高質量的臨床研究，很難想像本地中醫藥事業能有長久持續的發展。

特區政府剛剛公布的施政報告提出：會在本月底，成立「中醫中藥發展委員會」，集中研究政策措施，發展中醫中藥業。重點內容包括：提升中醫師專業水平及地位、加強促進中醫藥研發、鼓勵中西醫結合治療、擴大中醫中藥在公營醫療系統的角色，以及設立中醫住院服務等。我們歡迎政府的這一舉措，同時更期望政府能急莘莘學子所急、急業界所急、急市民所急，加大舉措，成立中醫教學醫院，這不單是為未來培養優秀的中醫藥人才、為市民提供全面的醫藥醫療服務、為中醫藥業界提供更好的發展平台，更是本港中醫藥是否能夠長遠發展的箇中關鍵。

中醫教學醫院的成立已是迫在眉睫！

（按：卞兆祥教授亦為香港浸會大學協理副校長，專責籌建中醫教學醫院。）

建立香港中醫教學醫院的可行性

□香港浸會大學中醫藥學院 臨床部主任 卞兆祥教授

正如筆者上周在本欄撰文所述，無論從教學、臨床研究、或是醫療服務等角度分析，香港都急需建立中醫教學醫院。今天繼續討論：在香港設立中醫教學醫院可行嗎？

事實上，在香港設立中醫教學醫院不但有其必要性，且是可行的。

從社會認知及政府政策來看，香港社會已準備好建立中醫教學醫院。這細引述民建聯於2009年9~10月曾就本地中醫服務進行電話調查的資料，調查結果顯示普遍市民認同中醫的重要性，更有八成人認爲政府推動中醫力度不足，建議興建中醫院。由此可見民間對於中醫藥服務的認同，不單需要中醫住院服務，更是渴求本地中醫院的成立。

近年，不少醫療服務機構亦相繼提出開設中醫住院服務的計劃，例如廣華醫院在2011年末開始，成立中西醫結合服務團隊，爲多個專科的住院病人服務；於2012年6月，亦向立法會提交設有中醫病房的醫院重建計劃。

需要說明的是：中醫住院服務，並不等同於中醫院，也不等同於中醫教學醫院。食物及衛生局局長高永文醫生較早前在接受媒體訪問中，談及本港成立中醫康復醫院構想，這證明社會總體已有興建中醫院的共識，也是中醫藥醫療服務與教育研究的大勢所趨。

人才資源充足

在人才資源方面，香港亦能滿足建立中醫教學醫院的中醫藥人才需求。自1998年香港浸會大學首先開辦中醫學學士及生物醫學理學士雙學位課程以來，多間大學設立中醫藥的全日制與兼讀制課程，爲長遠而持續的本地中醫藥人才培養踏出堅實一步。

現時，本港共有三所大學提供全日制中醫學位課程，包括香港浸會大學、香港中文大學及香港大學，每年共約有90名中醫本科畢業生；此外，尚有部分全日制頂士學位課程的畢業生等。截至目前爲止，已累積有近800名全日制中醫專畢業生，加上本地兼讀制學位課程的學生以及從中國內地中醫藥高等院校畢業的學生人數，總數已超過3000名。此外，還有一批早年來港工作的中醫藥專業人才，他們是非常重要的一支力量。

自《中醫藥條例》實施以來，現時香港共有註冊中醫師6,560名，裁列中醫師2,732名，有限制註冊中醫師73名，是建立中醫教學醫院的人力資源基礎。

在中藥專才方面，香港浸會大學設立了全日制中藥學學士學位課程，培養優秀的中藥學專才，爲中藥鑑定、驗證、開發、管理等工作注入新動力。除此以外，尚有其他院校設立的中藥學設置課程，文憑課程等等，爲業界水平的提升打下穩固的基礎。近十年來，政府還以專才方式從內地引進中醫、中藥專業人才，他們也是香港中醫藥服務的新生力量。這些中醫藥專業人才，是成立中醫院極爲重要的人才儲備，亦將是未來中醫院的重要力量。

探索實踐見效

對於在香港設立中醫院，香港浸會大學進行了積極的探索與實踐。自2009年開始，香港浸會大學與香港防癌會合作，於香港防癌會賽馬會癌症康復中心開設中醫藥服務，此中心除爲門診病人提供中醫藥服務，亦爲住院的腫瘤病人提供中醫藥到診服務；中醫腫瘤專科醫生與負責住院病房的腫瘤專科顧問西醫生一起，共同協商治療方案，爲病人提供中西醫結合的腫瘤治療服務。

同時，我們亦於醫院內設立中醫住院病房，爲中風、頑固痛證等病人提供以中醫治療爲主體的中西醫配合住院治療服務。

在開展中醫住院服務初期，我們與醫院管理層、護理人員及駐院顧問醫生等，就中醫藥醫療服務的形式、內容、中西醫及醫護之間的配合等進行了廣泛的交流與討論，讓雙方對診療過程、治療手段、治療結果都估、治療過程中的可能風險等有了深切的了解。然後，我們針對不同的病種，制定了中西醫綜合治療的相關指引。於日常運作上，主診中醫師與顧問醫生每天聯合巡房，就病人的病情進行討論，制定綜合治療方案，並對治療效果進行評估。護理人員亦接受相關中醫藥專業知識的培訓，使中西醫治療方案得以完善實施。

中西協作良好

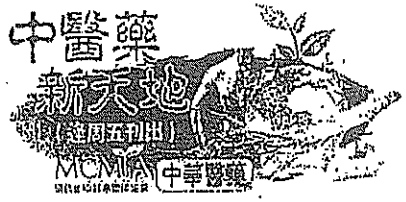
在此過程中，我們亦因應住院服務的其他需要，例如：如何處理醫療保險問題、住院病房的危急情況處理、確保醫療操作安全、減低醫療風險等方面，訂立應對措施。通過這一服務的嘗試，我們深入了解中醫住院服務的社會需求，積累了與西醫生一起爲病人訂立恰當的診斷、治療、預防等綜合方案及其風險管理的經驗，爲日後中醫教學醫院的中西醫協作打下良好基礎。

在中醫藥醫療服務的營運管理方面，自浸大中醫藥學院成立以來的10多年中，先後開設了多間中醫藥診所，一方面滿足學生見習的需要，同時亦爲公衆提供中醫藥診療服務，並推動臨床研究。

營運管理上軌

現時，浸大轄下已有15間中醫藥專科診所，其中8間爲獨立運作，7間爲與醫院管理局及非牟利機構合作建立；所設科別從全科到中醫心血管科、消化科、針灸科、中醫骨傷科、中醫皮膚科、中醫腫瘤科、中醫眼科、中醫婦科、中醫兒科等專科服務類別。在診所日常運作上，我們訂定了一整套的指引及程序，確保病人得到最佳的治療效果。我們亦建立了一支醫療管理專業團隊，對於醫事條例、醫療風險管理、人力資源管理、財務運作管理等均較熟悉，爲中醫教學醫院的營運管理積累經驗。

基於以上論點，我們認爲：不論是在社會認知、中醫藥人才儲備、中醫院的營運管理等方面，中醫教學醫院的預備已然就緒。要滿足本地的醫療需求，培養未來的中醫藥人才，持續發展本土中醫藥，中醫教學醫院的成立不僅是必要的，而且也是可行的。



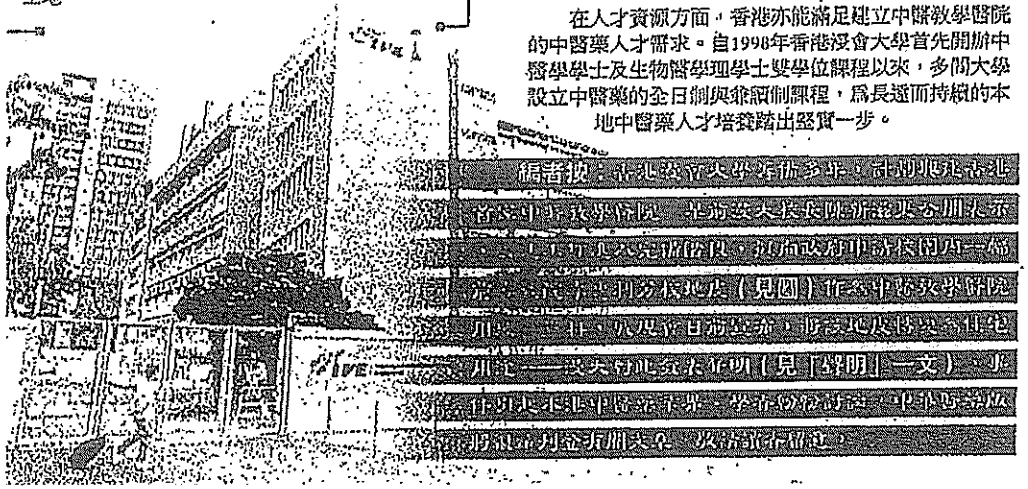
香港浸會大學聲明

浸會大學對於城市規劃委員會轄下的都會規劃小組委員會通過「採納」把九龍塘前李惠利校舍南部用地由「政府、機構或社區」用地轉變為住宅用途的建議，表示極度遺憾！

浸大認為，土地用途一旦更改，表示該幅土地此後不能再用作提供教育和社區設施（包括醫院），對社區、高等教育界和整個社會都造成損失。此外，浸大校園已經飽和，戶外空間嚴重不足，該幅土地被浸大建築物包圍，是供浸大未來持續發展及解決迫切擴建需要的最合理用地。

浸大校長陳新滋教授表示，浸大肯定會在城規條例的公眾諮詢期內再度堅決反對，也呼籲同學、同事、校友和友好，透過不同渠道表達反對意見。

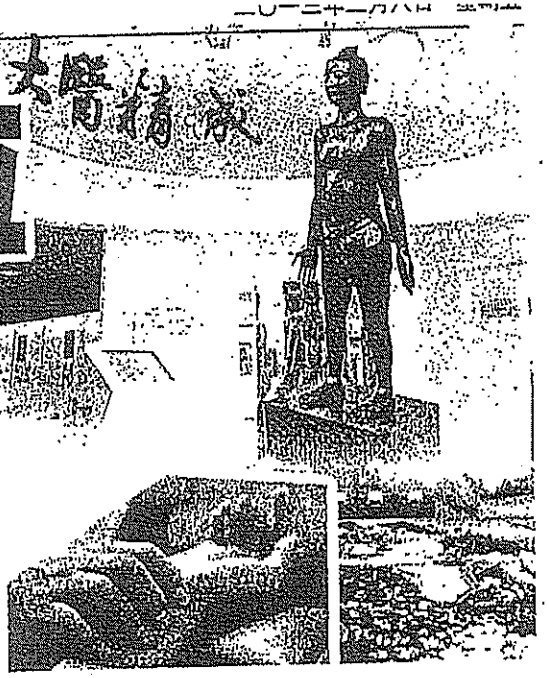
陳校長亦向關心這件事的同學、同事、校友和社會人士致謝，他說，大學同仁會繼續同心協力，為大學和高等教育的未來一起盡力爭取這片土地。



中醫藥雜誌
每周四出版 每周三截稿出刊
網址http://www.takungpao.com
FAX:2672 5593
版權所有翻印必究

香港中醫教學醫院的定位

□香港浸會大學中醫藥學院 臨床部主任 卞兆祥教授

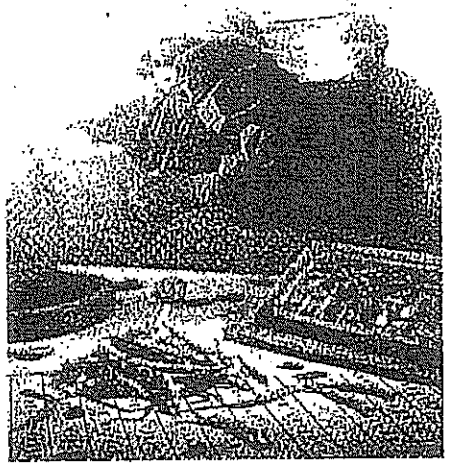


無可否認，香港中醫教學醫院的建立能為未來培養優秀的中醫藥人才，亦能為市民提供更全面的醫藥醫療服務，對於中醫藥業界也提供了更好的發展平台。事實上，香港在整體社會共識上、人才資源的儲備，以及管理管理的經驗等方面亦已預備好建立中醫教學醫院。不過，香港到底需要一間怎樣的中醫教學醫院？

首先，它將是一間教學醫院。醫院在為病人提供高質素醫療服務的同時，教學與研究應是其發揮的主體功能之一。這一點與公營或私營醫院現時所建的中醫門診，或是將要興建的中醫病房以醫療服務為主體不同。教學醫院不單滿足本港市民對中醫藥醫療服務的需要，更為本地培養優秀的中醫藥專才以應未來社會所需，推動香港長遠的中醫藥發展。中醫教學醫院必須肩負教學任務，為教學服務，一方面中醫教學醫院的臨床中醫師及西醫生可從事臨床課堂教學；不僅如此，中醫教學醫院可為在讀的中醫、中藥學生提供在本地的醫療及法規制度下進行與未來臨床工作環境相符的見習與實習的機會，學員可跟隨帶教老師參與中醫門診與中醫病房的日常診療工作，從而全面掌握中醫藥在門診及住院病人治療中可以發揮的作用，這有助於全面提升學員的臨床能力，有利於學員畢業後在港從事臨床工作，對學員及市民大眾均有所裨益。另一方面，中醫教學醫院亦將成為註冊中醫師持續進修的場所之一，這對整個中醫藥行業的傳承都有益處。

以臨床研究為主

其次，中醫教學醫院亦須以臨床研究為主導，逐步開展以循證醫學為導向的臨床實踐與臨床研究，推進中醫臨床服務，提高臨床治療的效果。循證醫學是臨床中醫藥學的發展方向。中醫教學醫院可針對本港多發、而中醫有較佳治療效果及優勢的疾病，如腫瘤、中風、自身免疫性疾病等，確立重點臨床研究內容，開展大型臨床研究，探討中醫、中西醫配合治療的療效、安全性及其成本效益，為臨床醫師提供中西醫合療的循證醫學證據，並將研究成果與業界分享，將研究結果應用於治療上，為病人探求最為有效的綜合治療方案。同時，中醫教學醫院亦可成為中藥臨床藥物試驗基地，開展中醫藥新藥臨床試驗，為中藥新藥的研發提供研究平台。



中西醫配合治療

第三方面，中醫教學醫院將以中西醫配合為主體。中、西醫治療各有其優勝之處，香港中醫教學醫院將是一所中西醫配合的醫院，讓市民可以同時選用中醫及中西醫配合的醫療服務。在門診服務方面，中醫教學醫院可提供獨立的中醫及西醫門診服務，同時還將提供中西醫合療服務，讓患者有更多的選擇機會。此外，因應中醫教學醫院門診與病房的結合，如病人在門診接受初步診斷後有住院需要，即可馬上收入病房以接受進一步的診治。在住院服務方面，中醫教學醫院可同時提供中醫及西醫的診治手段，及中西醫會診服務。中西醫將根據需要對病人的總體病情進行綜合評估，共同協商並制訂治療方案，以及各自負責中西醫的治療工作，讓病人得到綜合的調理。藉此平台，不單可以建立中西醫配合的治療手段，亦能在臨床中了解中西醫的特點及差異，從而發掘中西醫配合的切入點，更有助中醫與其他醫療行業的配合，並且憑藉香港的優勢，將這一經驗向全世界推廣。中醫教學醫院中，臨床治療的主要治療手段，將是以中醫手段為主，配合西醫治療。根據中醫教學醫院的實際需要，可不用設立大型手術室、大型檢查儀器如磁腦掃描及磁力共振等，但是為了滿足醫院條例的要求，將需設立小型手術室，由駐院西醫生處理簡單的門診小手術等。除此以外，中醫教學醫院將安排24小時中西醫當值，確保病人於任何時間均可得到適當的急救處理；並與鄰近有急症設備之公立醫院聯絡，如遇需要處理急症個案，將由救護車送往此等公立西醫院處理。香港中醫教學醫院亦將遵循《醫院條例》中的所有規定，當中包括設施設備、風險管理、員工管理、病人權益的保障、處理投訴制度的設立等。

循證醫學進行實踐

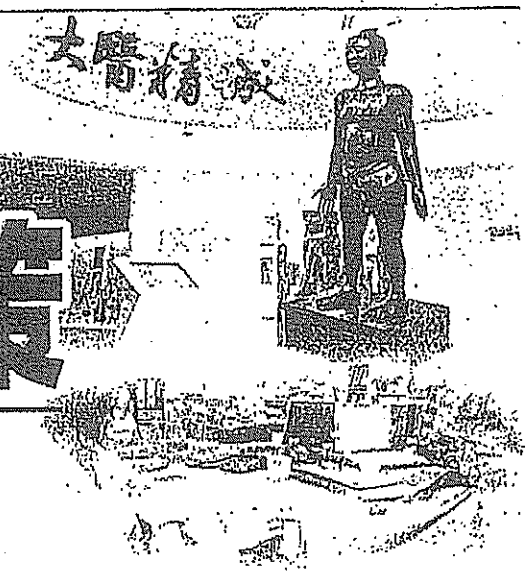
中醫教學醫院服務的住院病人，將主要考慮有循證醫據證明中醫藥確有療效的病症，例如中風、癌症及嚴重痛症等。實踐經驗及臨床研究證明中醫藥可為這類疾病提供較佳的療效，有助控制病情，延緩惡化。中醫教學醫院可通過為病人提供綜合的治療，如中草藥、針灸、推拿、按摩、藥物蒸熏等，並在飲食、生活調理上為病人作出配合，讓病人接受較全面及個人化的治理，彌補現時公營或私立以西醫為主體的醫療服務的不足，同時亦為求得更好的治療目標而努力。除此以外，婦科、骨傷科等中醫較具優勢的專科亦可在建院後逐步加入，為更廣泛的病患提供優良的中醫服務。

香港中醫教學醫院另一個重要的定位問題是：它將是一家公立醫院還是以大學為主體、自負盈虧的非牟利醫院？最理想的情況，也是我們的目標：應是由政府資助建院，運作管理由政府相關部門與大學共同負責，與現時本港兩間大學的教學醫院相類似。如果是這樣，香港中醫教學醫院將是以公營醫院的模式運作。此外，浸會大學也會考慮自籌資金，爭取可以自資建院。這種情況下，中醫教學醫院將是以自負盈虧為前提的非牟利醫院，同時通過不同的資助計劃等，讓低收入人士也能享用中醫教學醫院所提供的治療服務。此兩種模式中，以公營醫院的模式運作，是中醫教學醫院的最佳選擇。

總體而言，為了革新香林學子，並考慮日後醫療專才的培訓，香港中醫教學醫院必須是一所以中醫藥教學及研究為目標的醫院；並且，中醫教學醫院應採納中西醫配合的治療策略，以發揮中西醫的特長，讓病人取得最佳的療效；同時，為了更有效地運用社會資源，目標病人應以中醫治療較具優勢的病種為主，例如中風、腫瘤、嚴重痛症的病人；最後，我們倡導中醫教學醫院以公營醫院的模式經營，務求減輕現時西醫院的壓力，為廣大的市民提供中醫藥住院服務。

中醫藥新天地
每周五刊出
MCMIA 中華醫藥
現代化中醫藥國際協會策劃

香港大公報有限公司出版
網址http://www.takungpao.com
FAX:2572 5593
版權所有 翻印必究



香港中醫教學醫院 萬事俱備 只欠政策

□香港浸會大學中醫藥學院臨床部主任 卞兆祥教授

筆者連續在本專欄先後論述在港設立中醫教學醫院的必要性、可行性及其定位；然而，要明確落實中醫教學醫院的建設，尚有三個關鍵因素：土地、資金、政府政策。其中又以政府政策尤爲關鍵。

巧婦難為 無米之炊

巧婦難爲無米之炊。興建中醫教學醫院需要投入大量資金。資金的來源可來自政府出資或大學自行籌組。

特區政府於上月公布，本財政年度首9個月錄得400億元的盈餘。不少學者均指出，政府在考慮全面性「派糖」，提出有針對性的紓困措施外，應投入更多資源予中長期發展的項目。

建立中醫教學醫院將長遠有助推動本地高等教育及醫療體制的發展，亦符合特首施政報告中提出的「擴大中醫中藥在公營醫療系統的角色」的理念，配合社會中長期的發展。因此，政府應該考慮撥款興建中醫院。而且，中醫教學醫院的資金投入相比400億盈餘只佔一個很少的數目，但日後的回報、對社會影響卻是長久的。

基於建立香港中醫教學醫院對整個社會的必要性及迫切性，如果政府出資興建則是最佳的選擇。當然，香港浸會大學也有信心可以通過籌募方式籌集足夠資金建院，爲廣大市民謀福祉。但是，正如前文所述，兩種情形下（中醫院和中醫教學醫院）的醫院運作模式將會不同。

雖說大學在資金方面有辦法解決，土地問題卻是一個不可逾越的鴻溝。沒有土地，一切有關中醫教學醫院的計劃藍圖只能是紙上談兵。

作爲中醫教學醫院，要滿足其長遠的教學及醫療目標，其用地應是永久性的。因此，無論中醫教學醫院是以政府出資或是大學以自籌資金方式興建，我們急切地期盼政府可以因應中醫教學醫院的需求，盡快劃出適當的土地，建立中醫教學醫院。

作爲進行大學醫學課程的教學醫院，一般都是建在大學附近，這不但方便學生、教授及醫師，也讓大學的研究能夠與醫療有更緊密的結合。教室、實驗室與病房相鄰，方便學生見習、實習，也方便教授的教學與臨床實踐，從而促進教與學的效果。因此，在醫院選址上，我們殷切期望教學醫院能夠與大學鄰近，這樣，教學、臨床、醫療管理等將可更爲集中。

在三三四學制推行後，中醫課程由原來的五年制改爲六年制，目的就是增加臨床見習與實習的時間，提高臨床技能的培訓。在六年的時間內，若學生的實習場地與大學教學設施相近鄰，省下來的時間應可更有效地運用於學習上，否則時間浪費在交通上實在可惜。假設學生每次往返醫院與大學需要1小時，則每周將需3-6小時，6年之內單純花在路途上的時間還超過700小時。如果這個時間能夠花在實習上或者學習上，則效果相應會完全不同！

選址近鄰 有利醫教

其實，在大學校區附近建立附屬的教學醫院，已經成爲一種常規。以香港爲例，香港大學、香港中文大學，其教學醫院也是鄰近大學的所在地。

以中國內地歷史悠久的五間中醫藥大學（北京、廣州、南京、上海、成都）爲例，各間大學都有超過三間以上的附屬醫院，而且通常有一間在大學的附近；如廣州中醫藥大學有四間附屬醫院，其中廣州中醫藥大學第一附屬醫院緊鄰大學校區；上海中醫藥大學有五間附屬教學醫院，一間鄰近大學校區；另外，台灣的中國醫藥大學，同時設有中醫學院及西醫學院，其附屬中醫教學醫院亦臨近大學校區；韓國慶熙大學，建有韓國最大的韓醫大學校，其附屬醫院也是與大學主校園相連。這種現象在歐美的西醫院校亦比比皆是。

自2009年起，香港浸會大學已開始向政府爭取建立中醫教學醫院。其間，浸大曾跟不同團體商討，研究合作建院的可能性，但亦因多種原因不合而未功。早前香港專業教育學院（李惠利）遷出原有校舍，該幅屬於「政府、機構或社區」用途的土地，緊鄰浸會大學，是現時建立香港中醫教學醫院的最佳選擇；它不單有利於教與學！從病人的角度出發，李惠利學院原校址也是一個不錯的選擇。它位處九龍塘，交通網絡四通八達，方便各區的病人求診，而且該區環境較寧靜幽幽，綠化度高，是建院的絕佳地點。

李惠利地皮三邊皆鄰接浸會大學，隱隱有合圍之勢，實難適用於其他用途。假如建設中醫教學醫院作育英才，並爲市民提供全面的中醫醫療服務，則將造福的不僅是九龍塘區民衆，更是全港市民。

突破窘局 造福市民

自1997年回歸以來，特區政府在中醫藥發展政策卻兩遍出歷史性步伐，促使香港中醫藥事業的發展取得長足的進步。由1998年香港浸會大學率先開辦中醫藥課程以來，本港三間大學各自努力，同時也與醫院管理局及本地不同的非牟利機構合作，先後開辦了不少中醫藥診所，解決了部分中醫藥臨床見習的問題。不過，香港註冊中醫考試中明確規定，中醫畢業生必須在課程中完成「不少於30周的畢業實習」；由於香港目前並沒有中醫教學醫院，因此，實習問題仍然依賴於中國內地的中醫院。但是香港不應該、也不可能長期依賴於中國內地的醫院進行中醫臨床實習，最重要的原因是兩地的醫療衛生法律並不一致。要突破這一窘局，盡快建立本港中醫教學醫院是唯一出路。

現時，無論在社會認知、中醫藥人才儲備、營運和管理經驗等方面，中醫教學醫院的預備已然就緒。目前，建院的難點看來是土地、資金等因素。

難道香港真的缺乏資金？

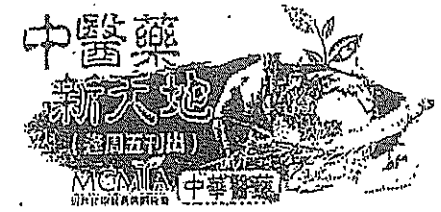
難道香港真的缺少一塊建院的土地？

發展局局長陳茂波先生日前在立法會答問大會上一語中的：「當局現時並無政策支持資助院校設立中醫教學醫院」。

自1998年特區政府開始將中醫藥納入高等教育體制以來，近十五年過去了，至今政府仍缺乏政策支持設立中醫教學醫院，這是香港中醫臨床教育舉步維艱的根源。

建立香港中醫教學醫院，萬事俱備，只欠政策。

深切期盼政府爲學生，爲市民，爲社會的未來，邁出歷史性的一步，盡快制定相關政策，完善中醫藥教育、研究，及醫療服務設施，支持在港建立中醫教學醫院。



TPB/R/S/K18/17-1506

6 March 2013

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

RECEIVED
2013 MAR -7 P 3:46
TOWN PLANNING BOARD

Dear Sir,

Objection Against Amendment Item A
to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

I am the past Council and Court Chairman of the Hong Kong Baptist University. I was very surprised by the news that the Government proposed to zone the southern part of the ex-Lee Wai Lee Campus to Residential (B). The whole idea is unreasonable and illogical, and the Government proposal has caused grave concern among the University community.

The land is currently zoned "Government, Institution or Community", which should be used for that purpose from short-term, medium-term, and long-term perspectives. Once rezoned to residential use, the loss to the higher education will be permanent and cannot be reversed. For Hong Kong people, the site is much more suitable for higher educational or medical development, which will benefit grass roots people, than for luxury housing. The proposal to build medium density residential flats does not match the society's urgent need for housing. Further, there is a shortage of land for educational purposes in Hong Kong. According to Government statistics, the shortage amounts to 80,000 sq.m. of operational area for the eight University Grants Committee-funded institutions.

The site is adjacent to the Hong Kong Baptist University campus. The expansion of the University into the site represents the most efficient use of land, as it will consolidate the University's activities in one location and allow it to make improvements to the environment and provide much-needed facilities.

More and more people understand and appreciate the effectiveness of Chinese medicine in treating certain diseases such as cancer, strokes and painful diseases. A Chinese Medicine Teaching Hospital is urgently needed as it will maximise the treatment strengths of Chinese medicine by offering comprehensive and systematic in-patient Chinese medicinal treatment, benefiting all Hong Kong people.

A Chinese Medicine Teaching Hospital will enable Chinese medicine students to conduct their internships in Hong Kong. In the absence of a Chinese Medicine Teaching Hospital, Chinese medicine students currently have to do their internships in Mainland China. Students cannot apply entirely what they learn in Mainland China to Hong Kong. The Chinese Medicine Teaching Hospital can support not only Hong Kong Baptist University, but also Chinese medicine students from other institutions.

The Lee Wai Lee site is most suitable for the Chinese Medicine Teaching Hospital as the land is readily available for construction without the need to change the land use. The proximity of the Chinese Medicine Teaching Hospital to the teaching facilities of Hong Kong Baptist University will also facilitate the provision of services offered by the teaching and clinical staff of the University to patients, which will enhance the effectiveness of the treatment.

To conclude, the Town Planning Board should exercise its wisdom to turn down the rezoning proposal and let the Hong Kong Baptist University have a chance to make proper representation before the next move.

Yours faithfully,

Name : Lau Wah-sum, GBS, OBE, LLD, DBA, JP
HKID Card No. :
Postal Address :

Tel No. :
Email Address :

[redacted]
Sent by: [redacted]

15/04/2013 上午 01:09

To tpbpd@pland.gov.hk
cc
bcc
Subject 滾 S/K18/17 齒惩≒啁铜錸齿霈哩摯

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt

本人 黃國建 反對前李惠利地皮改用途爲住宅。

首先，浸大提議興建教學中醫院，這是值得考慮的建議。

另外，爲促進浸大或高等教育界的長遠發展，也需要該地皮。

該地皮三面被浸大包圍，若興建住宅，很大可能受學生活動的噪音影響。

現時政府已將地皮放入賣地表，打算賣地予發展商，而地產商將會興建豪宅。豪宅並不能滿足港人置業需要，政府混淆了住宅供應及豪宅供應。

若該地皮興建豪宅，實在是浪費土地，得益只是地產商及投資者。

反對地產霸權, 還我香港核心價值. no capitalism

基於上述多個原因，本人反對政府將前李惠利地皮改作住宅之用。

TPB/R/S/K18/17-20743

電郵致：tpbpd@pland.gov.hk

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

敬啟者：

反對「九龍塘分區計劃大綱草圖編號 S/K18/17－修訂項目 A 項」

我反對上述修訂項目並要求將前李惠利校舍南部的土地保留為「政府、機構或社區（9）」用途。原因如下：

- 改變土地作住宅用途後不能逆轉，對社區和整個社會都造成損失。
- 在該地興建豪宅，不能解決住宅短缺問題。
- 在更改土地用途的諮詢期間，將該地放在政府的賣地表是誤導市民，程序上不公平。
- 浸大使用李惠利校舍用地作長遠發展，能最有效使用土地。
- 留地做教育
- 教育為先
- 反對興建豪宅

姓名： NG WING TUNG
日期： 21 Mar 2013
地址或電郵：[redacted]
電話：[redacted]

20751

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

反對《九龍塘分區計劃大綱核准圖》之 S/K18/17 九龍塘地帶改劃修訂申請

致城規會委員：

本人反對將前李惠利地帶改為住宅用途。

反對把位於聯福道的一幅毗鄰前李惠利校舍南部的土地，由「政府、機構或社區(9)」地帶改劃為「住宅(乙類)」地帶的理由如下:

1. 反對剝削市民的用地

「政府、機構或社區」地帶的資源本來是屬於每個市民的，而此等「政府、機構或社區」地帶的資源本來就不足夠，若將此地帶改劃為住宅用途，本可被市民使用的土地便被剝削，則本港居民應有的，如醫院、學校、社區會堂、和教堂等社區設施被削減，等同市民的福利被削減。

2. 反對改劃土地並非規劃意向，而祇屬長官意旨

行政長官會同行政會議祇是行使《城市規劃條例》第 12(1)(b)(ii)條所賦予的權力，將《九龍塘分區計劃大綱核准圖編號 S/K18/16》發還城市規劃委員會以作出修訂，但沒有提供任何規劃理據，祇屬長官意旨。所以修訂此地帶為住宅，根本是與規劃意向不符，祇是將屬於市民可以共享的資源拱手讓予發展商和投資者；並將多數人的利益轉移極少數人的利益。

3. 反對政府單方面先將此地帶放入賣地表造成既定事實

政府想學效合和在皇后大道東的 QRE Plaza 動作，不用考慮規劃的需求，便可以米已成炊為由，強將 Open Space「休憩用地」改劃為商業地帶。若政府確定修訂此地，必須改劃為住宅，除了要提供足夠理據外，政府理應同時將另一些同等價值的住宅地帶改劃為「政府、機構或社區」地帶，供市民選擇，是否願意以作交換，必須先諮詢市民意見，尋求共識，不要單方面造成既定事實，逼使城規會做橡皮圖章。

4. 反對在不宜居住地方興建豪宅

此地帶的三面被浸大包圍，若興建住宅，則住客與學生的作息時間存在很大差異，容易受學生活動的噪音影響，環境不算是理想，所以此地帶不宜改劃為住宅地帶。

5. 支持興建教學中醫院，維持原本 O2P 的規劃意向

浸大提議興建教學中醫院，有助本港中醫醫療和學術的提升，比起改劃為住宅，更有利於市民，使更多市民受益。

本人強烈反對九龍塘分區計劃大綱核准圖編號 S/K18/16 的 S/K18/17 的 A 項改劃修訂申請！

申述人 姚法銘

姓名：_____ 簽名：_____ 日期：13/4/2013

通訊地址：[redacted] 電郵：_____

08186

反對李惠利地皮建
支持浸大擴展中醫院
一人一信

TPB/R/S/K18/17-8145

S/K18/17

自由黨
LIBERAL PARTY

致：城市規劃委員會秘書處

本人對於政府提出修訂九龍塘分區大綱圖（OZP），把前李惠利校舍地皮改劃為住宅用途並興建豪宅，表示反對，理由如下：

（1）現時李惠利地皮，以及九龍塘軍營、浸會大學、聯校運動場和九龍仔公園一帶的「社區用地」（GIC），在都市規劃原意上屬於九龍塘和樂富一帶住宅的緩衝區，以免住宅密度過高。把原屬專上教育用地改建住宅，有違規劃原則；為興建豪宅而阻礙大學擴展，城規會委員不應該支持。

（2）如果九龍塘分區規劃，容許社區用地改劃為住宅，勢必做成極壞先例，引發其他社區土地改為住宅用途，現有住宅又申請加大發展密度，九龍塘的低密度區會遭到破壞。

（3）其他意見：

若土地劃歸浸會大學，以校舍會連成一片，成為一個完整的校園。

姓名：林家麟　電話：[redacted]

地址：[redacted]

電郵：

日期：24-2-2013　簽署：林家麟

RECEIVED
15 APR 2013
Town Planning Board

08136

我們會把收集到的一人一信遞交城規會作為反對意見。
閣下亦可把本一人一信，在2013年4月15日前，傳真至城規會。

爭取李惠利校舍用地

TPB/R/S/K18/17-3776

主要理據

反對前李惠利校舍改變爲住宅用地

- 改變土地用途後不能逆轉，對社區、高等教育界和整個社會都造成損失；
- 本港的高等教育用地不足，根據政府數字，各院校共欠缺八萬多平方米作業面積；
- 該幅土地位於九龍塘，建議興建低密度住宅，並不符當前社會對房屋的急切需要；
- 對市民來說，該幅土地作高等教育或醫療用途，較興建豪宅有利，可讓更多基層市民受惠。

前李惠利校舍用於浸大未來持續發展及解決迫切擴建需要是最合理的

- 李惠利校舍三面被浸大建築物包圍，可視爲校園整體的一部份；
- 浸大校園面積是八所政府資助院校中最小的（約 5.4 公頃）；在推行三三四學制時，浸大沒有得到額外撥地擴建校園，需要在現有校園擴建設施或加建樓層，令校園更飽和擠迫；
- 浸大使用李惠利校舍用地作長遠發展，能最有效使用土地，因爲校園活動可在同一地點上進行，並改善現有的教學環境和增加所需設施。

中醫教學醫院

- 愈來愈多市民明白中醫藥對治療腫瘤、中風、痛症等慢性、難治性疾病有效，中醫教學醫院有急切建立的需要，以加強中醫藥的服務，讓住院病人接受全面系統的中醫藥治療，惠及全港市民；
- 中醫教學醫院可讓中醫學生在香港實習，現時中醫學生需往內地實習，存在不少問題，例如內地與香港醫療體制不同；學生不能把在內地所學的全部知識和經驗（例如中醫可用西藥和開刀）應用在香港；
- 中醫教學醫院不單供浸大中醫藥學院使用，也歡迎其他院校的中醫學生實習之用；
- 李惠利校舍是最適合發展的現成土地，毋須更改土地用途，而該幅土地與浸大接連，鄰近中醫學教學大樓，教授和醫師能更頻密照顧病人，令治療效果更顯著；
- 根據海外和內地的經驗，著名中醫大學的教學醫院都設在校園附近（例如北京、南京、廣州、成都、韓國、台灣）；
- 中醫教學醫院的建立，也有利於跨學科研究、中藥新產品的研發和中醫藥產業的發展。

Form No. S6 表格第 S 6 號

For Official Use Only 請勿填寫此欄	Reference No. 檔案編號	TPB/R/S/K18/17-6618
	Date Received 收到日期	2 3 MAR 2013

1. The representation should be made to the Town Planning Board (the Board) before the expiry of the specified plan exhibition period. The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board, 15/F., North Point Government Offices, 333 Java Road, North Point, Hong Kong.
申述必須於指定的圖則展示期限屆滿前向城市規劃委員會（下稱「委員會」）提出，填妥的表格及支持有關申述的文件（倘有），必須送交香港北角渣華道 333 號北角政府合署 15 樓城市規劃委員會秘書收。

2. 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 333 號北角政府合署 17 樓及新界沙田上禾輋路 1 號沙田政府合署 14 樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. 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並備。倘若未能提供所需資料，則委員會可把有關申述視爲不曾提出論。

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 *)

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 *)

3. Details of the Representation
申述詳情

Draft plan to which the representation relates 與申述相關的草圖	九龍塘分區計劃大綱草圖編號S/K18/17

* 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」

Parts 1, 2 and 3　第 1 、第 2 及第 3 部分

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
A 項	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ oppose 反對	
	☐ support 支持 ☐ 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 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. Plans, 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/繪圖爲彩圖或超過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。

.....

.....

.....

5. Signature 簽署

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

.....
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 .....

on behalf of
代表 .....
Company/Organization Name and Chop (if applicable)
公司/機構名稱及蓋章（如適用）

Date
日期 21/3/2013.

Statement on Personal Data 個人資料的聲明

1. 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:

   (a) 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
   (b) 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：

   (a) 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
   (b) 方便「申述人」與委員會秘書及政府部門之間進行聯絡。

2. 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。

3. 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，其地址爲香港北角渣華道333號北角政府合署15樓。

* 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」
「✓」at the appropriate box 請在適當的方格內加上「✓」號

就草圖作出申述
Representation Relating to Draft Plan

TPB/R/S/K18/17-15008 1

參考編號
Reference Number: 130415-185626-31955

提交限期
Deadline for submission: 15/04/2013

提交日期及時間
Date and time of submission: 15/04/2013 18:56:26

提出此宗申述的人士
Person Making This Representation: 先生 Mr. Leslie Ng

申述詳情
Details of the Representation :

與申述相關的草圖
Draft plan to which the representation relates: S/K18/17

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
A項 — 把解放軍駐港總部以北的一幅海旁土地由「休憩用地」地帶修訂爲「其他指定用途」註明「軍事用地(1)」地帶。	反對 Oppose	駐港解放軍已有多幅空置用地，無需佔去可供大眾使用的「休憩用地」，而且該位置環境優美，應該予以公眾及遊客使用作優先考慮。

對草圖的建議修訂(如有的話)
Proposed Amendments to Draft Plan(if any):

15016

就草圖作出申述
Representation Relating to Draft Plan

TPB/R/S/K18/17-15038

參考編號
Reference Number: 130415-133740-16277

提交限期
Deadline for submission: 15/04/2013

提交日期及時間
Date and time of submission: 15/04/2013 13:37:40

提出此宗申述的人士
Person Making This Representation: 先生 Mr. 李風

申述詳情
Details of the Representation :

與申述相關的草圖
Draft plan to which the representation relates: S/K18/17

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**
我反對S/H24/8將中區填海區的部份位置轉爲軍事用途，。	反對 Oppose	我反對S/H24/8將中區填海區的部份位置轉爲軍事用途，應維持作休憩用途，若海上部份需要興建碼頭，應作公眾使用，解放軍不應獨佔。 而且中環地段地價高昂，解放軍軍事用途毫無迫切性及必要性可言，不應佔用如此高昂的地段，

對草圖的建議修訂(如有的話)
Proposed Amendments to Draft Plan(if any):

15046

TOWNLAND
TOWNLAND C
PROJECT MANAGEMENT, URBAN AND REGIONAL PL...
MASTER PLANNING, URBAN DESIGN, CONCEPT ARCHITECTURE AND LANDSCAPE ARCHITECTURE

RECEIVED
2013 JUN 11 P 5:26
TOWN PLANNING BOARD

Ref: HKBU/LWLTI/JEN/03
Date: 11 June 2013

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

Dear Sir,

Comments on the 25,884 Representations Relating to Amendment Item A of the Draft Kowloon Tong Outline Zoning Plan (OZP) No. S/K/18/17

We are instructed by Hong Kong Baptist University ("HKBU") to submit **Comments** in relation to ALL the **Representations** received by the Town Planning Board ("**TPB**") concerning Amendment Item A of the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17 (the "**Draft OZP**") under Section 6A (1) of the Town Planning Ordinance (CAP.131) (the "**Ordinance**").

Amendment Item A relates to the 'Re-zoning of a Site at Renfrew Road, covering the Southern Part of the Ex-Lee Wai Lee Campus from "Government, Institution or Community (9)" ("**G/IC(9)**") to "Residential (Group B)" ("**R(B)**"). Relevant Remarks in relation to R(B) are noted at Page 7 of the Draft Kowloon Tong Outline Zoning Plan S/K18/17, specifically: *"(1) No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/ or redevelopment in access of a maximum plot ratio of 4.5 and a building height of 50m, to be measured from the mean level of Renfrew Road".*

A total of **25,884 Representations** were received by the TPB of which only 7 (0.03%) were Supportive of the Amendment Item A (hereinafter referred to as the "**Support Representations**"). The other 25,877 (99.97%) Representations state clear Objections to the Amendment Item A (hereinafter referred to as the "**Objection Representations**").

This letter provides HKBU's Comments on the Support Representations received. It also provides HKBU's Comments on the Objection Representations received and is supported by Annex 1: '**Analysis of Objections Submitted to the TPB on Amendment Item A of the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17**'.

城 市 規 劃 顧 問

MAIN HONG KONG OFFICE :
18th Floor, 101 King's Road, North Point, Hong Kong
Telephone : (852) 2521 2911 Facsimile : (852) 2521 6631
E-mail address : tcltd@townland.com Website : www.townland.com

CHINA OFFICE (SHENZHEN) :
Room F, 25th Floor, Daqing Building, 6027 Shennan Avenue, Futian District, Shenzhen City, PRC. Postal Code 518040
Telephone : (86)(755) 8369 0780 Facsimile : (86)(755) 8300 5274
E-mail address : tcltd@townland.com

CHINA OFFICE (CHENGDU) :
Room 1113, Unit 1, Building 2, Shangding International, No.27, 4th Block of South Renmin Road, Chengdu City, Wuhou District, Postal Code 610047
Telephone : (86)(28) 8553 5759
E-mail address : tcltd@townland.com

INDIA OFFICE :
CRD Samarth, 3rd Floor, 86 S.V. Road, Khar (W), Mumbai, 400 052, India
Telephone : (91 22) 6455 0290 Facsimile : (91 22) 6455 0297
E-mail address : tcpl@townland.com

INDONESIA OFFICE :
Gedung Graha Tirtadi, 102, 1/F
Jl. Raden Saleh No.20, Jakarta Pusat - 10330, Indonesia
Telephone : (62 21) 3983 7470 Facsimile : (62 21) 3983 7471
E-mail address : tcljkt@townland.com

ASSOCIATED COMPANIES :
TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)
TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)
TOWNLAND CONSULTANTS (CHENGDU) LIMITED (China)
TOWNLAND CONSULTANTS PVT. LIMITED (India)
PT TOWNLAND INTERNATIONAL (Indonesia)
HOWARD & SEDDON PARTNERSHIP (United Kingdom)

ISO 9001: 2008
Certificate No.: CC844

SUPPORT REPRESENTATIONS: NOS. TPB/R/S/K18/17-1 TO TPB/R/S/K18/17-7 INCLUSIVE

The 7 Support Representations have been carefully reviewed in order to fully understand the specific points raised. The headings below relate to the overarching **key issues** raised by Representers. Opinions relating to the shortage of residential land and the establishment of a Chinese Medicine Teaching Hospital ("**CMTH**") were the most prevalent points. HKBU's response to the issues and points raised is provided as follows:

Shortage of Residential Land

- 5 of the 7 Support Representations highlight the need for / shortage of residential land in Hong Kong as justification for supporting Amendment Item A.
- Summary of the specific points raised:
  - *the Site will help alleviate the shortage of residential land, even if only in a small way;*
  - *the housing supply in Kowloon Tong area should be increased as this will help stabilise property prices and increase the supply to allow the middle-classes to own a flat and improve their living environment;*
  - *the need for a clause on the land lease 'Hong Kong Housing for Hong Kong People' and if possible the Site should be zoned "Residential (Group A)" ("**R(A)**");*
  - *Hong Kong citizens' wish for an even distribution of residential land.*
- None of the letters provide any site specific reasons as to why residential use is considered appropriate on the Southern Part of the Ex-Lee Wai Lee Campus (the "**ex-LWL Site**").

HKBU Comments on 'Shortage of Residential Land' Points

1. The shortage of residential land in Hong Kong to meet acute needs is recognised. However, as land is an extremely scarce resource it would be a significant failing of the Hong Kong planning system if strategically important G/IC sites (such as the ex-LWL Site) were lost without proper long-term strategic assessment of G/IC needs. Imprudent reactions to solve current shortages in residential land by a piecemeal approach will have disastrous consequences for the future provision of public facilities, particularly tertiary education in this case. Alternative sites for residential development can be found elsewhere in Hong Kong; however, alternative G/IC sites to meet future education needs are extremely limited. HKBU, whose existing campus surrounds the ex-LWL Site on 3 sides, requires a comprehensive and sustainable campus development solution. Residential development on the ex-LWL Site through the re-zoning of the Site from G/IC to residential use would be irreversible and a permanent loss to Hong Kong.
2. HKBU fully supports the Chief Executive's 2013 policy objectives for housing, which clearly prioritise the need to *"assist grassroots families to secure public housing to meet their basic housing needs"*,[1] as well as encouraging homeownership and maintaining a healthy private property market, (*Para 58 refers*). To put it into context, the Government has a target of supplying 100,000 public rental housing ("**PRH**") units over the five years starting from 2018 to address the acute need.

---

1 *2013 Policy Address 'Seek Change, Maintain Stability, Serve the People with Pragmatism'*

3. In response to the point suggesting that residential development on the ex-LWL Site would help alleviate the shortage of housing land, the development of 495 private residential flats on the ex-LWL Site **would not alleviate the acute public housing shortage** that exists in Hong Kong. Any private housing development on the ex-LWL Site is likely to cater to the high-end market. Consequently, it would not improve the lives of those Hong Kong residents most in need, but instead is more likely to arouse public sentiment against the new residential development if it is beyond the means of most Hong Kong residents. Public opinion on this issue (from objections received by the TPB) highlights a high degree of opposition to "luxury housing" on the ex-LWL Site and perceived profits earned by developers on such developments. Around 13,000 Representers object to the development of "luxury housing" on the ex-LWL Site.

4. In response to the point on stabilising property prices and helping the middle classes to own a flat, the development of 495 flats (costing around HK$20 million each[2]) **would have a negligible impact in stabilising property prices** in the area. On the contrary, it is suggested that investors are likely to be interested, thereby pushing up property prices in the District. Colliers' 'Residential Market Research and Forecast Report' (Q1 2013), for instance, predicts that prospective real estate buyers will not allow higher transaction costs (such as the increased stamp duty) to deter them from entering the market. A HK$20 million flat is far beyond the HK$18,000 median household income in Hong Kong. In fact only the top 3% of households (earning over HK$100,000 per month) could afford one of these flats[3]. **These flats would therefore not be affordable for the majority of the 'middle classes'.**

5. The Government indicated its intention of selling the ex-LWL Site in February 2013, when it was identified in the Government's 2013/2014 Land Sale Programme. It is unknown if the ex-LWL Site would be included in the 'Hong Kong Property for Hong Kong People' Government scheme, which restricts the sale of flats built on these sites to Hong Kong permanent residents only. Even if the ex-LWL Site were included in the 'Hong Kong Property for Hong Kong People' Government scheme, the recent sale of two such plots of land in Kai Tak for "*higher than surveyors forecasts*"[4] provides a strong indication of developer's confidence in future sale prices.

6. In response to the suggestion that the ex-LWL Site be zoned as R(A), which is high density residential development, clearly this would be inappropriate given the predominantly low to medium density character of the local area. As highlighted in Section 7 of HKBU's Objection Statement (April 2013) the maximum Plot Ratio of 4.5 and Building Height Restriction ("**BHR**") of 50m allowed under Amendment Item A will result in a development that is out of character in this location and could lead to developers in nearby streets to lobby for higher Plot Ratios/ Building Heights, thereby eroding the special character of Kowloon Tong in a piecemeal fashion over time. **Clearly R(A) is unsuitable for this area which is predominantly zoned G/IC and even in other parts of Kowloon Tong where typical residential is restricted under the "Residential (Group C)" ("R(C)") zone.**

---

2 *The price was calculated based on the price of various properties of One Mayfair, 1 Broadcast Drive. One Mayfair is the latest residential development in the vicinity of the ex-LWL Site. According to centradata (as at 26 March 2013), there were 6 properties sold between Oct and Nov 2012. The price ranged from HK$17,922 per sq. ft to HK$30,750 per sq-ft. The median sale price (per sq-ft) was taken to calculate the estimated price of the housing units at the ex-LWL Site*

3 *Based on 2010 Statistics. Source: 'Hong Kong : The Facts', Published by the Information Services Department, updated January 2012*

4 *'Kai Tak Sites for 'Locals Only' Sell Above Estimates" SCMP, 6 June 2013*

7. Notwithstanding the points raised above, the R(B) zoning of the ex-LWL Site under Amendment Item A is out-of-character and incompatible with the immediate area and results in a piecemeal and illogical zoning pattern. The development of private residential housing directly adjacent to over 3,500 student hostel spaces is considered an inappropriate use of land and a cause for potential noise and nuisance complaints from future residents due to the land use conflict.

Chinese Medicine Teaching Hospital ("CMTH")

- 4 of the 7 Support Representations expressed opinions on HKBU's proposal to build a CMTH on the ex-LWL Site.
- Summary of the specific points raised:
  - *question Chinese Medicine's ("**CM**"s) effectiveness and whether public money should be used for this;*
  - *Hong Kong needs a Chinese Medicine Hospital, however it does not mean that the Government should allocate a site to an institution;*
  - *the number of CM students are not more than 600, therefore why reserve this valuable site and build an exclusive CMTH for these 'minority students';*
  - *if there is a CMTH, students from HKU, CU and HKBU should be allowed to participate in the internship programme;*
  - *why does HKBU not cooperate with the HK Baptist Hospital to operate a Chinese Medicine Clinic?;*
  - *the Tsim Sha Tsui ("**TST**") Kai Fong Welfare Association site is the ideal site for a CMTH given its location to people with the greatest need as it should serve those that are under-privileged. Conversely the ex-LWL Site is not a good site for a CMTH as it is too far from under-privileged areas. It is too middle-class.*

HKBU Comments on CMTH

1. The Government has pledged its support to further the development of CM, including *"introducing Chinese medicine in-patient services"* in the '2013 Policy Address' (*Para 169 refers*) and is supportive of training and more opportunities for internship and clinical practice (LC Paper No.CB (2)758/12-13(03)) *'Development of Chinese Medicine in Hong Kong'* (*Para 7 refers*)).
2. The issue of effectiveness is subjective. There is significant evidence highlighting the effectiveness of CM. A recent survey by another institute on public views on CM Services in Hong Kong highlighted the **overall support** for a CMTH in Hong Kong. Of those interviewed, 54% had visited a CM practitioner in the last two years. It was found that there was significant support (81% of interviewees) for the establishment of a CMTH in Hong Kong to train local practitioners. Over 60% of respondents stated that they would be willing to use in-patient services and a further 28% stated that the likelihood was 'fair'. Of those interviewed, 36.6% stated that they felt it was necessary for the CMTH to be located near the University campus and nearly 40% felt that it was a 'fair' requirement. (Details of the survey can be found in Appendix F of HKBU's April 2013 Objection Statement submitted to the TPB).

3. HKBU is requesting the ex-LWL Site so as to develop a self-financed, public University operated, non-profit making CMTH offering a complete CM undergraduate programme which will benefit CM students and the wider public in Hong Kong (far in excess of 600 people). The provision of land for privately funded teaching facilities is consistent with the Government's long-term commitment to the education sector. HKBU is at the forefront of CM and was the first local institution offering CM education at the tertiary level in 1998. HKBU has assumed a prominent role in CM higher education, research and clinical practice in Hong Kong. HKBU is therefore an ideal institution to develop a CMTH which will provide training and in-patient and out-patient facilities. The CMTH will provide internship places for the three CM Schools in Hong Kong. In addition, the CMTH will undertake clinical research in CM and inter-disciplinary research in Chinese and Western medicine.

4. Although privately funded, the proposed CMTH will be a non-profit-making Non-Governmental Organisation (NGO) Teaching Hospital – not an exclusive Private Hospital. As a self-financed NGO, the CMTH will offer affordable treatment to the local community and Hong Kong residents (from under-privileged and middle class backgrounds). The growing elderly population is most likely to benefit from the affordable CM in-patient services proposed by HKBU on the ex-LWL Site.

5. HKBU wrote to the Government in February 2013 formally withdrawing its proposal to develop a CMTH at the TST District Kai Fong Welfare Association site as it was deemed no longer feasible by HKBU due to the lands grant issues, the size of the site for operations and technical issues conflicting with CMTH requirements. There is no prospect of the CMTH being located at the TST site in future.

6. The ex-LWL Site is the most suitable location for a CMTH. It is convenient and accessible for patients, being well served by public transport (Kowloon Tong and Lok Fu MTR Stations and green mini buses). It is also the most suitable site from an operational and educational perspective, as it will be closely connected to the Jockey Club School of Chinese Medicine Building and on-campus Hostels. Alternative land is scarce, whereas the ex-LWL Site has no technical constraints for the proposed consolidation of the HKBU Campus.

7. The School of Chinese Medicine – of HKBU, already provides a CM Clinic for the community, therefore the proposed cooperation with the Hong Kong Baptist Hospital is not necessary. There is a need for a much larger and comprehensive CMTH to provide the proposed services, as identified in Point 3 above. Collaboration with the Hong Kong Baptist Hospital to set up a CM Hospital is yet to be explored, however the Vision and Mission of the University in setting up a Teaching Hospital is clearly different from that of a Private Hospital. In any event, the Land Lot of Hong Kong Baptist Hospital in Kowloon Tong has already been maximised.

HKBU's General Need for the ex-LWL Site / HKBU's Need for Student Hostels

- 2 of the 7 Support Representations expressed opinions on HKBU's need for additional land, with one Representer (TPB/R/S/K18/17-6) making specific points relating to Student Hostel accommodation.
- Summary of the specific points raised:
  - *Student dormitory not required [if only] for convenience;*
  - *HKBU's facilities are considered adequate. Additional facilities considered to be over-provision and redundant;*
  - *HKBU is experiencing lack of land as they have too many students from Mainland China (undergraduate, postgraduate and PhD);*

- *Refutes the need for more Student Hostel accommodation for Mainland Chinese students, which are funded by Hong Kong tax payers when Hong Kong students cannot get a Hostel place;*
- *Provision of a new Hostel is the reason HKBU cannot develop a CMTH. HKBU should consider demolishing Dr. Ng Tor Tai International House, which together with the northern portion of the ex-LWL Site would allow HKBU to build a CMTH and achieve integrated development.*

HKBU Comments on HKBU's General Need for the ex-LWL Site / HKBU's Need for Student Hostels

1. HKBU has a shortfall of some 2,000 square metres of publicly funded academic spaces and 1,331 Student Hostel places up to the 2014/15 academic year according to Education Bureau's prevailing Policies and calculation formula. The Government has reserved 0.64 ha of land in the northern portion of the ex-LWL Site for higher education use and indicated that the land will be granted to HKBU. However, this is insufficient to build the proposed 1,700 Student Hostel complex (which requires 0.73 ha). The University Grants Committee ("**UGC**") gave its full support for HKBU's capital proposal to build the 1,700 Student Hostel complex (which includes 300 privately funded Hostel places) in February 2013. The provision of Government land to educational institutions for a reasonable number of privately funded Hostels, though at the discretion of the Government, is a matter of precedent, and discussions between HKBU and the Education Bureau are ongoing on this issue. Notwithstanding this, the University needs to consider education needs beyond 2014/15, hence the need to retain the ex-LWL Site for education related uses.
2. HKBU's current ratio of non-local students is around 10.6%[5]. Under existing Education Policies the non-local student quota for UGC-funded Universities is 20%. Indeed, it is the shortage of Student Hostels that has limited the progress of 'internationalisation' of HKBU. In any event, the points relating to the number of Mainland Chinese students and related Hostel provision are not relevant planning considerations.
3. With regard to the point made in TPB/R/S/K18/17-2 concerning the adequacy of HKBU's facilities, HKBU has provided clear evidence in the 'Objection Statement' submitted to the TPB in April 2013 of the medium and longer term proposals for the ex-LWL Site to Government, including a CMTH; a Complex of Creativity and an International Exchange Centre. From an education perspective it has been proven that HKBU's future growth would be thwarted due to the lack of available adjacent land. The ex-LWL Site is fundamental for HKBU to achieve its long term Vision and remain competitive in an increasingly globalised and competitive education environment.
4. From a land use planning perspective the comprehensive planning of the HKBU campus with the ex-LWL Site will consolidate related land uses and relieve the cramped and congested conditions on the existing Campus and thus create a better educational facility. HKBU students occupy the smallest Campus area per student head of population, in comparison to all the other UGC-funded Universities in Hong Kong.

---

5 *Source: Education Bureau Letter to HKBU, dated 10 May 2013*

D) Land Sale Revenue

- 3 of the 7 Support Representations expressed specific support for the sale of the ex-LWL Site due to the revenue generation.
- Summary of the specific points raised:
  - *the Government will earn a considerable amount of revenue by selling the ex-LWL Site. This will help the development of Hong Kong;*
  - *the land sale will benefit the Government treasury, and as a result there will be more resources to alleviate poverty problems.*

HKBU Comments on 'Land Sale Revenue'

1. The points stated above in TPB/R/S/K18/17-3 and TPB/R/S/K18/17-6 are personal and highly subjective comments relating to Lands (not Planning) considerations. They therefore have no bearing or weight on the planning issues to be considered by the TPB.
2. Revenues generated from land sales are not automatically available for poverty alleviation. In any event, G/IC Sites are important resources for Hong Kong's citizens, therefore the decision to sell such sites should only take place after proper and serious assessment.
3. It is important to consider the tangible and intangible long-term benefits which HKBU's proposals will bring to education, and Hong Kong society as a whole. The benefits of education will influence generations to come, whereas the land sale will result in a one-off revenue benefit.

Other

- 1 of the 7 Support Representations expressed frustration with the quality of local tertiary education as a reason for supporting Amendment Item A.
- 1 of the 7 Support Representations highlighted that HKBU's land use is subject to "Government Property Agency ("**GPA**") consideration……";

HKBU Comments on 'Other'

1. The point stated above in TPB/R/S/K18/17-1 is a personal and highly subjective comment. It is not a planning consideration, therefore has no bearing or weight on the planning issues to be considered by the TPB.
2. The point stated above in TPB/R/S/K18/17-2 fails to appreciate that land use is a consideration of the TPB, who is tasked with promoting the health, safety, convenience and general welfare of the community through the systematic preparation of plans for the layout of such areas of Hong Kong as the Chief Executive may direct, as well as the types of buildings suitable for erection therein.

Overall Comments on the Support Representations

The Support Representations fail to offer convincing and relevant planning reasons to support Amendment Item A. Many of the comments are subjective and personal, with several addressing the matter from inappropriate perspectives.

Analysis of Objections Submitted to the TPB on Amendment Item A of the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

The Paper at Annex 1 'Analysis of Objections Submitted to the TPB on Amendment Item A of the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17', provides preliminary quantitative and qualitative analyses of the Representations which object to Amendment Item A.

There were a total of 25,877 Representations objecting to Amendment Item A (99.97% of all Representations submitted). A summary of the key findings of the Annex 1 Paper is provided below.

- The loss of G/IC was the primary objection point, specifically highlighted by over 90% of Representers.
- Over three quarters of the Representers (around 20,000 people) specifically highlighted the need to retain the ex-LWL Site for future higher education use – with around 60% of those specifically requesting the ex-LWL Site for HKBU's future expansion. In addition, a good portion of Representers specifically highlighted the need for the ex-LWL Site to be used for a CMTH.
- Almost half of the Representers highlighted that they were opposed to "luxury housing" on the ex-LWL Site.
- Over a quarter of the Representers highlighted the procedural unfairness, relating to the ex-LWL Site being identified in the Government's 2013-14 Land Sale Programme before the TPB had made a decision in the light of Representations made on Amendment Item A.

A number of prominent individuals and groups / organisations have objected to Amendment Item A and include four LegCo Members, Kowloon City District Council Members, the Civic Party's 'Environment and Sustainable Development Policy Branch', members of the Liberal Party and various concerned groups including 'HK Redevelopment Concern Group', 'Designing Hong Kong' and 'Hong Kong Kowloon City Industry and Commercial Association Limited'. Most object to the loss of G/IC land as it is important for the future needs of education, and highlight that the luxury residential development allowed for under Amendment Item A will not resolve the Grassroots' housing needs.

Panel on Education of the Legislative Council (LegCo) Meeting 10 June 2013

The Panel on Education of the Legislative Council ("**LegCo**"), at its meeting held on 10 June 2013, received an update from the Administration and discussed the latest developments on the Amendment Item A in respect of the southern portion of the ex-LWL Site. All nine members who made verbal comments at the meeting remained consistent in their views that the ex-LWL Site should be retained for educational use, including for the future expansion of the HKBU and the development of a CMTH. HKBU trusts that the TPB will seriously consider the comments of the LegCo Education Panel.

TOWNLAND

HKBU also welcomes the Education Bureau's recent letter (10 May 2013) which states that the site planning for the proposed Student Hostel on the northern portion of the ex-LWL Site can now proceed. HKBU will continue to discuss the issue with the Government.

Should you have any queries, please do not hesitate to contact the undersigned, Ms Cindy Tsang (Direct Line: [redacted]), Ms Jennifer Gordon (Direct Line: [redacted]) or Miss Maggie Wu (Direct Line: [redacted]).

Yours faithfully
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED

Keren Seddon
Chief Executive Officer

KRS/CT/JEN/MAG

Enc

cc Client
The Team

1. INTRODUCTION

1.1 The Draft Kowloon Tong Outline Zoning Plan S/K18/17 (the "**Draft OZP**") was gazetted on 15 February 2013 and received **25,884** Representations during the 2-month public comment period, which closed on 15 April 2013. There were only 7 (0.03%) Representations supporting Amendment Item A, i.e., rezoning of a site at Renfrew Road, covering the southern part of the ex-Lee Wai Lee Campus (the "**ex-LWL Site**"), from "Government, Institution or Community (9)" ("**G/IC(9)**")to "Residential (Group)B" ("**R(B)**") ("**Amendment Item A**"). The remaining 25,877 (99.97%) Representations were opposed to Amendment Item A.

1.2 Hong Kong Baptist University ("**HKBU**") and Townland Consultants Limited ("**TOWNLAND**") have reviewed all of the 25,877 Objection Representations received by the Town Planning Board ("**TPB**") in order to identify and analyse the specific objections points raised by members of the public. This Paper provides the preliminary findings of the analysis undertaken. The aim of the Paper is to provide the TPB and public with an overview of the Objection Representations submitted.

1.3 The Paper comprises the following Sections:

- Section 2 sets out the methodology including the categories of objection points made by Representers;
- Section 3 provides a quantitative analysis of the objection points;
- Section 4 provides a qualitative analysis of objection points; and
- Section 4 concludes the findings.

2. METHODOLOGY

2.1 All of the 25,877 Objection Representations have undergone preliminary analysis. In the majority of cases, each Representation (letter/email/form etc) contained between two and three objection points relating to Amendment Item A. Therefore, each "objection point" and or "proposed remedy" has been categorised.

Defining the Categories

2.2 It was necessary to produce a set of "generic categories" to allow for the preliminary quantitative analysis of the Objection representations. The majority of the objection points can be categorised under the following fifteen "categories" as follows.

A. Oppose loss of "G/IC(9)" and / or Suggest retention of "G/IC(9);
B. Retain the ex-LWL Site for higher education/ education;
C. Support the establishment of a Chinese Medicine Teaching Hospital ("**CMTH**");
D. Reserve/Use for the future expansion of HKBU;
E. Support HKBU student hostel development;
F. Procedural unfairness (relating to the placing of the ex-LWL Site on the Land Sale Programme before the TPB's consideration of the Amendment Item A);
G. Against luxury housing on the site;
H. Residential considered inappropriate land use due to environmental/ character etc;
I. Support HKBU;

J. Support the ex-LWL Site for development of medical services;

K. Against developers or "anti- developer hegemony";

L. Discontentment with the Government in relation to housing planning and long-term development;

M. The need of other G/IC and recreational facilities in the area;

N. Lack of consultation; and

O. Others

2.3 Other objection points, which did not comfortably fit within any these categories were registered "Others" and specific points have been referred to in the 'qualitative analysis' section.

2.4 Some of the objection points made by Representers were generic and required an 'interpretation' of the points made. Examples are provided below.

- Many Representers stated "support education"/ "*education should be the first priority*"; "*Government should put more resources on education*" or "*education should not be overridden by economic development*". In such cases it was assumed that the Representers propose reverting the ex-LWL Site to educational use or allocating more land resources for supporting education development. Therefore, these comments were categorised under "**Retain the ex-LWL Site for higher education/ education**".
- Some Representers simply wrote "*think of the next generation*". This comment was categorised under "**Oppose loss of "G/IC(9)". Suggest retention of "G/IC(9)**"
- Some objection points mentioned that the School needs more space/ lacks space/ needs more student hostel places. Since no specific school name was given, these comments were categorised under "**Retain the ex-LWL Site for higher education/ education**".

2.5 **Table 1** below identifies each category of objection and examples of the types of specific points registered in that category.

Table 1 Categories of Points Raised

	Categories of Points Raised	Examples of the Range of Specific Points Included within this Category
A.	**Oppose loss of "G/IC(9)". Suggest retention of "G/IC(9)"**	- Oppose rezoning of the ex-LWL Site from "G/IC(9)" to residential use. The Government should revert the Site to "G/IC(9)use". - Think of the next generation
B.	**Retain the ex-LWL Site for higher education/ education**	- Support Education. - Hong Kong lacks resources to support development of education. - The Government should provide more land resources for supporting development of education. - More resources should be allocated for supporting development of education. - Investment in Education is far important than developing residential housing/ luxury housing. - Education is the first priority. - Educational use will bring more benefit to the community than luxury housing.
C.	**Chinese Medicine Teaching Hospital (CMTH)**	- Hong Kong needs a CMH/CMTH in order to provide comprehensive and systematic in-patient CM treatment. - The CMTH can provide internship place for students studying CM, including those studying in the University of Hong Kong, Chinese University of Hong Kong and HKBU. - General public can benefit from the CMTH/ CMH. - The CMTH will bring more benefits to the community than luxury housing. - The ex-LWL Site is most suitable for the CHMT as the land is readily available for development. The proximity of the CMTH to the teaching facilities of HKBU will facilitate provision of services offered by the teaching and clinical staff of HKBU, thereby enhancing the effectiveness of the treatment. - The Government should allocate more resources to develop CM Services.

	Categories of Points Raised	Examples of the Range of Specific Points Included within this Category
D.	**Reserve/Use for the future expansion of the Hong Kong Baptist University**	- HKBU has the smallest campus amongst the eight universities. Upon implementation of the "3-3-4" academic curriculum reform, no additional land was allocated for HKBU expansion - The ex-LWL Site can be most efficiently used by allocating it to HKBU for its long-term development. - Support HKBU to have long-term/ sustainable development. - The ex-LWL site is the most suitable site for expansion of HKBU. - HKBU has a lack of space for expansion. The existing campus is cramped. - To allocate the ex-LWL Site to HKBU will enhance integrity and integration of HKBU campus.
E.	**Hong Kong Baptist University Student Hostel Development**	- HKBU lacks hostel places. - Develop a student hostel at the ex-LWL Site in order to provide better living conditions for students.
F.	**Procedural Unfairness**	- It is premature to put the ex-LWL Site on the Land Sale Programme before the TPB's consideration of the Amendment.
G.	**Against luxury housing on the site**	- Building luxury housing on the ex-LWL site cannot solve the current housing problem. - Building luxury housing on the ex-LWL site is a waste of land resource. - There are alternative sites for luxury housing. - Building luxury housing on the ex-LWL site cannot help HK/ China Development. - There are too many luxury housing developments in Hong Kong.

	Categories of Points Raised	Examples of the Range of Specific Points Included within this Category
H.	**Residential Inappropriate land use (due to environmental/ character etc)**	- The G/IC zones at ex-LWL Site, Kowloon East Barracks, HKBU, the Joint Sports Centre and Kowloon Tsai Park serve as a buffer between Kowloon Tong and the residential developments at Lok Fu. To rezone the ex-LWL Site from educational use to residential use will contravene the original planning intention. - The residential developments at the ex-LWL Site will generate and attract traffic, which will cause traffic problems and affect pedestrian safety. - Potential conflict between future residents and students due to nuisance caused by students residing student hostels. - The proposed residential development is not compatible with the HKBU campus in terms of density and land use. - The residential developments at the ex-LWL Site will undermine the learning environment of HKBU and other schools in the adjacent area.
I.	**Support HKBU**	- Representer stated their support HKBU.
J.	**Support the ex-LWL Site for development of medical services**	- Support the ex-LWL Site to accommodate medical service facilities (not specifically for CMTH)
K.	**Against developers or "Anti-Developer Hegemony"**	- Developers in Hong Kong are so wealthy. - "Anti-Developer Hegemony"

	Categories of Points Raised	Examples of the Range of Specific Points Included within this Category

L.	**Discontentment with the Government**	- The Representers believed that the Government should:
		  - *consider the wider interests of the public*
		  - *have a better planning for the ex-LWL Site and a long-term planning of housing land supply*
		  - *not only consider the interests of rich people/ developers, but also the grassroots.*
		  - *should achieve a balance development. Economic development or housing land supply should not override other aspects, such as social and educational development.*
		- Against collusion between the Government and property developers or rezoning of the ex-LWL Site to Residential Use will facilitate Government-Business collusion/
		- There is lack of communication between different Government Departments
		- The Government should not infringe on people's right

M.	**The need of other G/IC and recreational facilities in the area.**	- The ex-LWL should be used for accommodating G/IC and recreational facilities, such as hospital, schools and rehabilitation centre.
N.	**Lack of Consultation**	- The consultation ignored HKBU's right of using the ex-LWL Site - Consultation should be conducted in prior to the rezoning of the ex-LWL Site. - The Consultation should consider the interests of major stakeholders
O.	**Others**	- The Site should be used for public rental housing - If the ex-LWL Site was rezoned to Residential use, it should be used for public rental housing/ Home Ownership Scheme - There are sufficient residential supply - There are alternative site for residential use, such as the adjacent military camp, Northeast New Territories as well as the Brownfield site to be redeveloped. - Support development of industries which HK has an advantage. - Not privatise the public space - Planning of the ex-LWL Site should take local development into account.

3. PRELIMINARY QUANTITATIVE ANALYSIS

3.1 Most of the Objection Representations identified between two and three points in their objection letter. From the preliminary analysis[1] of all the Objections submitted we can draw the following conclusions:

- The **loss of G/IC** was the **primary objection point**, specifically highlighted by over **90%** of Representers.
- Over **three quarters** of Representers (around 20,000 people) specifically highlighted the need to retain the ex-LWL Site for **future higher education use** – with around 60% of those specifically requesting the ex-LWL Site for HKBU's future expansion. In addition, a good portion of Representers specifically highlighted the need for the ex-LWL Site to be used for a CMTH.
- Almost half of the Representers highlighted that they were opposed to "luxury housing" on the ex-LWL Site.
- Over a quarter of Representers highlighted the procedural unfairness, relating to the ex-LWL Site being identified in the Government's 2013-14 Land Sale Programme before the TPB had made a decision on Amendment Item A.

3.2 It is evident from the preliminary findings that the majority of Representers are requesting that the Government retain the ex-LWL Site for higher education uses, with HKBU's expansion being the most frequently highlighted point, and a significant proportion (of Representers) calling for the ex-LWL Site to be used for a CMTH.

4. QUALITATIVE ANALYSIS

4.1 This Section provides details of the qualitative analysis, including an overview of some of the prominent individuals and concerned groups/ organisations who have written to the TPB, and their particular reasons for objecting to Amendment Item A.

4.2 Also included in this section are a few examples of some of the hundreds of personal comments made, which highlights the gravity and importance of Amendment Item A to a significant number of people in Hong Kong.

Prominent Representers Objecting to the Proposed Re-zoning

4.3 **Table 2** provides a list of some of the prominent individuals and groups / organisations objecting. Their reasons for objecting are discussed further below.

---

1 *A 'preliminary analysis' of all 25,877 Objection Representations has been undertaken, which has involved categorising all of the objection points made by Representers. Due to the very short timeframe available to undertake the analysis only preliminary findings are available as at 11 June 2013.*

Table 2 Prominent Representers

TPB Ref	Representer (Objector)
R9	**Mr. Lam Tai Fai** (LegCo Member, Functional Constituency - Industrial (Second))
R10	**Mr. Ip Kin Yuen** (LegCo Member, Functional Constituency – Education)
R11	**Ms Helena Wong Pik-wan** (LegCo Member, Geographical Constituency – Kowloon West Lecturer, Hong Kong Polytechnic University)
R12	**Mr. Chan Ka Lok, Kenneth** (LegCo Member, Geographical Constituency – Hong Kong Island Associate Professor, Department of Government and International Studies, Hong Kong Baptist University)
R13	**Mr. Siu Leong Sing** (Kowloon City DC member)
R14	**Ho Hin Ming** (Kowloon City DC member)
R15	**Environment and Sustainable Development Policy Branch - Civic Party**
R16	**Ho Hin Ming and Lee Zi Jing** – Liberal Party
R17	**Fu Chuan Fu** (Liberal Party)
R18	**Lee Zi Jing** (Liberal Party)
R19	**Fung Wai Wah** (Hong Kong Professional Teachers' Union)
R20	**Ng Yan Keung** (Chairman of HK Redevelopment Concern Group)
R21	**Designing HK**
R22	**Green Sense** (Attached a letter jointly signed by several concern groups, including **Central and Western Concern Group, Local Research Community, HK Redevelopment Concern Group, Civic Party, The Professional Commons, Land Justice League, Hong Kong Professional Teachers' Union, HKBU Student Union, Green Sense)**
R23	**The Incorporated Owners of Sunderland Estate**
R24	**Hong Kong Kowloon City Industry and Commercial Association Limited**
R39	**Mr. Wong Po-yan** (Chairman of the Board of Governors and the Council of Hong Kong Baptist College (1987-89))
R40	**Dr. Daniel C.W. Tse** (Chair of the University Council of the University of Macau, President Emeritus of Hong Kong Baptist University)
R41	**Prof. Ng Ching-Fai** (President of BNU-HKBU United International College, Past President and Vice-Chancellor of HKBU)

4.4 A variety of reasons were identified in the letters submitted to the TPB from the prominent individuals and groups / organisations listed above. These included:

- The four LegCo Members opposed the development of luxury residential development on the ex-LWL Site as it would **not resolve the grassroot's housing needs,** would result in the **irreversible loss of educational land.** All recommended that the site be used to **support future development of education.**
- **Support for HKBU's proposal to develop a CMTH,** in terms of the benefits this would bring Hong Kong society and internship opportunities was evident from numerous letters including those from Ms Helena Wong Pik-wan (LegCo Member), the Civic Party's 'Environment and Sustainable Development Policy Branch', Ho Hin Ming and Lee Zi Jing (Liberal Party Members), Mr. Ng Yan Keung (Chairman of the HK Redevelopment Concern Group), Designing HK (Ms Debbie Chan) and Hong Kong Kowloon City Industry and Commercial Association Limited.
- Several Representers commented on the **lost opportunity for HKBU** to develop an **integrated campus** if the ex-LWL Site is re-zoned for residential development, resulting in **fragmented planning** (Ms Helena Wong Pik-wan (LegCo Member), Mr. Siu Leong Sing (Kowloon City District Council Member), Ho Hin Ming and Lee Zi jing (Liberal Party) and 'Designing Hong Kong' (Debbie Chan).
- Dr. Daniel C.W. Tse (Chair of the University Council of the University of Macau, President Emeritus of Hong Kong Baptist University) outlined past Governments' support for universities, including reserving adjacent sites whenever possible. He states: "*to be consistent with the policies on higher education before and after the Re-unification, and too be in line with the world trend of competing for high quality human resources, there is no reason whatsoever why the whole Lee Wai Lee site should not be given to the Baptist University...*"
- Numerous other issues were raised in the individual letters which included: the shortage of student hostels, incompatibility of the proposed residential use in close proximity to student hostels, environmental impact (including traffic) and the undesirable density precedent this would set in Kowloon Tong.

Key Statements by Members of the Public

4.5 A review of all the Representations highlighted particular objection points in relation to Amendment Item A. Outlined below are some particular examples, identified under key themes.

Support for Education

4.6 The need to support Hong Kong's educational development as a key element of economic policy was highlighted. Representers considered that the Government should provide more resources for supporting the development of education. One Representer pointed out that:

> "*the economic development of Hong Kong over the last decades has been well behind our competitors like Korea and Singapore in this region. Tertiary education sector plays a pivotal role in revitalizing our economic basis and will contribute greatly to build up the knowledge base society*". (Representation No. TPB/R/S/K18/17- 3217 refers).

Expansion of the University Campus Using Adjacent Available Land

4.7 Some Representers highlighted that it is "common sense"/ "common practice" for universities to locate new academic buildings/ campus expansion area adjacent to the main campus. In Representation No. TPB/R/S/K18/17- 25 and 44, both quoted the cases of HKU and the PolyU. HKU located their campus expansion to the west of the main campus.

4.8 Another Representer notes "*fragmented planning cannot achieve a good campus layout*" (Representation No. TPB/R/S/K18/17- 44 refers). Other Representers highlight the piecemeal campus layout, with academic facilities scattered around - in Ho Sin Hang Campus and Shaw Campus and the inconvenience for students. (Representation No. TPB/R/S/K18/17- 7533 refers). A number of Representers hoped that educational facilities/ hostels will be accommodated at the ex-LWL Site in order to achieve synergy with the existing educational facilities in the neighbourhood. One Representer stated that:

> "*coherent and integrated planning and design encompassing the LWL site and the main campus of the HKBU would create operational efficiencies, but also avoid exacerbation of commuting which is not sustainable.*" (Representation No. TPB/R/S/K18/17- 21 refers).

To Enhance Learning Environment and Sense of Belonging

4.9 The majority of Representers highlight the need for sufficient space to be provided to facilitate educational development. One Representer highlighted that:

> "*education is more than teaching in classrooms. Education, especially tertiary education, emphasizes on interactions between people, communication and whole person development.*" (Representation No. TPB/R/S/K18/17- 275 refers).

4.10 Other Representers highlighted the lack of open space within HKBU (Representation No. TPB/R/S/K18/17- 7251, 7533 and 12075 refer). As pointed out by a Representer:

> "*one can argue that it [HKBU] can expand vertically and build taller buildings, hey! don't forget there is height limitation in Kowloon area and why do we need to suppress the students to study in some sort of public housing estate? Creativity and generation of innovative ideas need space – physically and mentally, we don't want to create more nervous young people.*" (Representation No. TPB/R/S/K18/17- 15042 refers).

4.11 In order to create a sense of belonging, student hostels have to be located near the university campus. A Representer makes the following observations[2]:

> "*living in a student hostel is part of university life. Although HKBU provides off campus accommodation for students, there will be a new student hostel in Tseng Kwan O, these are located far away from the HKBU campus. Therefore, the accommodation cannot help students to enjoy university life on campus.*" (Representation No. TPB/R/S/K18/17- 119 refers).

The Need to Provide a CMTH

4.12 A number of Representers highlighted the need for a CMTH / the need to promote CM in Hong Kong. A Representer pointed out that the current CM Service is limited to out-patient service, and that without in-patient service, the development of CM, especially treatment for emergency and critical illness, is limited. (Representation No. TPB/R/S/K18/17-43). The Representer further commented that given that the aging population in Hong Kong is increasing, the need for CM is growing in importance.

4.13 Another Representer commented that the development of CMTH will not only enhance the quality of CM education, such as provision of internship for students of CM from different universities, but also facilitate medical research and technology development. (Representation No. TPB/R/S/K18/17-28, 637).

4.14 A number of Representers have highlighted that the ex-LWL Site is the ideal location for a CMTH, and that the close proximity to the School of CM of HKBU will have significant advantages for teaching and research. (Representation No. TPB/R/S/K18/17-28).

---

2 *Translated and edited comments.*

The Need to Provide Academic Facilities and Student Hostels

4.15 A number of representations mentioned that lack of academic facilities and hostel places have caused significant inconvenience for the students and teaching staff of HKBU (Representation No. TPB/R/S/K18/17- 76, 195, 289, 637, 2011, 2229, 8401, 25586 refer). Due to lack of student hostel places, students have to reside off-campus. Thus, they have additional accommodation and transport costs.

4.16 Moreover, some Representers have highlighted that those students living in remote areas have to leave home incredibly early in order to reach classes on time (Representation No. TPB/R/S/K18/17- 2067 refers).

The Need for G/IC Facilities in the Neighbourhood

4.17 Several Representers highlighted the need for G/IC facilities in the local community (Representation No. TPB/R/S/K18/17- 14, 7423, 8183 refer). They highlight the lack of a community hall, elderly centres (except those privately-run) and indoor sport centres in the neighbourhood (Representation No. TPB/R/S/K18/17- 14 and 8183 refer). Other Representers mention that there is only one local Residential Care Home for the Elderly (excluding private) and that residents in the Kowloon Tong area have to compete for community facilities with their neighbours in Lok Fu and Shek Kip Mei. In their representation they request the Government to provide a CMTH, student hostel, community centre, indoor sports centre, elderly centre and multi-purpose facilities. (Representation No. TPB/R/S/K18/17- 14 refers).

Local Education Facilities

4.18 A number of Representers mentioned the need for more educational facilities to improve access to educational opportunities, including continuing learning. One Representer pointed out that many Hong Kong people have aspirations of pursuing further education (Representation No. TPB/R/S/K18/17-12422 refers). Moreover, some parents hoped that more educational facilities will be provided for their children (Representation No. TPB/R/S/K18/17- 7606, 12956 and 12957 refers).

Genuine Housing Needs of the Public

4.19 As indicated in the quantitative analysis, a number of Representers commented that the developments at the ex-LWL Site are likely to be luxury housing, which cannot address their housing needs. One Representer noted:

> "*we only earn HK$9,000 each month and are not eligible for public rental housing. We have difficulty to rent a bed, not to mention buying a luxury residential flat.*" (Representation No. TPB/R/S/K18/17-12964 refers).

4.20 Another Representer also mentioned that:

> "*the housing problem victims are those people with low income, but not those who can afford houses in Kowloon Tong! These people can't even get a normal living standard, let alone buying those luxurious housing in Kowloon Tong.*" (Representation No. TPB/R/S/K18/17-15005 refers)

4.21 The Kowloon District Planning Officer mentioned in the Kowloon City District Council Housing and Infrastructure Committee Meeting on 17 March 2013 that the planning intention of the "R(B)" zone was to satisfy the need of extended families who would like to move into a bigger flat. The housing market is influenced by a complex set of variables and it is much too simplistic to suggest that the development of high-end flats will result in the availability of smaller and lower cost units as people progress up through the housing ladder. One Representer points out that, according to the data provided Transport and Housing Bureau there are more than 220,000 people on the waiting list for public rental housing (125,000 households in total). He makes the point that even if an additional 495 low to medium-cost housing units become available as a result of people moving up the housing ladder, less than 0.004% of the households on the current public rental housing waiting list would benefit. (Representation No. TPB/R/S/K18/17-7533 refers).

Incompatibility of the R(B) Zone with the Neighbourhood

4.22 Some Representers commented that the proposed R(B) restrictions at the ex-LWL Site (e.g. Plot Ratio ("**PR**") of 4.5 and Building Height restriction ("**BHR**")) are incompatible with the existing densities and building heights in nearby residential streets. The surrounding residential streets including La Salle Road, Hereford Road, Oxford Road and Cambridge Road are low-density in nature, with a PR of 1.8. Representers state that the proposed R(B) Zone on the ex-LWL Site would set a precedent for surrounding sites and undermine the existing character of Kowloon Tong Area (Representation No. TPB/R/S/K18/17- 4285, 6959, 7870, 8046 refer).

4.23 Many Representers were concerned about the potential conflicts between the proposed R(B) Zone at the ex-LWL Site and the adjacent student hostels. One Representer, who is a student of the Polytechnic University of Hong Kong ("**PolyU**"), mentioned that their student hostel received complaints from the residents in the surrounding developments (Representation No. TPB/R/S/K18/17-8320 refers). Other Representers mention that students hostels of PolyU and the University of Hong Kong ("**HKU**") have received complaints from the nearby residential developments due to noise nuisance (TPB/R/S/K18/17-14 and 25).

5. CONCLUSION

5.1 A total of **25,884** Representations were submitted to the TPB during the 2-month public comment period, which closed on 15 April 2013. Of these **25,877 (99.97%) were opposed** to the re-zoning of the ex-LWL Site and only 7 (0.03%) were in support.

5.2 About three quarters of Representers (around 20,000 people) specifically highlighted the need to retain the ex-LWL Site for future higher education use – with around 60% of those specifically requesting the Site for HKBU's future expansion. In addition a good portion of Representers specifically highlighted the need for the Site to be used for a CMTH.

5.3 A number of prominent individuals and groups / organisations have objected to Amendment Item A and include four LegCo Members, Kowloon City District Council Members, the Civic Party's 'Environment and Sustainable Development Policy Branch', members of the Liberal Party and various concerned groups including 'HK Redevelopment Concern Group', 'Designing Hong Kong' and 'Hong Kong Kowloon City Industry and Commercial Association Limited'. Most object to the loss of G/IC land as it is important for the future needs of education, and highlight that the proposed luxury residential development will not resolve the Grassroots' housing needs.

5.4 Specific comments made by members of the public have been highlighted, which provide snapshots of personal difficulties experienced by students in relation to housing, commuting and campus space, views on the role of Government in supporting Hong Kong's future educational needs and the need for comprehensive, not fragmented planning.

Approved by:	Keren Seddon	
Edited by:	Cindy Tsang	
	Jennifer Gordon	
Prepared by:	Maggie Wu	
Date:	11 June 2013	
File Ref:	HKBU/LWLTI	

Form No. S6A
表格第S6A號

COMMENT ON REPRESENTATION RELATING TO DRAFT PLAN UNDER SECTION 6A(1) OF THE TOWN PLANNING ORDINANCE (CAP. 131)

根據《城市規劃條例》（第131章）第6A(1)條對草圖的申述提出意見

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

1. The comment should be made to the Town Planning Board (the Board) before the expiry of the specified period for making comment on the representation. 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.
意見必須於指定對申述提出意見的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意見的文件（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。

2. 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333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會的網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. 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 comment 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。提出意見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，則委員會可把有關意見視爲不曾提出論。

1. Person Making This Comment (known as "Commenter" hereafter)
提出此份意見的人士（下稱「提意見人」）

Name 姓名/名稱 (~~Mr./Mrs./Miss/Ms./Company~~/Organization* 先生/夫人/小姐/女士/公司/機構*)

Hong Kong Baptist University

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*)

Townland Consultants Limited

3. Details of the Comment
意見詳情

Draft plan to which the comment relates 與意見相關的草圖	Draft Kowloon Tong Outline Zoning Plan No. S/K18/17
Representation(s) to which the comment relates (please specify the representation number) 與意見相關的申述（請註明申述編號）	TPB/R/S/K18/17-1 to TPB/R/S/K18/17-25,884

* 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」

Parts 1, 2 and 3 第1、第2及第3部分

3. Details of the Comment (Continued) (use separate sheet if necessary)
意見詳情（續）（如有需要，請另頁說明）

Detailed comments on the representation(s) mentioned above 對上述所提及的申述的意見詳情

Please see the attached letter.

Part 3 Continued) 第3部分（續）

4. Plans, 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 comment. 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.

請列明連同意見一併遞交的位置圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有圖則/繪圖爲彩圖或超過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。

N/A

5. Signature 簽署

Signature 簽署 .....

~~"Commenter"~~ /Authorized Agent*
「提意見人」/ 獲授權代理人*

KEREN SEDDON
Name in Block Letters 姓名（以正楷填寫）

Chief Executive Officer
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 MRTPI, RPP

on behalf of 代表 Townland Consultants Limited

Company/Organization Name and Chop (if applicable)
公司/機構名稱及蓋章（如適用）

Date 日期 11 June 2013

Statement on Personal Data 個人資料的聲明

1. The personal data submitted to the Board in this comment will be used by the Secretary of the Board and Government departments for the following purposes:
   (a) the processing of this comment which includes making available the name of the "commenter" for public inspection when making available this comment for public inspection; and
   (b) facilitating communication between the "commenter" 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.

   委員會就這份意見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：

   (a) 處理這份意見，包括公布這份意見供公眾查閱，同時公布「提意見人」的姓名供公眾查閱；以及
   (b) 方便「提意見人」與委員會秘書及政府部門之間進行聯絡。

2. The personal data provided by the "commenter" in this comment may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

   「提意見人」就這份意見提供的個人資料，或亦會向其他人士披露，以作上述第1段提及的用途。

3. A "commenter" 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，「提意見人」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，其地址爲香港北角渣華道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

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

行政副校長暨秘書長
VICE-PRESIDENT (ADMINISTRATION) & SECRETARY

李兆銓
Andy S.C. Lee

Ref: VPAS13/0605/112
5 June 2013

Townland Consultants Limited
18/F., 101 King's Road
North Point, Hong Kong

Attn: Ms. Keren Seddon

Dear Madam,

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

COMMENT ON REPRESENTATIONS RELATING TO THE DRAFT KOWLOON TONG OUTLINE ZONING PLAN NO. S/K18/17

We hereby authorise Townland Consultants Limited (TOWNLAND) as the Planning Consultant to prepare and submit the above Comment on Representations on our behalf. TOWNLAND is hereby authorised to liaise, correspond and attend meetings with all relevant Government Departments and other bodies, as necessary, in respect of the Representation.

Yours faithfully,

Andy S C Lee
Vice-President (Administration) and Secretary

[redacted] 電話 [redacted] 傳真 Fax [redacted]
電郵 E-mail [redacted]

Printed on 100% Recycled Paper

tpbpd@pland.gov.hk

寄件者: <redacted>
收件者: <tpbpd@pland.gov.hk>
傳送日期: 11/06/2013 下午 07:12
附加檔案: Letter Ref HKBU_LWLTI_JEN_04.pdf
主旨: Letter Ref: HKBU/LWLTI/JEN/03 submitted on 11 June 2013 Relating to Comments on Representations (Draft Kowloon Tong OZP No. S/K18/17)

Dear Sir / Madam

We wish to submit 2 replacement pages to the Letter (Ref: HKBU/LWLTI/JEN/03) submitted by Townland Consultants Ltd earlier today in relation to the above captioned submission, submitted on behalf of the Hong Kong Baptist University ("HKBU"). The replacement pages correct inaccuracies in two separate sentences.

The replacement pages are Page 8 and Page 9. Please see attachment. The same covering letter and replacement pages were also faxed to the TPB this evening.

We should be grateful for your kind assistance in replacing these pages.

Should you have any queries, please do not hesitate to contact the undersigned, Ms Cindy Tsang (Direct Line: <redacted>), Ms Jennifer Gordon (Direct Line: <redacted> or Miss Maggie Wu (Direct Line: <redacted>).

Kind regards

Jennifer Gordon
Associate Town Planner
Townland Consultants Ltd

This e-mail and any attachments to it are intended only for the party to whom they are addressed. They may contain privileged and/or confidential information. If you have received this transmission in error please notify the sender immediately and delete any digital copies and destroy any paper copies. Thank-you.

Townland accepts no contractual liabilities or commitments arising from this e-mail unless subsequently confirmed by fax or letter or as an e-mail attachment giving company name, address, registration number and authorised signatory.

Web site: http://www.townland.com

TOWNLAND CONSULTANTS LTD.
PROJECT MANAGEMENT, URBAN AND REGIONAL PLANNING, SOCIAL DEVELOPMENT, DEVELOPMENT CONSULTANCY, MASTER PLANNING, URBAN DESIGN, CONCEPT ARCHITECTURE AND LANDSCAPE ARCHITECTURE

Our Ref.: HKBU/LWLTI/JEN/04
Date 11 June 2013

By Email and Fax

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

Dear Sir

SECTION 6A(1) COMMENTS ON REPRESENTATIONS
TOWN PLANNING ORDINANCE (CHAPTER 131)

COMMENTS ON REPRESENTATIONS RELATING TO THE DRAFT KOWLOON TONG OUTLINE ZONING PLAN NO.S/K18/17

FORMER CAMPUS OF THE HONG KONG INSTITUTE OF VOCATIONAL EDUCATION (LEE WAI LEE), RENFREW ROAD, KOWLOON TONG

We wish to submit 2 replacement pages to the Letter (Ref: HKBU/LWLTI/JEN/03) submitted by Townland Consultants Ltd earlier today in relation to the above captioned submission, submitted on behalf of the Hong Kong Baptist University ("HKBU"). The replacement pages correct inaccuracies in two separate sentences.

The replacement pages are Page 8 and Page 9.

We should be grateful for your kind assistance in replacing these pages.

Should you have any queries, please do not hesitate to contact the undersigned, Ms Cindy Tsang (Direct Line: [redacted]), Ms Jennifer Gordon (Direct Line: [redacted]) or Miss Maggie Wu (Direct Line: [redacted]).

Yours faithfully
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED

Keren Seddon
Chief Executive Officer

KRS/CT/JEN/MAG
Enc

MAIN HONG KONG OFFICE :
18th Floor, 101 King's Road, North Point, Hong Kong
Telephone : (852) 2521 2911 Facsimile : (852) 2521 6631
E-mail address : tcltd@townland.com Website : www.townland.com

CHINA OFFICE (SHENZHEN) :
Room E 25th Floor, Daqing Building, 6027 Shennan Avenue, Futian District, Shenzhen City, PRC. Postal Code 518040
Telephone : (86)(755) 8369 0780 Facsimile : (86)(755) 8300 5274
E-mail address : tcltd@townland.com

INDIA OFFICE :
CRD Samarth, 3rd Floor, 86 S.V. Road, Khar (W), Mumbai, 400 052, India
Telephone : (91 22) 6455 0290 Facsimile : (91 22) 6455 0297
E-mail address : tcpl@townland.com

INDONESIA OFFICE :
Gedung Graha Tirtadi, 102, 1/F, Jl. Raden Saleh No.20, Jakarta Pusat - 10330, Indonesia
Telephone : (62 21) 3983 7470 Facsimile : (62 21) 3983 7471
E-mail address : tcljk@townland.com

ASSOCIATED COMPANIES :
TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)
TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)
TOWNLAND CONSULTANTS (CHENGDU) LIMITED (China)
TOWNLAND CONSULTANTS PVT. LIMITED (India)
PT TOWNLAND INTERNATIONAL (Indonesia)
HOWARD & SEDDON PARTNERSHIP (United Kingdom)

ISO 9001: 2008
Certificate No.: CC844

Overall Comments on the Support Representations

The Support Representations fail to offer convincing and relevant planning reasons to support Amendment Item A. Many of the comments are subjective and personal, with several addressing the matter from inappropriate perspectives.

Analysis of Objections Submitted to the TPB on Amendment Item A of the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

The Paper at Annex 1 'Analysis of Objections Submitted to the TPB on Amendment Item A of the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17', provides preliminary quantitative and qualitative analyses of the Representations which object to Amendment Item A.

There were a total of 25,877 Representations objecting to Amendment Item A (99.97% of all Representations submitted). A summary of the key findings of the Annex 1 Paper is provided below:

- The loss of G/IC was the primary objection point, specifically highlighted by over 90% of Representers.
- Over three quarters of the Representers (around 20,000 people) specifically highlighted the need to retain the ex-LWL Site for future higher education use – with around 60% of those specifically requesting the ex-LWL Site for HKBU's future expansion. In addition, a good portion of Representers specifically highlighted the need for the ex-LWL Site to be used for a CMTH.
- Almost half of the Representers highlighted that they were opposed to "luxury housing" on the ex-LWL Site.
- Over a quarter of the Representers highlighted the procedural unfairness, relating to the ex-LWL Site being identified in the Government's 2013-14 Land Sale Programme before the TPB had made a decision in the light of Representations made on Amendment Item A.

A number of prominent individuals and groups / organisations have objected to Amendment Item A and include four LegCo Members, Kowloon City District Council Members, the Civic Party's 'Environment and Sustainable Development Policy Branch', members of the Liberal Party and various concerned groups including 'HK Redevelopment Concern Group', 'Designing Hong Kong' and 'Hong Kong Kowloon City Industry and Commercial Association Limited'. Most object to the loss of G/IC land as it is important for the future needs of education, and highlight that the luxury residential development allowed for under Amendment Item A will not resolve the Grassroots' housing needs.

Panel on Education of the Legislative Council (LegCo) Meeting 10 June 2013

The Panel on Education of the Legislative Council (LegCo), at its meeting held on 10 June 2013, received an update from the Administration and discussed the latest developments on the proposed use/rezoning of the southern portion of the ex-LWL Site. All nine members that made verbal comments at the meeting remained consistent in their views that the ex-LWL Site should be retained for educational use, including for the future expansion of the HKBU and the development of a CMTH. HKBU believes that the TPB will seriously consider the comments of the Panel on Education of LegCo.

TOWNLAND

HKBU also welcomes the Education Bureau's response made at the Panel on Education of LegCo on 10 June 2013, when they stated that the site planning for the proposed Student Hostel on the northern portion of the ex-LWL Site can now proceed. HKBU will continue to discuss the issue with the Government.

Should you have any queries, please do not hesitate to contact the undersigned, Ms Cindy Tsang (Direct Line: [redacted]), Ms Jennifer Gordon (Direct Line: [redacted]) or Miss Maggie Wu (Direct Line: [redacted]).

Yours faithfully
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED

Keren Seddon
Chief Executive Officer

KRS/CT/JEN/MAG

Enc

cc Client
The Team

[redacted]

07/06/2013 下午 05:49

To tpbpd@pland.gov.hk
cc opinion@hkbu.edu.hk
bcc
Subject 回應九龍塘分區計劃大綱草圖編號S/K18/17的申述 Comments on the representations relating to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt

致
城市規劃委員會主席
香港北角渣華道333號
北角政府合署十五樓

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

電郵Email: tpbpd@pland.gov.hk

副本送copy: opinion@hkbu.edu.hk Date: 2013-06-07

回應九龍塘分區計劃大綱草圖編號S/K18/17的申述 Comments on the representations relating to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

我支持編號TPB/R/S/K18/17-8 至 TPB/R/S/K18/17-25884的申述：反對修訂項目A項 --把位於聯福道的一幅涵蓋前李惠利校舍南部的土地，由「政府、機構或社區（9）」地帶改劃爲「住宅（乙類）」地帶。 我支持保留前李惠利校舍南部的土地爲「政府、機構或社區（9）」地帶，並讓香港浸會大學使用整幅土地作長遠整體規劃，配合該校未來發展，包括興建中醫教學醫院，讓整個社會受惠。 I support all representations numbered TPB/R/S/K18/17-8 to TPB/R/S/K18/17-25884 which oppose Amendment Item A -- Rezoning of a site at Renfrew Road, covering the southern part of the ex-Lee Wai Lee Campus, from "Government, Institution or Community (9)" ("G/IC(9)") to "Residential (Group B)". I support retaining the southern portion of the ex-Lee Wai Lee Campus site as "G/IC(9)" and allowing Hong Kong Baptist University to undertake integrated and coherent planning of the entire site for its future development, including the building of a Chinese Medicine Teaching Hospital which would benefit society at large.

姓名 Name:
陳偉業議員
電郵 Email:
[redacted]

[redacted]
10/06/2013 下午 10:20

To tpbpd@pland.gov.hk
cc opinion@hkbu.edu.hk
bcc
Subject 回應九龍塘分區計劃大綱草圖編號S/K18/17的申述 Comments on the representations relating to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt

致
城市規劃委員會主席
香港北角渣華道333號
北角政府合署十五樓

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

電郵Email: tpbpd@pland.gov.hk

副本送copy: opinion@hkbu.edu.hk Date: 2013-06-10

回應九龍塘分區計劃大綱草圖編號S/K18/17的申述 Comments on the representations relating to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

我支持編號TPB/R/S/K18/17-8 至 TPB/R/S/K18/17-25884的申述：反對修訂項目A項 一把位於聯福道的一幅涵蓋前李惠利校舍南部的土地，由「政府、機構或社區（9）」地帶改劃爲「住宅（乙類）」地帶。 我支持保留前李惠利校舍南部的土地爲「政府、機構或社區（9）」地帶，並讓香港浸會大學使用整幅土地作長遠整體規劃，配合該校未來發展，讓整個社會受惠。 I support all representations numbered TPB/R/S/K18/17-8 to TPB/R/S/K18/17-25884 which oppose Amendment Item A -- Rezoning of a site at Renfrew Road, covering the southern part of the ex-Lee Wai Lee Campus, from "Government, Institution or Community (9)" ("G/IC(9)") to "Residential (Group B)". I support retaining the southern portion of the ex-Lee Wai Lee Campus site as "G/IC(9)" and allowing Hong Kong Baptist University to undertake integrated and coherent planning of the entire site for its future development which would benefit society at large.

姓名 Name:
Hong Kong Baptist University Postgraduate Association
電郵 Email:
[redacted]

[redacted]
10/06/2013 下午 04:38

To tpbpd@pland.gov.hk
cc opinion@hkbu.edu.hk
bcc
Subject 回應九龍塘分區計劃大綱草圖編號S/K18/17的申述 Comments on the representations relating to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt

致
城市規劃委員會主席
香港北角渣華道333號
北角政府合署十五樓

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

電郵Email: tpbpd@pland.gov.hk

副本送copy: opinion@hkbu.edu.hk Date: 2013-06-10

回應九龍塘分區計劃大綱草圖編號S/K18/17的申述 Comments on the representations relating to the Draft Kowloon Tong Outline Zoning Plan No. S/K18/17

我支持編號TPB/R/S/K18/17-8 至 TPB/R/S/K18/17-25884的申述：反對修訂項目A項 -把位於聯福道的一幅涵蓋前李惠利校舍南部的土地，由「政府、機構或社區（9）」地帶改劃爲「住宅（乙類）」地帶。 我支持保留前李惠利校舍南部的土地爲「政府、機構或社區（9）」地帶，並讓香港浸會大學使用整幅土地作長遠整體規劃，配合該校未來發展，讓整個社會受惠。 I support all representations numbered TPB/R/S/K18/17-8 to TPB/R/S/K18/17-25884 which oppose Amendment Item A -- Rezoning of a site at Renfrew Road, covering the southern part of the ex-Lee Wai Lee Campus, from "Government, Institution or Community (9)" ("G/IC(9)") to "Residential (Group B)". I support retaining the southern portion of the ex-Lee Wai Lee Campus site as "G/IC(9)" and allowing Hong Kong Baptist University to undertake integrated and coherent planning of the entire site for its future development which would benefit society at large.

姓名 Name:
香港九龍城工商業聯會有限公司
電郵 Email:
[redacted]

致

城市規劃委員會主席
香港北角渣華道 333 號
北角政府合署十五樓

電郵：tpbpd@pland.gov.hk

傳真：2877 0245 / 2522 8426

RECEIVED
2013 JUN 11 P 3:30
TOWN PLANNING BOARD

回應「九龍塘分區計劃大綱草圖編號 S/K18/17」的申述

我校支持編號 TPB/R/S/K18/17-8 至 TPB/R/S/K18/17-25884 的申述：反對修正項目 A 項 — 把位於聯福道的一幅函蓋前李惠利校舍南部的土地，由「政府、機構或社區（9）」地帶改劃爲「住宅（乙類）」地帶。

我校認同編號 TPB/R/S/K18/17-25 香港浸會大學的反對申述，有關環境質素的部份。把前李惠利校舍南部的土地改劃爲「住宅（乙類）」地帶，環境因素的改變對本校負面影響甚爲深遠，包括：

- 區內交通流量增加，因而增加我校學童上落校巴時發生事故的風險；而且亦會產生更多交通噪音和汽車廢氣，導致本區環境質素下降；以及

- 發展商業性高尚住宅項目，通常會用盡地積比例，極有可能會阻擋天然光線和空氣流通。

因此，我校支持保留前李惠利校舍南部的土地爲「政府、機構或社區（9）」地帶。

簽署：陳雅麗

MARY ROSE SCHOOL 保民校學 KOWLOON

姓名：陳雅麗（保民校學校長）

電郵 / 傳真：[redacted]

日期：10/6/2013

Form No. 36A 表格第 S 6 A 號

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

1. The comment should be made to the Town Planning Board (the Board) before the expiry of the specified period for making comment on the representation. 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.
意見必須就指定對申述提出意見的期限屆滿前向城市規劃委員會（下稱「委員會」）提出，並寄往香港北角渣華道333號北角政府合署15樓城市規劃委員會秘書收。

2. 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「城市規劃委員會就規劃申請及申述書提交意見及公布該等意見指引」。該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）及城市規劃署規劃資料查詢處（熱線：2231 5000）（香港北角渣華道333號北角政府合署17樓及新界沙田上禾輋路1號沙田政府合署14樓）索取，亦可從委員會網頁下載（網址：http://www.info.gov.hk/tpb/）。

3. 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 comment 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城市規劃署的規劃資料查詢處索取。表格須以打字或正楷填寫，最好以英文及中文填寫。倘若所要求的資料沒有填寫，則意見可能不會被接納。

1. Person Making This Comment (known as "Commentor" hereafter) 提出此意見的人士（下稱「意見人」）
Name 姓名／名稱 (Mr./Mrs./Miss/Ms./Company/Organization* 先生／夫人／小姐／女士／公司／機構*)
陳某德

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*)
N.A.

3. Details of the Comment 意見詳情	
Draft plan to which the comment relates 與意見相關的草圖	S/K18/17.
Representation(s) to which the comment relates (please specify the representation number) 與意見相關的申述（請註明申述編號）	

* Delete as appropriate 刪除不適用者
Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

Parts 1, 2 and 3 第1、第2及第3部分

Form No. 5A 表格編號 5.6.A號

3. Details of the Comment (Continued) (use separate sheet if necessary)
意見陳情（續）（如有需要，請另頁說明）

Detailed comments on the representation(s) mentioned above 對上述所提及的申述的意見詳情

本人反對將位於聚福道的一幅用地前李惠利校舍南部的土地，由「政府、機構或社區(9)」地帶改劃為「住宅(乙類)」地帶。

首先，本人認為應保留前李惠利校舍南部的土地，用該地帶為「政府、機構或社區(9)」，即前李惠利校舍給香港浸會大學作不同用途，如未來擴建，即興建中醫教學醫院，此舉不但令年青新一代能接受多元化教育，更有利為屯區內一班老人家得到照顧及治療。再者，此地亦可保留日後發展用途，讓浸會大學作興建學生宿舍。香港理工大學之新建學生宿舍位於何文田，亦已接近理工大學，既然理工大學已有地方興建新宿舍，此一聚福道的地，便應保留給浸會大學，而非理工大學或其他用途。

Part 3 Continued) 第3部分（續）

Form No. S16 表格編號 S16

4. Plans, 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 comment. 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.
請列明建同呈見一附遞交的位置圖、地盤平面圖、其他相關圖則、繪圖及其他文件。倘有關此等圖則或繪圖的副本大小超過A3大小，每一式30份。至於其他補充文件（例如：影響評估報告），則每一式30份。

5. Signature 簽署

Signature 簽署 [signature]

Name in Block Letters 姓名（以正楷書寫） 陳寶德

"Commenter" / Authorized Agent* 「提意見人」/ 獲授權代理人*

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 ☐ HKIEA

Others 其他

on behalf of 代表 龍塘分區委員會

Company/Organization Name and Chop (if applicable) 公司/機構名稱及蓋章（如適用）

Date 日期 10/6/2013

Statement on Personal Data 個人資料收集聲明

1. The personal data submitted to the Board in this comment will be used by the Secretary of the Board and Government departments for the following purposes
   (a) the processing of this comment which includes making available the name of the "commenter" for public inspection when making available this comment for public inspection; and
   (b) facilitating communications between the "commenter" 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.
   城市規劃委員會就呈交的個人資料會主要用於處理意見書，以便進行（包括將意見書提供公眾查閱）及相關的城市規劃委員會規劃申請的目的，並作以下用途：
   (a) 處理意見書，包括公布載有「提意見人」姓名的意見書，供公眾查閱；及
   (b) 方便「提意見人」與城市規劃委員會秘書及／或政府部門之間的行政安排。

2. The personal data provided by the "commenter" in this comment may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.
   「提意見人」在意見書內提供的個人資料，或會向其他人士披露，以作上述第1段所述的用途。

3. A "commenter" 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，「提意見人」有權查閱及更正其個人資料。查閱個人及更正個人資料，應向城市規劃委員會秘書提出要求，其地址為香港北角渣華道333號北角政府合署15樓。

* Delete as appropriate 刪除不適用者
Please fill "NA" for inapplicable item 如在不適用的項目填寫「不適用」
Please put a "✓" in the appropriate box 請在適當的方格內加上「✓」號

Parts 4 and 5 第4及第5部分

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

SCHOOL OF BUSINESS

管理學系
Department of Management

10th June, 2013

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

BY HAND

Dear Mr. Chow & Members of Town Planning Board:

I understand you have received over 25,000 letters opposing to the re-zoning of the Lee Wai Lee site from a site designated for GIC to a site for yet another block of luxurious flats. In my opinion, this sends a clear message that the public does not accept this proposal.

Recently I had delivered a letter to Chief Executive C.Y. Leung, cc to Mr. Eddie Ng, Dr. Ko Wing-man and Mr. Paul Chan stating my opinion as a veteran academic at Hong Kong Baptist University about the re-zoning plan. In my letter to the Chief Executive, I had attached a list with the names of 175 people who support me in my assertions. For your reference, I attach herewith the list that I had submitted to our Chief Executive. By viewing at this list of professional people, I hope you will give more thoughts to why these visionary and thoughtful people in my circle all agreed that the University should be offered the land for the future development of education instead of using it for building another block of luxurious flats.

As you must know, this relatively small plot on Renfrew Road is surrounded on three sides by the HKBU campus. Then too, I also aware there is no additional unoccupied spaces in the vicinity of the University for the expansion and future development for higher education. Every day when I go to work, I pass by City University, on the same border of Kowloon Tong. City University, which moved from Mongkok a few decades ago, enjoys rather large outlay of land both in Yau Yat Chuen and Beacon Hill. These two sections of Kowloon Tong could have easily been bobbled up for high end private flats. I can only say that their commodious property stands as a tribute to earlier Town Planning Boards' foresight and high regard for higher education.

AACSB ACCREDITED · EFMD EQUIS ACCREDITED · Accredited by Association of MBAs
電郵 E-mail [redacted] 電話 Tel [redacted] 傳真 Fax [redacted]

Printed on 100% Recycled Paper

香港浸會大學
HONG KONG BAPTIST UNIVERSITY

工商管理學院
SCHOOL OF BUSINESS

管理學系
Department of Management

I want to highlight to the Town Planning Board the importance of WISE LAND ALLOTMENT for the community. Through my personal contact and survey, I have received full support for my views that the University should be given priority for the use of the former Lee Wai Lee campus since it literally surrounds this small Renfrew Road plot on three sides. They all agree that we are at a crossroad where we must decide to place young people's future above developers' padded pockets.

I sincerely hope you will give FAIR consideration to making the most efficient use of this piece of land and that you will decide to provide the much-needed facilities for the future development of the Hong Kong Baptist University.

With warmest regards,

Susanna Lo
Director, HRM Mentoring Program
Assistant Professor, Department of Management

Encl. Attachment list of supporters opposing to the rezoning of the Lee Wai Lee Campus

	Surename	Given Name	Company	Title
1	Au	Tommy	Hongkong Land Limited	Human Resources Manager
2	Au	Karic	RBC Wealth Management	Senior Vice President
3	Au	Andy	Master Hotel Supplies Ltd	Senior Sales Manager
4	Au	Dom	Career Times Online Limited	General Manager
5	Bickley	Gillian		Author (freelense)
6	Chak	Edward	AEON Store (Hong Kong) Co.,Ltd	General Manager - Operations
7	Chan	Katharine	Shun Hing Technology Co Ltd	Senior Manager
8	Chan	Adeline	Coach	Senior Trainer, Field Services Training
9	Chan	Clara	Hong Kong Young Industrialists Council	Vice President
10	Chan	William	Hospital Authority	Member
11	Chan	Michael	Café De Coral Holding Limited	Chairman
12	Chan	Evelyn	Hong Yip Service Company Ltd	Human Resources Manager
13	Chan	C Y	Hong Kong Broadband Network Limited	Senior Manager - Talent Management
14	Chan	Dean	Sun Hung Kai Properties Ltd	Sales Director
15	Chan	Diane	Career Times Online Limited	Executive Director
16	Chan	Connie	DHL	Manager - HR Development
17	Chau	Albert	Board Director of Haven of Hope Christian Service	Honorary Secretary
18	Chau	Amy	Standard Chartered Private Bank	Executive Director, Private Banking
19	Cheng	Janna	Urban Property Management Limited	Senior Group Manager- Human Capital
20	Cheng	Michael	Tao Heung Holding Limited	Chief Officer
21	Cheng	Kwok Ting	Hong Kong Yau Yat Chuen	Lion Club Member
22	Cheung	Lucia	Café De Coral Holding Limited	Senior Manager (Group Corporate Communications)
23	Cheung	Erik	SAE Magnetics (HK) Ltd.	HR Manager
24	Cheung	Senna	Towngas	senior HR Manager
25	Chiang	Aaron	Hong Yip Service Company Ltd	Head of Human Resources & Administration
26	Chik	Carman	Urban Property Management Limited	Human Resources Manager
27	Chim	Justine	Chim's Ergonomics and Safety Limited	Director and Principal Consultant
28	Chiu	Bruce	Max Consulting Co.,Ltd	Lead Consultant
29	Chiu	Winnie	Asia World Expo	Human Resources Director

	Surename	Given Name	Company	Title
30	Choi	Peter	Bank of Communications	Manager (Strategic Planning)
31	Choi	Mary	Hong Kong Airport Service Ltd	Personnel & Administration Manager
32	Chow	Annie	Avery Dennison	Director (Compensation and Benefits Asia Pacific)
33	Chow	Jimmy	Edmond De Rothschild	Director
34	Chow	Joyce	Fedex Express	Manager, Rewards
35	Chu	Johnny	PICO International (HK) Ltd	Assistant General Manager, Regional Human Resources
36	Chu	Priscilla	YESASIA Holding Limited	Co-founder & VP of Operations
37	Chu	Wilson	Partner & Senior Consultant	HMI
38	Chui	Zero	BOC Group Life Assurance Co.,Ltd	Product Development Manager
39	Chung	W.P.	Tao Heung Holding Limited	Chairman
40	Chung	Pauline	Hong Kong People Management Association / Chiaphua Industries Limited	President / Director of Human Resource
41	Chung	Tak Yue Joanna	Prudential Corporation Asia	Executive Financial Services Manager
42	Chung	Jess	Assistant Departmental Secretary (Appointment Services)	Lands Department, HKSAR
43	Fan	Kit	Towngas	Head - Corporate Human Resources
44	Fong	Sunny	McDonald's Asia Pacific / Middle East / Africa	Regional VP, HR Business Partner & Total Compensation
45	Fong	Richael	City U	Adjunct Professor
46	Fong	Friendy	Fedex Express	Managing Director, Human Resource Services, North Pacific Region
47	Fu	Joseph S.P.	Carlton Holding International Corporation	Owner & Chairman
48	Fung	Bobo	Hong Kong Productivity Council	Senior HR Executive (Hr & Administration)
49	He	Martin	Hong Kong Yau Yat Chuen	Lion Club Member
50	Ho	Charles	MTR Corporation Limited	Manager - Quality and Staff Wellness Training
51	Ho	Chi Pang	Top Gun Leather Manufacture Co.,Ltd	Director
52	Ho	Ronny	SML Group Limited	Chief Executive Officer

	Surename	Given Name	Company	Title
53	Ho	Ting Chi	Tsui Wah Restaurant	Director
54	Ho	Chi Pang	Hong Kong Yau Yat Chuen	Lion Club Member
55	Hsueh	Theodore	Christian Communications International Limited	BTM Officer-at-large
56	Hui	Rita	SmarTone Telecommunications Ltd.	General Manager - Human Resources
57	Hui	Garek	G&A Consulting Limited	Director
58	Ip	Barry	The Hong Kong Jockey Club	Head of Human Capital Development
59	Jiang	Laura	Duty Free	HR Training Manager
60	Kong	Tak kwan	Princess Margaret Hospital	Consultant Geriatrician
61	Kwan	Peter	Citibank (Hong Kong) Limited	Investment Consultant
62	Kwok	Angel	HKU SPACE	Senior Executive Officer (HR)
63	Kwok	Julie	Cargotec Asia Limited	Manager
64	Kwok	Sze Chi, Francis	Bright Smart Securities	Director
65	Lai	K T	Hong Kong Institute of Human Resource Management	Executive Council Committee
66	Lai	Nelson	Shun Hing Electronic Holdings Limited	General Manager - Group Human Resources Division
67	Lai	Ni Quiaque	Hong Kong Broadband Network	Head of Talent Engagement and Chief Financial Officer
68	Lai	Pele	Sanfield (Management) Ltd.	HR & Administration Manager
69	Lai	Christine	Pearson Asia Pacific	Regional Human Resources Director
70	Lam	Ivan	Morgan McKinley	Manager
71	Lam	Ken	Bank of Communications	Deputy Head of Human Resources Department
72	Lam	Edmund	Fubon Bank (HK) Limited	Vice President of Training &
73	Lam	Joey	HSBC	Premier Relationship Manager
74	Lam	Man Tin Soul	Hong Kong Yau Yat Chuen	Lion Club Member
75	Lau	Bonnie	Ngong Ping 360 Limited	Head of Human Resources and Corporate Services
76	Lau	Antony	G&A Consulting Limited	Director
77	Lau	Joshua	YESASIA Holding Limited	Founder and CEO
78	Lau	Rebecca	Lo & Lo	Solicitor

	Surename	Given Name	Company	Title
79	Law	Covan	Hospital Authority	Human Resources Manager
80	Lee	Joseph	The Hong Kong Jockey Club	Human Resources Manager (People Development)
81	Lee	Kenneth	Shun Hing Electric Service Centre Ltd	Assistant General Manager
82	Lee	Yuen Hong	Tsui Wah Restaurant	Chairman
83	Lee	Pik Yu		Freelance Author
84	Lee	Andrew	Steak Expert	CEO
85	Lee	David	Lee Kum Kee	Chairman
86	Lee	Edwin	HKBI Company Limited	Founder and CEO
87	Lee	Lannie	Maxi Potential Training & Counselling Center	Senior Consultant
88	Lee	kenji	Tsui Wah Group	Head of Project Department
89	Lee	Shiu	Lee Shiu Family Foundation Ltd	Vice Chairman
90	Lee	Wai Yan Robin	Hong Kong Yau Yat Chuen	Lion Club Member
91	Leung	David	MTR Corporation Limited	Managerial Training & Development Manager
92	Leung	Peter	Hospital Authority	Senior HR Manager
93	Leung	Carrie	Hong Kong Economic Times Limited	Assignment Editor (Executive Page)
94	Leung	Eric	Tao Heung Holding Limited	Chief Executive Officer
95	Leung	Simon	Café De Coral Holding Limited	General Manager - Property & Branch Development
96	Leung	Stephen	Pfizer Hong Kong	Country Manager
97	Li	David	New World Telecommunications Ltd	Vice President, Human Resources & Customer Services
98	Li	Caroline	Tao Heung Holding Limited / Hong Kong Food & Restaurant Federation	HR Director / Vice President
99	Li	Helen	Café De Coral Holding Limited	Director (Corporate Logistics)
100	Li	Kennes	SML Group	Regional Human Resources Director
101	Lo	Steve	ING	Senior Vice President
102	Lo	Kelvin	The Hong Kong Jockey Club	Senior People Development Specialist
103	Lo	Simon	HK Paper Industrial Assocation	President

	Surename	Given Name	Company	Title
104	Lo	Paul	Dah Chong Hong Holdings Ltd	Sr. Corporate Director & Chief Corporate Officer
105	Loo	Patrick	Heya Company Limited	General Manager, HR & Administrati
106	Lui	David	The Royal Bank of Scotland plc	Reward Technical Partner
107	Luk	Vincent	MTR Corporation Limited	General Manager - Human Resources
108	Man	Jessica	National University of Singapre	Centre Manager (Centre for Strategic Leadership)
109	Mong	Pei Yee, Perlie		Student
110	Moye	Jerry	Tai Po International Baptist Church	Pastor
111	Mrs. Mong	Man Wai, William		Housewife
112	Ng	Daniel	Shell Hong Kong Limited	Director
113	Ng	Cecilia	Manulife (International) Limited	Senior Director, Learning & Organizational Development, HR
114	Ng	K F	SAE Magnetics (HK) Ltd.	Senior Manager Group Human Resources
115	Ng	Carol	FedEx	Manager, Human Resource Services
116	Ng	Angela	The Association of Accredited Advertising Agencies of Hong Kong	Executive Director
117	Ng	Johnson	Hong Kong Ajisen Company Limited	Human Resources & Administrative Manager
118	Ng	Victor	China Construction Bank (Asia)	Senior Vice President
119	Poon	Pat	Lee Kum Kee International Holdings Ltd.	Senior Human Resources Manager
120	Poon	Jason	Hong Kong Ajisen Co.,Ltd	Executive Director
121	Poon	Daisy	Ajisen Group	CEO
122	Pun	Tracy	Account Manager	FedEx Express
123	Shih	Wing Ching	Centaline Property Agency Limited	Chairman
124	Shim	Daniel	MTR Corporation Limited	General Manager Human Resources Development
125	Sin	Barry	Avery Dennison	Customer Program Management
126	Siu	Wallance	Broadwood Limited	Director
127	Stone	Raymond		Author

	Surename	Given Name	Company	Title
128	Suen	Simon	SML Group Limited	Chairman
129	Suen	Chloe	Prudential Corporation Asia	Regional Manager - Talent and
130	Sun	Judy	HSBC	Head of Brand Development and Mangement (Marketing Asia-Pacific)
131	Sun	Dennis	Fuji Photo Products Co.,Ltd.	Chairman
132	Szeto	Ricky	Hung Fong Tong Holdings	Executive Director
133	Szeto	Mary	Hong Kong English Speaking Union	Chairlady
134	Tam	Yummy	Kowloon Central Cluster, Hospital Authority	Human Resource Manager (Training & Development)
135	Tang	Alsia	Shun Tak Group	Senior Manager, Group HR,
136	Tang	Kwok Tai	Lion Club	Lion Club Member (Yau Yat Chuen District)
137	Tang	Ila	Tung Wah College	Senior Human Resource Officer
138	Tin	Alan	Bank of Communications	Head of Retail Strategic Planning
139	To	Ada	Li & Fung (Trading) Ltd	Vice President - Human Resources
140	To	Kam	Manulife (International) Ltd	Head of Human Resources
141	Tong	Elaine	Westminster Travel Limited	Head of Human Resource
142	Tsang	Chester	MTR Corporation Limited	Management Training & Development Manager
143	Tsang	Fiona	Shell Hong Kong Limited	General Manager - Human Resources
144	Tsang	Jenny	Tao Heung Holding Limited	Senior Manager (Human Resources)
145	Tse	Alan	Regal Hongkong Hotel	Director of Human Resources
146	Tse	Kevin	Television Broadcasts Limited	Controller (Human & Support
147	Tse	Terence	Hospital Authority	Human Resources Manager
148	Tse	Jessica	A.S. Watson Group	Human Resources Manager
149	Tsoi	Stella	AEON Store (Hong Kong) Co.,Ltd	Manager (Personnel Department)
150	Vong	Carmen	Swire Coca-Cola HK	Senior Manager - Human Resources
151	Wai	Rose	Steve Lo People Resources Limited	Director - People Resources Consulting
152	Wan	Cavins	Shui On Building Contractors Limited	Senior Manager - Human Resources

	Surename	Given Name	Company	Title
153	Wong	Alan	DCH Hong Kong Ltd	General Manager Group Human Resources & Administration
154	Wong	Alex	Tao Heung Holding Limited	Senior Manager, T&D
155	Wong	Amy	Li & Fung (Trading) Ltd	General Manager, Human Resources
156	Wong	Francis	Hospital Authority	Cluster General Manager, Human Resources
157	Wong	Viola	Gold Peak Industries (Holdings) Ltd	Assistant Director HR & Administration
158	Wong	Wilfred	DFS HK Ltd	Director, Division Talent Management
159	Wong	Ming	HSBC	Wealth Management Manager
160	Wong	Michelle	Whirlpool (Hong Kong) Ltd.	Marketing Executive
161	Wong	Michael	Domon (International) Limited	Director
162	Wong	Helen	HSBC	Vice President (Commercial Banking)
163	Wong	Catherine	St. Mary's Canossian College	Principal
164	Wong	Lai Ying, Liz	HSBC	Manager, Customer Relations
165	Wong	James	International School of Flower Arrangemnt Ltd	Managing Director
166	Wu	Philip	Sun Hung Kai Properties Ltd	Manager (Staff Caring)
167	Wu	Chee Wo	Specialist in Cardiology	Doctor
168	Yan	Siu Yuk	Sun Life Hong Kong Limited	Unit Manager
169	Yao	Helen	UBS	Director
170	Yeung	Lika	Career Times Online Limited	Marketing Manager
171	Yeung	Stephen	Bank of Communications	Head of Retial Business Management Department
172	Yeung	Peter	Retired	BBS, JP
173	Yim	Lilian	Tricor Consulting Limited	Consulant
174	Yiu	Tim	Lion Club, Yau Yat Chuen District / ISA	Chairman / Managing Director
175	Yu	Woon Wai Gilbert	Lion Club, Yau Yat Chuen District / GDA Designs Co. Ltd	Lion Club Member (Yau Yat Chuen District) / Director

Extract from Minutes of 480th MPC held on 21.12.2012

Agenda Item 15

[Open Meeting]

Proposed Amendments to the Approved Kowloon Tong Outline Zoning Plan No. S/K18/16 (MPC Paper No. 14/12)

79. The Secretary reported that the site under the proposed amendment item A (i.e. ex-Lee Wai Lee (LWL) Campus) was located next to the Hong Kong Baptist University (HKBU). According to District Officer (Kowloon City), HKBU and its students had

requested the concerned site for the extension of HKBU campus. Mr. Laurence Li declared an interest in this item as he was an ex-member of the court of HKBU and was once involved in the discussion in the court regarding the use of the concerned site. Mr. Stephen Yau, who was the Chairman of a committee of HKBU, had declared an interest in this item. Mr. Dominic Lam, who had current business dealings with the HKBU, had declared an interest in this item. As the interests of Mr. Li, Mr. Yau and Mr. Lam were direct, the Committee agreed that they should leave the meeting temporarily. Ms. Julia Lau also declared an interest in this item as her family members lived in Kowloon Tong. As her family members' home was not in proximity to the sites under the proposed amendment items, the Committee agreed that Ms. Lau could stay in the meeting.

[Mr. Laurence Li left the meeting at this point. Mr. Stephen Yau and Mr. Dominic Lam left the meeting temporarily at this point.]

[Mr. Maurice Lee arrived to join the meeting at this point.]

80. With the aid of a powerpoint, Ms. S. H. Lam, STP/K briefed Members on the proposed amendments to the approved Kowloon Tong Outline Zoning Plan (OZP) as detailed in the Paper and covered the following main points :

Proposed Amendments to the OZP

(a) the proposed amendments related to the rezoning of part of the ex-LWL Campus site at Renfrew Road from "Government, Institution or Community (9)" ("G/IC(9)") to "Residential (Group B)" ("R(B)") (Amendment Item A) and rezoning of a site at Dumbarton Road/Grampian Road from "G/IC(3)" to "Residential (Group C)9" ("R(C)9") (western portion) (Amendment Item B) and from "G/IC(3)" to "G/IC(12)" (eastern portion) (Amendment Item C);

Amendment Item A: Rezoning of the Site at Renfrew Road from "G/IC(9)" to "R(B)"

Background

(b) in order to tackle the pressing housing problems in Hong Kong, the Chief

Executive announced on 30.8.2012 a package of short and medium terms measures to expedite the supply of subsidised and private housing units. One of the measures was to rezone 36 "G/IC" sites for residential uses after review by the Planning Department (PlanD). Among these sites, one was the part of the ex-LWL Campus site at Renfrew Road in Kowloon Tong;

(c) the site zoned "G/IC(9)" was part of the ex-LWL Campus of the Hong Kong Institute of Vocational Education (IVE) which was relocated to Tseung Kwan O in 2010. The Education Bureau (EDB) had confirmed that the northern part of the campus site (about 0.64ha) would be retained for higher educational use whereas the southern part of the site (about 0.88ha), i.e. the subject site, could be returned to Government. After examination, it was considered that the site was suitable for residential development and zoned as "R(B)" to help meet the acute housing demand;

Provision of GIC Facilities

(d) there was no deficit of planned GIC provision in the area except for a post office and an integrated children and youth service centre. Post office would usually be incorporated in a non-domestic building or the non-domestic portion of a commercial/residential development. As the subject site was intended for pure residential development, it was not appropriate to provide a post office in the future development. Besides, the Director of Social Welfare (DSW) did not require the site for children and youth service centre. Considering that the site was planned for a pure residential development without a non-domestic podium, the scope for incorporating social welfare facilities would be limited;

The Site and its Surroundings

(e) the buildings of the ex-LWL IVE were currently being used for post-secondary education on a temporary basis until end of 2013 to meet the contingency need during the initial stage of implementation of the new academic structure. The site abutted the buildings of the HKBU, including the 11-storey (50m) HKBU Communication and Visual Arts Building to its immediate south, the 19-storey (62m) HKBU Student Residence Halls to

its immediate west, and the HKBU Baptist University Road campus and Renfrew Road campus to the northeast and further north of the site with most buildings ranging from 10 to 13 storeys (41m to 69m);

The Rezoning Proposal

Planning Intention/Land Use Compatibility

(f) the planning intention of the proposed "R(B)" zoning was for medium-rise, medium-density residential developments where commercial uses serving the residential neighbourhood might be permitted on application to the Town Planning Board. The proposed residential use on the subject site was compatible with the surrounding uses;

Proposed Development Parameters

(g) the site was located at the street block occupied by the medium-rise and medium-density buildings of the HKBU. The buildings behind the site and to its south were 62m (19 storeys) and 50m (11 storeys) respectively, whereas the buildings across Renfrew Road were mainly low-rise of 12m to 22m (4 to 6 storeys). The buildings in the military camp close to the site were about 27m in height. To create a stepped height profile, it was proposed that a building height (BH) of 50m (about 15 storeys) should be imposed for the subject site. The proposed stepped height profile would echo the planned stepped height profile in Broadcast Drive area. The BH restriction stipulated in metre instead of number of storey was to ensure that the future development would not be taller than 50m;

(h) the surrounding HKBU buildings were having plot ratio (PR) ranging from 3.1 to 5.8. With a proposed BH restriction of 50m, a maximum PR of 4.5 for this "R(B)" site would be appropriate which was suitable for the local setting and broadly compatible with the PRs of the buildings in this street block. The proposed residential development would have a maximum gross floor area (GFA) of 39,600m^2. Assuming an average flat size of 80m^2, about 495 flats might be provided;

Visual Impact

(i) photomontages (Plans 5 to 8 of the Paper) were prepared to illustrate the visual impact of the proposed development. Four view points (Plan 1 of the Paper) surrounding the site were selected. When viewed from the first and second view points i.e. Junction Road Park and Kam Shing Road Recreation Ground, the proposed development was entirely or largely screened off by the neighbouring developments. When viewed from the third view point i.e. a footbridge on Waterloo Road near Suffolk Road, the proposed development was visible but the visual impact was not significant, as the proposed BH was comparable with nearby developments. When viewed from the fourth view point i.e. the Kowloon Tsai Park, the proposed development would fill up part of the existing visual gap between the HKBU buildings. However, it would not be visually intrusive with its BH being well below the ridgeline of Beacon Hill behind and the adjacent buildings;

Air Ventilation

(j) air ventilation impact arising from the proposed development, which was not bulky with a maximum BH of 50m, was not expected to be significant;

Traffic Aspect

(k) the Commissioner for Transport anticipated that the proposed residential use would not generate any significant adverse traffic impact;

Environmental Aspect

(l) the Director of Environmental Protection advised that with implementation of appropriate mitigation measures, such as building layout and orientation, building setback and boundary walls etc., the traffic noise and air impact on the proposed development could be duly addressed. Furthermore, a sewerage impact assessment (SIA) would be required to assess any potential impacts on the local/nearby system. It was considered feasible to impose the requirements for submission of Traffic Noise Impact Assessment and SIA in the future lease conditions;

Infrastructural, GIC and Open Space Aspects

(m) the proposed rezoning would not have significant adverse impact on other infrastructure in the area. GIC and open space provision in the area was also sufficient to meet the demand generated by the subject rezoning;

Rezoning a Site at Dumbarton Road/Grampian Road from "G/IC(3)" to "R(C)9" (western portion) (Amendment Item B) and "G/IC(12)" (eastern portion) (Amendment Item C)

Background

(n) on 7.9.2012, the Committee partially agreed a s.12A application No. Y/K18/6 relating to a site at 45 and 47 Grampian Road to facilitate redevelopment of the site into a seminary at the eastern portion (with preservation of the Grade 2 historic building, namely Sun Hok Building within the Bethel Bible Seminary) and a residential building at the western portion;

(o) for the western portion of the site (about 2,070m^2), the Committee agreed to rezone it from "G/IC(3)" to "R(C)9" with a maximum PR of 3 and a maximum BH of 8 storeys (excluding basements) for residential development which were the same as the existing "R(C)9" zone in the same street block. The proposed residential development would have a maximum GFA of 6,210m^2 and 44 flats;

(p) for the eastern portion of the site (about 2,070m^2), it was proposed to zone the seminary site as "G/IC(12)" so as to clearly state the planning intention, the requirement for planning application and the specific development parameters as agreed by the Committee. To reflect the applicant's proposal of preserving the Grade 2 historic building, it was proposed to state in the Planning Intention and Remarks of the "G/IC(12)" Notes that the Grade 2 building should be preserved in-situ and addition/alteration/modification works (except minor alteration and/or modification works which were ancillary and directly related to the always permitted uses) to the graded historic building required planning

permission from the Board. Besides, to address the Committee's concern on design compatibility between the historic building and the new building(s), suitable clauses were proposed in the Remarks of the Notes and the Explanatory Statement to stipulate that planning permission was required for new development on other part of the site or redevelopment of the existing buildings. For the historic building, it was restricted to its existing GFA and BH. For development within the remaining part of the "G/IC(12)" zone, it was restricted to a maximum GFA of 7,203m^2 and height of 8 storeys (excluding basement floor(s)) and 47.55mPD;

Proposed Amendment to Matters shown on the Plan

(q) Amendment Item A (about 8,810m^2): Rezoning the site at Renfrew Road from "G/IC(9)" to "R(B)";

(r) Amendment Item B (about 2,070m^2): Rezoning a site at the junction of Inverness Road and Dumbarton Road from "G/IC(3)" to "R(C)9";

(s) Amendment Item C (about 2,070m^2): Rezoning a site at the junction of Grampian Road and Dumbarton Road from "G/IC(3)" to "G/IC(12)";

Proposed Amendment to the Notes of the OZP

(t) incorporation of a new set of Notes for "R(B)" zone with user schedule, planning intention and Remarks. The Remarks stipulated the development restrictions of a maximum PR of 4.5 and BH of 50m, and a minor relaxation clause;

(u) incorporation in the Notes for the "G/IC" zone a new set of Notes for the "G/IC(12)" sub-area with user schedule, planning intention and Remarks. The Remarks stipulated the requirements of in-situ preservation of the historic building, development restrictions, the requirement for planning permission from the Board, as specified in paragraph 67(p) above, and a minor relaxation clause;

Proposed Amendment to the Explanatory Statement (ES) of the OZP

(v) the ES of the OZP was revised taking into account the proposed amendments as mentioned in the above paragraphs. Opportunity had also been taken to update the general information for the various land use zones to reflect the latest status and planning circumstances of the OZP;

Consultation

(w) the District Officer (Kowloon City) considered it likely that the relevant stakeholders would prefer to retain the "G/IC" zoning of the site at Renfrew Road for use by the HKBU to cope with the increase in the number of students as a result of the New Senior Secondary academic structure. In fact, since 2005, the HKBU and its students had requested that the site of the ex-LWL campus be reserved for the extension of HKBU campus. EDB had considered the overall development of HKBU and confirmed that the southern part of the ex-LWL site could be released for other use. EDB emphasized that the alternative use identified for the southern portion should not be incongruent with the ambience of HKBU. The District Lands Officer/Kowloon East supported the proposed rezoning from land revenue point of view. No objection from relevant departments was received;

(x) a LegCo case conference hosted by the Hon LEE Cheuk-yan, the Hon WONG Yuk-man and the Hon CHAN Ka-lok, Kenneth and attended by representatives of EDB and University Grants Committee (UGC) was conducted on 11.12.2012 to discuss a complaint on hostel shortfall in the HKBU. During the discussion, EDB and UGC explained that, taking into account the outstanding requirements for publicly-funded academic space and student hostel places of HKBU under prevailing policies, they had decided to reserve the northern portion of the ex-LWL campus for higher education and ancillary use. As regards the southern portion, as it was beyond the requirements of the university under prevailing policies, EDB took the view it could be returned to the Government for other use. At the case conference, the three LegCo members unanimously raised objection to rezone the southern portion for residential use. They urged the

Government to proactively and fully consult stakeholders on the rezoning proposal; and

(y) the Kowloon City District Council would be consulted on the amendments before or during the statutory exhibition period of the draft Kowloon Tong OZP for public inspection under section 5 of the Ordinance, which was a statutory consultation procedure to solicit public views. Other stakeholder(s) may be consulted as appropriate.

81. In response to a Member's question on the public consultation of the proposed amendments to the OZP, Miss Fiona Lung said that the Kowloon City District Council (KCDC) had not been consulted yet. If the proposed amendments were agreed by the Committee at the meeting, the KCDC would be consulted either before or during the statutory exhibition period of the OZP for public inspection. To her understanding, the opposition to the proposed residential use at the southern part of the ex-LWL site was mainly from the HKBU students who had lodged a complaint to the Legislative Council (LegCo) on hostel shortfall of the HKBU. During the LegCo case conference, three LegCo members raised objection to rezone the southern portion for residential use.

82. The Secretary further explained the general procedure of public consultation on proposed amendments to the OZP. After the proposed amendments to the OZP were agreed by the Committee, the OZP would be exhibited for two months for public inspection. Any person could make representations to the Board. The KCDC would be consulted during the exhibition period and could submit representation to the Board. The representations would be heard by the Board, and if the Board considered it necessary to propose amendments to the OZP to meet the representations, the further amendments would have to be exhibited for public inspection. The exhibition of proposed amendments to an OZP was a statutory channel for public consultation.

83. A Member said that the HKBU campus was currently crowded and there were not enough spaces for the students. The various art and cultural courses of HKBU required teaching venues with high floor-to-floor height. There was no such venue in the current HKBU campus. There was a need for expansion of the HKBU campus. The expansion of the HKBU campus was however constrained by the existing developments and natural hills

around the campus. The ex-LWL site next to the HKBU campus was a perfect location for its expansion. If the southern part of the ex-LWL site was rezoned for residential use, strong opposition from the HKBU was anticipated. It was difficult to balance between the immediate need for more housing land for the public and the longer-term demand for the expansion of HKBU.

84. A Member asked whether there would be compatibility problem between the future residential development at the amendment site with the adjacent HKBU campus and student hostels within the same street block. There were complaints that student hostel generated noise nuisance to the nearby residential developments. The Member further said that in view of the increase in number of students due to the new academic structure of 4-year university education, there should be a need for expansion of the HKBU campus. It was also noted that HKBU and the other two universities had to share a sportsground near HKBU, showing that the universities were suffering from a lack of sports facilities. The Member said that it was more appropriate to retain the site in the same street block of the HKBU campus for higher educational use by the HKBU or other universities in Hong Kong in future.

85. In response to a Members' concern on the need of using the site for the expansion of HKBU campus, Miss Fiona Lung said that EDB had established policy in assessing the need of and identifying suitable sites for meeting the expansion needs of universities including the change in academic structure of university education, the policy of student hostel residence allocation and campus requirement of different universities. EDB had confirmed that the northern part of the site (0.66ha) would be retained for higher educational uses whereas the southern part of the site (0.88ha) was not required for higher educational use and could be released for residential development. Based on the above advice from EDB, Planning Department then studied the possible uses of the southern part of the ex-LWL site in consultation with relevant bureaux/departments. The site was not required for any government, institution or community uses and found to be suitable for residential development which could help address the current housing shortage problem.

86. In response to a Member's concern on compatibility between the proposed residential development and the student hostel, Miss Fiona Lung said that there were examples of residential developments next to student hostels such as the student hostel of the

University of Hong Kong (HKU). As the southern part of the ex-LWL site would be a land sale site, the future developer should be aware of the adjacent university campus and student hostels, and would propose measures to mitigate the possible interface problem at the detailed design stage, if it was necessary to do so. EDB had also emphasized that the residential use at the southern portion of the site should not be incongruent with the ambience of the HKBU nearby. In response to the Member's question, Miss Fiona Lung said that there was no information on the management issue of the joint-university sportsground nearby.

87. A Member said that more information would be required for the Committee to make a decision in the instant case. The situation of the HKU student hostel quoted was different from the current situation as it was not at the same street block with the residential development. The proposed residential development at the southern part of ex-LWL site would likely have compatibility problem with the HKBU campus and student hostel at the same street block sharing the same access road. Although EDB advised that the southern part of the ex-LWL site was not required for higher educational use based on their assessment, there was not enough information on EDB's justifications behind this decision. Noting that some universities needed to develop joint-university hostels away from their campus such as Tseung Kwan O, the Member said that there should be a need for HKBU to use the entire ex-LWL site for student hostels. Strong response from the public on using the site for residential development was anticipated since the site would be an ideal site for the expansion of the HKBU.

88. A Member said that since nearly the entire street block had been currently occupied by educational uses including HKBU and the ex-LWL campus, it was a reasonable expectation for the HKBU to retain the entire ex-LWL site for expansion of the university. The Member was of the view that the land use of this site was a sensitive and political issue and there should be thorough discussions in the community on the future use of the site before proposing an amendment to the OZP. As there was insufficient information to address the Members' concerns at the meeting, the consideration of the proposed amendments to the ex-LWL campus site should be deferred and EDB should be invited to provide justifications for releasing the site for other uses.

89. The Chairman said that Members in general had reservation on the Amendment Item A of rezoning the southern part of ex-LWL site for residential use and Members would

like to have more information from EDB on the justification for releasing the site for other uses. The Chairman suggested deferring the consideration of the proposed amendment item A and requesting EDB to provide more information on its policy in assessing the expansion needs of HKBU and the decision to release the sites for other uses before the Committee could decide on the proposed amendment item A. The Committee agreed.

90. The Chairman asked whether Members agreed to the rezoning of the "G/IC" site at Dumbarton Road under Amendment Items B and C. A Member showed support to the rezoning since the concerned site was located within a residential neighbourhood and the proposed residential development would help address the housing need. The Committee in general agreed to the Amendment Items B and C.

91. After further deliberation, the Committee decided to:

(a) defer the consideration of the proposed Amendment Item A to the approved Kowloon Tong OZP No. S/K18/16. Planning Department was requested to invite representative(s) from EDB to attend the meeting of the Committee with a view to providing more information on the proposed Amendment Item A;

(b) agree to the proposed Amendment Items B and C to the approved Kowloon Tong OZP No. S/K18/16 and that the draft Kowloon Tong OZP No. S/K18/16A at Attachment I of the Paper (to be renumbered to S/K18/17 upon exhibition) and its Notes at Attachment II of the Paper in connection with Amendment Items B and C were suitable for exhibition under section 5 of the Ordinance; and

(c) adopt the revised Explanatory Statement (ES) at Attachment III of the Paper for the draft Kowloon Tong OZP No. S/K18/16A in connection with Amendment Items B and C as an expression of the planning intentions and objectives of the Board for the various land use zones on the Plan and the revised ES would be published together with the Plan.

[The Chairman thanked Miss Fiona S.Y. Lung, DPO/K and Ms. S.H. Lam, STP/K, for their attendance to answer Members' enquiries. They left the meeting at this point.]

[Mr. Stephen Yau and Mr. Dominic Lam returned to the meeting at this point.]

Extract from Minutes of 482nd MPC held on 25.01.2013

1. The Chairman said that a group of students from Hong Kong Baptist University petitioning at the North Point Government Offices had requested Members to meet with them in the lobby outside the meeting room with regard to Agenda Item 9 on the further consideration of the proposed amendments to the approved Kowloon Tong Outline Zoning Plan No. S/K18/16. The Secretary said that the students had also submitted a statement to the Committee which was tabled at the meeting for Members' information.

2. The Secretary continued to say that there had not been any precedent in which Members of the Committee met and discussed issues related to an agenda item with the petitioners. The Chairman said that it might not be appropriate to set a precedent as it was not uncommon for petitioners to submit their views to the Committee. Furthermore, the students had already submitted a written statement and the government representatives would explain the submission in details during the consideration of the item. Members generally agreed with the Chairman. The Chairman then requested the Secretariat to explain the Committee's decision to the students and inform them that the Committee would consider their written submission when the Committee considered Item 9.

Agenda Item 9

[Open Meeting]

Further Consideration of the Proposed Amendments to the Approved Kowloon Tong Outline Zoning Plan No. S/K18/16

(MPC Paper No. 2/13)

36. The concerned amendment item involved the former campus of the Hong Kong Institute of Vocational Education (Lee Wai Lee), Kowloon Tong. Representatives of Hong Kong Baptist University (HKBU) had submitted comments on the proposed amendments. The following Members had declared interests in this item:

Mr. Laurence Li	-	an ex-member of the court of HKBU and was once involved in the discussion in the court regarding the use of the concerned site;
Mr. Stephen Yau	-	the Chairman of a committee of HKBU;
Mr. Dominic Lam	-	had previous business dealings with the HKBU in 2006; and
Ms. Julia Lau	-	her family members lived in Kowloon Tong.

37. Members noted that Mr. Laurence Li had tendered apologies for being unable to attend the meeting. As Mr. Dominic Lam's business dealings with HKBU had ended more than three years ago, Members agreed that he should be allowed to stay in the meeting. As the family members of Ms. Julia Lau did not live in proximity to the concerned site under the proposed amendment item, Members agreed that Ms. Lau could stay in the meeting.

[Mr. Stephen Yau left the meeting temporarily at this point.]

38. The Secretary reported that a number of submissions had been tabled at the meeting. They included a letter dated 24.1.2013 from Professor Albert Chan, the President and Vice-Chancellor of the HKBU, a letter dated 24.1.2013 from the office of Hon. Wong Yuk Man, supplementary information provided by EDB, and a statement dated 25.1.2013 from the HKBU Student Union. The HKBU Student Union had also submitted an invitation to Members to sign an undertaking to affirm their support of the development of the education sector in Hong Kong and their protection of the rights of students in making a decision in the planning process involving land designated for educational purposes. The Secretary suggested that Members should take a few minutes to go over the submissions before proceeding to the consideration of the case. The representatives from PlanD would then be invited to elaborate on the submissions.

[Members were given a few minutes to go over the tabled submissions.]

39. With the aid of powerpoint presentation, Ms. S.H. Lam, STP/K, presented the further consideration of the proposed amendments to the approved Kowloon Tong Outline Zoning Plan No. S/K18/16 (the OZP) as detailed in the Paper and covered the following main points:

Introduction

(a) on 21.12.2012, the Committee considered the proposed amendments to the OZP and agreed to the proposed Amendment Items B and C on the rezoning of a site at Dumbarton Road/Grampian Road from "Government, Institution or Community (3)" ("G/IC(3)") to "G/IC(12)" (eastern portion) and "Residential (Group C)9" ("R(C)9") (western portion);

(b) the Committee decided to defer consideration of the remaining item, i.e. Amendment Item A, which concerned the rezoning of the southern part of the ex-Lee Wai Lee (LWL) campus site (the subject site) at Renfrew Road from "G/IC(9)" to "Residential (Group B)" ("R(B)") and requested PlanD to invite representatives from the EDB to attend the meeting of the Committee with a view to providing more information on the proposed Amendment Item A;

(c) the subject site was located to the immediate southwest of HKBU Baptist University Road Campus. EDB had confirmed that while the northern part of the ex-LWL site (0.64 ha) should be retained for higher education and ancillary uses, the subject site (0.88 ha) would be returned to the Government. It was included as one of the 36 "G/IC" sites proposed by the Government to be rezoned to residential use. The ex-LWL site was currently being used for post-secondary education on a temporary basis until the end of 2013;

Submissions received after the Committee meeting held on 21.12.2012

(d) after the Committee meeting held on 21.12.2012, three letters from the Acting President and Vice-Chancellor of HKBU, Staff Representative, Court of HKBU and the HKBU Century Club Ltd. to the Chairman of the Town Planning Board were received. The HKBU requested that the whole ex-LWL site should be retained for long-term development of HKBU and proposed that the ex-LWL site be used for a student hostel and a Chinese medicine teaching hospital (CMTH). Similar requests were also made to the Chief Executive, Secretary for Development, Secretary for Education and Secretary for Food and Health;

Further information from EDB

(e) EDB advised that the Administration and the UGC had all along been supporting UGC-funded institutions including HKBU in the development of publicly-funded academic facilities and student hostels in accordance with well-established policies and calculation criteria. For HKBU, apart from the Communication and Visual Arts Building completed earlier, HKBU had also been given approval to use public funding of $945.1 million and campus land for a campus development project to meet the needs arising from the implementation of new academic structure. The two new buildings had provided HKBU with nearly 20,000m^2 of academic space. The Administration had also implemented various measures, including the provision of additional facilities to the university, to meet its requirements for academic space;

(f) having considered the outstanding requirements for publicly-funded academic space and student hostels of HKBU under the prevailing policies, EDB had decided to reserve the northern portion of the ex-LWL site for higher education and ancillary use. HKBU had submitted a new hostel proposal to UGC, suggesting that new hostel blocks be constructed on the northern part of the ex-LWL site. UGC would submit its recommendations to the Administration in due course;

(g) EDB was of the view that if HKBU could make the best use of the northern part of the ex-LWL site, it would be able to meet all its outstanding requirements for academic facilities and publicly-funded student hostels under the prevailing policies, including those arising from the implementation of the new 4-year undergraduate curriculum;

(h) as the subject site was beyond the requirements of HKBU under the prevailing policies, EDB considered that there was no need to retain it for higher education use and had accordingly surrendered it for redeployment to ensure optimal use of valuable land resources to meet the development needs of Hong Kong;

Comments of FHB on the proposed CMTH

(i) HKBU first put forward to the FHB in 2009 a proposal to develop a CMTH at the ex-LWL site as a preferred site. HKBU subsequently suggested to FHB in 2011 that a part of the building of the Tsim Sha Tsui Kai Fong Welfare Association in Tsim Sha Tsui could be redeveloped into a Chinese medicine hospital. HKBU sent in detailed proposals to FHB for developing the site in Tsim Sha Tsui in November 2011 and September 2012 respectively. FHB, together with departments concerned, was working closely together with HKBU to take the project forward;

(j) FHB advised that it supported the development of Chinese medicine hospitals in Hong Kong to provide treatment for patients and training opportunities for Chinese medicine students. However, it was not a must

to have the teaching hospitals within or close to the university campus; and

Decision Sought

(k) Members were invited to consider the further information submitted by EDB and FHB as well as the proposed Amendment Item A.

40. Miss Fiona Lung, DPO/K, introduced three of the submissions which were tabled at the meeting. The submissions were made by Professor Albert Chan, the President and Vice-Chancellor of the HKBU, office of Hon. Wong Yuk Man, and a statement from the HKBU Student Union. She covered the following main points:

Submission from the office of Hon. Wong Yuk Man

(a) many of the residents in Kowloon Tong lived in low-density residential developments. A majority of the Planning Scheme Area under the OZP was zoned as "R(B)" or "Residential (Group C)" ("R(C)"). While the Government claimed that the subject site was not required for GIC uses and should be rezoned for residential development to meet housing needs, Hon. Wong's office questioned the rationale provided by the Government, and considered that the needs of the students for hostel places were more acute than the needs of the public for "R(C)" sites in the Kowloon Tong area. In addition, the subject site was located close to the campus of HKBU, the student activities might affect the daily lives of the residents in the future. The subject site was therefore not suitable to be rezoned to "R(C)". In view of the controversies arising from PlanD's proposal, his office requested the Town Planning Board (the Board) not to agree to the proposed amendment;

Submission from Prof. Albert Chan, President and Vice-Chancellor of HKBU

(b) Prof. Albert Chan lodged an objection to the proposed amendment and requested the Committee not to agree with the proposed amendment. He considered that the ex-LWL site represented the most logical and sustainable location for HKBU's future growth. There were six main points of objection:

(i) <u>The need for "G/IC" reserves for future short, medium and long term needs</u>

i. according to Town Planning Board Guidelines No. 16 (TPB PG-No. 16), the "G/IC" sites were important to "cater for unforeseen future demands for which no specific GIC uses had been designated for the time being." TPB PG-No. 16 also stated that where redevelopment for non-G/IC uses were proposed, it had to be established that the "provision of GIC facilities would not be jeopardized." Therefore, there was a need to maintain "G/IC" reserves to meet the future short, medium and long term needs of society;

ii. from HKBU's perspective, the ex-LWL site was essential to meet the current and future education needs of the university. Although the Government stated that the subject site was beyond the requirements of HKBU under the prevailing policies, the subject site was still considered by HKBU as an integral part of the university's future;

iii. the Government had alleged that HKBU was pursuing a site for the CMTH in Tsim Sha Tsui. However, HKBU had advised the Government in October 2012 that the Tsim Sha Tsui site was no longer an option and HKBU had to develop the CMTH on the ex-LWL site. A master plan for the ex-LWL site incorporating the student hostels and the proposed CMTH was sent to the Government in October 2012;

iv. during 2012, HKBU had discussed with the Government on the options for the LWL site. These options included a Complex of Creativity and an International Exchange Centre and Convention Centre. If the subject site was rezoned to "R(B)", any future facilities would have to be located at an off-site location;

v. HKBU had reached a saturation point on its current campus and

any medium to longer term projects had to be located at an off-site location. HKBU urged the Government to reconsider its position on the use of the subject site;

(ii) HKBU's campus utilization and pressing need for additional land

i. the campus of HKBU was very small (5.4 ha) and each HKBU student occupied a land area of about 8.96 m^2, which was very low in comparison with other universities. Since 2005, HKBU had been requesting the allocation of the ex-LWL site for its expansion plans in order to provide additional facilities and improve the campus environment;

ii. HKBU had recently submitted a proposal to the UGC to build a new hostel complex providing 1,700 places on the northern part of the ex-LWL site. There was insufficient land in the northern part of the ex-LWL site to accommodate the other planned facilities in the medium/longer term, in particular the CMTH;

(iii) HKBU's plans for the ex-LWL site were consistent with the strategic government policies and priorities

i. HKBU's proposals for a CMTH and/or Creativity Complex and/or International Exchange Centre at the ex-LWL site were in line with Government policies. The 2013 Policy Address supported the work of the universities and the innovation and technology industries. It was also proposed that a Chinese Medicine Development Committee be set up to further the development of the Chinese medicine industry;

ii. the School of Communication and the emerging Academy of Visual Arts would also benefit greatly from the potential Complex of Creativity on the ex-LWL site. These facilities were in line with the Government's support for cultural and arts development;

iii. one of the objectives of the Hong Kong 2030 Planning Vision and

Strategy was to provide sufficient land reserves to meet the changing needs of different economic sectors;

(iv) Supporting the education sector as a key pillar of Hong Kong's future growth and competitiveness

i. HKBU had an internationally acclaimed School of Communication and was at the forefront of Chinese medicine research. The development of these facilities would enhance Hong Kong's economy and global standing in these fields;

ii. the CMTH in the medium term and/or Complex of Creativity and/or the International Exchange Centre in the medium to longer terms were the current identified needs of HKBU. There would be other areas that could be developed in the future. As these new opportunities could not be foreseen, flexibility was required;

(v) Lack of stakeholder consultation and transparency

HKBU was a major stakeholder in the proposed rezoning of the ex-LWL site. It had been involved in the on-going discussions with the Government on the development of the ex-LWL site since 2005. It had also been actively pursuing the ex-LWL site for the CMTH. However, HKBU had never been consulted by the Government on the proposed rezoning;

(vi) Efficient use of land/consolidation of uses/sustainability/common sense

consolidating the university's facilities on one integrated site represented the most efficient use of land. From a sustainability perspective, it was important to ensure that adjacent land uses were compatible and did not lead to future conflict. It was important to consider the consequences of the proposed rezoning as HKBU would be forced to develop facilities elsewhere, which would lead to more travelling for students and duplication of core services.

Submission from the HKBU Student Union

(c) the HKBU Student Union stated that there was a shortage of about 1,000 hostel places in HKBU. For many years, HKBU had been negotiating with the Government for the use of the ex-LWL site for hostels and long-term development. It was therefore unreasonable for the Government to deprive 1,000 students of their rights to live in hostels and to compromise the long-term development of the university for the sake of providing 500 residential units. The HKBU Student Union raised four main points:

i. there was an urgent need to provide additional hostel places in HKBU. The ex-LWL site was the most suitable location for providing a new hostel as it would allow students to use the existing academic facilities and services in HKBU;

ii. the HKBU campus was cramped. HKBU had previously sought to take up the site at No.1 Broadcast Road for the development of the university but the site was sold for the development of a luxury residential development. The agreement of the proposed amendment would represent another error of the Government;

iii. geographically, the ex-LWL site was an integral part of the HKBU campus. They requested that the entire ex-LWL site be granted to HKBU for its long-term development; and

iv. the HKBU Student Union requested to participate in the meeting of the Committee so that their voice could be directly heard by Members.

41. Mr. Wallace Lau, Principal Assistant Secretary for Education (Higher Education), introduced the EDB's submission tabled at the meeting. He covered the following main points:

(a) the tabled submission was to supplement the further information that had

been incorporated in the Paper;

(b) the Administration and the UGC had all along been supporting UGC-funded institutions, including the HKBU, in the development of publicly-funded academic facilities and student hostels. In terms of academic facilities, the new buildings recently completed within the HKBU campus, including the Communication and Visual Arts Building, provided more than 9,000m^2 of floor area of academic space. Funding had already been provided to HKBU to develop a new building providing nearly 20,000m^2 of academic space. With the completion of these facilities, a total of 29,000m^2 of new academic space, representing about 36% of the existing campus facilities, would be added to HKBU. It should also be noted that the HKBU had recently submitted a proposal to the Government on the long-term use of the former Royal Air Force station at Kwun Tong Road for academic purposes. If the proposal was approved, the site would provide over 2,000m^2 of additional academic space to HKBU. All these new developments testified that the Administration was very concerned about the future development of HKBU;

(c) with regard to the student hostels, HKBU would require an additional 1,331 publicly-funded student hostel places by the 2014/2015 academic year. In fact, HKBU had submitted a new proposal to UGC seeking to provide a total of 1,700 hostel places at the northern part of the ex-LWL site. Of the 1,700 hostel places, 1,400 of them would be publicly-funded hostel places. If the proposal was approved, the proposed hostel complex would be able to fully meet the outstanding hostel place requirements for the UGC-funded sector of HKBU. The remaining 300 hostel places, which would be privately funded, would be in excess of the requirements of hostel places based on UGC's calculation. When considering HKBU's proposal, the Administration would, together with HKBU, examine whether the northern part of the ex-LWL site could be better utilized to meet the future needs of HKBU both in terms of its hostel and academic space; and

(d) in deciding whether a particular site should be reserved for use by

UGC-funded institutions, a host of relevant factors should be taken into account, e.g. whether there were any additional requirements for space and whether the additional requirements could be met within the campus or at an off-campus location; the distance between the main campus and the proposed off-campus location; and the location and size of the sites reserved for higher education throughout Hong Kong. In fact, to address the shortfalls in hostel places and academic facilities in other UGC-funded institutions, EDB and UGC had been in discussion with some of them with a view to exploring the feasibility of constructing hostels and academic facilities in various places in Hong Kong. It should be noted that the subject site was not among the sites identified to meet the needs of the academic institutions. Taking a holistic account of the above factors, it was considered that there was no need to retain the subject site for the purpose of expansion by UGC-funded institutions including HKBU.

42. Ms. Estrella Cheung, Principal Assistant Secretary for Food & Health (Health), said that the FHB had all along been supporting the development of Chinese medicine hospitals in Hong Kong with the main objective to provide treatment for patients, and also training opportunities for Chinese medicine students if needed. Upon receipt of a proposal for Chinese medicine hospital with an appropriate site for the purpose identified, FHB would examine the proposal in great details and would discuss with the proponent on the way forward. With regard to the proposed Chinese medicine hospital at Tsim Sha Tsui, HKBU had submitted detailed proposals to FHB in November 2011 and September 2012 respectively, and they indicated that the proposed hospital was going to be self-financed. As for the ex-LWL site, HKBU had submitted a master plan in October 2012 and it was a one-page schematic plan showing the broad layout and disposition of the hospital building within the subject site. The master plan was submitted to FHB through an informal channel with no other detailed information. It was only in mid-January 2013 that FHB was informed that HKBU had considered the proposal to develop a CMTH in Tsim Sha Tsui no longer feasible.

43. The Chairman asked whether the UGC had any comment on the proposed Complex of Creativity and the International Exchange Centre and Convention Centre mentioned in the letter submitted by Principal Prof. Albert Chan of HKBU. Mr. Kelvin

Siu, Assistant Secretary-General (Capital) of the Secretariat of UGC, said that the UGC had not received any proposals from HKBU concerning the Complex of Creativity. He also said that the additional requirement of 1,331 student hostel places that were required for the UGC-funded sector of HKBU as mentioned in EDB's supplementary information was for the 2014/15 academic year.

Undertaking submitted by HKBU Student Union

44. The Chairman said that the HKBU Student Union had invited Members to sign an undertaking to affirm their support of the development of the education sector in Hong Kong and their protection of the rights of students in making a decision in the planning process involving land designated for educational purposes. As stated in the preamble of the Town Planning Ordinance (the Ordinance), the objective of the Ordinance was to "promote the health, safety, convenience and general welfare of the community by making provision for the systematic preparation and approval of plans for the lay-out of areas of Hong Kong as well as for the types of building suitable for erection therein and for the preparation and approval of plans for areas within which permission is required for development." In this regard, the Board had been discharging its duties in accordance with the provisions of the Ordinance for the general welfare of the community. The Chairman invited Members to consider the invitation to sign the undertaking with reference to the preamble of the Ordinance.

45. A Member said that as the students invited Members to sign the undertaking in their individual capacity, it might not be necessary for the Committee to discuss the matter at the meeting and should leave it to the discretion of the individual Members. The Member suggested that the Committee should focus on the consideration of the proposed amendment to the OZP. Another Member shared the same view. The Chairman said and Members agreed that they would make their own decisions whether to sign and return the undertaking to the HKBU students.

46. The Chairman continued to say that the Committee was not to consider whether a site should be granted to a particular organization nor the funding policy of the Government. The case in point was whether the site in question should be rezoned from "G/IC" to residential use.

General issues on educational policy

47. A Member asked how long it would take for the UGC to examine a proposal such as the Complex of Creativity submitted by HKBU and come to a stance on whether to support the proposal. Mr. Kelvin Siu said that the UGC had all along been supporting the universities in developing hostel places and academic facilities in accordance with the established policies and calculation criteria. If a proposal was submitted to the UGC, it would normally take a few months for the UGC to consider and reach a decision following the established procedures. However, it appeared that only sketchy information was available regarding the Complex of Creativity. According to his experience, it would usually take quite some time for the university to come up with a proposal with sufficient details for the consideration of the UGC.

48. A Member asked whether there was any principle in determining if a proposed facility of a university should be located within or off campus. Mr. Wallace Lau said that the selection of the location of a proposed facility would depend on the needs of a university. The HKBU, for example, had recently submitted a proposal to the Government to use the former Royal Air Force station in Kowloon Bay, which was quite far away from the HKBU campus, but this off-campus facility was considered by HKBU to be desirable for specific academic purposes. It was difficult to lay down a general principle on the selection of a location for a proposed facility, but the example of HKBU demonstrated that it was not essential for all academic facilities to be juxtaposed to the campus of a university.

49. The same Member continued to ask why the subject site, which was a "G/IC(9)" site previously occupied by an educational institute and was adjacent to the existing HKBU campus, was not identified to meet the needs of the post-secondary institutions. Mr. Wallace Lau said that in deciding whether a particular site should be reserved for use by a post-secondary institution, the EDB had to consider a host of relevant factors, including the needs of the institution. The mere fact that there was a piece of vacant land adjacent to a post-secondary institution had no bearing on whether it had to be granted to that or some other post-secondary institutions for expansion purposes.

Future demand for post-secondary education

50. The same Member said that it seemed that the new facilities in HKBU were only intended to meet the previous outstanding requirements for academic space and hostel

places. Noting that the UGC generally had a funding cycle of three years and taking into account the projected growth in student population and the demand for higher education, the Member asked whether there was any long-term development plan for HKBU and whether there would be enough land to meet the future needs of HKBU in the next funding cycle. Mr. Wallace Lau said that for the academic years from 2011/12 to 2022/23, the projected population in the age cohort that would normally enrol in a post-secondary institution would decrease from about 80,000 persons to 51,000 persons. Against this background, it was unlikely that the demand for hostel places and academic facilities would increase substantially in the future, and hence the requirements of these facilities as calculated by the existing formula should be able to meet the future demand. As regards the need for new academic programmes or faculties, the universities could submit proposals for the required funding support to the UGC under their triennial Academic Development Proposals for UGC's consideration.

51. The same Member asked whether the number of post-secondary students to be admitted would decrease if there was a decrease in the population of the age cohort that would normally enrol in a post-secondary institution. Mr. Wallace Lau said no decision had yet been made on the number of UGC-funded student places after the 2012/15 triennium.

52. The same Member asked whether the funding to be granted for each student would increase if the number of post-secondary students decreased during the concerned academic years. Mr. Wallace Lau said that the number of students to be admitted to a post-secondary institution would not only depend on the change in the population of the concerned age cohort but also other factors such as the results of Hong Kong Diploma of Secondary Education (HKDSE) examination. In view of the decrease in population, even if the percentage of students that would be admitted to a post-secondary institution might increase, the actual number of students would unlikely increase significantly.

The future development of HKBU

53. A Member said that the street block where the subject site was located and the surrounding areas were mainly occupied by GIC uses and therefore the subject site should better be reserved for higher educational uses by HKBU. To decide whether the subject site should be rezoned to residential uses, it was necessary to have more information on the

future development of HKBU. The Member asked whether HKBU was indeed smaller in size in comparison with other universities in the urban areas as claimed by the President of HKBU, and whether there was any forecast on the requirements for additional facilities for HKBU in the long term, including those facilities that were required to be located close to the existing campus.

54. In response, Mr. Wallace Lau said that the EDB and the UGC had been supporting the universities in the development of publicly-funded academic facilities and student hostels. As regards the publicly-funded student hostels, there were shortfalls in the provision of student hostels in all UGC-funded institutions except Lingnan University and the Hong Kong Institute of Education. For HKBU, there was a projected shortfall of 1,331 hostel places in the 2014/15 academic year. As there was a proposal to develop a hostel complex at the northern part of ex-LWL site which would provide a total of 1,700 hostel places including 1,400 publicly-funded places, the outstanding hostel place requirements of HKBU could be fully met.

55. In response to a question from a Member, Mr. Wallace Lau said that publicly-funded student hostels should only serve the students enrolled in the UGC-funded programmes. UGC-funded institutions were expected to give priority to the students enrolled in the UGC-funded programmes in the allocation of hostel places.

56. Mr. Wallace Lau continued to say that regarding academic space, out of the eight UGC-funded institutions, two of them did not have any shortfall. As for HKBU, there was a projected shortfall of 4,733m^2 in net operational floor area (NOFA) in academic space in the 2014/15 academic year. The shortfall could be partially met if the proposal to use the former Royal Air Force station for academic purposes was approved, which would provide over 2,000m^2 of additional academic space to HKBU. Meanwhile, the EDB would, together with HKBU, explore the possibility of accommodating the extra academic facilities required within the northern part of the ex-LWL site. As the proposed hostel complex with 1,700 hostel places included 300 privately-funded places which would be in excess of HKBU's requirements under existing policy, considerations should be given to addressing the shortfall in academic facilities required for the UGC-funded sector in the overall development of the hostel complex. Assuming the new hostel complex and the extra academic facilities could be co-located at the northern part of the ex-LWL site, HKBU

would be one of the two UGC-funded institutions in Hong Kong that could fully meet all the outstanding requirements in student hostels and academic space under existing policy.

57. A Member asked whether there was any information on the forecast of the requirements of HKBU in the next 10 to 20 years. Mr. Wallace Lau said that the requirements of academic facilities and student hostels were determined based on well-established policies and calculation criteria. As the UGC conducted academic planning and recurrent grants assessment with the UGC-funded institutions on a triennial basis, no long-term forecast for the next 10 to 20 years could be available. Nevertheless, if the institutions submitted proposals for new academic programmes with solid justifications to the UGC, the Administration and the UGC would offer their full support to the institutions in terms of funding and provision of land resources. In the case of HKBU, about 36% of the academic spaces had already been added to its campus over the past years. The Administration would continue to support the institutions based on their own needs in the future.

58. The same Member continued to ask whether it would be more appropriate for the expansion area of a post-educational institution to be located close to its existing campus. Mr. Wallace Lau said that the location of the expansion area would depend on the nature and operational needs of the academic activities to be conducted in the expansion area. The examples of the former Royal Air Force station which was being used by HKBU and the Prince of Wales Hospital which provided clinical teaching facilities for the Faculty of Medicine of the Chinese University of Hong Kong demonstrated that some academic facilities did not have to be located close to the campus.

59. At the request of a Member, Ms. Estrella Cheung showed the Committee the master plan submitted by the HKBU to the FHB concerning the proposed CMTH at the subject site through a visualizer.

The UGC-funded sector and self-financed sector

60. In response to a Member's question on the principle for Government's support for self-financed programmes provided by post-secondary institution, Mr. Wallace Lau said that the EDB and UGC had no objection to the establishment of self-financed programmes by individual institutions. However, the general principle was that such activities should

not detract from the core work of the UGC-funded institutions, namely to deliver the UGC-funded programmes. Therefore, if there was a piece of land that could be used for development of a new academic facility, the priority should be to use it to meet the space requirements of UGC-funded programmes. Under this general principle, each institution could run their own self-financed programmes according to its own strengths and interests.

61. In response to a question from a Member, Mr. Wallace Lau said that there was an existing practice in UGC-funded institutions where privately-funded hostel places were made available to students under the UGC-funded programmes. That said, in the case of HKBU, it might be more appropriate for HKBU to make better use of the northern part of the ex-LWL site by co-locating both publicly-funded hostel places and some new academic facilities to address the shortfall of academic space required for the operation of UGC-funded programmes, in order to safeguard the interests of students in UGC-funded programmes.

[Ms. Bonnie Chan arrived to join the meeting at this point.]

62. Noting that it was important for a post-secondary institution to determine whether a proposed academic facility could receive the support of the UGC as this would entail significant resource implications, the Vice-Chairman asked whether the Government or the UGC had any initial views on the proposals submitted by the HKBU for the CMTH, Complex of Creativity and the International Exchange Centre and Convention Centre.

63. In response, Mr. Wallace Lau said that the EDB provided support for the self-financing sector of an educational institution through other established channels such as Land Grant Scheme and interest-free loans which could provide new land resources and loans to the self-financing sector to establish new school premises. Furthermore, similar to students studying in UGC-funded programmes, needy students of self-financed programmes were also eligible for financial assistance from the Government. The only major difference between UGC-funded sector and the self-financing sector was that the UGC-funded sector was able to receive annual funding from the Government, while the self-financing sector would rely on other sources of income such as private donations and tuition fees.

64. The Chairman said that as the Committee's task was to ascertain whether the subject site should be retained for "G/IC(9)" use or should be rezoned to residential purposes, it might not be necessary for the Committee to focus on the detailed differences in government policy towards the UGC-funded programmes and the self-financing sector.

Number of student places of UGC-funded programmes in the next ten years

65. The Vice-Chairman said that although it appeared that the northern part of the ex-LWL site could meet the short term requirements of HKBU in terms of the provision of academic facilities and student hostels, there was no information on the long-term forecast of the requirements of new facilities other than the projected decrease in the population of the concerned age cohort. In relation to this, he asked whether there was any information on the typical growth rate of a post-secondary institution in a ten-year period. In response, Mr. Wallace Lau said that it was difficult to provide a reliable estimate on the typical growth rate of post-secondary institutions as the strengths and academic development strategies of each institution were different. However, the following information could be provided for Members' reference. There was no plan to change the number of the first-year-first-degree intake places in the UGC-funded sector, which was currently maintained at 15,000 places per year. In addition, the senior year intake places of UGC-funded programmes for students having sub-degrees or other relevant qualifications would on average amount to 4,000 places per year. In other words, the total approved number of undergraduate students in UGC-funded institutions would amount to 68,000. In view of the declining population of the relevant age cohort, it was anticipated that the number of places to be provided each academic year would remain relatively stable for the next ten years.

Issues in land use planning

66. Noting that Kowloon Tong was originally a residential neighborhood, with institutions and school developments gradually moving into the area over the years, a Member asked if there was a specific ratio between residential developments and institutional/school developments in Kowloon Tong and whether such ratio had been maintained. Miss Fiona Lung said that a large part of Kowloon Tong had been developed into the low-density Kowloon Tong Garden Estate, while some other areas had been developed into uses such as post-secondary institutions and a military camp. No specific ratio had been set for the different types of land uses within the Kowloon Tong area.

67. The Chairman summarized that based on the current information available, the northern part of the ex-LWL site could to a large extent meet the needs of HKBU. The outstanding requirements of about 2,000m^2 could not justify the granting of the subject site to HKBU. The new facilities proposed by HKBU, including the CMTH, the Complex of Creativity and an International Exchange Centre and Convention Centre, had not yet obtained the support of the relevant policy bureaux. Ms. Estrella Cheung clarified that the FHB supported the development of a CMTH, but considered that it might not be necessary for the proposed CMTH to be located at the subject site.

68. The Chairman asked whether there was any other GIC facilities that required the use of the subject site. In response, Ms. Fiona Lung said that in accordance with the Hong Kong Planning Standards and Guidelines, there was no deficit of planned GIC provision in the Kowloon Tong area except for a post office and an integrated children and youth service centre. As the two facilities could be incorporated into a non-domestic building or the non-domestic part of a commercial/residential building, it was considered not necessary to reserve the whole subject site for standalone development of these proposed facilities.

69. The Chairman went on to ask if the proposed "R(B)" zone would cause any land use incompatibility problems with the adjacent "G/IC(8)" and "G/IC(9)" zones. Miss Fiona Lung said that the subject site was proposed to be rezoned to "R(B)" after considering that there was no need to use the site for GIC uses and there was an urgent need for more sites to meet the acute housing shortage problem. Residential use at the subject site was compatible with the adjacent GIC uses. The proposed maximum plot ratio of 4.5 and the maximum building height of 50m (about 15 storeys) were also considered congruent with the nearby developments.

70. A Member said that the proposed "R(B)" zone was compatible with the nearby GIC developments. However, the Member considered that there was still not enough information on the long-term forecast of the needs of HKBU. HKBU had grown substantially in the past few decades and it was reasonable to expect that the HKBU would continue to grow in the future. This was especially true since the implementation of the four-year undergraduate curriculum, as students were expected to spend more time on campus. As the subject site was adjacent to the HKBU, it might be more appropriate to

reserve it for use by HKBU. If suitable sites away from the HKBU campus could be identified for the self-financing sector of HKBU, the Government might consider using those sites further away from the campus for residential developments instead.

71. The Vice-Chairman said that residential developments were not incompatible with post-secondary educational use. It was common in Hong Kong to have residential developments located close to universities such as the University of Hong Kong. In considering whether the subject site should be retained for GIC uses or be rezoned to "R(B)", it was not necessary to limit the considerations to HKBU. If the subject site could be retained for GIC uses, considerations should also be given to allowing other post-secondary institutions to use the site so that those sites being considered for higher educational uses at the present moment could be released for residential developments.

72. Mr. Wallace Lau said that the EDB had all along been liaising with the different post-secondary institutions on the granting of additional land for their use. However, the subject site was not among the sites identified to meet the needs of those institutions. As regards the suggestion of the Vice-Chairman on the shared use of the subject site by different institutions, it was considered that the feasibility of the suggestion would depend on what types of facilities the institutions intended to build at the site. For example, the development of self-contained academic units or research centres at the subject site might be more feasible than building a library for shared use.

73. Noting that an existing building straddled the northern part of the ex-LWL site and the subject site, the Chairman asked whether the existing building would be demolished and what the procedures would be for disposal of the two sites. Miss Fiona Lung said that if the Committee agreed to the proposed amendment, the draft OZP showing the proposed amendment would be exhibited for public inspection under the Ordinance. Concerned departments were still considering views on the outstanding technical issues including demolition of the building. Mr. Wallace Lau added that all publicly-funded projects of UGC-funded institutions had to undergo the same procedures as other public works projects and funding had to be sought from LegCo.

The way forward

74. After a long deliberation, the Chairman said that there were two options that

could be considered by the Committee. First, the Committee could defer making a decision on the rezoning proposal on the subject site but retain its "G/IC" zoning so that HKBU or other institutions could continue their liaison with the Government on the use of the site in the future. Second, the subject site could be rezoned to "R(B)" and published under section 5 of the Ordinance so that the public and the stakeholders could submit representations for the Board's consideration under the provisions of the Ordinance.

75. Two Members supported the first option on the following counts: (i) although residential development was generally compatible with the nearby GIC uses, HKBU had proposed facilities that could also be located at the subject site without any land use compatibility issues. As these proposed facilities had not been considered and approved by the UGC, it might not be appropriate to rezone the site at this stage without pending the decision of the UGC on HKBU's proposed development; (ii) given the fluctuation in the number of potential students, there could be changes in the education policy in the future. Without sufficient information on the prospect of the changes of the policy, it might not be appropriate to rezone the subject site at this stage.

76. The Chairman said that under the first option, the most concerned stakeholders would continue to feel aggrieved that they were not given a statutory channel to submit their views on the proposed amendment to the Committee. If the Committee decided to gazette the proposed amendment under section 5 of the Ordinance under the second option, then they and the general members of the public would have an opportunity to submit representations to the Committee as provided under the Ordinance.

77. A Member supported the second option as it allowed members of the public to submit representations to the Board for consideration. The Member considered that more information on the number of students to be admitted by the post-secondary institutions in the future and the corresponding requirements for additional land or academic facilities should be made available to the Board for consideration. The Member also hoped that post-secondary institutions other than HKBU would submit their views on the proposed amendment if they were interested in using the site or part of the site. The Member was also of the view that the proposed residential development was compatible with the GIC uses.

78. A Member said that the consideration of the proposed amendment could be further deferred until there was a position from the Government on the location of the CMTH proposed by HKBU. If the Government supported the proposed location of the CMTH at the subject site, then there would not be any need to rezone the site. Ms. Estrella Cheung said that the proposed Chinese medicine hospital was not a UGC-funded teaching facility but a self-financed hospital, and it was not a must for the proposed hospital to be located at the subject site. She added that it was also important to take into consideration possible alternative use and/or other stakeholders' interest for the site.

79. The Vice-Chairman asked if the proposed amendment should be submitted to the full Board for consideration. The Secretary said that under the Board's established practice, a matter could be referred to the full Board if it involved a major planning principle, major public interests or was of territorial significance. On this point, the Secretary reported that an email from "亞洲中港民生關注組" had just been received. The group requested that the proposed amendment be referred to the full Board and the Development Bureau for consideration.

80. A Member supported the second option to gazette the proposed amendment under the Ordinance. In response to this Member's question, the Secretary said that if the proposed amendment was gazetted under section 5 of the Ordinance, the draft OZP showing the proposed amendment would be exhibited for public inspection for a period of two months. During this period of time, any person could submit representations to the Board. The relevant district council would also be consulted. After the end of the plan exhibition period, any representations received would be made available for public comment. A hearing would then be held by the Board to consider all the representations and comments received, and all the representers and commenters would be invited to attend the hearing. If the Board decided to propose further amendments to the OZP after the hearing, the proposed further amendment would be published and any person, other than those who had submitted representations and comments to the Board, could submit further representations to the Board. A further hearing would then be held by the Board to consider the further representations, and the representers, commenters and further representers would be invited to the hearing. The decision of the Board, together with all the representations, comments and further representations considered by the Board, would be submitted to the Chief Executive in Council for a final decision.

81. A Member was concerned that the decision of the Committee to gazette the proposed amendment would give the public an impression that a final decision had been made. The Secretary said that if the Committee agreed to gazette the proposed amendment after considering on the information presented by relevant government departments/bureaux, the OZP amendment would be exhibited for public inspection. The Board would make the final decision after hearing the representations and comments as provided under the Ordinance. Another Member agreed to gazette the proposed amendment for public inspection.

82. The Vice-Chairman said that if the proposed amendment was gazetted for public inspection, the Board would be able to receive representations and comments from the stakeholders as well as members of the public under the statutory process. The Chairman agreed with the Vice-Chairman and said that the Committee had so far listened to the information presented by the relevant government departments/bureaux. If the proposed amendment was gazetted, then the views of the members of the public including the stakeholders could also be heard by the full Board as provided under the Ordinance.

83. The Chairman concluded that Members in general agreed that the proposed amendments were suitable for exhibition under section 5 of the Ordinance.

84. After further deliberation, the Committee decided to :

(a) agree to the proposed amendments to the approved Kowloon Tong OZP and that the draft Kowloon Tong OZP No. S/K18/16A at Attachment II of the Paper (to be renumbered to S/K18/17 upon exhibition) and its Notes at Attachment III of the Paper were suitable for exhibition under section 5 of the Ordinance; and

(b) adopt the revised Explanatory Statement at Attachment IV of the Paper for the draft Kowloon Tong OZP No. S/K18/16A as an expression of the planning intentions and objectives of the Board for the various land use zones on the OZP and the revised ES would be published together with the OZP.

[The Chairman thanked Miss Fiona S.Y. Lung, DPO/K, Ms. S.H. Lam, STP/K, Mr. Wallace Lau, Principal Assistant Secretary for Education (Higher Education) of EDB, Mr. Sammy Leung, Assistant Secretary for Education (Higher Education) of EDB, Mr. Kelvin Siu, Assistant Secretary-General (Capital) of the Secretariat of UGC and Ms. Estrella Cheung, Principal Assistant Secretary for Food & Health (Health), FHB, for their attendance to answer Members' enquiries. They left the meeting at this point.]

[Mr. Stephen Yau returned to join the meeting at this point.]

[Mr. Dominic Lam, Prof. P.P. Ho, Ms. Julia Lau and Prof. C.M. Hui left the meeting at this point.]

[The meeting was adjourned for a short break of 5 minutes and resumed at 12:20p.m.]

[Miss Elsa Cheuk, Chief Town Planner/ Special Duties (CTP/SD) and Mr. Timothy Lui, Senior Town Planner/Special Duties (STP/SD), were invited to the meeting at this point.]

Extract of Minutes of HIC of the KCDC on 7.3.2013

九龍城區議會轄下

房屋及基礎建設委員會第八次會議紀錄

新議事項

《九龍塘分區計劃大綱草圖編號 S/K18/17》所收納的修訂項目
(房建會文件第 15/13 號)

15. 主席表示此議程涉及其區議會選區範圍，認爲交由房建會副主席勞超傑議員主持較爲恰當，並根據《九龍城區議會會議常規》，由勞議員作爲臨時主席，暫代主持此議程。

16. 規劃署九龍規劃處高級城市規劃師林秀霞女士介紹文件第 15/13 號中有關《九龍塘分區計劃大綱草圖編號 S/K18/17》所收納的修訂項目，包括：

(一) 把位於聯福道的前李惠利校舍用地南部由「政府、機構或社區(9)」地帶改劃爲「住宅(乙類)」地帶；及

(二) 把位於東寶庭道／延文禮士道／嘉林邊道的伯特利神學院用地由「政府、機構或社區(3)」地帶改劃爲「住宅(丙類)9」地帶(該土地的西部)及「政府、機構或社區(12)」地帶(該土地的東部)。

林秀霞女士並就有關前李惠利校舍用地南部的土地用途改劃作以下補充：

(一) 政府已在前李惠利校舍用地的北面部分預留 6,400 平方米土地給香港浸會大學(下稱「浸大」)作校園發展，如能充分發展，可全面滿足浸大按現行政策下 2,000 多平方米教學樓面空間和 1,331 個學生宿位的剩餘需求。該校舍用地的南面部分則已超出浸大按現行政策下的需要，在公平原則下沒有理據將該部分批予浸大作教育用途。由於南部用地無須保留作高等教育用途，故教育局將用地交還政府作重新調配，確保善用寶貴的土地資源，應付本港的發展需要；

(二) 浸大曾先後於 2011 年 11 月及 2012 年 9 月兩次向食衞局提出與尖沙咀街坊福利會合作，將後者位於尖沙咀的大樓部份空間發展爲一所浸大中醫院，並提交詳細計劃建議書。食衞局一直支持該合作計劃。浸大及後於 2013 年 2 月 18 日正式致函食衞局，表示撤回與尖沙咀街坊福利會的合作計劃，並提出前李惠利校舍用地爲新選址；及

(三) 浸大建議的中醫院屬私營醫療設施，與其他私家醫院無異。由於政府現時沒有政策向個別團體提供政府土地以發展自資中醫院用途，只可考慮由私人提供土地或在已獲批的土地申請改變用途以自資興建中醫院，因此政府並不支持在前李惠利校舍的政府土地興建中醫院。即使日後香港開辦中醫院並爲學生提供臨床實習機會，亦無需鄰近有關院校。現時很多提供實習機會的醫院亦非位處院校毗鄰。

17. 何顯明議員表示修訂《九龍塘分區計劃大綱草圖編號 S/K18/17》的諮

詢過程應該公平、公正及公開，並舉例指署方未有就興建位於佛光街的香港理工大學學生宿舍諮詢區議會。他指出九龍塘區的居民對老人院、長者中心及社區會堂等社區設施有需求。另外，他認爲政府不應於諮詢區議會及城市規劃委員會(下稱「城規會」)前，便將前李惠利校舍用地南部列入下年度的賣地表，他認爲部份用地應預留給浸大興建學生宿舍，自由黨亦反對在該地興建豪宅，故建議政府現階段將該地皮剔出賣地表。

18. 陸勁光議員查詢前李惠利校舍用地南部由「政府、機構或社區(9)」地帶改劃爲「住宅(乙類)」將會提供多少個住宅單位。另外，他認爲署方不應倉促將前李惠利校舍用地南部列入賣地表，他希望政府考慮地區的一致性，於該地興建老人中心等社區設施。

19. 黃以謙議員查詢伯特利神學院將來能否容許公眾人士參觀或是否會改作其它用途。另外，他希望署方從交通及環境等因素評估前李惠利校舍用地南部是否適合由「政府、機構或社區(9)」地帶改劃爲「住宅(乙類)」地帶。他查詢若有關用地改劃爲住宅用地能否配合浸大的發展，以及是否會考慮附近居民的意見。他向教育局查詢若有關用地保留爲「政府、機構或社區(9)」地帶，局方會否讓浸大優先使用，並向食物及衞生局(下文簡稱「食衞局」)查詢現行的中醫院政策。

20. 張仁康議員表示對前李惠利校舍用地南部由「政府、機構或社區(9)」地帶改劃爲「住宅(乙類)」地帶有保留，擔心學生的噪音會引起日後居民的投訴，並會增加該區附近道路的交通負荷。另外，他認爲本港高等教育用地嚴重不足，政府將該地保留爲「政府、機構或社區(9)」地帶較有公共效益，並希望政府及城規會多考慮各方的意見。

21. 吳寶強議員表示支持本港中醫業的發展，希望政府多聆聽前李惠利校舍用地附近居民的意見。

22. 蕭亮聲議員表示本港高等教育土地不足，政府應該諮詢浸大師生對前李惠利校舍用地的意見，他亦認爲該地應保留作教育用途。同時，他指出發展局不應於完成兩個月的諮詢程序及得到城規會同意改劃土地用途

前，把該用地納入下年度的賣地表。

23. 任國棟議員認爲前李惠利校舍用地不應改建作豪宅，署方應該與浸大商討於該地發展私營中醫院的可行性。他指出何文田舊邨用地未經諮詢區議會便納入勾地表，反映政府沒有就改劃土地用途認真進行諮詢。另外，他表示前李惠利校舍用地附近設有九龍塘消防局，消防鐘聲及消防車出入可能會引起日後居民投訴，故認爲署方更改土地用途的建議是規劃錯配。

24. 副主席表示市民對署方未完成諮詢程序便將前李惠利校舍用地改爲興建豪宅的做法有保留。另一方面，他亦對於把該地預留予浸大發展私營中醫院有保留，因爲有興趣申辦中醫院的機構不只浸大，政府應公平對待所有申請者。另外，他建議政府及城規會應對該地發展持開放態度，包括考慮興建基層住屋、青年宿舍或社區設施。他認爲興建豪宅不能解決整體市民的住屋需要，希望政府廣泛諮詢各持份者，以就該土地的發展用途達成共識。

25. 蕭婉嫦議員認爲政府在考慮土地用途時應以市民爲本，建議政府做好諮詢工作。她亦表示支持發展中醫院，希望政府與浸大就可行方案作深入討論。

26. 規劃署九龍規劃專員龍小玉女士綜合回應指出：

(一) 署方所有改劃土地用途的項目必定以傳閱文件或出席會議的形式諮詢區議會。署方重視議員的意見及諮詢的程序，並確保所有諮詢過程公平、公正、公開。政府絕對無意繞過城規會的法定諮詢程序，賣地表列出的土地，必須完成法定城規程序後，方可推出市場。署方希望藉是次會議向議員解釋有關改劃土地用途的修訂項目，並將議員的意見轉交城規會考慮；

(二) 原址爲何文田舊山谷邨的香港理工大學學生宿舍的土地屬「住宅(甲類)」用途，有關土地用途不需進行改劃，故無須經過法定的城規諮詢程序；

(三) 署方曾就前李惠利校舍用地南部的土地用途諮詢相關部門，獲告知該區在發展專上教育、醫療及社區設施等「政府、機構及社區」用途的土地足夠。由於九龍塘屬住宅區，署方認爲發展住宅是合適的建議。社區會堂方面，庇利街的社區會堂即將落成，啓德發展區的社區會堂亦快將動工，署方亦已於何文田區預留土地興建社區會堂；

(四) 署方已就改劃土地用途對環境及交通的影響諮詢環保署、運輸署等部門，並於完成景觀及通風研究後，才將改劃土地用途建議交由城規會考慮。就學生宿舍的噪音問題，發展商可在建築設計上加設隔音措施，減低學生宿舍可能產生的噪音對該發展的影響，而學生宿舍亦屬住宅類別；在土地用途而言，並非不協調的發展；

(五) 前李惠利校舍南部用地的面積約 0.88 公頃，最高地積比率限 4.5 倍，最高建築物高度限 50 米，即約 15 層，假設單位面積約 80 平方米，將會提供近 500 個單位，滿足市民換樓的需要，有關項目不屬於低密度豪宅類別；及

(六) 伯特利神學院屬於私人重建項目，重建後不會開放予公眾使用。

27. 發展局首席助理秘書長(規劃及地政)1 鍾瑞琦女士回應指將預計可於該年度內供應市場的政府土地納入該年度的政府賣地計劃，是當局的一貫做法，這安排可就預計土地供應向市場提供具體資訊，讓市場可作所需準備。這些土地當中會包括因需進行各種程序，例如終止短期租約、有待工程完成或與相關政府部門協調等而未能即時提供，但預計應可於年度內供應的土地。她表示有關的改劃用途現已進入法定城市規劃程序，局方一直尊重有關程序，並待完成相關法定城市規劃程序後，才會將該土地推出市場。

28. 教育局首席助理秘書長(高等教育)劉家麒先生回應指教育局與大學教育資助委員會(下稱「教資會」)一直按照既定公式處理全港八所資助院校的教育用地發展。浸大近年共獲政府批撥超過 4,000 平方米政府土地和近 12 億元公帑興建新教學大樓，提供接近 30,000 平方米的教學樓面空間，

而局方亦正處理浸大申請長遠使用觀塘道前皇家空軍基地 2,000 多平方米教學樓面空間。他重申，若浸大善用前李惠利校舍用地北面部分的土地興建學生宿舍和符合其需要的教學設施，可完全滿足浸大按現行政策下 2,000 多平方米教學樓面空間和 1,300 多個學生宿位的剩餘需求。他指出浸大將會成爲全港不欠學生宿位及教學樓面面積的兩間大學之一，局方認爲該用地南面部分已超出浸大按政策下的需要。

29. 食衞局首席助理秘書長(衞生)1 章景星女士回應指政府一直致力推動中醫藥發展。雖然局方現時並無提供政府土地供發展私營中醫院用途的政策，但會考慮個別團體在私人土地上興建中醫院的建議。她指出根據現行法例，中醫院需具備足夠而合適的人手、院舍及設備。她表示事實上局方與衞生署支持浸大與尖沙咀街坊福利會合作發展私營中醫院的計劃，並一直協助處理有關申請，但直至今年二月才獲浸大發信通知撤回有關計劃，同時提出前李惠利校舍用地南部作爲興建中醫院的選址。她指出根據現行的政策，前李惠利校舍用地南部仍爲政府土地，故政府不能因地理位置原因而將該用地交由浸大發展私營中醫院。局方不支持浸大利用該地興建私營中醫院，但並不代表局方不支持浸大興建中醫院的計劃，否則局方不會一直協助浸大在尖沙咀的中醫院計劃。另外，她亦感謝吳寶強議員及蕭婉嫦議員支持中醫藥發展。

30. 潘志文議員表示浸大已向局方表明有意於該地發展中醫院，教育局應該爲學生爭取。他向教育局查詢爲何沒有興建首間中醫教學醫院的需求，並查詢局方曾否與浸大作深入討論。

31. 吳奮金議員表示前李惠利校舍用地應該繼續作爲「政府、機構或社區」的用途，若該地改劃爲住宅用途，亦只能興建約 500 個豪宅，對於解決整體房屋需求幫助不大。另外，他指出社會對改劃該地用途的反對聲音非常強烈，認爲政府應在決定納入賣地表前，諮詢該用地附近居民的意見。

32. 劉偉榮議員表示，他預計該地所提供的單位將以每個 2,000 萬元以上出售，具備相約購買力的市民亦能夠在香港其他地點置業。有關土地規劃改動無助解決市民的住屋需要，將可能帶來無可估量的損失，他不贊同改

劃該地作豪宅用途。另外，他指出政府有責任推動中醫學院發展，若果政府不贊成於該地興建私營中醫院，可考慮改爲公營發展。此外，他表示在學生宿舍旁邊興建豪宅，將可能對未來的住戶帶來噪音問題。

33. 黃潤昌議員表示不認同該地不會發展爲豪宅的說法，並表示九龍城區缺乏社區設施用地，市區亦缺乏滿足普羅市民住屋需要的住宅用地，而非豪宅用地。他建議保留該地爲「政府、機構或社區」地帶，至於該地應否預留予浸大發展中醫院可再作討論。另外，他指出既然大學對中醫藥發展有承擔，政府應該更積極配合和推動中醫藥政策。

34. 何顯明議員表示政府應優先考慮發展中醫院或讓浸大發展綜合中醫院。他希望政府尊重市民希望發展中醫藥的意願，不應將前李惠利校舍南部用地改劃爲興建豪宅。

35. 任國棟議員表示署方應向社會福利署查詢應否保留前李惠利校舍用地發展社福設施。另外，他認爲學生宿舍及九龍塘消防局爲將來居民帶來影響。他指出政府應關顧低下階層的住屋需要，而非豪宅住戶的住屋需要。他認爲發展局不應在完成諮詢程序前把該地納入下年度的賣地表，並向食衞局查詢會否支持浸大發展非私營的中醫院。

36. 張仁康議員表示同意劉偉榮議員的提議，於現階段將前李惠利校舍用地保留作「政府、機構或社區」地帶，讓九龍城區居民及區議會繼續商討有關土地用途。另外，他希望政府聆聽浸大師生對興建中醫院的訴求，而推動發展中醫院亦有助減輕其他公營醫療機構的壓力。

37. 副主席表示對於署方指該地並非發展豪宅的說法有保留。另外，他支持中醫藥發展，建議食衞局與有興趣發展中醫藥發展的院校加強溝通。若該局認爲前李惠利校舍用地不適合用作發展中醫院，可提供其他方案供相關大學考慮。他認爲現時沒有迫切需要將該地改劃爲「住宅(乙類)」地帶。

38. 規劃署龍小玉女士回應指社會對不同面積的單位均有需求，較大的單位能夠滿足香港部分家庭的住屋需要。在作出有關改劃土地用途的建議

前，署方已根據香港規劃標準與準則評估是否需要保留該幅土地發展社區設施，而相關部門亦已因應該區人口及其政策，考慮是否需要在該幅土地發展社區設施。她明白部門的意見與居民的要求或有落差，希望諮詢期內多聆聽居民對有關土地改劃用途的意見，包括對社區設施的需要等。另外，她會與九龍塘消防局跟進任國棟議員的意見。

39. 發展局鍾瑞琦女士回應指政府一直以多管齊下的措施增加土地供應，政府亦需要兼顧不同類型住宅項目的發展及住屋需要，包括公屋、居屋及私人住宅。她表示署方在考慮其他部門的意見及地區的環境後，認爲適合將該地改劃爲住宅。

40. 教育局劉家麒先生指出局方預留觀塘道用地給浸大發展，是由於浸大過去數年一直使用觀塘道前皇家空軍基地用地作視覺藝術的課程。而應浸大的要求，局方正考慮由浸大提交長遠使用該地提供視覺藝術課程的建議書。他表示浸大沒有向教資會申請將發展中醫藥教學醫院納入工務工程申請項目，而局方認爲浸大沒有需要在前李惠利校舍用地發展中醫院。另一方面，浸大直至 2013 年 2 月 18 日才正式以書面通知政府撤回與尖沙咀街坊福利會合作發展中醫院的計劃，所以局方難以在該日前，將浸大於前李惠利校舍用地興建中醫院視爲正式建議。此外，他指出浸大建議興建的中醫院屬私營性質，局方認爲不應運用大學教育的撥款資助興建有關醫療設施。

41. 食衞局章景星女士回應指浸大建議的中醫院屬私營自資醫療項目，局方認爲不能直接向浸大提供鄰近的政府土地興建中醫院。另外，她指出政府最近成立的中醫中藥發展委員會將考慮興建公營中醫院的建議，但公營中醫院住院服務不等於浸大建議的私營中醫院。若政府將來制訂政策向團體提供政府土地發展中醫院，亦必須按照一貫公平、公正、透明的原則向有興趣申辦中醫院的團體批出用地。

42. 潘志文議員向教育局查詢曾與浸大商討興建中醫院建議的詳情，他表示食衞局應邀請有興趣發展中醫院的團體參與投標，以表示支持中醫藥發展，而非支持改劃該土地爲住宅。另外，他指出市民較關心置業的問題，

而非換樓。他查詢政府會否因應市民及區議會的反對意見，將該土地保留爲「政府、機構或社區」地帶，並將其剔出賣地表。

43. 任國棟議員希望署方就該用地興建社福設施進行諮詢。

44. 何顯明議員表示議員都不贊成將前李惠利校舍用地改劃爲住宅用地，有關該地的用途可日後再作探討。

45. 副主席表示議員不贊成在該地興建豪宅，並希望局方可就該地的發展用途廣泛諮詢市民。

46. 規劃署龍小玉女士表示會按議員的意見，就該區對社福設施的需要，再諮詢社會福利署。署方亦會將議員的意見轉交城規會考慮。

Extract of Minutes of HIC of the KCDC on 7.11.2013

九龍城區議會轄下
房屋及基礎建設委員會第 12 次會議記錄

反對 S/K 18/17 所建議的土地改變用途，並要求將其中一部分發展為社區中心附設室內運動場、長者及護老中心、多用途設施及區內非牟利團體辦事處
(文件第 73/13 號)

85. 主席介紹文件，並表示由於城規會將於本年 12 月會議中討論有關土地改變用途，因此希望代表居民再次表達立場。另外，他指浸會大學於較早前已將大學在該地點發展中醫院意向的資料分發給各位委員參考。

86. 規劃署唐寶煌女士回應指由於城規會於 12 月須處理有關中環軍用碼頭改劃的聆訊，相信有關前李惠利用地改劃的聆訊將不會在 12 月進行。她表示就有關改劃，城規會會按照《城市規劃條例》處理和考慮收集到的申述和意見，並於稍後時間就所收到的申述和意見作公開聆訊，所有提申述人士都將被邀請出席有關聆訊。

87. 鄭利明議員表示不贊成在大學設施附近興建住宅，認爲會破壞大學校園的和諧氣氛，產生社會矛盾。他建議政府把有關土地交予大學發展。

88. 蕭婉嫦議員表示在有關土地建設住宅，與周邊環境並不配合。她認爲應該保留土地作社區用途，並於稍後再考慮有關的發展形式。

89. 張仁康議員表示不贊同改變有關土地爲住宅用途。他以半島豪庭與理工大學學生宿舍就學生產生噪音而形成的矛盾爲例，說明興建住宅於校舍附近並不合適，因此要求規劃署從善如流，將土地保持爲「政府、機構或社區」地帶。此外，他亦支持主席提出將部分土地撥作社區中心和區內非牟利團體辦事處等用途。

90. 梁美芬議員表示政府必須從要長遠角度進行土地規劃，認爲在有關土地興建樓宇，將會影響現有大學及引發與居民衝突。

91. 黃以謙議員表示支持保留土地爲「政府、機構或社區」地帶，指地產商未必

會立即將建成的樓宇出售，因此短期樓宇的供應並不會增加。

92. 勞超傑議員指在較早時間舉行的房建會會議，委員已表達反對改變有關土地爲住宅用途的立場，他要求秘書處將委員意見轉交城規會。

93. 主席請秘書處跟進，將委員有關改變土地用途的意見轉交規劃署及和城規會。

(會後補注：秘書處已於 11 月 27 日去信規劃署及和城規會轉達委員的意見。)

九龍城區議會
九龍紅磡畢利街42號
九龍城政府合署7樓

FAX

Annex Ve of
TPB Paper No. 9585

KOWLOON CITY DISTRICT COUNCIL
7/F, Kowloon City Government Offices,
42 Bailey Street, Hung Hom, Kowloon
電話號碼：2621 3410
傳真號碼：2621 3943

本函檔號：HAD KC DC/13/1/7/4

香港濱華道333號
北角政府合署15樓
城市規劃委員會

執事先生：

《九龍塘分區計劃大綱草圖編號 S/K18/17》

本人謹代表九龍城區議會轄下房屋及基礎建設委員會(下簡稱「房建會」)就《九龍塘分區計劃大綱草圖編號 S/K18/17》所建議的土地改變用途，向　貴會反映委員的意見。

房建會於2013年11月7日的第12次會議上，就　貴會在《九龍塘分區計劃大綱草圖編號 S/K18/17》中把位於聯福道的前李惠利校舍南部由「政府、機構或社區(9)」地帶改爲「住宅(乙類)」地帶的建議作出討論。委員認爲政府不應將有關用地改劃爲住宅用途，而應將其保留爲「政府、機構或社區(9)」地帶，以發展社區或教育等設施，並就有關土地的用途諮詢附近居民及持分者的意見。

隨函附上房建會第12次會議的第73/13號討論文件「反對 S/K 18/17 所建議的土地改變用途，並要求將其中一部分發展爲社區中心附設室內運動場、長者及護老中心、多用途設施及區內非牟利團體辦事處」，以供參閱。

九龍城區議會轄下
房屋及基礎建設委員會主席

何顯明

何顯明

2013年11月27日

副本：規劃署九龍規劃專員龍小玉女士

HAD LH 46

Extract of Minutes of LegCo Panel on Education on 11.3.2013

立法會
Legislative Council

Panel on Education

IV. Issues relating to the existing policy on the use of land for education purposes

(LC Paper No. CB(4)460/12-13(01) -Paper provided by the Administration

LC Paper No. CB(4)460/12-13(02) -Submission from Hong Kong Baptist University)

Related papers

Administration's answer to an oral question raised by Dr Hon LAM Tai-fai at the Council meeting of 6 February 2013

Administration's answer to a written question raised by Dr Hon LAM Tai-fai at the Council meeting of 27 February 2013

Government statement on Hong Kong Baptist University's request to use the site of the former campus of Hong Kong Institute of Vocational Education (Lee Wai Lee) dated 4 March 2013 (http://www.info.gov.hk/gia/general/201303/04/P201303040689.htm)

5. The Chairman declared that he was a Court member of the Hong Kong Polytechnic University ("HKPolyU") and of the Hong Kong Baptist

University ("HKBU"), and also the supervisor and member of the school management committee of Lam Tai Fai College. Mrs Regina IP declared that she was a member of the school management committee of a Direct Subsidy Scheme school and the principal of Savantas Liberal Arts Academy. Ms Claudia MO declared that she taught courses at HKBU and the Chinese University of Hong Kong ("CUHK"). Mr Christopher CHUNG declared that he was a Court member of the University of Hong Kong ("HKU") and a Council member of the Hong Kong Arts School. The Deputy Chairman declared that he was a Court member of HKU, a part-time lecturer of HKU and the Hong Kong Institute of Education. Dr Helena WONG declared that she was a lecturer of HKPolyU. Dr Fernando CHEUNG declared that he was a lecturer of HKPolyU.

6. Ms Claudia MO queried why the policy secretaries of the bureaux concerned (namely, the Education Bureau ("EDB"), the Development Bureau ("DEVB") and the Food and Health Bureau ("FHB") were not in attendance for this agenda item which was of great importance. In this regard, the Chairman informed members that Mr Kevin YEUNG was the Acting Secretary for Education ("Acting SED") as Mr Eddie NG was on duty visit. He further said that he was fully aware of the importance of and widespread public concern arising from this agenda item. Hence, he had instructed the Secretariat to convey his request to the Administration that the Secretary for Food and Health and the Secretary for Development should also attend the Panel meeting to answer members' question. In response to the written request of the Secretariat on 8 March 2013, the EDB had replied in writing on the same day that the DEVB and FHB would be represented by Mr Thomas CHAN, Deputy Secretary for Development (Planning & Lands)1 ("DSDEV(P&L)1") and Miss Janice TSE, Deputy Secretary for Food & Health (Health)1 ("DSFH(H)1") respectively. The Chairman advised that should members have any query about the attendance of representatives from the Administration, they were at liberty to seek the Administration's explanation at this meeting.

Briefing by the Administration and other parties

7. At the invitation of the Chairman, Acting SED briefed members on the issues relating to the existing policy on the use of land for educational purposes by highlighting the salient points in the Administration's paper [LC Paper No. CB(4)460/12-13(01)].

8. Members noted the submission from Hong Kong Baptist University [LC Paper No. CB(4)460/12-13(02)]. Prof Albert CHAN, President and Vice-Chancellor of HKBU, and Miss FUNG Ching-man, President of HKBU Student Union, presented their views. Mr Ivan HO of Hong Kong Institute of

Architects, Mr TAM Po-yiu of Hong Kong Institute of Planners and Mr Vincent NG of Hong Kong Institute of Urban Design also stated their views.

Discussion

Campus development of tertiary institutions

9. Mr Albert HO asked EDB to explain its role in the planning process in relation to the use of land for education purpose, in particular its assessment of the development needs of HKBU.

10. In response, Acting SED advised that as explained in the Administration's paper, government land would be allocated to University Grants Committee ("UGC")-funded institutions for campus development in accordance with the prevailing policy and procedures. To meet the shortfall in student hostels and academic space of HKBU, the Government had reserved the northern portion of the site of the former campus of the Hong Kong Institute of Vocational Education (Lee Wai Lee) ("ex-IVE(LWL) site") for use by HKBU. If fully utilized, HKBU's requirements for student hostel places and academic space up to the 2014-2015 academic year could be fully met under the prevailing policies and calculation criteria. The southern portion of the ex-IVE(LWL) site was beyond HKBU's requirements under the existing polices. After careful assessment, EDB was of the view that it was not necessary to reserve the southern portion of the ex-IVE(LWL) site for the expansion of higher education institutions, including HKBU. EDB also agreed that the site could be surrendered to the Government for other uses so as to optimize the use of scarce land resources.

11. The Deputy Chairman did not subscribe to the Administration's explanation, and considered that the Government should adopt a long-term vision on the planning and development of universities, instead of considering the development needs of universities merely with reference to the requirements under existing policies and standards. Dr Fernando CHEUNG shared a similar view and asked whether EDB had consulted HKBU before surrendering the southern portion of the ex-IVE(LWL) site to the Government for other uses. Ms Claudia MO took the view that SED should demonstrate his support for the development of the tertiary education sector by striving to retain the site for educational use.

12. In response, Acting SED confirmed that the Administration and UGC had all along supported HKBU and other UGC-funded institutions in their campus development on a fair and consistent basis in accordance with well-established policies. Principal Assistant Secretary (Higher Education)

said that HKBU had been consulted on its campus development needs for the triennium 2012-2013 to 2014-2015 when the Government and UGC conducted the triennial planning cycle and funding requirements for the UGC sector.

13. Mr WONG Yuk-man noted from media reports that Prof Albert CHAN had stated that he would resign from his current post if HKBU could not secure the use of the southern portion of the ex-IVE(LWL) site for its proposed development of Chinese medicine hospital. Mr WONG considered that although the policy on the use of land involved different bureaux and departments, the use of land resources for educational purposes should be within the jurisdiction of EDB. Mr WONG noted that some statistics had been given in the Government's press statement issued on 4 March 2013 to illustrate that the Government had made available sufficient land resources and funding to fully meet the needs of HKBU for campus development. He considered that EDB should also set out further explanation on the calculation criteria and in what ways the northern portion of the site would be sufficient to meet the development needs of HKBU. Miss FUNG Ching-man, President of HKBU Student Union, concurred that the Government should explain the rationale and calculation criteria leading to its conclusion that the development needs of HKBU would be fully met with the allocation of only the northern portion of the ex-IVE(LWL) site.

Rezoning the ex-IVE(LWL) site and including it in the land sale programme

14. Dr Fernando CHEUNG said that the ex-IVE(LWL) site was designated for "Government, Institution or Community" ("GIC") use and had been used for educational purpose for decades. Dr CHEUNG questioned the immediate need, if any, for rezoning this site for medium-density luxury residential development. Mr Charles MOK remarked that since the site in question was surrounded by the campus of HKBU on three sides, rezoning the southern portion of the site for medium-density residential development might not be the best development option. Nevertheless, consideration might be given to building public rental housing or Home Ownership Scheme flats on the site. Mr WONG Yuk-man also opined that the development of luxury residential properties could hardly address the housing needs of the community. The Chairman sought clarification on whether it was the Government's stance that the site was most suitable for medium-density residential development.

15. In response, DSDEV(P&L)1 said that after careful assessment, the Government had come to the view that the southern portion of the ex-IVE(LWL) site was not required to be reserved for higher education purpose or other GIC uses. As the areas to the west and south of the site were mainly for residential development and there were no incompatible uses in its

vicinity, the Administration considered that the site was suitable for medium-density residential development and had submitted a proposal to the Town Planning Board ("TPB") to rezone the southern portion of the site for this purpose.

16. Mr LEUNG Yiu-chung was concerned that the Administration had bypassed the proper town planning procedures as it had included the southern portion of the ex-IVE(LWL) site in the land sale programme ("LSP") before TPB had the opportunity to consider representations received during the two-month consultation period and make its final decision on the use of the site. Dr Fernando CHEUNG considered that DEVB should devise a long-term plan on the supply and use of land, and should not compete for a site that had been used for educational purpose for decades. Ms Claudia MO asked whether the DEVB could remove the listing of the site on LSP.

17. In response, DSDEV(P&L)1 confirmed that the Administration had all along followed established planning procedures in handling the ex-IVE(LWL) site. After assessment and consultation with relevant bureaux/departments, the Administration had come to the view that the site was not required to be reserved for GIC use and was suitable to be rezoned for residential purpose. Hence, in late 2012, the Planning Department submitted the relevant rezoning proposal to TPB with a view to optimizing the use of land and meeting the housing needs of the community. DSDEV(P&L)1 advised that it was the established practice of the Government to include in LSP those sites that were anticipated to be available within the year, but were not immediately available pending completion of various processes and town planning procedures. This arrangement would provide the market with information about anticipated land supply and facilitate preparation by the market. He reaffirmed that including the southern portion of the ex-IVE(LWL) site in the land sale programme was in line with the established practice, and that the site would only be put up for sale after completion of the necessary processes.

18. Mrs Regina IP enquired whether the policy of "Hong Kong property for Hong Kong people" would apply to the residential development on the ex-IVE(LWL) site. In reply, DSDEV(P&L)1 said that at the present stage, the Government had decided to apply the "Hong Kong property for Hong Kong people" measure to two sites in the Kai Tak area requiring the flats built thereon to be sold to Hong Kong residents only. The Government would consider the need to include similar requirements in the Conditions of Sale of other sites in the light of future market conditions.

19. Mr LEUNG Kwok-hung remarked that if the three policy secretaries concerned could not resolve the use of the site in question, they should seek the

direction of the Chief Secretary for Administration ("CS") or even the Chief Executive ("CE"). Mr LEUNG asked whether instruction had been sought from CS or CE. Acting SED reaffirmed that relevant bureaux/departments had followed established procedures in handling the matter and he had not sought advice from CS or CE.

20. On the question of whether the Government had consulted HKBU before recommending to TPB to rezone the southern portion of the ex-IVE(LWL) site for residential use, Professor Albert CHAN said that the Government had not consulted HKBU on the matter. Prof CHAN and Mr Andy LEE reiterated that HKBU opposed the rezoning of the site for luxury residential development, and urged that the site should be retained for educational use. In this connection, Dr Fernando CHEUNG was concerned whether any government officials had been at fault by deciding arbitrarily to recommend to TPB a change in land use.

21. Miss FUNG Ching-man noted from the Government's press statement issued on 4 March 2013 that the proposed rezoning was to meet the community's housing needs. However, Miss FUNG queried whether the development of luxury residential properties, instead of public housing units or homes for the elderly, was conducive to solving the housing problem.

22. Mr TAM Po-yiu declared that he was an external examiner of the Department of Urban Planning and Design of HKU. Mr TAM said that from the perspective of a planner, there was nothing wrong for residential properties to be located near university campus, and rezoning the southern portion of the ex-IVE(LWL) site for residential use was a compatible option as there were low-density residential properties in the vicinity. However, in accordance with the statutory town planning procedures, it would be for TPB to decide on the land use having regard to all relevant requirements, including the representations, if any, on the amendments to the approved outline zoning plan.

23. Mr Ivan HO said that the Hong Kong Institute of Architects considered that the proposed use of the southern portion of the ex-IVE(LWL) site, similar to other sites, should be handled in accordance with the established policy and applicable town planning procedures. Government land should not be granted to any party simply because it was located in the proximity of the party concerned. However, Mr HO found it questionable for the Government to include the site on its LSP prior to TPB's final decision after completion of all the statutory procedures. Mr HO said that he was not convinced of the merits of rezoning the southern portion of the ex-IVE(LWL) site to residential use because from the planning perspective, rezoning the site to residential use

might not create synergy nor benefit to the neighbouring areas. Due to the scarcity of land resources to serve different uses, Mr HO considered that the Government should immediately conduct a comprehensive review and formulate a long term plan for the development of universities.

24. Mr Vincent NG declared that he had participated in HKBU's campus development projects and was familiar with HKBU's circumstances. Mr NG took the view that the Government's move had amply reflected its eagerness to identify sites for residential development regardless of other social needs in the planning process, such as education, medical service, public space etc. He did not consider that building luxury residential properties would help resolve the housing problem. Although according to the Government's assessment, there was no immediate need to allocate the site to any higher educational institution, Mr NG took the view that the Government should adopt a long-term planning perspective and retain the ex-IVE(LWL) site for future educational use. Given that HKU and HKPolyU had implemented expansion plans in the vicinity of their main campus, the Government should consider ways to achieve the optimal use of land in urban planning and campus development.

HKBU's proposed development of a Chinese medicine hospital

25. Dr Helena WONG said that currently, three local universities, namely CUHK, HKU and HKBU, offered UGC-funded programmes on Chinese medicine. However, they did not have affiliated Chinese medicine hospitals for clinical training and internship. Dr WONG considered that the Administration should take action to address the need for Chinese medicine hospitals in Hong Kong. Ms Claudia MO recalled that the Government had once stated that it supported the development of Hong Kong as a Chinese medicine hub. She was concerned that there was no Chinese medicine hospital in Hong Kong and clinical internship opportunities could only be found in the Mainland.

26. In response, DSFH(H)1 advised that the Administration supported the development of Chinese medicine and Chinese medicine hospitals in Hong Kong. The Chinese Medicine Development Committee had decided to study the feasibility of Chinese medicine in-patient service such as how to provide resuscitation facilities for Chinese medicine in-patient service. There was no established policy to provide government land for the development of a private Chinese medicine hospital. Currently, clinical internship of local Chinese medicine programmes could be arranged at local Chinese medicine clinics and at Chinese medicine hospitals in the Mainland.

27. In this connection, the Chairman reminded members that the existing policy on the promotion of Chinese medicine and the development of Chinese medicine hospitals in general was outside the scope of this agenda item.

28. Mrs Regina IP asked whether FHB supported HKBU's proposal of developing a Chinese medicine hospital. In response, DSFH(H)1 advised that FHB in principle supported proposals for the development of a Chinese medicine hospital on private land by any interested party to provide Chinese medicine in-patient services. Where conditions permitted, the Chinese medicine hospital so established might also provide clinical training opportunities for institutions in Hong Kong offering Chinese medicine courses.

29. Dr Helena WONG considered that a teaching hospital should be regarded as an educational facility. Mr LEUNG Yiu-chung considered that a Chinese medicine hospital could facilitate the teaching and conduct of researches on Chinese medicine. Mr Albert HO enquired about EDB's stance on HKBU's proposed development of a Chinese medicine teaching hospital at the ex-IVE(LWL) site.

30. In response, Acting SED explained the Government's stance that Chinese medicine hospitals were medical facilities for the general public and any proposal to set up such a hospital should first and foremost be considered from the perspectives of healthcare and community needs. HKBU's proposed Chinese medicine hospital was a self-financed project not covered in the current UGC triennial plan for HKBU. If such a hospital was built, HKBU could consider partnering with it for the purpose of providing internship training for its Chinese medicine programme. Regarding the location of a teaching Chinese medicine hospital, there was no requirement that it must be within or close to the university campus.

31. Members noted that according to HKBU, it had proposed to the Government that the entire ex-IVE(LWL) site be allocated to HKBU for long term development. On the question of whether the Government had promised to allocate the southern portion of the ex-IVE(LWL) site to HKBU for the development of a Chinese medicine hospital, members noted that the Administration and HKBU held different views. Referring to the Government's press statement issued on 4 March 2013 which mentioned a meeting held on 10 October 2012 between HKBU and FHB, Dr Fernando CHEUNG sought further information from FHB about the meeting. The Deputy Chairman also enquired on the action, if any, taken after the said meeting to follow up HKBU's proposal to use the ex-IVE(LWL) site for development a Chinese medicine hospital.

32. In response, DSFH(H)1 said that in recent years, HKBU had put forward to FHB various ideas on the development of a Chinese medicine hospital. In June 2011, the Administration was advised that HKBU had found common ground with the Tsim Sha Tsui District Kai Fong Welfare Association ("TSTKFWA") in establishing a Chinese medicine hospital at the Association's building. In November 2011, HKBU submitted a detailed proposal to FHB. Since then, FHB had followed up the matter with HKBU. In September 2012, HKBU provided supplementary information on its proposal, which included detailed information on the mode of collaboration with TSTKFWA, the timetable for the development, feasibility study report and budget etc. The Government had all along supported this joint project. Subsequently, at an informal meeting on 10 October 2012, HKBU indicated that difficulties had been encountered in the joint development plan with TSTKFWA and that it was also interested in developing the hospital on the ex-IVE(LWL) site as an alternative. After the informal meeting, HKBU provided a one-page layout plan to FHB by e-mail showing the location of the proposed hospital at the southern portion of the ex-IVE(LWL) site. The plan however did not contain detailed information. FHB subsequently understood from other government departments that this proposed alternative site did not belong to HKBU and was therefore not feasible under existing policies. FHB continued its efforts on liaising with other government departments on how to assist HKBU in respect of its joint project with TSTKFWA. DSFH(H)1 further said that the Government was only formally notified by HKBU on 18 February 2013 of the withdrawal of its joint project with TSTKFWA. In the same letter, HKBU mentioned that it considered the ex-IVE(LWL) site to be the most suitable site for building the Chinese medicine hospital.

33. Noting that HKBU had provided a layout plan to FHB by e-mail on 10 October 2012, the Deputy Chairman asked whether this should be taken as HKBU's intention to pursue the development of a Chinese medicine hospital at the ex-IVE(LWL) site. DSFH(H)1 responded that on 10 October 2012, HKBU had not advised FHB that it had given up its joint project with TSTKFWA to pursue an alternative instead.

34. At the invitation of the Chairman, Prof Albert CHAN stated that in the view of HKBU, the meeting held with FHB on 10 October 2012 was a formal and official meeting. A senior official from FHB, the then Chairman of the Council of HKBU, a Vice-President responsible for administration and himself were present. The discussion at that meeting was primarily about HKBU's proposal to develop a Chinese medicine hospital at the ex-IVE(LWL) site. The official also indicated that he would assist HKBU in its request to use the site in question to develop a Chinese medicine hospital. Moreover, prior to the said meeting, HKBU had already submitted to FHB its detailed proposal on

development of a Chinese medicine hospital. The only change made to the proposal in October 2012 was the proposed location of the hospital. Prof CHAN said that it had been HKBU's well-known intention for many years to establish a Chinese medicine teaching hospital and this initiative was included in HKBU's 10-year development plan - "Vision 2020" approved by the Council of HKBU. HKBU had a reasonable expectation that FHB would follow up with relevant bureaux/departments on its revised proposal. On the question of whether HKBU had followed the formalities and established procedures in pursuing its proposal, Prof CHAN said that all along, when submitting its proposal and supplementary information for the consideration of the Administration, HKBU had not been advised that it did not follow the relevant procedures.

35. Mr TAM Po-yiu gave his view that a teaching hospital might not necessarily be in the proximity of the main university campus. Noting that the Government and the Shenzhen authority had jointly conducted a planning study on the development of the Lok Ma Chau Loop, Mr TAM said that the Government and other parties might wish to consider the feasibility of developing Chinese medicine hospitals in the Loop area.

Motion

36. The Chairman informed members that he had received the wordings of a motion proposed to be moved by Ms Claudia MO. He advised that the proposed motion was related to the agenda item under discussion and could therefore be moved. Dr Fernando CHEUNG proposed to move certain amendments to the original motion. Both Ms MO's original motion and Dr CHEUNG's amendments had been set out in writing and tabled before members. Members agreed to deal with the motion, and that further debate would not be required since the Panel had already discussed the subject at length.

37. At the invitation of the Chairman, Acting SED reiterated that the bureaux and departments involved had all along followed the established procedures when handling the ex-IVE(LWL) site.

38. With the concurrence of Ms Claudia MO and Dr Fernando CHEUNG, the Chairman put to vote Ms Claudia MO's motion as amended by Dr Fernando CHEUNG (at **Annex 1**). Eight members voted for the motion, no member voted against. One member abstained. The Chairman declared that the motion was passed.

(*Post-meeting note*: The Administration's response to the motion was circulated to members vide LC Paper No. CB(4)538/12-13(01) on 2 April 2013.)

39. DSFH(H)1 indicated that she would like to make some further clarifications regarding HKBU's proposal to use the southern portion of the ex-IVE(LWL) site. Due to time constraint, the Chairman invited her to provide the information in writing after the meeting.

(*Post-meeting note*: A letter from FHB dated 19 March 2013 was circulated to members vide LC Paper No. CB(4)514/12-13(01) on 22 March 2013. A letter from HKBU in response to FHB's aforesaid letter was circulated to members vide LC Paper No. CB(4)537/12-13(01) on 2 April 2013.)

(The Chairman left the meeting at this juncture and the Deputy Chairman took over the chair.)

Annex 1

就議程項目"使用土地作教育用途的現行政策相關事宜"通過的議案

Motion passed under agenda item "Issues relating to the existing policy on the use of land for education purposes"

議案措辭

本委員會反對政府將前香港專業教育學院李惠利分校的教育用地改變用途，撥入賣地表作興建中密度豪宅。並要求政府保留前香港專業教育學院李惠利分校校舍用地作「政府、機構或社區」(GIC)用途，包括作原教育用途。

(毛孟靜議員動議並經張超雄議員修訂)

Wording of the Motion

(Translation)

That this Panel opposes the Government's move of changing the educational use of the site of the former campus of the Hong Kong Institute of Vocational Education (Lee Wai Lee) and including the site in the land sale programme for the construction of medium density luxury residential units, and urges the Government to retain the site of the former campus of the Hong Kong Institute of Vocational Education (Lee Wai Lee) for "Government, Institution or Community" ("GIC") use, including the originally designated educational use.

(Moved by Hon Claudia MO and as amended by Dr Hon Fernando CHEUNG Chiu-hung)

Extract of Minutes of LegCo Panel on Education on 10.6.2013

立法會
Legislative Council

Panel on Education

VI. Update on the proposed use of the southern portion of the former campus site of the Hong Kong Institute of Vocational Education (Lee Wai Lee)

(LC Paper No. CB(4)756/12-13(03) -- Paper provided by the Administration)

Other papers previously issued in connection with the meeting on 11 March 2013

(LC Paper No. CB(4)460/12-13(01) -- Paper provided by the Administration

LC Paper No. CB(4)460/12-13(02) -- Submission from Hong Kong Baptist University

LC Paper No. CB(4)514/12-13(01) -- Letter dated 19 March 2013 from the Food and Health Bureau

Action

LC Paper No. CB(4)537/12-13(01) -- Letter dated 28 March 2013 from Hong Kong Baptist University

LC Paper No. CB(4)538/12-13(01) -- Administration's response to the motion passed by the Panel under agenda item IV of the meeting held on 11 March 2013)

Briefing by the Administration

40. At the invitation of the Chairman, Under Secretary for Education ("US(Ed)") briefed members on the latest progress on the proposed use of the southern portion of the former campus site of the Hong Kong Institute of Vocational Education (Lee Wai Lee) ("ex-IVE(LWL) site") by highlighting the salient points in the Administration's paper [LC Paper No. CB(4)756/12-13(03)]. He advised members that the northern portion of the ex-IVE(LWL) site had been reserved to meet the development needs of the Hong Kong Baptist University ("HKBU"). The southern portion of the site was proposed for rezoning from "Government, Institution or Community" ("GIC") to residential use to meeting housing needs. The relevant draft Kowloon Tong Outline Zoning Plan had been exhibited for public inspection from 15 February to 15 April 2013. Upon the expiry of the public inspection period, the Town Planning Board ("TPB") had received a total of 25 884 representations. These representations were published for public comments until 11 June 2013. Taking into account the representations and comments received, TPB would proceed with making a decision on the rezoning proposal in accordance with the Town Planning Ordinance ("TPO") (Cap.131).

Discussion

Campus development of tertiary institutions

41. Noting a letter from HKBU dated 7 June 2013 expressing its objection to the proposed rezoning of the site in question, Mrs Regina IP sought the Education Bureau("EDB")'s view on HKBU's request for additional land for providing, at its own cost, about 300 hostel places for students pursuing self-financing programmes. Mrs IP remarked that allocating the southern portion of the ex-IVE(LWL) site to HKBU would facilitate its long term planning of campus development.

Action

(*Post-meeting note*: HKBU's letter was circulated to members vide LC Paper No. CB(4)770/12-13(01) on 11 June 2013.)

42. US(Ed) advised that under the prevailing policy applicable to all UGC-funded institutions, the development of student hostels for self-financing programmes was not entitled to public funding and the Government had no obligation to provide land for this purpose. However, UGC-funded institutions could consider building student hostels for their self-financing programmes on existing land within their campus as long as the facilities for UGC-funded programmes were not adversely affected.

43. In response to Mrs Regina IP's enquiry about the proportion of students that could be allocated student hostels at HKBU, US(Ed) said that upon the completion of the planned hostels in the northern portion of the ex-IVE(LWL) site, HKBU would have sufficient hostel places to satisfy student hostel demand under UGC's existing policies, including living in hostel for at least one year during the four years of study at HKBU.

44. Mr MA Fung-kwok declared that he was a Council member of HKBU. Mr MA commented that EDB should retain the site in question for education purpose even though there was no immediate need to allocate the site to any specific institution. Consideration should also be given to reserving the site in question for HKBU in exchange for another site currently in use by HKBU that was far from its Kowloon Tong campus.

45. US(Ed) said that the Government had reserved the northern portion of the ex-IVE(LWL) site for use by HKBU while the southern portion was beyond HKBU's requirement under the existing policies. After careful assessment, EDB was of the view that the site in question could be surrendered to the Government for other uses in the community.

Development of Chinese medicine teaching hospital

46. Dr Fernando CHEUNG declared that he was an alumnus of HKBU. Noting that HKBU had submitted its proposal on a Chinese medicine teaching hospital and the site in question was surrounded by the campus of HKBU, he considered it reasonable to reserve the entire ex-IVE(LWL) site for use by HKBU.

47. Ms Claudia MO declared that she was teaching journalism at HKBU on a part-time basis. She was of the view that EDB had the responsibility to provide land resources for education purpose. She asked whether the

Action

Administration would earmark the site in question for the development of a Chinese medicine teaching hospital if TPB decided against rezoning the southern portion of the ex-IVE(LWL) site to residential use.

48. US(Ed) explained that under the prevailing policies and calculation criteria, the Government had reserved the northern portion of the ex-IVE(LWL) site for use by HKBU so that its publicly-funded academic space and student hostel entitlements up to the 2014-2015 academic year could be fully met. The Chinese medicine hospital proposed by HKBU was a self-financed project not eligible for UGC funding. Hence, the Government had no policy to provide land for its development. In considering the allocation of land for educational use, EDB would have to take into account the needs of the entire education sector.

49. Deputy Secretary for Food & Health (Health)1 ("DSFH(H)1") advised that the Administration supported the development of Chinese medicine and Chinese medicine hospitals in Hong Kong. The issue of Chinese medicine in-patient service was being studied by the Chinese Medicine development Committee.

50. On the future use of the southern portion of the ex-IVE(LWL) site, Deputy Secretary for Development (Planning & Lands)1 ("DSDEV(P&L)1") informed members that TPB had yet to consider the representations and comments on the rezoning proposal and complete the statutory process.

51. Noting that UGC-funded programmes on Chinese medicine had been offered for many years, Mr MA Fung-kwok remarked that the Food and Health Bureau should have studied the issue of provision of a Chinese medicine teaching hospital much earlier. Mr LEUNG Yiu-chung considered that a Chinese medicine teaching hospital should be put in place to dovetail with the development of local Chinese medicine programmes.

52. US(Ed) said that currently, the clinical training of local Chinese medicine programmes could be arranged at Chinese medicine hospitals in the Mainland. DSFH(H)1 clarified that the local Chinese medicine sector had all along been providing out-patient service. However, as the development of a Chinese medicine hospital would involve the provision of in-patient service, the subject would require further study by the Chinese Medicine Development Committee.

53. Noting the Administration's explanation, Mr LEUNG Yiu-chung questioned whether the development of local Chinese medicine programmes would need to rely heavily on the support of the Mainland in the long run.

Action

US(Ed) advised that the development of undergraduate programmes comprised different modules or activities such as teaching, research and practical training. Clinical training and internship would only form part of the programmes.

Planning-related issues

54. Ms Claudia MO and Dr Fernando CHEUNG were gravely concerned that the Administration had included the southern portion of the ex-IVE(LWL) site in the land sale programme before the TPB had made a decision on the rezoning of the site.

55. DSDEV(P&L)1 advised that it was the established practice of the Government to include in the land sale programme those sites that were not immediately available pending completion of various processes and town planning procedures, but were anticipated to be available within the year. He reaffirmed that including the southern portion of the ex-IVE(LWL) site in the land sale programme was in line with the established practice.

56. Noting that TPB had received a total of over 25,000 representations and over 99% of these representations opposed the proposed rezoning of the site in question, Dr Helena WONG enquired about the Administration's stance in the light of these representations.

57. The Chairman declared that he was a Court member of HKBU. He remarked that the proposed rezoning, if approved by TPB, would be detrimental to the education sector. He further asked whether the Development Bureau would withdraw its rezoning proposal and return the site in question to EDB; and whether EDB would strive to secure the site for educational use.

58. DSDEV(P&L)1 explained that TPB, being an independent statutory body established under TPO, would perform its functions in accordance with relevant provisions in TPO. TPB had published the representations received for public comments until 11 June 2013; and would consider the representations and comments received on the rezoning proposal prior to making a decision. On whether the rezoning proposal would be withdrawn, DSDEV(P&L)1 reiterated that after careful assessment, the Government had come to the view that the southern portion of the ex-IVE(LWL) site was not required to be reserved for higher education purpose or other GIC uses, and had therefore submitted a proposal to TPB to rezone the southern portion of the site for residential use. Currently there was no plan to return the site to EDB.

Action

59. US(Ed) said that EDB was aware that over 25 000 representations had been received opposing the proposed rezoning of the site to residential use. However, it was yet to be ascertained whether the representations had made a common call for reserving the site for educational use. US(Ed) confirmed that the site in question was returned to the Government after careful assessment on the need of the higher education sector. At this juncture, EDB had no plan to seek the site for educational use.

60. The Deputy Chairman remarked that as revealed in the vast majority of representations received by TPB, the community's view was very clear. He considered that in proposing to rezone the southern portion of the ex-IVE(LWL) site, the Administration had failed to accurately gauge the prevailing public opinions on the matter.

61. Dr Kenneth CHAN declared that he was an associate professor of the Department of Government and International Studies at HKBU. Dr CHAN was concerned about the Administration's stance that the demolition of the existing building on the ex-IVE(LWL) site should only commence after the future use of the whole ex-IVE(LWL) site had been decided. He considered that this approach would impede HKBU's planning and preparation for its future development including fund-raising for the construction of new buildings and hostels. The Chairman shared similar concern and remarked that given the fluctuation in prices during the interim period, it would be difficult for HKBU to prepare the budget and control the cost if demolition works could not commence shortly.

62. In reply, US(Ed) explained that the existing building on the site was a single block straddling both the northern and southern portions and demolition of the whole building would be required before either portion of the site was to be redeveloped. It would be prudent to embark upon demolishing the building after the long-term plan on the future use of the whole site had been decided. In the interim, HKBU could continue with its planning and discussion with UGC on the details of its development plan; while the Administration would provide appropriate assistance to ensure the disbursement of funding in due course.

Representations Supporting Amendment Item A

Representation No.	Reason	PlanD's Response
R1	Hong Kong is desperately in lack of residential land. I fully support the proposed zoning for building more residential units for the goodness of Hong Kong. I am at the time against the HKBU to make use of the Site for their own purpose as I am very frustrated with the quality of local tertiary education and the proliferation and lowering standard of some 2nd rank universities in Hong Kong.	See para. 6.4.1 of Town Planning Board (TPB) Paper No. 9585
R2	A. Hong Kong is currently lack of residential land. The area zoned for residential use can help solve the problem even to small extend. B. HKBU's objection are groundless: i. HKBU is situated at city centre. Its student dormitory is not required because of its convenient location. ii. Chinese medicine's effectiveness is still in question. Whether we should continue put public resources into it is arguable. iii. HKBU's facilities are already considered adequate. More facilities for them is regarded as over – provision and redundant. iv. Their land use is subject to Government Property Agent's consideration.	See paras. 6.4.1 and 6.4.3 of TPB Paper No. 9585
R3	A. The Hong Kong community has a pressing need for housing. The Site is at a prime location fetching high land premium. It will generate substantial revenue to support local development if it is to be sold. Moreover, if more residential flats are provided in Kowloon Tong area, it will help to stabilize property prices and rentals in the area and assist the middle class to buy or upgrade their flats and improve their living environment. B. Hong Kong is really in need of a Chinese medicine hospital but it does not mean the Government has to give away the prime lot to an individual University for the development of a dedicated School of Chinese Medicine. The number of students enrolled for the 6-year programme of the School of Chinese Medicines, HKBU is just 600. Why do we need to give them such a prime lot for development of a hospital which belongs to them solely? There is a hospital in Kowloon Tong, why does HKBU not cooperate with it to provide Chinese medicine out-patient	See paras. 6.4.1 and 6.4.3 of TPB Paper No. 9585

Representation No.	Reason	PlanD's Response
	and Chinese medicine in-patient services? I do not agree that Kowloon Tong needs to have 3 hospitals.	
R4	I support putting the whole Lee Wai Lee site for auction.	The Site is proposed to be reverted to "G/IC(9)" zone to meet the latest demand of land for GIC use
R5	Support the Government to build more flats and include "Hong Kong Property for Hong Kong People" clause. If possible, better rezone it to "Residential (Group A)".	"R(A)" zone which is intended for higher density development is not appropriate for the Site, which falls in a predominantly low to medium density setting.
R6	A. Oppose to the occupation of the Site by HKBU for the following reasons: HKBU does not have land for hostel and teaching use because it has taken in excessive numbers of Mainland students for its bachelor, master and doctor degree programmes in Hong Kong. The Mainland students coming to Hong Kong can enjoy the subsidy of the taxpayers to rent flats in the prime lots in Kowloon Tong with potential for very high land premium/rentals while the local students are not provided with hostels. As a result, HKBU has to build hostels extensively, leading to shortage of land for development of the School of Chinese Medicine. It therefore takes an alternative way in an attempt to occupy public land for its use. The Dr. Ng Tor Tai (NTT) International House of HKBU is already fully occupied by Mainlanders. The taxpayers should not be held responsible for providing accommodation for the Mainland students. If HKBU is to develop a Chinese medicine hospital, it can demolish the NTT International House for redevelopment. In that way, the hospital can be built and combined with the part of the Lee Wai Lee site (i.e. the section belonging to HKBU) for development. B. Increase the public revenue and make use of the resources to solve the poverty problem.	A. See paras. 6.4.1 and 6.4.3 of TPB Paper No. 9585 B. Issue falling outside the ambit of the TPB
R7	A. Contrasting opinion towards HKBU's opposition to Item A as follows:	A. See paras. 6.4.1, 6.4.2 and 6.4.3 of TPB Paper

Representation No.	Reason	PlanD's Response
	The Tsim Sha Tsui (TST District) Kai Fong Welfare Association locates in an area with the largest number of basic – class citizens from Yau Tsim Mong District and the ethnic minorities. Comparing with Kowloon Tong, there is always a high frequency of passenger flows near TST District Kai Fong Welfare Association, which is favourable for a Chinese Medicinal Hospital of HKBU to ensure a sufficient number of patient supports. The ultimate purpose for HKBU to establish a Chinese Medicinal Hospital is to provide the underprivileged class with genuine cares. "Popularization" of service is a prior concern! If the Hospital is located in Lee Wai Lee, many impoverished people would suppose that the medical services only please the wills of middle class. They would then insist on preferring the "human – touched" clinical services from the traditional Chinese – medicine stalls, instead of making a long – distance travel to Kowloon Tong simply for receiving a "scientific" mode of Chinese medical consultation. B. For the Lee Wai Lee issue, a balance has been made among HKBU's aspiration in Chinese medicine education, public expectation towards the prospect of Chinese-medicine industry, the money-making concerns of property developers, and Hong Kong citizens' wish for an even distribution of residential land uses.	No. 9585 B. Noted
R6738 R8315	A. There is an urgent need for housing land to address housing shortage problem. B. HKBU has adequate land.	See para. 6.4.1 of TPB Paper No. 9585
R6861	A. Support to change the Site for residential use. B. Object to constructing a Chinese Medicine Hospital at the Site.	Noted
R8322	A. The School of Chinese Medicines, HKBU made inadequate preparation. The proposal was revised within a short period without consulting the Chinese Medicine graduates. It lacks the edge of providing effective and prompt medical services for the community. B. The School bombarded the students/graduates with emails requesting them to send their objections to the Government and suggesting them to send in more than one email with the intention of changing the support ratio in an unfair manner.	See paras. 6.4.1 of TPB Paper No. 9585

Annex VIb
of TPB paper No. 9585

Adverse Representations on Amendment Item A (rezoning of the southern portion of the LWL site from "G/IC(9)" to "R(B)") - Main Points and Responses

[The grounds of the representations objecting to Item A are summarized and grouped under the respective points below.]

Representation Points	PlanD's Responses
A. Loss of land for GIC facilities	
The rezoning would be an irreversible loss to the education sector, the community and the society as a whole, as it cannot be used for education or community facilities. There is limited supply of GIC land in Hong Kong and Kowloon Tong, but a lot of alternatives for residential use in other locations. The Site should be used for suitable uses to help more people such as community centre, educational facilities, hospital, social welfare facilities, e.g. residential care home for the elderly, specialized hostels, library, indoor recreation centre, park, cultural/art facilities or offering to non-profit making organizations for provision of community service. The Site should not be for commercial purpose or residential use that would benefit a small number of people. Reverting the Site for GIC use would serve more people and more cost effective as well as alleviate objecting views. Should rezone another site to "G/IC" to compensate. Although Kowloon Tong is a luxury residential area, development should balance the all-rounded needs of the society including education and seek for sustainable development for Hong Kong real estate. The rezoning could not ensure long-term economic benefit. Land use should match with the surrounding developments and follow the majority view.	The Site is proposed to be reverted to "G/IC(9)" zone. See paragraphs 6.4.4(c) and (d) of Town Planning Board (TPB) TPB Paper No. 9585. Adequate land has been reserved for open space use to serve local population.
The original "G/IC" zoning is to serve a buffer for the residential area in Kowloon Tong and Lok Fu to avoid excessive density. The rezoning violates the planning principle.	The proposed medium-rise housing is acceptable from visual and air ventilation points of view. The Site is proposed to be reverted to "G/IC(9)" zone to meet the latest demand of land for GIC use.
The rezoning would set a precedent for the Government to ignore the zoning system and rezone educational and community land for developer to gain profit.	Rezoning is a statutory public consultation process under the Town Planning Ordinance to enable the stakeholders and the public

Representation Points	PlanD's Responses
	to express views for consideration of the TPB.
B. Educational/ Higher Educational Uses	
Shortage of educational land and importance of education There is a shortage of land for educational purposes. According to Government statistics, the shortage amounts to 80,000m^2 of operational area for the eight UGC-funded institutions. When there is a shortage of land for higher educational uses, it is unreasonable to allocate an area as low density residential use. Student hostel places of higher educational institutions are inadequate. It is important to build student hall. Higher education is very important for Hong Kong's development and will contribute greatly to build up the knowledge base society. Adequate land should be reserved for sustainable development of higher education. Local higher educational places should be increased. Education is precious resource of the society. Education is the first priority of a country and the base of all kinds of development. It should be accorded with priority than other uses. Education is a long-term investment for the Hong Kong society and important for Hong Kong's future. The Government should provide good learning environment for students and should not neglect education due to current benefit. Education land is precious. The Site is all along been used for educational purpose. The Site should be reserved for educational use. The rezoning would deteriorate the shortage of educational land in urban area. Should balance education/academic development and economic development/personal benefit. Hong Kong Polytechnic University (PolyU) has the right to use half of the LWL site. City University of Hong Kong (CityU) is small and needs an existing school building for educational use. ***Education more important than residential/economic development*** For Hong Kong people, the Site is more suitable for educational/higher educational development, which will benefit grass roots people/general public/future development of the society, than for luxury housing. Educational use is more important than commercial development. Building luxury housing benefits a small amount of people but building a school will benefit more students/the public. Luxury flats are usually used for investment and benefit investors only. In the long-run, investment in education and raising the quality of education will bring more benefit to the society than residential use. Should not sacrifice long term educational need to short term economic benefit/ housing	See paragraphs 6.4.4 (d) and (e) of TPB Paper No. 9585

Representation Points	PlanD's Responses
development. Using the Site for education purpose would help enhance the ability of the youth. The TPB should not support the proposal that adversely affect expansion of a university due to luxury housing development. There is too much luxury housing in Kowloon Tong. Should not use land only for property development and move GIC facilities away from the urban area. There is a lot of land for residential development but limited land for educational use. In planning the use for a site, priority should be given to educational use but not luxury housing for making profit. ***Site suitable for educational use*** Two universities (HKBU and CityU) are in proximity with the Site which makes the Site perfect for the future expansion for these two universities. The Site is reasonably near to PolyU. It will be a very desirable location for facilities which can enhance the collaboration among these three universities.	
C HKBU expansion need	
HKBU lack of space The HKBU campus site is the smallest among the eight UGC-funded institutions (around 5.4ha). HKBU was not allocated additional land to develop necessary facilities for the implementation of the 3-3-4 academic reform. HKBU had to build new facilities on campus or construct additional floors on existing buildings. The campus is already congested to the point of saturation. Outdoor area is seriously inadequate. HKBU using the Site would increase the activity space of students, improve congestion and allow a better environment for students. ***HKBU development*** The Site can be most efficiently used by allocating it to HKBU for its long-term development. The Site is surrounded on three sides by the HKBU and is geographically an integral part of the University. The HKBU already has its facilities in this street block. The expansion of HKBU into the Site represents the most efficient use of land, as it will consolidate the University's activities in one location and allow HKBU to make improvements to the environment and provide much-needed facilities. The Site is very important for future development of HKBU because it has all along in lack of land for development. HKBU needs the Site to meet its already growing needs, i.e. new programmes, increased need for student accommodation, etc. HKBU's library requires expansion. Educational facilities of HKBU should be enhanced. It is extremely difficult for HKBU to find land nearby to expand in the future. HKBU needs the Site more imminent than residents of luxury flats, not only for HKBU and its students but also for the surrounding community.	See paragraph 6.4.4(e) of TPB Paper No. 9585.

Representation Points	PlanD's Responses
To be consistent with the policies on higher education before and after the re-unification, and to be in line with the world trend of competing for high quality human resources, there is no reason whatsoever why the whole LWL site should not be given to HKBU for the sake of the long term benefits of the community. Support HKBU. Object to resume HKBU land. The need for tertiary institution is increasing. Why not give HKBU a complete campus and better use this piece of land for long-term development ? Sacrificing a piece of land that is crucial to HKBU's future development to commercial interests of the housing market is not constructive or synergistic with the needs of the Hong Kong community. It will cause irreversible damage to HKBU. The Site should be given to HKBU but not for luxury housing. LWL campus of IVE is educational facilities. If it is given to HKBU, it could be used for educational purpose immediately. This would save construction cost. There is no point to change the use of this land right now, then find another place for HKBU for campus development. Find a site for HKBU in other area would force extra commuting for students. ***HKBU Hostel*** The Government said that the northern portion of the LWL site can provide about 1,300 student hostel places to HKBU and adequate to meet their need under the existing educational policy. The Site exceeds the need of HKBU. This reflects short-sightedness of the Government, ignoring the long-term development of higher education. Living in a student hostel is part of university life. Those off-campus hostels cannot help students to enjoy university life on campus. Hostel places in HKBU are in shortage. Land should be used for construction of student hostels. Students have to reside off-campus and this requires additional cost. Using the Site for student hostels would reduce the demand for private housing flats in the area and reduce the commuting time. This would reduce the traffic flow. Inadequate student hostel places also adversely affect the lives of local students and students from Mainland as rent of private flat is high. ***Other points*** LWL is the training place of the fencing team. If it is demolished, there is no other place for training. HKBU needs a 50m long swimming pool. The Government should consider taking back HKBU staff quarter site at Fo Tan and give the Site to HKBU.	

Representation Points	PlanD's Responses
Previously reserved for HKBU HKBU has been liaising with the Government over future use of the Site for several years, it is surprising that the Government did not discuss its plans to rezone the Site with HKBU. HKBU has neither indicated to the Government nor come to any agreement with the Government that HKBU requires only half of the land and is ready to withdraw its request for the whole plot. HKBU should be given a fair opportunity to apply for use of the full area of the LWL site. The Government has reserved the Site for expansion of HKBU and should keep its promise.	See paragraph 6.4.6 of TPB Paper No. 9585.
D Chinese Medicine Hospital (CMH)/Chinese Medicine Teaching Hospital (CMTH) and/or other Medical Facilities	
Support CMH/CMTH/Medical use Support development of CMH/CMTH/medical use. Being a centre of eastern and western culture, Hong Kong should have a CMH. The result of a survey on public perception towards Chinese medicine services in Hong Kong shows there is an urgent and genuine need for a CMTH. Chinese medicine is effective in treating chronic and refractory diseases. Given that the aging population in HK is increasing, the need for Chinese medicine is imminent. A CMTH is urgently needed and would benefit grass root people/all Hong Kong People than luxury housing. Developing CMH would raise the competitiveness of Hong Kong, enhance the role of Hong Kong as an educational hub, raise the status of Hong Kong and attract health care travel visitors. Building a CMTH would facilitate professionalization of the Chinese medicine industry and would benefit more patients. Without a CMH, there would not be a systematic Chinese medicine education. CMTH can provide venue for clinical training, facilitate clinical research, contribute to the advancement/standardization/ modernization of Chinese medicine, as well as integration of Chinese and western medicine. Without in-patient service, the development of Chinese medicine, especially treatment for emergency and critical illness, is limited. The Site is easily accessible, readily for construction without the need to change the land use and suitable for a CMTH. The benefits of the construction of the proposed CMTH on the Site to the community, the higher education sector and the Chinese medicine industry will fulfill the principle of optimum utilization of land. To convert the Site for luxury housing is to put the cart before the horse and to put the trivial above the important. It will affect the plan of building a CMTH on the Site as well as offering internships for Chinese medicine students in Hong Kong.	See paragraphs 6.4.4 (f) and (h) of TPB Paper No. 9585.

Representation Points	PlanD's Responses
In the latest Policy Address, the Government stressed the development of Chinese medicine, but now uses the Site for luxury housing and strangles the plan of developing the first CMTH. It is self-contradictory. Efficient use of land for medical purpose demonstrates the Government's commitment to promoting Chinese medicine. Developing a CMH is an important step for medical service development and medical reform. The Hong Kong Government has sufficient fiscal surplus to forgo the proceeds from the sale of the Site to make long-term investment in Chinese medical education. ***Medical facilities*** For Hong Kong people, the Site is more suitable for medical service development, which will benefit grass roots people/general public than for luxury housing. More medical facilities are needed. The society needs good and more doctors in an aging city like Hong Kong. This takes a lot of investment. Such investment will not only provide better medical services but also promote the Government's image as being far-sighted, reasonable and caring.	
For HKBU CMTH The Site is small and should be given to HKBU for developing CMH/CMTH. The Site is very important for HKBU for developing Chinese medicine programme and internship. A CMTH should best be located at LWL campus, which is adjacent to the Chinese Medicine Building of HKBU. The proximity of the CMTH to the teaching facilities will enhance the effectiveness of the treatment. Teaching hospital of renowned Chinese medicine universities are built near their campus. There have been discussions about the establishment of CMH for many years. HKBU has good facilities, good experience and experienced Chinese medicine doctors, why such plan cannot be substantiated in this piece of land? Such development would not only benefit HKBU, but also call for the repaid development of Chinese medicine as well as enhancing the public health as a whole. HKBU has been reputable for the Chinese medicine discipline and its clinics have been popular. HKBU CMH could facilitate co-operation with Chinese medicine sector of Hong Kong University. The Government has been discussing with HKBU about building a CMH on the Site for several years. The Government breaks the promise and changes the land use.	See paragraph 6.4.4(g) of TPB Paper No. 9585. See paragraph 6.4.6 of TPB Paper No. 9585.
Internship of Chinese medicine students A CMTH will enable Chinese medicine students to conduct their internships in Hong Kong. Chinese medicine students currently have to do their internships in the Mainland. The medical system of the Mainland is different from that of Hong Kong. What students learn in the Mainland cannot be all applied to Hong Kong. This creates many	See paragraph 6.4.4(g) of TPB Paper No. 9585.

Representation Points	PlanD's Responses
problems. The CMTH can support not only HKBU, but also Chinese Medicine students from other institutions. There are inadequate places in Hong Kong for Chinese medicine students to practice.	
D1 object to constructing a CMH.	Noted.
E [omitted]	
F Proposed Residential Use	
Unable to address housing shortage The development of luxury residential properties fails to address the shortage of housing. Low/medium density residential flat does not match the society's urgent need for housing of smaller flats. Developing the Site into residential area cannot solve the immediate needs of housing issue without full planning at that district. Due to building height restriction, housing development on the Site is unable to resolve housing shortage. The Site is not a good choice for increasing flat supply. ***Object to luxury housing/residential use*** Objection to build luxury housing. Luxury apartments should not be built there. Luxury property adds little to the real economy. Rezoning the Site for building luxury housing is an irrational decision. Rich people have a lot of choices for their deluxe housing. Building luxury housing would widen the gap between the rich and the poor. The Site is unsuitable for residential/luxury housing development. Objection to construction of luxury housing or public rental housing. Building whatever housing in such small piece of land is very odd. There is adequate/too much residential land in Kowloon Tong/ Hong Kong. There is no need to use the Site bounded by university buildings and military camp for residential development. Should not sacrifice education and use all land for property development. Building residential development on the Site is lack of long-term land use planning and neglects the need of the overall development. It is very short-sighted for the Government to change the purpose of the land to residential use. The allocation of the LWL site for residential use will not save any land resources for the general public as a whole, as a piece of land at somewhere else would anyway be needed.	See paragraphs 2.4 and 6.4.4 (l) of TPB Paper No. 9585. However, as set out in paragraphs 6.4.4(c) and (d) of TPB Paper No. 9585, the Site is proposed to be reverted to "G/IC(9)" zone.

Representation Points	PlanD's Responses
Incompatible with adjoining campus/ surroundings Objection to construction of in-fill luxury housing in campus/abutting campus. The Site is unsuitable for housing, with university buildings on all sides. It will look strange to have a block of luxury residential building within the HKBU campus area. They are incompatible. Residential land use will jeopardize the surrounding area of the University campus, both in terms of traffic flow and walks of life, affect educational atmosphere and create a long term conflict of land use. The residents will complaint against noise from the hostels, causing a shock to hostel culture and tradition. The "R(B)" zone with a plot ratio 4.5 is not consistent with the surrounding residential zoning of "R(C)4". ***Residential use affects /to be affected by surrounding uses /environment/traffic*** Additional traffic would cause conflict between vehicles and pedestrians and would create air and noise pollution, and hence degrade the overall environmental quality of the area. Using the land for residential area will add pressure on maintaining a low population density in the neighborhood. The construction work would affect the nearby residential care home for the elderly and the university. In case medium-density housing is built, there is insufficient supply of community services for residents. Would set an undesirable precedent for rezoning of other "G/IC" land for residential use.	
The Site abuts a fire station and not suitable for residential development.	The Director of Fire Services advises that for the purpose of minimizing noise impact to occupants of neighbouring buildings, measures including operating public address system with lower volume at night time and installing all speakers in such a way that least impact to the surroundings. Besides, the officer-in-charge of fire appliance/ambulance would exercise their discretion in a sensible manner in using siren (especially during the hours of darkness) having

Representation Points	PlanD's Responses
	due regard to the operational needs, road safety and the prevailing traffic conditions.
Should resolve grass root housing problem Should resolve grass root housing problem. Inadequate public housing. The Site should be used to build public/subsidized housing, and should not be for private/luxury housing. There is adequate supply of medium-density housing.	See paragraph 6.4.4(l) of TPB Paper No. 9585.
Need a comprehensive plan for housing issue Hong Kong Government should provide an organized plan for housing issues rather than ad hoc projects on scattered small sites.	See paragraph 6.4.4(l) of TPB Paper No. 9585
Others Consider lower floors for educational use and upper floors for luxury flats.	It is proposed to revert the Site to "G/IC(9)" zone. See paragraphs 6.4.4(c) and (d) of TPB Paper No. 9585
G Public Consultation	
No/Inadequate public consultation /Ignore public opinion The planning intention of the OZP has been developed for more than 30 years. The Government should consult public of the major change of the planning intention, from low density to medium density, through public discussion. Should enhance the transparency of the public consultation. Should consult HKBU and the students. Should conduct consultation again. Objection to Government's neglect of public opinion. ***procedurally wrong/misleading*** It is misleading to the public and procedurally wrong to include the Site in the Land Sale Programme while the public consultation on the rezoning is still underway.	See paragraphs 6.4.4(i) and (j) of TPB Paper No. 9585
H Others	
Anti-property development hegemony. Should not change to a property project, only for the benefit of developer.	Noted.
Objection to conspiracy between the Government and the businessmen.	The proposed "R(B)" zone is to meet the housing need of the community, but not to benefit a particular party.
Anti-Government hegemony. Government is bullying an education institution that has no political background.	All parties are fairly treated by the Government on the basis of established policies and procedures.

Representation Points	PlanD's Responses
The town planning system is controlled by the Government. Land use planning reflects the view of Government officials. The TPB should consider the benefit of the society, not personal benefit.	The TPB is an independent statutory body with predominately non-official members and the goal of promoting the general welfare of the community. It would consider all views received impartially in making a decision on the landuse zoning of the Site.
Should consider using the private recreational land for increasing flat supply.	The use of allocated private recreational land falls within the purview of Home Affairs Bureau and should be considered separately.
The Chinese Military reserved area is more suitable for residential development/luxury housing than the Site. Should use the military camp site for educational use.	The military camp site is required for military use.
Should use the vacant Government land first to solve the housing shortage problem.	The Government has adopted a multi-pronged approach to increase land supply in short, medium and long terms. Using vacant Government land is one of the measures.
The problem of housing shortage is not due to inadequate land, but lack of planning and using too much land for luxury housing.	See paragraph 6.4.4(l) of TPB Paper No. 9585
Residential land nearby should also be changed for educational use.	Residential land nearby has all been developed.
The Government does not have long term planning for developing the area in Renfrew Road.	The land use planning for the area is reflected on the Kowloon Tong OZP.
The Site is close to military camp and not suitable for residential development. Developing luxury housing on the Site would affect the safety of the military camp. Developing the Site for educational use or CMH would be desirable.	There are existing residential and GIC developments abutting the military site. They are not incompatible.
The Site should not be used for Government use.	The Site is proposed to be reverted to "G/IC(9)" zone to meet the needs of the community. See paragraphs 6.4.4(c) and (d) in TPB Paper No. 9585.

Representation Points	PlanD's Responses
Resource should be reserved for the public and not for a small amount of people. Should consider the case on the basis of the benefit/need of the whole Hong Kong not the developer/rich. Long term development is more important. Should think for the next generation.	Noted.
The Government has huge fiscal surplus. There is no need to sell the Site for revenue.	Fiscal aspect is not a consideration of the TPB.
The rezoning amendment is not justifiable. Turning the Site into a residential plot violates the principle of building a civilized city. It reduces the town's ability to generate agglomeration economies.	Noted. The Site is proposed to be reverted to "G/IC(9)" zone to meet the need of the community.
Luxury housing is not for Hong Kong people. It would attract more Mainland people to Hong Kong to buy flat and adversely affect the opportunity of Hong Kong people to buy a flat. Building luxury housing would raise the property price. Property price is already very high. Should build more affordable housing.	The price of housing units is determined by the private market and is not a consideration of TPB.
The land is readily available for education use. The Government should not complicate the matter with such controversial move. The community deserves more harmony rather than confrontation.	It is proposed to revert the Site to "G/IC(9)" zone. See paragraphs 6.4.4(c) and (d) of TPB Paper No. 9585.
Anti-national education. Objection to development of Nam Sang Wai. From fung shui point of view, school would adversely affect nearby luxury housing.	Not relevant to the amendment.
If the TPB give the Site to HKBU for development of CMTH so that the Chinese medicine students can avoid long travelling to Mainland to practice, a representer is willing to donate a piece of land at Sai Kung for luxury housing development.	See paragraph 6.4.4(f) of TPB Paper No. 9585.
Support luxury housing/HKBU building luxury housing.	The Site is proposed to be reverted to "G/IC(9)" zone. See paragraphs 6.4.4(c) and (d) of TPB Paper No. 9585.
P Proposal	
P1 Revert the zoning of the Site to "G/IC(9)" / "G/IC".	See paragraph 6.4.5 of TPB Paper No. 9585.

反對修訂項目 A 的申述要點

Major Points of Adverse Representations on Amendment Item A

R1 – R1000 (不包括 without R1-R7)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R103 R112 R380 R615	A
R67	A, B
R61 R254 R261 R485	A, B, C
R226 R269	A, B, C, D
R56 R120 R121 R192 R222 R234 R273 R277 R682 R772	A, B, C, D, F
R32	A, B, C, D, F, G
R31	A, B, C, D, F, G, H, P1
R11 R25 R28 R35	A, B, C, D, F, G, P1
R115 R116 R172 R173 R174 R268 R270 R271 R272 R280 R282 R356 R357 R359 R360 R439 R440 R479 R516 R533 R552 R584 R654 R657 R678 R691 R701 R703 R739 R767 R785 R786 R791 R792 R793 R797 R799 R800 R801 R806 R809 R813 R935 R996 R999 R1000	A, B, C, D, F, P1
R215 R734 R879 R959	A, B, C, D, P1
R408	A, B, C, F
R29	A, B, C, F, G, H
R42	A, B, C, F, G, P1
R379 R385 R465 R497 R685 R891	A, B, C, F, P1
R175 R240 R680 R742 R794	A, B, C, P1
R136	A, B, D
R74 R113 R117 R300 R507	A, B, D, F
R15	A, B, D, F, G, H
R26	A, B, D, F, G, P1
R204 R243 R536 R596 R652 R655 R656 R659 R740 R764 R765 R922	A, B, D, F, P1
R225 R677 R904	A, B, D, P1
R47 R163 R778	A, B, F
R531 R687	A, B, F, P1
R468	A, B, P1
R551 R830	A, C
R155 R177 R212 R820 R834	A, C, D
R85 R89 R239	A, C, D, F
R16	A, C, D, F, G
R14	A, C, D, F, H
R185 R436	A, C, D, F, P1
R20	A, C, D, G, H
R686 R993	A, C, D, P1
R521 R559	A, C, F
R557	A, C, F, G
R161 R224 R529	A, C, F, P1
R77 R259 R860	A, C, P1
R450 R568 R632	A, D
R45	A, D, F
R8	A, D, F, G
R241 R645 R646	A, D, F, P1
R990	A, D, P1
R17 R18 R46 R150	A, F
R9	A, F, G, P1
R22	A, F, H
R452 R689 R955 R997	A, F, P1
R815	A, H
R54 R893 R941	A, P1
R52 R105 R144 R200 R228 R250 R266 R302 R307 R377 R396 R473 R474 R491 R515 R528 R583 R635 R763 R770	B
R66 R106 R153 R187 R193 R237 R294 R312 R410 R413 R414 R483 R494 R498 R500 R543 R545 R605 R670 R833	B, C
R40 R72 R78 R92 R95 R183 R197 R220 R257 R289 R365 R383 R400 R768 R771 R841 R844 R858	B, C, D
R81 R88 R375 R384 R537 R556 R614	B, C, D, F
R34	B, C, D, F, G, P1
R94 R275 R279	B, C, D, F, H
R168 R180 R191 R245 R263 R354 R372 R416 R423 R441 R509 R642 R692 R698 R699 R700 R737 R738 R917	B, C, D, F, P1
R382	B, C, D, G
R41 R43 R230 R238 R445 R469 R506 R508 R547 R550 R629 R643 R644 R648 R649 R650 R693 R694 R695 R696 R706 R707 R708 R709 R710 R711 R712 R713 R714 R715 R716 R717 R718 R719 R720 R721 R722 R723 R724 R725 R726 R727 R728 R729 R730 R731 R732 R733 R789 R790 R882 R974	B, C, D, P1
R38 R65 R70 R73 R75 R107 R123 R127 R134 R138 R139 R140 R149 R260 R299 R355 R393 R411 R495 R554	B, C, F
R44	B, C, F, G

Annex VIc of
TPB Paper No. 9585

R12	B, C, F, G, P1
R221 R535	B, C, F, H
R145 R170 R171 R214 R303 R313 R314 R361 R470 R471 R484 R523 R625 R641 R665 R766 R780 R781 R811 R889 R940 R998	B, C, F, P1
R37 R39 R49 R114 R190 R233 R291 R298 R301 R305 R306 R311 R317 R318 R320 R321 R322 R324 R325 R327 R328 R329 R330 R331 R332 R333 R334 R335 R339 R340 R341 R342 R343 R344 R345 R348 R349 R350 R352 R395 R397 R412 R417 R419 R420 R421 R425 R428 R429 R434 R449 R455 R461 R463 R476 R477 R481 R489 R490 R493 R502 R503 R505 R511 R513 R539 R540 R541 R548 R586 R606 R607 R608 R622 R627 R634 R639 R664 R667 R668 R671 R675 R704 R754 R775 R776 R796 R805 R807 R864 R874 R899 R927 R933	B, C, P1
R79 R108 R160 R368 R520 R631 R816 R837 R848 R850 R852 R855 R875 R877	B, D
R188 R219 R442 R621 R674 R676 R774	B, D, F
R83	B, D, F, G, H
R169 R387 R404 R454 R457 R462 R653 R783 R787 R930 R971 R984	B, D, F, P1
R392	B, D, H
R295 R475 R914 R950 R954 R962 R963 R964 R980	B, D, P1
R130 R131 R151 R194 R216 R253 R264 R267 R504 R636 R779 R814 R821	B, F
R10 R19	B, F, G
R23	B, F, G, H
R394	B, F, H
R36 R255 R288 R389 R451 R486 R587 R628 R669 R757 R915 R926 R948	B, F, P1
R13	B, G
R939	B, G, H, P1
R938	B, H, P1
R48 R50 R251 R438 R446 R447 R681 R753 R890 R897 R901 R906 R916 R921 R923 R936 R942 R944 R947 R952 R960 R961 R966 R968 R978 R987 R992 R995	B, P1
R69 R76 R86 R87 R96 R122 R126 R128 R135 R137 R141 R148 R152 R195 R201 R207 R244 R246 R247 R287 R309 R316 R388 R403 R405 R424 R478 R517 R522 R546 R572 R613 R862	C
R55 R60 R63 R64 R84 R90 R100 R102 R118 R119 R124 R199 R203 R218 R274 R283 R362 R363 R366 R378 R381 R415 R524 R561 R595 R633 R637 R835 R856	C, D
R57 R98 R109 R133 R147 R158 R196 R252 R278 R281 R310 R402 R418 R448 R526 R563 R617 R672 R822 R828	C, D, F
R27	C, D, F, G
R407	C, D, F, H, P1
R21 R53 R166 R176 R182 R227 R265 R276 R284 R358 R370 R371 R459 R527 R532 R544 R553 R624 R626 R661 R690 R741 R782 R803 R810 R895 R932 R949 R951 R956 R972	C, D, F, P1

R422	C, D, H, P1
R30 R104 R125 R164 R184 R202 R319 R433 R464 R492 R542 R673 R684 R705 R746 R788 R892	C, D, P1
R33 R59 R62 R71 R82 R97 R129 R142 R156 R157 R162 R167 R178 R189 R206 R308 R315 R336 R351 R386 R399 R406 R496 R512 R514 R518 R525 R534 R679 R773 R819	C, F
R364 R610	C, F, H
R437	C, F, H, P1
R68 R179 R229 R231 R290 R390 R391 R458 R460 R487 R488 R501 R609 R777 R784 R795 R884 R912 R965	C, F, P1
R99	C, H
R638	C, H, P1
R58 R146 R205 R217 R236 R249 R293 R304 R323 R338 R346 R353 R367 R376 R443 R444 R466 R472 R510 R558 R588 R611 R612 R702 R755 R756 R824 R857 R885 R887 R894 R896 R900 R905 R907 R908 R909 R913 R918 R929 R931 R934 R945 R953 R958 R967 R970 R976 R977 R983 R985 R986 R988 R989 R991 R994	C, P1
R91 R101 R110 R111 R159 R208 R209 R213 R223 R235 R256 R258 R347 R369 R373 R538 R562 R564 R565 R566 R567 R569 R570 R571 R573 R574 R575 R577 R578 R579 R580 R581 R589 R591 R592 R593 R597 R598 R599 R600 R603 R604 R616 R618 R620 R623 R630 R640 R743 R744 R745 R748 R749 R750 R751 R752 R758 R759 R760 R761 R762 R817 R818 R823 R829 R832 R838 R839 R840 R846 R849 R851 R853 R854 R865 R866 R867 R868 R869 R872 R876 R878	D
R93 R132 R154 R165 R210 R242 R262 R374 R409 R480 R499 R519 R555 R582 R590 R594 R601 R602 R619 R827 R836 R845 R859 R871 R873	D, F
R804	D, F, G, P1
R198 R292 R337 R530 R697 R735 R736	D, F, P1
R576 R842	D, H
R24 R181 R232 R296 R297 R401 R435 R453 R456 R482 R647 R651 R658 R660 R662 R663 R666 R688 R798 R802 R880 R881 R888 R902 R903 R911 R919 R924 R928 R946 R969 R973 R979	D, P1
R80 R143 R186 R285 R549 R683 R769 R812 R847 R870	F
R211	F, G
R248 R560	F, H
R398	F, H, P1
R51 R467 R886 R910 R925 R937 R943 R975 R981	F, P1
R286 R883 R957 R982	H, P1
R747 R825 R826 R831 R843 R861 R863	NIL
R326 R426 R427 R430 R431 R432 R585 R808 R898 R920	P1

R1001 – R2000 (不包括 without R1192)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/ Proposals and Responses (Refer to Annex VIb)
R1461 R1465 R1478	A
R1474	A, B, C, D
R1031 R1200 R1209	A, B, C, D, F
R1019	A, B, C, D, F, G
R1126	A, B, C, D, F, H, P1
R1001 R1005 R1014 R1028 R1029 R1032 R1033 R1050 R1051 R1052 R1111 R1141 R1164 R1211 R1220 R1269 R1319 R1328 R1388 R1422 R1436 R1483 R1498 R1499 R1505 R1507 R1539 R1544 R1709 R1788 R1789 R1790 R1791 R1810 R1881 R1882 R1949	A, B, C, D, F, P1
R1508 R1509 R1728	A, B, C, D, H, P1
R1112 R1178 R1214 R1414 R1510 R1605 R1615 R1814 R1906 R1913	A, B, C, D, P1
R1190 R1310 R1531 R1793 R1966 R1982	A, B, C, F, P1
R1260 R1280 R1287 R1365	A, B, C, P1
R1479 R1480	A, B, D
R1781	A, B, D, F
R1566	A, B, D, F, G, P1
R1216 R1406 R1500 R1502 R1504 R1541 R1675 R1792 R1877 R1893 R1894	A, B, D, F, P1
R1094 R1570	A, B, D, P1
R1025	A, B, F
R1022 R1023 R1326 R1403	A, B, F, P1
R1452	A, B, G, P1
R1243 R1349 R1351 R1404 R1440 R1547 R1548 R1643 R1672 R1725 R1846 R1939 R1986	A, B, P1
R1020	A, C, D, F
R1577	A, C, D, F, H, P1
R1191 R1603 R1644	A, C, D, F, P1
R1657 R1666	A, C, D, P1
R1391	A, C, D1, P1
R1047	A, C, F, H, P1
R1342 R1503 R1646 R1656 R1891 R1899	A, C, F, P1
R1174 R1217 R1553 R1732 R1928 R1990	A, C, P1
R1521	A, F
R1575 R1631 R1834 R1874	A, F, P1
R1002 R1105 R1122 R1149 R1210 R1229 R1247 R1371 R1396 R1397 R1431 R1640 R1819	A, P1
R1609	A,B, D, F, P1
R1026 R1475 R1482 R1518	B
R1477 R1741	B, C
R1040	B, C, D
R1027 R1506 R1524	B, C, D, F
R1177	B, C, D, F, H
R1276	B, C, D, F, H, P1
R1004 R1016 R1068 R1155 R1194 R1205 R1207 R1380 R1446 R1456 R1756 R1918 R1944 R1970 R1981	B, C, D, F, P1
R1809 R1839	B, C, D, H, P1
R1107 R1167 R1189 R1237 R1251 R1317 R1379 R1393 R1434 R1537 R1576 R1607 R1645 R1674 R1687 R1726 R1727 R1759 R1828 R1914 R1917	B, C, D, P1
R1045 R1188	B, C, F
R1150	B, C, F, H, P1
R1088 R1104 R1110 R1136 R1139 R1142 R1274 R1275 R1311 R1416 R1417 R1542 R1551 R1594 R1733 R1743 R1757 R1769 R1866 R1875 R1911 R1934	B, C, F, P1
R1516	B, C, H
R1219 R1598 R1802	B, C, H, P1
R1007 R1010 R1035 R1038 R1082 R1093 R1129 R1138 R1140 R1144 R1152 R1157 R1196 R1223 R1239 R1266 R1285 R1299 R1300 R1309 R1339 R1346 R1357 R1369 R1376 R1392 R1453 R1454 R1458 R1563 R1581 R1617 R1619 R1628 R1636 R1671 R1693 R1719 R1723 R1737 R1739 R1755 R1758 R1767 R1768 R1770 R1775 R1844 R1868 R1895 R1900 R1962 R1996	B, C, P1
R1072 R1075 R1083 R1490 R1491 R1493 R1495	B, D
R1070 R1203 R1466 R1470 R1519	B, D, F
R1021 R1186	B, D, F, G
R1024	B, D, F, G, H
R1034 R1195 R1584 R1658	B, D, F, G, P1
R1467	B, D, F, H
R1103 R1232 R1258 R1437 R1578 R1664 R1734 R1817 R1833 R1857 R1916 R1948 R1953	B, D, F, P1

R1015 R1041 R1116 R1118 R1146 R1158 R1212 R1241 R1272 R1282 R1297 R1315 R1320 R1325 R1334 R1345 R1347 R1382 R1405 R1424 R1430 R1441 R1513 R1564 R1591 R1612 R1662 R1698 R1711 R1750 R1847 R1850 R1852 R1856 R1888 R1898 R1956 R1963 R1976 R1998	B, D, P1
R1008 R1523	B, F
R1327 R1543	B, F, G, H, P1
R1854 R1915	B, F, G, P1
R1090 R1097 R1121 R1124 R1173 R1201 R1238 R1256 R1270 R1303 R1335 R1344 R1374 R1386 R1415 R1432 R1439 R1534 R1549 R1597 R1622 R1655 R1715 R1797 R1806 R1864 R1922 R1923 R1967 R1997	B, F, P1
R1714	B, G, H, P1
R1273 R1408 R1629 R1840	B, G, P1
R1338 R1377 R1623 R1635 R1766 R1796 R1804 R1938	B, H, P1
R1003 R1058 R1084 R1085 R1091 R1100 R1101 R1106 R1117 R1120 R1127 R1128 R1132 R1137 R1145 R1151 R1168 R1228 R1234 R1245 R1252 R1255 R1264 R1267 R1271 R1283 R1284 R1289 R1295 R1296 R1301 R1306 R1312 R1321 R1330 R1331 R1333 R1348 R1352 R1353 R1354 R1366 R1370 R1372 R1373 R1375 R1412 R1413 R1418 R1420 R1426 R1451 R1484 R1486 R1546 R1555 R1556 R1557 R1558 R1559 R1561 R1588 R1604 R1618 R1625 R1627 R1639 R1641 R1648 R1650 R1651 R1659 R1663 R1676 R1682 R1692 R1696 R1699 R1707 R1718 R1720 R1721 R1746 R1747 R1753 R1771 R1795 R1798 R1807 R1813 R1821 R1836 R1842 R1849 R1851 R1859 R1862 R1863 R1886 R1907 R1909 R1920 R1927 R1929 R1945 R1946 R1947 R1950 R1951 R1954 R1958 R1974 R1978 R1983 R1992 R1993	B, P1
R1059 R1061 R1074 R1202 R1204 R1457 R1512	C
R1065 R1208 R1485 R1514 R1520 R1784	C, D, F
R1215	C, D, F, G, P1
R1143 R1159 R1286 R1291 R1385 R1387 R1501 R1511 R1552 R1608 R1610 R1621 R1660 R1677 R1695 R1703 R1748 R1884 R1890	C, D, F, P1
R1848	C, D, H, P1
R1013 R1046 R1049 R1055 R1113 R1197 R1199 R1224 R1227 R1235 R1240 R1244 R1254 R1394 R1428 R1438 R1538 R1540 R1568 R1574 R1592 R1606 R1647 R1667 R1691 R1764 R1786 R1827 R1841 R1883 R1892 R1897 R1904 R1930 R1943 R1957 R1969 R1972 R1977	C, D, P1
R1460	C, F
R1367 R1562 R1738	C, F, G, P1
R1030 R1098 R1099 R1102 R1119 R1125 R1166 R1172 R1180 R1198 R1206 R1314 R1337 R1359 R1378 R1402 R1423 R1448 R1526 R1532 R1536 R1572 R1593 R1616 R1661 R1685 R1689 R1713 R1729 R1735 R1742 R1777 R1816 R1825 R1838 R1867	C, F, P1
R1876 R1879 R1902 R1908 R1925 R1941 R1965 R1968 R1984 R1987 R1991	
R1263	C, G, H, P1
R1932	C, G, P1
R1278 R1599 R1853	C, H, P1
R1009 R1039 R1086 R1087 R1089 R1096 R1108 R1114 R1115 R1123 R1131 R1133 R1147 R1153 R1154 R1156 R1162 R1169 R1170 R1171 R1175 R1176 R1181 R1182 R1183 R1184 R1185 R1218 R1230 R1231 R1242 R1246 R1248 R1249 R1250 R1253 R1257 R1259 R1261 R1268 R1277 R1279 R1281 R1288 R1290 R1292 R1298 R1302 R1304 R1305 R1313 R1318 R1322 R1324 R1329 R1355 R1358 R1360 R1361 R1364 R1381 R1384 R1389 R1390 R1399 R1400 R1407 R1419 R1425 R1427 R1429 R1433 R1435 R1442 R1447 R1449 R1450 R1455 R1545 R1550 R1554 R1571 R1580 R1583 R1589 R1590 R1601 R1633 R1634 R1652 R1654 R1665 R1669 R1670 R1681 R1683 R1684 R1686 R1694 R1704 R1706 R1712 R1716 R1717 R1724 R1740 R1745 R1749 R1751 R1761 R1762 R1773 R1774 R1778 R1800 R1801 R1803 R1805 R1812 R1815 R1822 R1824 R1829 R1830 R1831 R1832 R1843 R1845 R1858 R1872 R1880 R1885 R1887 R1889 R1910 R1919 R1931 R1936 R1937 R1955 R1959 R1960 R1964 R1975 R1979 R1985 R1988 R1989 R1994	C, P1
R1017 R1042 R1056 R1057 R1060 R1062 R1063 R1064 R1066 R1067 R1069 R1077 R1078 R1079 R1080 R1462 R1463 R1464 R1468 R1469 R1473 R1481 R1487 R1488 R1489 R1492 R1494 R1496 R1497 R1782	D
R1071 R1073 R1076 R1081 R1459 R1471 R1472 R1476 R1780 R1783 R1785 R1787	D, F
R1586	D, F, G, P1
R1043 R1092 R1134 R1222 R1236 R1316 R1525 R1528 R1533 R1600 R1624 R1690 R1702 R1779 R1818 R1835 R1837	D, F, P1
R1529	D, G, P1
R1006 R1012 R1036 R1048 R1053 R1054 R1095 R1135 R1148 R1160 R1161 R1163 R1193 R1213 R1225 R1226 R1233 R1262 R1308 R1340 R1343 R1350 R1362 R1363 R1368 R1383 R1395 R1398 R1401 R1409 R1410 R1421 R1444 R1445 R1530 R1535 R1560 R1565 R1569 R1585 R1587 R1596 R1602 R1614 R1630 R1632 R1637 R1642 R1649 R1680 R1688 R1697 R1701 R1705 R1710 R1731 R1760 R1763 R1772 R1794 R1799 R1808 R1811 R1855 R1865 R1869 R1896 R1901 R1903 R1912 R1933 R1940 R1942 R1952 R1961 R1971 R1973 R1980	D, P1
R1522	F
R1823	F, G, P1
R1638	F, H, P1
R1011 R1018 R1109 R1179 R1221 R1265 R1293 R1294 R1307 R1323 R1332 R1336 R1341 R1356 R1411 R1443 R1517 R1527 R1567 R1573 R1579 R1582 R1611 R1613 R1620 R1668 R1678 R1679 R1722 R1730 R1744 R1752 R1765 R1776 R1820 R1860	F, P1

R1861 R1873 R1924 R1926 R1935 R1999 R2000	
R1044	G
R1626 R1653 R1700 R1995	G, P1
R1187 R1736 R1870 R1871	H, P1
R1515	NIL
R1037 R1130 R1165 R1595 R1673 R1708 R1754 R1826 R1878 R1905 R1921	P1

R2001 – R3000 (不包括 without R2312, R2375)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R2471	A, B
R2446	A, B, C, D, F
R2759 R2938 R2970	A, B, C, D, F, P1
R2479 R2483	A, B, C, D, P1
R2992	A, B, C, F, H, P1
R2444	A, B, C, F, P1
R2002 R2137 R2192 R2298 R2321 R2590 R2598 R2683	A, B, C, P1
R2141 R2220 R2763 R2937	A, B, D, F, P1
R2160	A, B, D, H, P1
R2269 R2464 R2465 R2808 R2816 R2819	A, B, D, P1
R2336 R2357 R2643 R2774	A, B, F, P1
R2031 R2946	A, B, P1
R2480 R2481 R2482 R2484	A, C, D, F, P1
R2530 R2655 R2949	A, C, D, P1
R2387	A, C, F, P1
R2175 R2252 R2551	A, C, H, P1
R2149 R2203 R2666 R2771 R2932 R2950	A, C, P1
R2392 R2707	A, D, F, P1
R2036 R2341 R2760	A, D, P1
R2397 R2451	A, F
R2509	A, F, P1
R2013 R2023 R2028 R2091 R2122 R2132 R2145 R2237 R2251 R2283 R2284 R2307 R2313 R2348 R2519 R2521 R2541 R2614 R2618 R2680 R2778 R2802 R2809 R2810 R2941 R2958	A, P1
R2367 R2368 R2373 R2381 R2384 R2450 R2455 R2456 R2460 R2462 R2971 R2999	B
R2383	B, C
R2440	B, C, D
R2459 R2468	B, C, D, F
R2260 R2445 R2477 R2607 R2931 R2936	B, C, D, F, P1
R2385	B, C, D, F, G
R2054 R2813	B, C, D, H, P1
R2077 R2154 R2177 R2225 R2288 R2449 R2511 R2645 R2947 R2952	B, C, D, P1
R2009 R2333 R2438 R2489 R2517 R2539 R2685 R2752 R2822 R2844 R2969	B, C, F, P1
R2197	B, C, G, P1
R2502 R2549 R2555 R2823	B, C, H, P1
R2010 R2037 R2044 R2063 R2071 R2084 R2098 R2100 R2110 R2116 R2119 R2121 R2124 R2148 R2213 R2216 R2239 R2245 R2271 R2276 R2356 R2376 R2436 R2488 R2503 R2516 R2522 R2523 R2534 R2535 R2573 R2576 R2589 R2637 R2638 R2639 R2664 R2679 R2684 R2696 R2741 R2772 R2781 R2797 R2821 R2843 R2848 R2878 R2880 R2896 R2897 R2898 R2910 R2919 R2925 R2957 R2960	B, C, P1
R2366 R2377 R2993	B, D
R2388 R2467 R2604 R2856	B, D, F, P1
R2218	B, D, H, P1
R2017 R2034 R2074 R2133 R2255 R2273 R2277 R2291 R2325 R2393 R2437 R2531 R2566 R2586 R2587 R2688 R2765 R2773 R2775 R2777 R2791 R2865 R2866 R2877 R2930 R2935	B, D, P1
R2448	B, F, H
R2035 R2089 R2095 R2214 R2247 R2258 R2259 R2275 R2282 R2326 R2335 R2343 R2349 R2466 R2475 R2505 R2594 R2605 R2702 R2728 R2731 R2754 R2766 R2825 R2892 R2894 R2912 R2939	B, F, P1
R2362	B, G
R2019 R2101 R2105 R2174 R2495 R2508 R2732 R2869 R2962	B, H, P1
R2012 R2014 R2024 R2042 R2045 R2047 R2059 R2062 R2066 R2069 R2076 R2080 R2081 R2087 R2106 R2108 R2113 R2114 R2118 R2130 R2131 R2135 R2138 R2152 R2163 R2166 R2185 R2188 R2195 R2204 R2212 R2223 R2235 R2236 R2238 R2243 R2244 R2262 R2272 R2278 R2279 R2297 R2318 R2324 R2332 R2344 R2487 R2491 R2494 R2500 R2513 R2538 R2554 R2559 R2562 R2563 R2571 R2572 R2578 R2580 R2582 R2585 R2603 R2612 R2615 R2620 R2627 R2630 R2632 R2646 R2654 R2656 R2674 R2700 R2709 R2711 R2713 R2714 R2717 R2720 R2736 R2739 R2740 R2744 R2745 R2746 R2758 R2762 R2780 R2784 R2787 R2793 R2795 R2801 R2815 R2826 R2832 R2835 R2837 R2841 R2845 R2846 R2849 R2850 R2852 R2855 R2858 R2859 R2891 R2895 R2899 R2902 R2903 R2906 R2908 R2915 R2916 R2917 R2918 R2922 R2924 R2940 R2944 R2948 R2954 R2955 R2963 R2966 R2972 R2973	B, P1
R2364 R2457 R2472 R2476 R2997 R3000	C
R2442	C, D
R2829	C, D, F, H, P1
R2049 R2300 R2378 R2441 R2490 R2524 R2653 R2694 R2776 R2881 R2968	C, D, F, P1

R2127	C, D, H, P1
R2016 R2022 R2043 R2051 R2070 R2088 R2129 R2134 R2150 R2155 R2198 R2226 R2228 R2257 R2270 R2280 R2302 R2339 R2345 R2391 R2394 R2395 R2398 R2399 R2400 R2401 R2402 R2403 R2404 R2405 R2406 R2407 R2408 R2409 R2410 R2411 R2412 R2413 R2414 R2415 R2416 R2417 R2418 R2419 R2420 R2421 R2422 R2423 R2424 R2425 R2426 R2427 R2428 R2429 R2430 R2431 R2432 R2433 R2434 R2435 R2485 R2497 R2504 R2536 R2570 R2606 R2648 R2657 R2673 R2676 R2704 R2738 R2761 R2767 R2769 R2783 R2785 R2790 R2805 R2840 R2853 R2854 R2870 R2879 R2909 R2953 R2975 R2976 R2977 R2978 R2979 R2980 R2981 R2982 R2983 R2984 R2985 R2986 R2987 R2988 R2989	C, D, P1
R2452 R2453	C, F
R2021	C, F, G, P1
R2520 R2661 R2812	C, F, H, P1
R2026 R2041 R2060 R2061 R2073 R2102 R2123 R2162 R2167 R2205 R2215 R2232 R2233 R2241 R2261 R2301 R2306 R2386 R2389 R2498 R2510 R2525 R2528 R2529 R2547 R2558 R2560 R2565 R2567 R2568 R2574 R2579 R2583 R2619 R2623 R2650 R2658 R2687 R2691 R2701 R2726 R2735 R2747 R2751 R2800 R2803 R2871 R2872 R2890 R2928 R2929 R2951	C, F, P1
R2056	C, G, P1
R2020 R2136 R2172 R2176 R2230 R2263 R2296 R2330 R2514 R2665 R2729 R2764 R2867 R2883	C, H, P1
R2004 R2006 R2011 R2015 R2025 R2027 R2029 R2030 R2032 R2033 R2038 R2039 R2046 R2048 R2050 R2052 R2055 R2058 R2064 R2065 R2067 R2072 R2075 R2078 R2082 R2085 R2086 R2090 R2093 R2094 R2096 R2097 R2103 R2104 R2107 R2111 R2112 R2115 R2117 R2120 R2126 R2139 R2140 R2142 R2143 R2147 R2153 R2157 R2158 R2161 R2164 R2165 R2171 R2173 R2180 R2181 R2182 R2184 R2186 R2187 R2189 R2190 R2191R2196 R2199 R2200 R2201 R2202 R2206 R2208 R2210 R2211 R2227 R2229 R2231 R2234 R2246 R2248 R2250 R2253 R2254 R2266 R2267 R2268 R2285 R2286 R2290 R2293 R2294 R2299 R2303 R2304 R2305 R2310 R2311 R2315 R2316 R2317 R2319 R2323 R2329 R2331 R2338 R2340 R2346 R2350 R2351 R2352 R2354 R2355 R2390 R2492 R2493 R2499 R2501 R2506 R2507 R2512 R2515 R2518 R2526 R2527 R2532 R2533 R2537 R2540 R2542 R2546 R2548 R2550 R2552 R2553 R2556 R2557 R2561 R2569 R2577 R2581 R2584 R2588 R2591 R2592 R2593 R2595 R2596 R2597 R2599 R2600 R2601 R2602 R2608 R2609 R2613 R2616 R2617 R2621 R2622 R2624 R2625 R2626 R2628 R2629 R2631 R2633 R2634 R2635 R2636 R2642 R2644 R2647 R2649 R2651 R2652 R2659 R2660 R2662 R2663 R2667 R2671 R2672 R2675 R2678 R2681 R2682 R2686 R2689 R2690 R2692 R2693 R2695 R2697 R2699 R2703 R2705 R2708 R2712 R2716 R2718 R2719 R2725 R2727 R2730 R2733 R2737	C, P1

R2742 R2749 R2756 R2757 R2768 R2770 R2779 R2782 R2786 R2788 R2789 R2792 R2794 R2796 R2798 R2807 R2814 R2817 R2818 R2820 R2824 R2827 R2828 R2830 R2831 R2833 R2834 R2836 R2838 R2839 R2842 R2847 R2857 R2860 R2861 R2862 R2863 R2868 R2882 R2884 R2885 R2886 R2887 R2888 R2889 R2893 R2900 R2901 R2905 R2911 R2914 R2920 R2923 R2926 R2942 R2943 R2945 R2956 R2961 R2965 R2967 R2974	
R2040 R2358 R2363 R2365 R2371 R2372 R2379 R2458 R2474 R2990 R2995 R2996 R2998	D
R2360 R2369 R2447 R2994	D, F
R2193	D, F, H, P1
R2005 R2109 R2156 R2289 R2478 R2496 R2677 R2710 R2753 R2873 R2927	D, F, P1
R2159 R2564	D, H, P1
R2001 R2003 R2007 R2008 R2018 R2053 R2057 R2099 R2128 R2168 R2170 R2179 R2183 R2194 R2207 R2209 R2217 R2219 R2224 R2240 R2242 R2249 R2265 R2274 R2287 R2292 R2295 R2308 R2314 R2322 R2327 R2328 R2334 R2337 R2342 R2396 R2439 R2463 R2543 R2575 R2610 R2611 R2640 R2669 R2670 R2698 R2721 R2723 R2724 R2748 R2750 R2755 R2799 R2806 R2811 R2851 R2864 R2933 R2934 R2959	D, P1
R2370 R2382 R2469 R2470 R2473 R2991	F
R2068 R2256 R2443	F, G, P1
R2374 R2461	F, H
R2913	F, H, P1
R2079 R2083 R2092 R2125 R2144 R2146 R2151 R2221 R2222 R2281 R2309 R2347 R2454 R2544 R2668 R2715 R2722 R2734 R2804 R2874 R2875 R2876	F, P1
R2264	G, P1
R2359	H
R2169 R2320 R2743 R2907	H, P1
R2361	NIL
R2178 R2353 R2380 R2486 R2545 R2641 R2706 R2904 R2921 R2964	P1

R3001 - R4000 (不包括 without R3178, 3208)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點 / 建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R-3201 R-3268	A
R-3776	A, B, C, D, F
R-3049 R-3050 R-3063 R-3215 R-3282 R-3781 R-3755	A, B, C, D, F, P1
R-3760	A, B, C, P1
R-3154 R-3155 R-3156	A, B, D, F
R-3039 R-3216 R-3379 R-3472 R-3520 R-3909 R-3943	A, B, D, F, P1
R-3616	A, B, D, P1
R-3285	A, B, F, G, P1
R-3304 R-3308 R-3339 R-3883	A, B, P1
R-3200	A, C
R-3514 R-3523	A, C, D, F, P1
R-3604	A, C, D, P1
R-3759	A, C, F, G
R-3757	A, C, F, G, P1
R-3305	A, C, F, P1
R-3373 R-3650 R-3805	A, C, P1
R-3413	A, D, F, G, P1
R-3298	A, D, P1
R-3793	A, F, G
R-3654	A, F, G, P1
R-3851	A, F, H, P1
R-3519 R-3944	A, F, P1
R-3790	A, G, P1
R-3032 R-3307 R-3320 R-3336 R-3356 R-3359 R-3439 R-3488 R-3499 R-3588 R-3615 R-3709 R-3828 R-3888 R-3932 R-3962	A, P1
R-3002 R-3003 R-3013 R-3019 R-3020 R-3177 R-3204 R-3230 R-3247 R-3254 R-3267 R-3269 R-3270 R-3272 R-3786	B
R-3274 R-3653	B, C
R-3185 R-3241	B, C, D
R-3052 R-3772 R-3791 R-3889	B, C, D, F, P1
R-3525 R-3558 R-3734 R-3801 R-3863 R-3959	B, C, D, P1
R-3001	B, C, F
R-3388	B, C, F, G, P1
R-3485	B, C, F, H, P1
R-3023 R-3041 R-3217 R-3302 R-3375 R-3390 R-3394 R-3607 R-3651 R-3667 R-3694 R-3721 R-3758 R-3804 R-3848	B, C, F, P1
R-3544 R-3767	B, C, G, P1
R-3044 R-3283 R-3333 R-3344 R-3349 R-3423 R-3424 R-3487 R-3491 R-3496 R-3530 R-3555 R-3567 R-3568 R-3576 R-3617 R-3659 R-3743 R-3763 R-3802 R-3837 R-3858 R-3974	B, C, P1
R-3057 R-3158 R-3160 R-3163 R-3164 R-3172 R-3212 R-3228 R-3232 R-3238 R-3276 R-3765 R-3787	B, D
R-3030 R-3378 R-3475 R-3565 R-3585 R-3639 R-3680 R-3773 R-3778	B, D, F, P1
R-3955	B, D, H, P1
R-3024 R-3026 R-3286 R-3306 R-3374 R-3411 R-3442 R-3452 R-3482 R-3513 R-3533 R-3543 R-3547 R-3566 R-3579 R-3589 R-3591 R-3594 R-3606 R-3608 R-3665 R-3673 R-3677 R-3688 R-3771 R-3808 R-3820 R-3875 R-3881 R-3895 R-3896 R-3929 R-3934 R-3936 R-3941 R-3966 R-3971 R-3999	B, D, P1
R-3167 R-3180 R-3187 R-3189 R-3207 R-3221 R-3245	B, F
R-3486 R-3735	B, F, G, P1
R-3550 R-3741 R-3830	B, F, H, P1
R-3277 R-3279 R-3280 R-3341 R-3366 R-3372 R-3377 R-3503 R-3522 R-3569 R-3590 R-3634 R-3643 R-3644 R-3681 R-3687 R-3746 R-3814 R-3816 R-3822 R-3826 R-3829 R-3891 R-3894 R-3953 R-3957 R-3964 R-3988	B, F, P1
R-3754 R-3833	B, G, P1
R-3222 R-3656	B, H
R-3400 R-3450 R-3609 R-3613 R-3714 R-3730 R-3745 R-3857 R-3903 R-3917	B, H, P1

R-3046	R-3218	R-3291	R-3292	R-3293	R-3294	R-3296	R-3297	R-3299	B, P1
R-3301	R-3314	R-3316	R-3321	R-3329	R-3335	R-3337	R-3338	R-3347	
R-3351	R-3353	R-3357	R-3367	R-3381	R-3386	R-3396	R-3401	R-3405	
R-3407	R-3412	R-3426	R-3433	R-3437	R-3445	R-3446	R-3447	R-3448	
R-3449	R-3460	R-3464	R-3466	R-3469	R-3476	R-3479	R-3484	R-3498	
R-3502	R-3506	R-3510	R-3516	R-3517	R-3527	R-3528	R-3537	R-3542	
R-3562	R-3563	R-3564	R-3570	R-3571	R-3572	R-3587	R-3592	R-3599	
R-3605	R-3618	R-3621	R-3622	R-3630	R-3632	R-3635	R-3638	R-3640	
R-3641	R-3642	R-3645	R-3646	R-3648	R-3649	R-3658	R-3666	R-3682	
R-3686	R-3689	R-3691	R-3702	R-3706	R-3707	R-3718	R-3724	R-3728	
R-3744	R-3747	R-3750	R-3761	R-3768	R-3770	R-3794	R-3803	R-3815	
R-3817	R-3839	R-3841	R-3844	R-3845	R-3850	R-3852	R-3865	R-3866	
R-3869	R-3873	R-3876	R-3879	R-3880	R-3884	R-3893	R-3900	R-3914	
R-3923	R-3924	R-3939	R-3949	R-3973	R-3977	R-3978	R-3983	R-3987	
R-3995									
R-3159	R-3762								C
R-3764									C, D
R-3055	R-3191	R-3260							C, D, F
R-3890									C, D, F, H, P1
R-3348	R-3456	R-3512	R-3561	R-3578	R-3582	R-3813	R-3912	R-3926	C, D, F, P1
R-3969	R-3998								
R-3769									C, D, G, P1
R-3678	R-3716								C, D, H, P1
R-3022	R-3034	R-3047	R-3064	R-3065	R-3066	R-3067	R-3068	R-3069	C, D, P1
R-3070	R-3071	R-3072	R-3073	R-3074	R-3075	R-3076	R-3077	R-3078	
R-3079	R-3080	R-3081	R-3082	R-3083	R-3084	R-3085	R-3086	R-3087	
R-3088	R-3089	R-3090	R-3091	R-3092	R-3093	R-3094	R-3095	R-3096	
R-3097	R-3098	R-3099	R-3100	R-3101	R-3102	R-3103	R-3104	R-3105	
R-3106	R-3107	R-3108	R-3109	R-3110	R-3111	R-3112	R-3113	R-3114	
R-3115	R-3116	R-3117	R-3118	R-3119	R-3120	R-3121	R-3122	R-3123	
R-3124	R-3125	R-3126	R-3127	R-3128	R-3129	R-3130	R-3131	R-3132	
R-3133	R-3134	R-3135	R-3136	R-3138	R-3139	R-3140	R-3141	R-3142	
R-3143	R-3144	R-3145	R-3146	R-3147	R-3148	R-3149	R-3150	R-3151	
R-3152	R-3295	R-3342	R-3364	R-3369	R-3371	R-3380	R-3387	R-3461	
R-3463	R-3465	R-3494	R-3504	R-3532	R-3669	R-3723	R-3732	R-3739	
R-3742	R-3751	R-3792	R-3796	R-3797	R-3798	R-3799	R-3800	R-3806	
R-3824	R-3834	R-3868	R-3922	R-3928	R-3945	R-3965			
R-3157									C, F

R-3652									C, F, G
R-3362	R-3740	R-3766							C, F, G, P1
R-3278	R-3440	R-3703	R-3920	R-3992					C, F, H, P1
R-3014	R-3325	R-3382	R-3397	R-3404	R-3430	R-3432	R-3457	R-3473	C, F, P1
R-3489	R-3501	R-3508	R-3521	R-3549	R-3552	R-3580	R-3628	R-3672	
R-3675	R-3690	R-3722	R-3731	R-3752	R-3821	R-3825	R-3827	R-3882	
R-3910	R-3935	R-3946	R-3976	R-3982	R-3991	R-3996			
R-3774									C, G, H, P1
R-3539	R-3551	R-3655	R-3729						C, G, P1
R-3309	R-3331	R-3370	R-3633	R-3676	R-3927				C, H, P1
R-3029	R-3033	R-3035	R-3038	R-3045	R-3300	R-3303	R-3310	R-3311	C, P1
R-3313	R-3317	R-3318	R-3319	R-3322	R-3323	R-3324	R-3326	R-3327	
R-3328	R-3330	R-3334	R-3340	R-3345	R-3350	R-3354	R-3355	R-3358	
R-3360	R-3361	R-3363	R-3368	R-3376	R-3385	R-3391	R-3395	R-3398	
R-3399	R-3402	R-3406	R-3414	R-3416	R-3418	R-3421	R-3422	R-3427	
R-3431	R-3434	R-3435	R-3438	R-3441	R-3443	R-3444	R-3451	R-3458	
R-3459	R-3462	R-3467	R-3470	R-3471	R-3474	R-3478	R-3480	R-3481	
R-3490	R-3493	R-3500	R-3505	R-3507	R-3509	R-3511	R-3515	R-3529	
R-3531	R-3534	R-3540	R-3541	R-3546	R-3553	R-3554	R-3556	R-3557	
R-3559	R-3573	R-3574	R-3581	R-3583	R-3586	R-3593	R-3598	R-3600	
R-3601	R-3602	R-3603	R-3610	R-3611	R-3614	R-3619	R-3620	R-3624	
R-3631	R-3647	R-3657	R-3660	R-3662	R-3663	R-3664	R-3668	R-3679	
R-3683	R-3692	R-3695	R-3698	R-3699	R-3705	R-3708	R-3711	R-3712	
R-3713	R-3715	R-3717	R-3720	R-3725	R-3726	R-3727	R-3733	R-3736	
R-3749	R-3756	R-3789	R-3807	R-3810	R-3823	R-3831	R-3835	R-3836	
R-3840	R-3843	R-3846	R-3849	R-3853	R-3859	R-3860	R-3867	R-3871	
R-3877	R-3878	R-3886	R-3887	R-3897	R-3898	R-3899	R-3901	R-3902	
R-3904	R-3905	R-3907	R-3915	R-3918	R-3921	R-3925	R-3930	R-3931	
R-3937	R-3947	R-3948	R-3951	R-3956	R-3960	R-3961	R-3968	R-3970	
R-3975	R-3984	R-3989	R-3990	R-3994	R-3997	R-4000			
R-3015	R-3017	R-3018	R-3021	R-3056	R-3058	R-3059	R-3060	R-3061	D
R-3162	R-3165	R-3166	R-3169	R-3170	R-3171	R-3173	R-3174	R-3175	
R-3176	R-3184	R-3190	R-3194	R-3195	R-3196	R-3197	R-3198	R-3202	
R-3203	R-3205	R-3206	R-3209	R-3210	R-3211	R-3219	R-3223	R-3224	
R-3225	R-3226	R-3229	R-3236	R-3237	R-3244	R-3246	R-3248	R-3249	
R-3252	R-3255	R-3257	R-3264	R-3266	R-3783	R-3785	R-3788		
R-3188	R-3220	R-3239	R-3240	R-3782					D, F
R-3186									D, F, H

R-3009	R-3037	R-3040	R-3281	R-3365	R-3389	R-3536	R-3545	R-3637	D, F, P1
R-3674	R-3775	R-3779	R-3812	R-3870	R-3874	R-3892	R-3993		
R-3161	R-3168	R-3199	R-3213	R-3231	R-3234	R-3262	R-3263		D, H
R-3856									D, H, P1
R-3027	R-3028	R-3031	R-3036	R-3042	R-3053	R-3312	R-3315	R-3346	D, P1
R-3383	R-3392	R-3410	R-3417	R-3420	R-3425	R-3428	R-3429	R-3436	
R-3453	R-3454	R-3477	R-3483	R-3495	R-3518	R-3538	R-3548	R-3560	
R-3577	R-3595	R-3596	R-3625	R-3626	R-3627	R-3636	R-3661	R-3671	
R-3693	R-3696	R-3704	R-3795	R-3819	R-3832	R-3842	R-3862	R-3864	
R-3872	R-3885	R-3906	R-3913	R-3919	R-3950	R-3952	R-3954	R-3958	
R-3963	R-3967	R-3985	R-3986						
R-3004	R-3008	R-3011	R-3016	R-3153	R-3179	R-3182	R-3265	R-3271	F
R-3048									F, G, P1
R-3005	R-3012								F, H
R-3780									F, H, P1
R-3051	R-3214	R-3284	R-3332	R-3343	R-3352	R-3384	R-3492	R-3524	F, P1
R-3535	R-3612	R-3685	R-3697	R-3701	R-3737	R-3738	R-3753	R-3777	
R-3809	R-3818	R-3838	R-3847	R-3854	R-3861	R-3911	R-3916	R-3938	
R-3972	R-3980	R-3981							
R-3235	R-3261	R-3275							G
R-3700									G, P1
R-3193	R-3243								H
R-3403	R-3408	R-3409	R-3455	R-3468	R-3497	R-3575	R-3584	R-3623	H, P1
R-3710	R-3719	R-3855	R-3908	R-3933					
R-3006	R-3007	R-3010	R-3054	R-3062	R-3181	R-3183	R-3192	R-3227	NIL
R-3233	R-3242	R-3250	R-3251	R-3253	R-3256	R-3258	R-3259	R-3273	
R-3784									
R-3025	R-3043	R-3287	R-3288	R-3289	R-3290	R-3393	R-3415	R-3419	P1
R-3526	R-3597	R-3629	R-3670	R-3684	R-3940	R-3942	R-3979		

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R-4290	A
R-4310	A, B, C, D, F
R-4313 R-4702 R-4712 R-4713 R-4716 R-4717 R-4779	A, B, C, D, F, G, P1
R-4018 R-4688 R-4705 R-4938	A, B, C, D, F, P1
R-4156 R-4174	A, B, C, D, P1
R-4282 R-4996	A, B, C, F, G
R-4386 R-4387 R-4715 R-4780	A, B, C, F, G, P1
R-4447 R-4999	A, B, C, P1
R-4976	A, B, D, F
R-4082 R-4127 R-4308 R-4985 R-4989 R-5000	A, B, D, F, P1
R-4464 R-4615 R-4961	A, B, D, P1
R-4482	A, B, F, G, P1
R-4059 R-4191 R-4244 R-4252 R-4268	A, B, F, P1
R-4053 R-4092 R-4340 R-4349 R-4357 R-4359 R-4379 R-4481 R-4665 R-4743 R-4908 R-4949	A, B, P1
R-4364 R-4389 R-4709 R-4714 R-4722 R-4781 R-4889	A, C, D, F, G, P1
R-4031 R-4253 R-4319 R-4320 R-4321 R-4322 R-4323 R-4324 R-4325 R-4326 R-4327	A, C, D, F, P1
R-4767	A, C, D, H, P1
R-4566	A, C, D, P1
R-4311 R-4986	A, C, F, G
R-4312 R-4381 R-4382 R-4383 R-4384 R-4385 R-4388 R-4390 R-4391 R-4765 R-4774 R-4970	A, C, F, G, P1
R-4568 R-4756 R-4777	A, C, F, P1
R-4136	A, C, H, P1
R-4143 R-4259 R-4467 R-4485 R-4517 R-4661 R-4719 R-4943	A, C, P1
R-4212	A, D, F, P1
R-4001 R-4154 R-4173 R-4394 R-4569 R-4725 R-4950	A, D, P1
R-4993	A, F, G, H
R-4003 R-4149 R-4158 R-4276 R-4283 R-4418 R-4453 R-4471 R-4480 R-4586 R-4591 R-4821	A, F, P1
R-4040	A, H, P1
R-4021 R-4115 R-4168 R-4189 R-4192 R-4246 R-4265 R-4279 R-4345 R-4396 R-4405 R-4415 R-4435 R-4441 R-4445 R-4449 R-4476 R-4486 R-4491 R-4504 R-4508 R-4514 R-4529 R-4537 R-4551 R-4558 R-4580 R-4592 R-4601 R-4606 R-4647 R-4660 R-4730 R-4737 R-4764 R-4769 R-4788 R-4800 R-4847 R-4952	A, P1
R-4292	B
R-4162 R-4226 R-4248 R-4995	B, C, D, F, P1
R-4044 R-4073 R-4091 R-4121 R-4157 R-4167 R-4337 R-4378 R-4563 R-4749 R-4898 R-4968	B, C, D, P1
R-4094 R-4195 R-4228 R-4280 R-4288 R-4330 R-4338 R-4421 R-4477 R-4495 R-4511 R-4672 R-4770 R-4771 R-4841 R-4894	B, C, F, P1
R-4981 R-4983	B, C, G
R-4361	B, C, G, P1
R-4232	B, C, H, P1
R-4009 R-4016 R-4023 R-4043 R-4060 R-4074 R-4126 R-4130 R-4133 R-4147 R-4151 R-4155 R-4171 R-4194 R-4204 R-4211 R-4229 R-4243 R-4250 R-4256 R-4281 R-4339 R-4393 R-4399 R-4434 R-4450 R-4489 R-4505 R-4543 R-4549 R-4559 R-4573 R-4574 R-4575 R-4595 R-4611 R-4616 R-4638 R-4651 R-4690 R-4732 R-4735 R-4747 R-4762 R-4836 R-4871 R-4910 R-4914 R-4915 R-4920 R-4923 R-4932 R-4954 R-4988	B, C, P1
R-4297 R-4300 R-4303 R-4971 R-4975	B, D
R-4301	B, D, F
R-4087 R-4122 R-4177 R-4237 R-4261 R-4262 R-4266 R-4304 R-4346 R-4372 R-4446 R-4526 R-4560 R-4643 R-4694 R-4757 R-4808 R-4854 R-4958	B, D, F, P1
R-4506	B, D, G, P1
R-4026 R-4063 R-4066 R-4100 R-4137 R-4164 R-4198 R-4203 R-4207 R-4208 R-4370 R-4375 R-4380 R-4410 R-4461 R-4466 R-4468 R-4484 R-4493 R-4494 R-4523 R-4598 R-4635 R-4653 R-4655 R-4669 R-4675 R-4697 R-4720 R-4744 R-4752 R-4753 R-4820 R-4859 R-4940 R-4956 R-4969 R-4984	B, D, P1
R-4216	B, F, G, H, P1
R-4570	B, F, G, P1
R-4263 R-4333	B, F, H, P1
R-4006 R-4019 R-4022 R-4027 R-4090 R-4104 R-4108 R-4119 R-4129 R-4150 R-4160 R-4172 R-4187 R-4235 R-4273 R-4342 R-4360 R-4362 R-4377 R-4420 R-4424 R-4428 R-4431 R-4438 R-4442 R-4478 R-4498 R-4500 R-4501 R-4538 R-4572 R-4579 R-4626 R-4678 R-4689 R-4724 R-4759 R-4766 R-4772 R-4799 R-4819 R-4840 R-4845 R-4873 R-4926 R-4944 R-4945	B, F, P1

R-4835								B, G, P1
R-4220	R-4401	R-4436	R-4437	R-4525	R-4581	R-4613	R-4691	B, H, P1
R-4739	R-4745	R-4812						
R-4028	R-4035	R-4047	R-4050	R-4055	R-4061	R-4064	R-4069	B, P1
R-4070	R-4075	R-4076	R-4083	R-4084	R-4095	R-4097	R-4098	
R-4111	R-4114	R-4135	R-4139	R-4144	R-4153	R-4161	R-4165	
R-4169	R-4180	R-4185	R-4186	R-4188	R-4190	R-4193	R-4197	
R-4199	R-4206	R-4209	R-4213	R-4214	R-4218	R-4238	R-4241	
R-4245	R-4251	R-4255	R-4257	R-4315	R-4318	R-4334	R-4335	
R-4336	R-4341	R-4344	R-4350	R-4352	R-4354	R-4356	R-4358	
R-4365	R-4369	R-4371	R-4376	R-4397	R-4403	R-4406	R-4409	
R-4411	R-4412	R-4414	R-4422	R-4427	R-4429	R-4430	R-4432	
R-4433	R-4440	R-4444	R-4448	R-4452	R-4456	R-4457	R-4458	
R-4459	R-4460	R-4462	R-4463	R-4465	R-4470	R-4475	R-4479	
R-4487	R-4492	R-4496	R-4499	R-4507	R-4515	R-4516	R-4519	
R-4531	R-4534	R-4539	R-4546	R-4547	R-4555	R-4557	R-4562	
R-4565	R-4567	R-4571	R-4585	R-4587	R-4590	R-4596	R-4599	
R-4600	R-4608	R-4609	R-4610	R-4618	R-4620	R-4625	R-4627	
R-4628	R-4630	R-4634	R-4645	R-4654	R-4662	R-4666	R-4674	
R-4676	R-4677	R-4680	R-4683	R-4684	R-4685	R-4687	R-4693	
R-4698	R-4700	R-4704	R-4707	R-4708	R-4723	R-4726	R-4733	
R-4740	R-4748	R-4751	R-4760	R-4776	R-4782	R-4783	R-4784	
R-4785	R-4787	R-4792	R-4793	R-4795	R-4796	R-4797	R-4801	
R-4802	R-4803	R-4806	R-4814	R-4818	R-4822	R-4823	R-4829	
R-4831	R-4832	R-4837	R-4838	R-4839	R-4846	R-4849	R-4850	
R-4853	R-4856	R-4865	R-4868	R-4870	R-4874	R-4880	R-4883	
R-4887	R-4893	R-4895	R-4896	R-4897	R-4904	R-4906	R-4909	
R-4911	R-4918	R-4922	R-4929	R-4939	R-4941	R-4942	R-4946	
R-4953	R-4960	R-4963	R-4977	R-4978	R-4987			
R-4284								C
R-4974	R-4979							C, D
R-4296								C, D, F
R-4755								C, D, F, H, P1
R-4002	R-4065	R-4096	R-4099	R-4112	R-4286	R-4502	R-4522	C, D, F, P1
R-4588	R-4664	R-4891	R-4900	R-4902				
R-4577								C, D, G, P1
R-4827								C, D, H, P1
R-4010	R-4037	R-4056	R-4058	R-4068	R-4081	R-4101	R-4131	C, D, P1
R-4140	R-4222	R-4242	R-4247	R-4392	R-4509	R-4540	R-4561	
R-4696	R-4729	R-4736	R-4750	R-4786	R-4834	R-4855	R-4862	
R-4866	R-4885	R-4933	R-4991					

R-4668	R-4810							C, F, G, P1
R-4541								C, F, H, P1
R-4011	R-4038	R-4042	R-4045	R-4048	R-4051	R-4089	R-4117	C, F, P1
R-4125	R-4181	R-4182	R-4196	R-4200	R-4210	R-4258	R-4285	
R-4368	R-4373	R-4423	R-4425	R-4439	R-4518	R-4530	R-4584	
R-4617	R-4622	R-4686	R-4703	R-4734	R-4738	R-4789	R-4863	
R-4878	R-4881	R-4937	R-4964	R-4966				
R-4503	R-4701	R-4899						C, G, P1
R-4067	R-4086	R-4178	R-4201	R-4417	R-4886			C, H, P1
R-4004	R-4005	R-4007	R-4012	R-4014	R-4017	R-4020	R-4034	C, P1
R-4036	R-4041	R-4054	R-4057	R-4062	R-4072	R-4078	R-4093	
R-4103	R-4109	R-4116	R-4120	R-4124	R-4128	R-4138	R-4141	
R-4152	R-4159	R-4170	R-4176	R-4202	R-4215	R-4217	R-4221	
R-4224	R-4225	R-4233	R-4236	R-4239	R-4254	R-4260	R-4267	
R-4271	R-4274	R-4275	R-4277	R-4306	R-4309	R-4316	R-4328	
R-4331	R-4343	R-4355	R-4366	R-4367	R-4374	R-4402	R-4407	
R-4408	R-4413	R-4426	R-4443	R-4469	R-4472	R-4473	R-4474	
R-4490	R-4510	R-4513	R-4521	R-4524	R-4527	R-4528	R-4533	
R-4536	R-4542	R-4550	R-4552	R-4553	R-4576	R-4582	R-4602	
R-4604	R-4612	R-4624	R-4636	R-4637	R-4639	R-4641	R-4644	
R-4648	R-4649	R-4658	R-4667	R-4673	R-4679	R-4681	R-4695	
R-4699	R-4721	R-4728	R-4731	R-4741	R-4763	R-4768	R-4773	
R-4790	R-4791	R-4805	R-4807	R-4809	R-4811	R-4813	R-4824	
R-4830	R-4833	R-4842	R-4843	R-4844	R-4851	R-4861	R-4864	
R-4872	R-4875	R-4876	R-4877	R-4888	R-4901	R-4903	R-4907	
R-4917	R-4919	R-4928	R-4931	R-4935	R-4936	R-4955	R-4957	
R-4962	R-4992	R-4994	R-4998					
R-4287	R-4289	R-4293	R-4294	R-4295	R-4299			D
R-4302	R-4972	R-4973						D, F
R-4025	R-4046	R-4110	R-4118	R-4175	R-4183	R-4219	R-4230	D, F, P1
R-4272	R-4305	R-4329	R-4400	R-4614	R-4642	R-4656	R-4682	
R-4758	R-4775	R-4848	R-4869	R-4921	R-4959			
R-4052	R-4512	R-4640	R-4884					D, H, P1
R-4008	R-4013	R-4024	R-4029	R-4030	R-4071	R-4077	R-4105	D, P1
R-4106	R-4107	R-4123	R-4134	R-4163	R-4166	R-4223	R-4231	
R-4234	R-4249	R-4278	R-4307	R-4317	R-4332	R-4348	R-4363	
R-4416	R-4419	R-4451	R-4483	R-4497	R-4532	R-4578	R-4589	
R-4594	R-4597	R-4603	R-4605	R-4607	R-4619	R-4621	R-4629	
R-4650	R-4657	R-4670	R-4692	R-4710	R-4816	R-4858	R-4860	
R-4882	R-4890	R-4892	R-4912	R-4916	R-4927	R-4930	R-4934	
R-4967	R-4990							
R-4291	R-4298	R-4982						F

R-4015	R-4454	R-4905	R-4948					F, G, P1
R-4079	R-4179	R-4706						F, H, P1
R-4032	R-4033	R-4049	R-4080	R-4088	R-4102	R-4142	R-4145	F, P1
R-4146	R-4148	R-4205	R-4227	R-4240	R-4264	R-4270	R-4314	
R-4347	R-4351	R-4395	R-4398	R-4404	R-4455	R-4488	R-4520	
R-4548	R-4554	R-4556	R-4564	R-4583	R-4593	R-4623	R-4632	
R-4633	R-4646	R-4652	R-4663	R-4711	R-4718	R-4727	R-4742	
R-4746	R-4754	R-4761	R-4778	R-4798	R-4804	R-4815	R-4817	
R-4825	R-4828	R-4867	R-4924	R-4951	R-4965			
R-4545	R-4671	R-4794	R-4826	R-4913	R-4947			G, P1
R-4039	R-4085	R-4113	R-4132	R-4269	R-4353	R-4535	R-4659	H, P1
R-4857	R-4925	R-4997						
R-4980								NIL
R-4184	R-4544	R-4631	R-4852	R-4879				P1

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/ 建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R-5591 R-5594	A
R-5128	A, B, C, D, F
R-5087 R-5438	A, B, C, D, F, G, H
R-5430	A, B, C, D, F, G, P1
R-5072 R-5089	A, B, C, D, F, P1
R-5043 R-5077 R-5432 R-5539 R-5540 R-5618	A, B, C, F, G, P1
R-5437	A, B, C, P1
R-5252	A, B, D
R-5452 R-5981	A, B, D, F, P1
R-5436	A, B, F, G
R-5001 R-5003 R-5004 R-5079 R-5206 R-5444 R-5862	A, B, F, P1
R-5029	A, B, H, P1
R-5040 R-5717 R-5730	A, B, P1
R-5074	A, C, D, F
R-5431	A, C, D, F, G
R-5044 R-5429 R-5434 R-5435	A, C, D, F, G, P1
R-5075	A, C, F, G
R-5083 R-5138	A, C, F, G, H, P1
R-5068 R-5073 R-5076 R-5439 R-5440 R-5441 R-5443 R-5541 R-5561 R-5580 R-5585 R-5703 R-5704 R-5729 R-5925	A, C, F, G, P1
R-5303 R-5420	A, C, P1
R-5050 R-5568	A, D, P1
R-5084 R-5453 R-5519 R-5684 R-5932	A, F, P1
R-5983	A, H, P1
R-5010 R-5026 R-5056 R-5124 R-5195 R-5203 R-5297 R-5341 R-5465 R-5486 R-5501 R-5542 R-5553 R-5589 R-5613 R-5787 R-5828 R-5836 R-5907 R-5915	A, P1
R-5008 R-5033 R-5034 R-5082 R-5126 R-5222 R-5232 R-5253 R-5603	B
R-5211 R-5446	B, C
R-5487	B, C, D, F, H, P1
R-5104 R-5445 R-5583	B, C, D, F, P1
R-5081 R-5103	B, C, D, H, P1
R-5296 R-5305 R-5378 R-5477 R-5786	B, C, D, P1
R-5481 R-5771	B, C, F, H, P1
R-5009 R-5070 R-5168 R-5200 R-5302 R-5328 R-5427 R-5433 R-5442 R-5466 R-5520 R-5668 R-5781 R-5922 R-5930	B, C, F, P1
R-5802 R-5952	B, C, G, P1
R-5784	B, C, H, P1
R-5024 R-5031 R-5037 R-5039 R-5069 R-5093 R-5096 R-5118 R-5208 R-5209 R-5265 R-5266 R-5271 R-5276 R-5323 R-5326 R-5348 R-5372 R-5412 R-5455 R-5464 R-5469 R-5491 R-5506 R-5527 R-5538 R-5749 R-5782 R-5827 R-5833 R-5863 R-5978 R-5982	B, C, P1
R-5059 R-5228 R-5254 R-5602	B, D
R-5220	B, D, F
R-5100 R-5167	B, D, F, H, P1
R-5204 R-5397 R-5623 R-5891 R-5893 R-5949 R-5971	B, D, F, P1
R-5177	B, D, G, P1
R-5233	B, D, H
R-5855 R-5961	B, D, H, P1
R-5129 R-5152 R-5291 R-5320 R-5342 R-5345 R-5360 R-5473 R-5504 R-5511 R-5552 R-5557 R-5667 R-5685 R-5716 R-5845 R-5894 R-5900 R-5969	B, D, P1
R-5112 R-5130 R-5421 R-5640 R-5696 R-5702 R-5914 R-5916	B, F, H, P1
R-5047 R-5057 R-5078 R-5092 R-5106 R-5107 R-5110 R-5131 R-5141 R-5146 R-5148 R-5153 R-5158 R-5169 R-5175 R-5268 R-5289 R-5382 R-5450 R-5451 R-5475 R-5479 R-5483 R-5502 R-5503 R-5508 R-5564 R-5605 R-5615 R-5619 R-5620 R-5631 R-5637 R-5692 R-5694 R-5733 R-5741 R-5743 R-5747 R-5775 R-5776 R-5800 R-5807 R-5832 R-5842 R-5850 R-5851 R-5877 R-5884 R-5890 R-5918 R-5934 R-5937 R-5966 R-5972 R-5988	B, F, P1
R-5411	B, G, H, P1
R-5155 R-5955	B, G, P1
R-5018 R-5163 R-5193 R-5270 R-5670 R-5706 R-5711 R-5732 R-5742 R-5837 R-5853 R-5875 R-5898 R-5910	B, H, P1
R-5015 R-5017 R-5020 R-5022 R-5023 R-5028 R-5035 R-5038 R-5042 R-5045 R-5049 R-5051 R-5053 R-5058 R-5071 R-5086 R-5091 R-5094 R-5095 R-5098 R-5101 R-5102 R-5116 R-5122 R-5123 R-5125 R-5133 R-5135 R-5145 R-5150 R-5159 R-5165 R-5171 R-5179 R-5180 R-5183 R-5188 R-5191 R-5196 R-5198 R-5202 R-5264 R-5272 R-5273 R-5277 R-5279 R-5280 R-5288 R-5299 R-5307 R-5309 R-5311 R-5318 R-5322 R-5327 R-5329 R-5332 R-5333 R-5336 R-5340 R-5344 R-5349 R-5351 R-5361	B, P1

R-5363	R-5366	R-5373	R-5381	R-5395	R-5399	R-5402	R-5407	
R-5408	R-5409	R-5413	R-5415	R-5418	R-5419	R-5425	R-5449	
R-5474	R-5478	R-5482	R-5485	R-5495	R-5496	R-5497	R-5498	
R-5499	R-5505	R-5510	R-5515	R-5518	R-5521	R-5524	R-5526	
R-5528	R-5529	R-5535	R-5543	R-5546	R-5562	R-5563	R-5574	
R-5579	R-5586	R-5604	R-5607	R-5609	R-5611	R-5612	R-5616	
R-5617	R-5621	R-5622	R-5627	R-5628	R-5629	R-5635	R-5636	
R-5641	R-5642	R-5643	R-5645	R-5653	R-5654	R-5660	R-5661	
R-5662	R-5664	R-5666	R-5671	R-5674	R-5679	R-5680	R-5682	
R-5683	R-5687	R-5691	R-5698	R-5701	R-5708	R-5719	R-5720	
R-5723	R-5731	R-5734	R-5735	R-5738	R-5744	R-5746	R-5748	
R-5750	R-5751	R-5753	R-5756	R-5759	R-5760	R-5763	R-5764	
R-5766	R-5769	R-5772	R-5773	R-5777	R-5779	R-5780	R-5788	
R-5790	R-5791	R-5795	R-5797	R-5798	R-5801	R-5809	R-5811	
R-5812	R-5813	R-5816	R-5817	R-5824	R-5834	R-5838	R-5843	
R-5852	R-5854	R-5858	R-5861	R-5865	R-5867	R-5869	R-5870	
R-5872	R-5876	R-5879	R-5881	R-5887	R-5888	R-5889	R-5896	
R-5899	R-5904	R-5913	R-5917	R-5919	R-5920	R-5926	R-5927	
R-5928	R-5929	R-5933	R-5940	R-5941	R-5943	R-5946	R-5953	
R-5973	R-5975	R-5976	R-5980	R-5985	R-5987	R-5997	R-5999	
R-5213	R-5245	R-5545						C
R-5127	R-5235	R-5249						C, D
R-5942								C, D, F, H, P1
R-5119	R-5176	R-5396	R-5544					C, D, F, P1
R-5533								C, D, H, P1
R-5025	R-5261	R-5314	R-5385	R-5387	R-5406	R-5456	R-5472	C, D, P1
R-5659	R-5675	R-5678	R-5713	R-5984	R-5986			
R-5064	R-5241							C, F
R-5945								C, F, G, H, P1
R-5136	R-5673	R-5857	R-5951					C, F, H, P1
R-5085	R-5121	R-5134	R-5151	R-5156	R-5161	R-5181	R-5282	C, F, P1
R-5294	R-5312	R-5337	R-5358	R-5379	R-5398	R-5410	R-5424	
R-5493	R-5517	R-5532	R-5634	R-5656	R-5690	R-5695	R-5727	
R-5755	R-5768	R-5892	R-5950	R-5957	R-5958	R-5960	R-5964	
R-5447								C, G, P1
R-5192	R-5275	R-5338	R-5355	R-5377	R-5531	R-5608	R-5689	C, H, P1
R-5829								

R-5002	R-5006	R-5007	R-5014	R-5016	R-5019	R-5021	R-5027	C, P1
R-5030	R-5036	R-5048	R-5052	R-5055	R-5080	R-5097	R-5108	
R-5154	R-5160	R-5162	R-5164	R-5170	R-5173	R-5182	R-5184	
R-5185	R-5186	R-5190	R-5194	R-5205	R-5260	R-5267	R-5274	
R-5278	R-5283	R-5284	R-5286	R-5287	R-5301	R-5304	R-5315	
R-5321	R-5330	R-5331	R-5339	R-5343	R-5346	R-5350	R-5352	
R-5356	R-5357	R-5362	R-5364	R-5365	R-5368	R-5369	R-5380	
R-5386	R-5389	R-5392	R-5394	R-5400	R-5416	R-5423	R-5426	
R-5457	R-5459	R-5461	R-5463	R-5468	R-5471	R-5480	R-5484	
R-5489	R-5490	R-5509	R-5513	R-5514	R-5522	R-5525	R-5530	
R-5534	R-5558	R-5559	R-5569	R-5570	R-5571	R-5573	R-5578	
R-5582	R-5610	R-5625	R-5626	R-5630	R-5657	R-5676	R-5677	
R-5681	R-5688	R-5693	R-5705	R-5707	R-5739	R-5740	R-5757	
R-5761	R-5762	R-5765	R-5770	R-5778	R-5783	R-5789	R-5792	
R-5793	R-5794	R-5815	R-5822	R-5826	R-5831	R-5841	R-5906	
R-5909	R-5921	R-5944	R-5947	R-5948	R-5954	R-5963	R-5965	
R-5967	R-5979	R-6000						
R-5060	R-5061	R-5062	R-5065	R-5066	R-5212	R-5223	R-5234	D
R-5239	R-5243	R-5246	R-5247	R-5250	R-5255	R-5590	R-5595	
R-5596	R-5597	R-5598	R-5601					
R-5063	R-5088	R-5215	R-5217	R-5218	R-5219	R-5226	R-5238	D, F
R-5244								
R-5293								D, F, G, P1
R-5290								D, F, H, P1
R-5115	R-5139	R-5140	R-5147	R-5178	R-5256	R-5257	R-5258	D, F, P1
R-5259	R-5390	R-5500	R-5639	R-5672	R-5785	R-5856	R-5885	
R-5923	R-5974							
R-5013	R-5572							D, G, P1
R-5393	R-5592							D, H
R-5011	R-5111	R-5646						D, H, P1
R-5005	R-5041	R-5157	R-5187	R-5210	R-5295	R-5298	R-5313	D, P1
R-5316	R-5334	R-5335	R-5371	R-5391	R-5401	R-5454	R-5548	
R-5549	R-5550	R-5551	R-5554	R-5581	R-5584	R-5587	R-5588	
R-5624	R-5686	R-5745	R-5767	R-5804	R-5830	R-5849	R-5936	
R-5970								
R-5067	R-5224							F
R-5722								F, G, P1
R-5189	R-5375	R-5384	R-5523	R-5649	R-5874			F, H, P1

R-5046	R-5054	R-5090	R-5099	R-5105	R-5113	R-5120	R-5137	F, P1
R-5143	R-5172	R-5281	R-5285	R-5292	R-5300	R-5306	R-5308	
R-5317	R-5324	R-5347	R-5353	R-5354	R-5367	R-5370	R-5374	
R-5376	R-5388	R-5403	R-5414	R-5448	R-5460	R-5467	R-5470	
R-5476	R-5492	R-5494	R-5507	R-5512	R-5536	R-5537	R-5632	
R-5633	R-5644	R-5699	R-5709	R-5710	R-5718	R-5724	R-5736	
R-5737	R-5752	R-5754	R-5796	R-5803	R-5806	R-5819	R-5820	
R-5839	R-5846	R-5860	R-5864	R-5873	R-5878	R-5882	R-5883	
R-5902	R-5912	R-5956	R-5959	R-5962	R-5993			
R-5638	R-5669	R-5990						G, P1
R-5240								H
R-5032	R-5109	R-5132	R-5142	R-5144	R-5149	R-5166	R-5174	H, P1
R-5197	R-5199	R-5310	R-5319	R-5325	R-5383	R-5404	R-5417	
R-5458	R-5488	R-5516	R-5606	R-5647	R-5721	R-5728	R-5758	
R-5774	R-5808	R-5818	R-5821	R-5823	R-5825	R-5866	R-5895	
R-5911	R-5924	R-5991	R-5992	R-5994	R-5995	R-5996		
R-5214	R-5216	R-5221	R-5225	R-5227	R-5229	R-5230	R-5231	NIL
R-5236	R-5237	R-5242	R-5248	R-5251	R-5593	R-5599	R-5600	
R-5012	R-5114	R-5117	R-5201	R-5207	R-5262	R-5263	R-5269	P1
R-5359	R-5405	R-5422	R-5428	R-5462	R-5547	R-5555	R-5556	
R-5560	R-5565	R-5566	R-5567	R-5575	R-5576	R-5577	R-5614	
R-5648	R-5650	R-5651	R-5652	R-5655	R-5658	R-5663	R-5665	
R-5697	R-5700	R-5712	R-5714	R-5715	R-5725	R-5726	R-5799	
R-5805	R-5810	R-5814	R-5835	R-5844	R-5847	R-5848	R-5859	
R-5868	R-5871	R-5880	R-5886	R-5897	R-5901	R-5903	R-5905	
R-5908	R-5931	R-5935	R-5938	R-5939	R-5968	R-5977	R-5989	
R-5998								

R6001 – R7000 (不包括 without R6618, R6738 & R6861)

申述編號 Rep. No. (TPB/R/S/K18/17-)								申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R-6580	R-6648	R-6649	R-6702	R-6841	R-6842	R-6858	R-6950	A
R-6627	R-6680							A, B
R-6191								A, B, C, D, F
R-6321								A, B, C, D, F, G, H, P1
R-6716	R-6756							A, B, C, D, F, G, P1
R-6750								A, B, C, D, F, H, P1
R-6495	R-6505	R-6595	R-6930	R-6997	R-6998			A, B, C, D, F, P1
R-6726	R-6728	R-6729	R-6731	R-6733				A, B, C, D, P1
R-6720								A, B, C, F, G, H
R-6653	R-6928							A, B, C, F, G, H, P1
R-6374	R-6413	R-6435	R-6438	R-6476	R-6568	R-6715	R-6814	A, B, C, F, G, P1
R-6887	R-6910	R-6924	R-6927	R-6929	R-6940			
R-6709								A, B, C, F, P1
R-6503								A, B, C, P1
R-6189	R-6590	R-6954						A, B, D, F, P1
R-6047	R-6053	R-6347	R-6368	R-6373	R-6723	R-6922	R-6992	A, B, D, P1
R-6710								A, B, F, G, P1
R-6265	R-6416	R-6456	R-6504					A, B, F, P1
R-6718								A, C, D, F, G
R-6328								A, C, D, F, G, H, P1
R-6489	R-6624	R-6632	R-6652	R-6677	R-6707	R-6708	R-6743	A, C, D, F, G, P1
R-6749	R-6797	R-6799	R-6800	R-6802	R-6806	R-6832	R-6834	
R-6835	R-6837	R-6838	R-6839	R-6881	R-6882	R-6926		
R-6941								A, C, D, F, P1
R-6320								A, C, F
R-6735	R-6736							A, C, F, G
R-6600	R-6705							A, C, F, G, H, P1
R-6025	R-6088	R-6103	R-6105	R-6111	R-6114	R-6115	R-6118	A, C, F, G, P1
R-6120	R-6125	R-6156	R-6160	R-6205	R-6327	R-6329	R-6330	
R-6331	R-6332	R-6333	R-6334	R-6345	R-6353	R-6434	R-6523	
R-6524	R-6534	R-6543	R-6545	R-6546	R-6577	R-6578	R-6579	
R-6606	R-6617	R-6620	R-6621	R-6622	R-6623	R-6625	R-6633	
R-6634	R-6635	R-6636	R-6637	R-6640	R-6641	R-6643	R-6646	
R-6647	R-6651	R-6654	R-6655	R-6656	R-6657	R-6669	R-6670	
R-6671	R-6672	R-6676	R-6678	R-6681	R-6706	R-6711	R-6725	
R-6741	R-6751	R-6786	R-6787	R-6789	R-6792	R-6794	R-6798	
R-6801	R-6804	R-6805	R-6808	R-6816	R-6817	R-6818	R-6819	
R-6830	R-6831	R-6833	R-6836	R-6840	R-6860	R-6863	R-6867	
R-6880	R-6884	R-6885	R-6889	R-6900	R-6909	R-6911	R-6914	
R-6934	R-6936	R-6939	R-6947	R-6957	R-6958	R-6961	R-6966	
R-6967	R-6968	R-6971	R-6974	R-6986	R-6999			
R-6912								A, C, G, H, P1
R-6862								A, C, G, P1
R-6642								A, D
R-6713								A, D, F, G, P1
R-6089	R-6554							A, F, H, P1
R-6030	R-6344	R-6399	R-6700					A, F, P1
R-6955								A, G
R-6035	R-6149	R-6150	R-6177	R-6178	R-6186	R-6356	R-6388	A, P1
R-6395	R-6426	R-6464	R-6483	R-6484	R-6555	R-6572	R-6603	
R-6611	R-6615	R-6732	R-6739	R-6745	R-6869	R-6893	R-6980	
R-6988								
R-6848	R-6849							B
R-6853	R-6859							B, C
R-6638	R-6645	R-6719						B, C, D
R-6446	R-6589							B, C, D, F, H, P1
R-6402	R-6498	R-6526	R-6614					B, C, D, F, P1
R-6387								B, C, D, H, P1
R-6214	R-6339	R-6358	R-6419	R-6477	R-6499	R-6506	R-6531	B, C, D, P1
R-6586	R-6727	R-6925	R-6996					
R-6306	R-6752							B, C, F, H, P1
R-6083	R-6442	R-6776						B, C, F, P1
R-6386								B, C, G, P1
R-6059	R-6281	R-6389	R-6404	R-6449	R-6485			B, C, H, P1
R-6154	R-6190	R-6193	R-6218	R-6251	R-6275	R-6349	R-6450	B, C, P1
R-6452	R-6510	R-6527	R-6560	R-6596	R-6788	R-6812	R-6854	
R-6872								
R-6335	R-6337	R-6575	R-6581	R-6658	R-6659	R-6664	R-6673	B, D
R-6675	R-6687	R-6724	R-6843	R-6844	R-6847	R-6856		
R-6639								B, D, F, H, P1
R-6008	R-6077	R-6412	R-6432	R-6454	R-6461	R-6465	R-6473	B, D, F, P1
R-6508	R-6509	R-6557	R-6588					
R-6385								B, D, G, P1

R-6952								B, D, H
R-6126								B, D, H, P1
R-6117	R-6124	R-6127	R-6152	R-6157	R-6245	R-6316	R-6341	B, D, P1
R-6379	R-6417	R-6421	R-6436	R-6443	R-6462	R-6722	R-6742	
R-6907	R-6977	R-6990	R-6993	R-6995				
R-6935								B, F
R-6033								B, F, G, P1
R-6199	R-6283	R-6403	R-6486	R-6994				B, F, H, P1
R-6006	R-6014	R-6022	R-6042	R-6054	R-6068	R-6090	R-6104	B, F, P1
R-6141	R-6159	R-6188	R-6212	R-6234	R-6246	R-6248	R-6250	
R-6252	R-6269	R-6313	R-6354	R-6361	R-6398	R-6427	R-6433	
R-6444	R-6459	R-6478	R-6490	R-6530	R-6569	R-6607	R-6608	
R-6616	R-6712	R-6757	R-6760	R-6761	R-6764	R-6770	R-6782	
R-6811	R-6820	R-6823	R-6875	R-6878	R-6919	R-6944		
R-6128	R-6174	R-6200	R-6304	R-6322	R-6362	R-6382	R-6383	B, H, P1
R-6397	R-6769	R-6874	R-6906					
R-6007	R-6009	R-6010	R-6018	R-6021	R-6024	R-6027	R-6029	B, P1
R-6032	R-6036	R-6041	R-6043	R-6044	R-6048	R-6049	R-6050	
R-6052	R-6055	R-6056	R-6057	R-6058	R-6063	R-6064	R-6067	
R-6071	R-6074	R-6079	R-6080	R-6082	R-6085	R-6087	R-6097	
R-6100	R-6107	R-6108	R-6110	R-6113	R-6116	R-6130	R-6131	
R-6133	R-6135	R-6136	R-6140	R-6143	R-6147	R-6148	R-6153	
R-6164	R-6165	R-6169	R-6172	R-6173	R-6176	R-6180	R-6182	
R-6187	R-6194	R-6195	R-6197	R-6203	R-6208	R-6213	R-6222	
R-6226	R-6227	R-6229	R-6230	R-6231	R-6232	R-6233	R-6236	
R-6237	R-6238	R-6240	R-6241	R-6244	R-6254	R-6255	R-6256	
R-6259	R-6262	R-6266	R-6268	R-6270	R-6278	R-6284	R-6289	
R-6293	R-6296	R-6298	R-6299	R-6300	R-6302	R-6303	R-6308	
R-6309	R-6310	R-6314	R-6317	R-6323	R-6324	R-6343	R-6350	
R-6351	R-6355	R-6357	R-6359	R-6365	R-6370	R-6372	R-6377	
R-6391	R-6394	R-6407	R-6408	R-6409	R-6410	R-6414	R-6428	
R-6431	R-6448	R-6458	R-6463	R-6470	R-6491	R-6492	R-6496	
R-6497	R-6500	R-6502	R-6511	R-6513	R-6516	R-6525	R-6528	
R-6529	R-6535	R-6537	R-6538	R-6539	R-6548	R-6561	R-6564	
R-6566	R-6587	R-6591	R-6594	R-6601	R-6610	R-6744	R-6746	
R-6747	R-6758	R-6762	R-6765	R-6774	R-6775	R-6781	R-6826	
R-6829	R-6871	R-6876	R-6877	R-6894	R-6895	R-6904	R-6905	
R-6969	R-6973	R-6976	R-6978	R-6979	R-6982	R-6983		
R-6630	R-6663	R-6721	R-6734					C
R-6626	R-6628							C, D
R-6522	R-6714							C, D, F, G, P1

R-6139	R-6221	R-6312	R-6340	R-6956				C, D, F, P1
R-6401								C, D, G, P1
R-6016	R-6034	R-6086	R-6376	R-6425	R-6440	R-6447	R-6481	C, D, P1
R-6494	R-6533	R-6558	R-6754	R-6755	R-6883	R-6923	R-6931	
R-6937								
R-6717								C, F
R-6015	R-6019	R-6102	R-6106	R-6220	R-6247	R-6264	R-6276	C, F, P1
R-6422	R-6423	R-6424	R-6439	R-6501	R-6519	R-6521	R-6585	
R-6593	R-6598	R-6737	R-6777	R-6778	R-6783	R-6825	R-6870	
R-6942	R-6943	R-6953						
R-6455	R-6469	R-6584						C, G, P1
R-6084	R-6223	R-6279	R-6311					C, H, P1
R-6002	R-6003	R-6012	R-6017	R-6028	R-6046	R-6070	R-6072	C, P1
R-6075	R-6076	R-6081	R-6091	R-6092	R-6093	R-6094	R-6095	
R-6096	R-6099	R-6137	R-6162	R-6204	R-6210	R-6215	R-6217	
R-6225	R-6235	R-6239	R-6242	R-6249	R-6253	R-6261	R-6272	
R-6274	R-6277	R-6282	R-6287	R-6305	R-6307	R-6367	R-6406	
R-6430	R-6451	R-6453	R-6467	R-6474	R-6482	R-6487	R-6488	
R-6493	R-6541	R-6567	R-6583	R-6599	R-6730	R-6763	R-6768	
R-6772	R-6779	R-6780	R-6813	R-6815	R-6821	R-6824	R-6855	
R-6864	R-6890	R-6896	R-6898	R-6913	R-6946	R-6960		
R-6573	R-6574	R-6576	R-6619	R-6650	R-6662	R-6674	R-6679	D
R-6690	R-6695	R-6698	R-6703	R-6845	R-6846	R-6850	R-6851	
R-6852	R-6916	R-6917	R-6920					
R-6704	R-6945	R-6948	R-6949	R-6951				D, F
R-6915								D, F, G
R-6507								D, F, H, P1
R-6201	R-6326	R-6415	R-6553	R-6667	R-6766	R-6773	R-6784	D, F, P1
R-6785	R-6938	R-6987	R-6991					
R-6206	R-6865							D, H, P1
R-6062	R-6078	R-6123	R-6134	R-6161	R-6192	R-6198	R-6202	D, P1
R-6216	R-6224	R-6260	R-6286	R-6288	R-6290	R-6318	R-6325	
R-6369	R-6371	R-6393	R-6437	R-6445	R-6479	R-6544	R-6547	
R-6556	R-6563	R-6570	R-6592	R-6613	R-6665	R-6666	R-6668	
R-6682	R-6684	R-6688	R-6691	R-6693	R-6696	R-6697	R-6701	
R-6771	R-6793	R-6803	R-6886	R-6888	R-6891	R-6903	R-6972	
R-6981	R-6985							
R-6660	R-6661	R-6689	R-6857	R-6959				F
R-6565								F, G, P1
R-6031	R-6384	R-6400	R-6460	R-6892				F, H, P1

R-6004	R-6013	R-6069	R-6098	R-6151	R-6171	R-6183	R-6207	F, P1
R-6209	R-6211	R-6257	R-6280	R-6292	R-6294	R-6297	R-6315	
R-6342	R-6360	R-6366	R-6420	R-6512	R-6532	R-6540	R-6542	
R-6551	R-6562	R-6571	R-6605	R-6609	R-6644	R-6759	R-6828	
R-6868	R-6873	R-6879						
R-6045	R-6271	R-6363	R-6441	R-6457				G, P1
R-6005	R-6040	R-6060	R-6066	R-6132	R-6144	R-6146	R-6163	H, P1
R-6196	R-6219	R-6267	R-6273	R-6285	R-6291	R-6295	R-6380	
R-6381	R-6405	R-6517	R-6520	R-6602	R-6683	R-6822	R-6897	
R-6899	R-6901	R-6902	R-6932					
R-6336	R-6338	R-6629	R-6685	R-6686	R-6699	R-6918	R-6921	NIL
R-6001	R-6011	R-6020	R-6023	R-6026	R-6037	R-6038	R-6039	P1
R-6051	R-6061	R-6065	R-6073	R-6101	R-6109	R-6112	R-6119	
R-6121	R-6122	R-6129	R-6138	R-6142	R-6145	R-6155	R-6158	
R-6166	R-6167	R-6168	R-6170	R-6175	R-6179	R-6181	R-6184	
R-6185	R-6228	R-6243	R-6258	R-6263	R-6301	R-6319	R-6346	
R-6348	R-6352	R-6364	R-6375	R-6378	R-6390	R-6392	R-6396	
R-6411	R-6418	R-6429	R-6466	R-6468	R-6471	R-6472	R-6475	
R-6480	R-6514	R-6515	R-6518	R-6536	R-6549	R-6550	R-6552	
R-6559	R-6582	R-6597	R-6604	R-6612	R-6631	R-6692	R-6694	
R-6740	R-6748	R-6753	R-6767	R-6790	R-6791	R-6795	R-6796	
R-6807	R-6809	R-6810	R-6827	R-6866	R-6908	R-6933	R-6962	
R-6963	R-6964	R-6965	R-6970	R-6975	R-6984	R-6989	R-7000	

R7001 – R8000 (不包括 without R7025, R7386, R7914, R7945)

申述編號 Rep. No. (TPB/R/S/K18/17-)								申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R-7362	R-7579	R-7591	R-7595	R-7601	R-7607	R-7609	R-7610	A, B, C, D, F
R-7611	R-7613	R-7615	R-7617	R-7825	R-7826	R-7829	R-7954	
R-7959	R-7974	R-7975						
R-7133	R-7366	R-7869						A, B, C, D, F, G
R-7900								A, B, C, D, F, G, H
R-7036	R-7037	R-7153	R-7154	R-7289	R-7312	R-7342	R-7343	A, B, C, D, F, G, H, P1
R-7344	R-7345	R-7346	R-7347	R-7348	R-7349	R-7350	R-7351	
R-7352	R-7353	R-7354	R-7355	R-7356	R-7357	R-7358	R-7359	
R-7360	R-7462	R-7466	R-7501	R-7632	R-7633	R-7634	R-7680	
R-7725	R-7726	R-7727						
R-7083	R-7136	R-7263	R-7282	R-7285	R-7286	R-7291	R-7308	A, B, C, D, F, G, P1
R-7311	R-7318	R-7325	R-7341	R-7449	R-7464	R-7465	R-7492	
R-7493	R-7497	R-7502	R-7539	R-7560	R-7656	R-7669	R-7670	
R-7673	R-7684	R-7692	R-7717	R-7718	R-7724	R-7740	R-7741	
R-7742	R-7758	R-7759	R-7795	R-7800	R-7905	R-7934	R-7935	
R-7189	R-7209							A, B, C, D, F, H, P1
R-7130	R-7260	R-7262	R-7537	R-7545	R-7549	R-7551	R-7553	A, B, C, D, F, P1
R-7554	R-7556	R-7561	R-7602	R-7604	R-7612	R-7614	R-7616	
R-7690	R-7691	R-7693	R-7721	R-7729	R-7820	R-7827	R-7828	
R-7847	R-7851	R-7854	R-7865	R-7908	R-7909	R-7918	R-7927	
R-7933	R-7944	R-7950	R-7958	R-7976	R-7978			
R-7757								A, B, C, D, H, P1
R-7544	R-7559	R-7608	R-7677	R-7879	R-7881	R-7894	R-7917	A, B, C, D, P1
R-7247								A, B, C, F, G
R-7790								A, B, C, F, G, H
R-7290	R-7546	R-7804	R-7824					A, B, C, F, G, H, P1
R-7080	R-7101	R-7127	R-7129	R-7162	R-7223	R-7224	R-7266	A, B, C, F, G, P1
R-7270	R-7272	R-7288	R-7313	R-7314	R-7317	R-7324	R-7504	
R-7505	R-7625	R-7671	R-7783	R-7796	R-7799	R-7810	R-7813	
R-7823	R-7848	R-7937	R-7939					
R-7886	R-7897							A, B, C, F, P1
R-7530	R-7576							A, B, D
R-7364	R-7580	R-7582	R-7583	R-7586	R-7599	R-7951		A, B, D, F
R-7128								A, B, D, F, G, H, P1
R-7679								A, B, D, F, G, P1
R-7298	R-7332	R-7422	R-7552	R-7574	R-7674	R-7675	R-7745	A, B, D, F, P1
R-7769	R-7780	R-7930	R-7977					
R-7192	R-7744							A, B, D, P1
R-7120	R-7962							A, B, F
R-7126								A, B, F, G
R-7860								A, B, F, G, P1
R-7003	R-7135	R-7222	R-7264	R-7321	R-7334	R-7450	R-7786	A, B, F, P1
R-7245								A, B, H
R-7732	R-7733	R-7913						A, B, P1
R-7965								A, C, D
R-7148								A, C, D, F, G
R-7533								A, C, D, F, G, H, P1
R-7086	R-7113	R-7134	R-7161	R-7188	R-7243	R-7248	R-7309	A, C, D, F, G, P1
R-7319	R-7486	R-7542	R-7618	R-7622	R-7627	R-7644	R-7649	
R-7668	R-7702	R-7797	R-7798	R-7801	R-7811	R-7819	R-7883	
R-7884	R-7892	R-7936	R-7982					
R-7575	R-7728							A, C, D, F, P1
R-7738	R-7818	R-7893						A, C, D, P1
R-7084	R-7085	R-7213	R-7367	R-7368	R-7369	R-7370	R-7371	A, C, F, G
R-7372	R-7373	R-7374	R-7375	R-7376	R-7383	R-7384	R-7385	
R-7387	R-7388	R-7389	R-7390	R-7392	R-7393	R-7401	R-7402	
R-7403	R-7961							
R-7736								A, C, F, G, H
R-7338	R-7440	R-7640						A, C, F, G, H, P1
R-7001	R-7004	R-7006	R-7007	R-7008	R-7095	R-7097	R-7102	A, C, F, G, P1
R-7103	R-7106	R-7107	R-7109	R-7110	R-7112	R-7114	R-7115	
R-7121	R-7123	R-7138	R-7150	R-7160	R-7165	R-7166	R-7167	
R-7168	R-7169	R-7170	R-7172	R-7176	R-7177	R-7195	R-7210	
R-7211	R-7225	R-7230	R-7231	R-7232	R-7249	R-7250	R-7265	
R-7273	R-7274	R-7283	R-7292	R-7293	R-7294	R-7310	R-7323	
R-7327	R-7331	R-7336	R-7340	R-7451	R-7453	R-7454	R-7460	
R-7461	R-7467	R-7468	R-7470	R-7471	R-7481	R-7635	R-7637	
R-7643	R-7651	R-7657	R-7696	R-7697	R-7698	R-7699	R-7700	
R-7701	R-7703	R-7704	R-7705	R-7706	R-7707	R-7708	R-7709	
R-7710	R-7711	R-7712	R-7715	R-7716	R-7720	R-7760	R-7762	
R-7772	R-7781	R-7794	R-7802	R-7803	R-7805	R-7806	R-7807	
R-7808	R-7809	R-7812	R-7846	R-7856	R-7866	R-7867	R-7872	
R-7877	R-7890	R-7926	R-7932	R-7940	R-7960	R-7963		
R-7967	R-7970							
R-7252	R-7441	R-7442	R-7444	R-7445	R-7446	R-7457	R-7458	A, C, F, P1
R-7459	R-7524	R-7641	R-7694					
R-7002	R-7208	R-7215						A, C, P1
R-7183								A, D

R-7423	A, D, F
R-7447 R-7735	A, D, F, G, P1
R-7218 R-7220 R-7221 R-7226 R-7287 R-7448 R-7499	A, D, F, P1
R-7216 R-7476	A, D, P1
R-7603	A, F
R-7822	A, F, G
R-7269 R-7326 R-7455	A, F, G, H, P1
R-7636	A, F, G, P1
R-7132 R-7212 R-7217 R-7219 R-7227 R-7267 R-7268 R-7271 R-7295 R-7296 R-7320 R-7328 R-7335 R-7496 R-7503 R-7626 R-7628 R-7629 R-7630 R-7631 R-7761 R-7784 R-7785 R-7792 R-7793 R-7817	A, F, P1
R-7009 R-7013 R-7141 R-7142 R-7228 R-7322 R-7443 R-7488 R-7489 R-7490 R-7491 R-7498 R-7639 R-7816 R-7907 R-7990 R-7991 R-7992 R-7993 R-7994 R-7995 R-7996 R-7997 R-7998 R-7999 R-8000	A, P1
R-7199 R-7202 R-7203 R-7204 R-7205 R-7206 R-7300 R-7301 R-7302 R-7304 R-7305 R-7377 R-7526 R-7592 R-7972	B
R-7088 R-7242	B, C
R-7149 R-7363 R-7365 R-7532	B, C, D
R-7567 R-7578 R-7964 R-7973	B, C, D, F
R-7870	B, C, D, F, G
R-7606 R-7832 R-7835 R-7836 R-7837 R-7838 R-7839 R-7840 R-7842 R-7843 R-7844 R-7845 R-7868 R-7871 R-7873 R-7874 R-7880 R-7889 R-7980 R-7981 R-7983	B, C, D, F, H
R-7619	B, C, D, F, H, P1
R-7081 R-7082 R-7087 R-7229 R-7251 R-7316 R-7424 R-7478 R-7587 R-7946	B, C, D, F, P1
R-7236	B, C, D, G, H, P1
R-7898	B, C, D, G, P1
R-7152 R-7469 R-7540 R-7589 R-7676 R-7767 R-7928	B, C, D, P1
R-7404 R-7569 R-7577 R-7596	B, C, F
R-7214	B, C, F, G, P1
R-7888	B, C, F, H
R-7522 R-7541	B, C, F, H, P1
R-7090 R-7315 R-7521 R-7748 R-7875 R-7885 R-7904	B, C, F, P1
R-7896	B, C, G, F, P1
R-7666	B, C, G, P1
R-7196 R-7519 R-7558	B, C, H, P1
R-7089 R-7201 R-7405 R-7474 R-7483 R-7509 R-7722 R-7850	B, C, P1
R-7146 R-7185 R-7186 R-7207 R-7244 R-7254 R-7303 R-7581 R-7593 R-7667 R-7855 R-7966	B, D
R-7525 R-7528 R-7573	B, D, F

R-7330 R-7482	B, D, F, G, P1
R-7124 R-7416 R-7831	B, D, F, H
R-7426	B, D, F, H, P1
R-7011 R-7151 R-7155 R-7194 R-7235 R-7238 R-7239 R-7246 R-7261 R-7297 R-7307 R-7495 R-7548 R-7658 R-7659 R-7660 R-7661 R-7662 R-7663 R-7664 R-7665 R-7899 R-7910 R-7920 R-7921 R-7922	B, D, F, P1
R-7021	B, D, H
R-7538 R-7942	B, D, H, P1
R-7191 R-7382 R-7413 R-7425 R-7479 R-7480 R-7494 R-7507 R-7768 R-7791	B, D, P1
R-7256 R-7257 R-7299 R-7412 R-7562	B, F
R-7408 R-7409	B, F, H
R-7119 R-7523	B, F, H, P1
R-7159 R-7175 R-7190 R-7233 R-7234 R-7237 R-7258 R-7420 R-7427 R-7428 R-7430 R-7506 R-7515 R-7585 R-7685 R-7687 R-7688 R-7689 R-7765 R-7861 R-7862 R-7863 R-7864 R-7876 R-7891	B, F, P1
R-7600	B, G
R-7255 R-7306 R-7411 R-7852	B, H
R-7527	B, P
R-7019 R-7100 R-7117 R-7156 R-7163 R-7171 R-7179 R-7279 R-7394 R-7395 R-7396 R-7397 R-7398 R-7399 R-7400 R-7435 R-7472 R-7473 R-7508 R-7510 R-7513 R-7516 R-7555 R-7557 R-7683 R-7686 R-7713 R-7714 R-7719 R-7753 R-7763 R-7782 R-7788 R-7814 R-7815 R-7947	B, P1
R-7145 R-7406 R-7415 R-7571 R-7594 R-7957 R-7968	C
R-7144 R-7333 R-7570 R-7841	C, D
R-7198 R-7379 R-7380 R-7381 R-7407 R-7417	C, D, F
R-7915	C, D, F, G, P1
R-7182 R-7414 R-7821 R-7125 R-7131 R-7337 R-7419 R-7475 R-7512 R-7518 R-7597 R-7755 R-7773 R-7849	C, D, F, H
R-7024 R-7026 R-7027 R-7028 R-7029 R-7030 R-7031 R-7032 R-7033 R-7034 R-7035 R-7038 R-7039 R-7040 R-7041 R-7042 R-7043 R-7044 R-7045 R-7046 R-7047 R-7048 R-7049 R-7050 R-7051 R-7052 R-7053 R-7054 R-7055 R-7056 R-7057 R-7058 R-7059 R-7060 R-7061 R-7062 R-7063 R-7064 R-7065 R-7066 R-7067 R-7068 R-7069 R-7070 R-7071 R-7072 R-7073 R-7074 R-7075 R-7076 R-7077 R-7078 R-7079 R-7329 R-7605 R-7731 R-7737 R-7746 R-7752 R-7774 R-7778 R-7787 R-7859 R-7878 R-7923 R-7929	C, D, P1
R-7137 R-7361 R-7563 R-7568 R-7588 R-7682 R-7857 R-7955 R-7985 R-7987	C, F

R-7418	R-7487	R-7547	R-7754	R-7766	R-7771	R-7916	R-7952	C, F, P1
R-7734	R-7789							C, G, P1
R-7598								C, H
R-7015	R-7016	R-7018	R-7020	R-7094	R-7096	R-7111	R-7157	C, P1
R-7410	R-7431	R-7432	R-7434	R-7437	R-7517	R-7543	R-7642	
R-7750	R-7776	R-7777	R-7911					
R-7147	R-7181	R-7184	R-7187	R-7378	R-7529	R-7531	R-7535	D
R-7564	R-7565	R-7572	R-7590	R-7695	R-7830	R-7901	R-7902	
R-7903	R-7948							
R-7010	R-7259	R-7534	R-7536	R-7833	R-7953			D, F
R-7979								D, F, H
R-7118	R-7281	R-7421	R-7500	R-7672	R-7956			D, F, P1
R-7197	R-7339	R-7834						D, H
R-7122	R-7514							D, H, P1
R-7012	R-7014	R-7017	R-7098	R-7104	R-7105	R-7108	R-7116	D, P1
R-7139	R-7140	R-7158	R-7193	R-7200	R-7240	R-7280	R-7284	
R-7436	R-7438	R-7439	R-7452	R-7456	R-7484	R-7520	R-7638	
R-7652	R-7678	R-7730	R-7739	R-7743	R-7747	R-7751	R-7779	
R-7887	R-7895	R-7912	R-7924	R-7931	R-7938	R-7941	R-7943	
R-7091	R-7092	R-7093	R-7253	R-7391	R-7550	R-7566	R-7858	F
R-7949	R-7969	R-7971	R-7984					
R-7986								F, G, P1
R-7477								F, H, P1
R-7023	R-7164	R-7241	R-7429	R-7433	R-7511	R-7681	R-7749	F, P1
R-7853	R-7882							
R-7775								G, P1
R-7925								H, P1
R-7022	R-7143	R-7584						NIL
R-7005	R-7099	R-7173	R-7174	R-7178	R-7180	R-7275	R-7276	P1
R-7277	R-7278	R-7463	R-7485	R-7620	R-7621	R-7623	R-7624	
R-7645	R-7646	R-7647	R-7648	R-7650	R-7653	R-7654	R-7655	
R-7723	R-7756	R-7764	R-7770	R-7906	R-7919	R-7988	R-7989	

R8001 – R9000 (不包括 without R8975, R8315 & R8322)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R-8399 R-8781 R-8991	A
R-8285 R-8298 R-8306	A, B, C, D
R-8006 R-8009 R-8013 R-8014 R-8304	A, B, C, D, F
R-8041 R-8110 R-8237 R-8252 R-8385 R-8486 R-8490 R-8491 R-8492 R-8493 R-8494 R-8495 R-8547 R-8599 R-8680 R-8687	A, B, C, D, F, G, P1
R-8015 R-8018 R-8063 R-8121 R-8124 R-8135 R-8196 R-8247 R-8286 R-8310 R-8389 R-8575 R-8576 R-8588 R-8590 R-8797 R-8948	A, B, C, D, F, P1
R-8052 R-8311	A, B, C, D, G, P1
R-8580 R-8591	A, B, C, D, P1
R-8043	A, B, C, F
R-8034 R-8262 R-8264 R-8946	A, B, C, F, G
R-8189 R-8190 R-8195 R-8256 R-8340 R-8565 R-8644 R-8662 R-8669 R-8681 R-8686 R-8690 R-8700 R-8733 R-8834 R-8849 R-8955	A, B, C, F, G, P1
R-8101 R-8238	A, B, C, F, P1
R-8241 R-8923	A, B, C, P1
R-8012 R-8017 R-8146 R-8158 R-8159 R-8160 R-8162 R-8164 R-8165 R-8167 R-8177 R-8179 R-8313 R-8443	A, B, D, F
R-8864	A, B, D, F, G, P1
R-8032 R-8122 R-8259 R-8261 R-8307 R-8978 R-8996	A, B, D, F, P1
R-8439 R-8994	A, B, D, P1
R-8147 R-8148 R-8149 R-8150 R-8151 R-8152 R-8153 R-8154 R-8155 R-8156 R-8161 R-8163 R-8166 R-8168 R-8169 R-8170 R-8171 R-8172 R-8173 R-8175 R-8176 R-8178 R-8180 R-8181 R-8182 R-8183 R-8293 R-8309 R-8314	A, B, F
R-8325 R-8925 R-9000	A, B, F, P1
R-8555	A, B, G, P1
R-8447 R-8449 R-8510	A, B, P1
R-8245 R-8294	A, C
R-8204	A, C, D, F, G, H
R-8037 R-8099 R-8100 R-8505 R-8548 R-8568 R-8577 R-8708 R-8718 R-8721 R-8807 R-8857 R-8926 R-8982	A, C, D, F, G, P1
R-8174	A, C, D, F, H
R-8312 R-8318	A, C, D, F, P1
R-8267	A, C, D, G, H
R-8339 R-8368 R-8546	A, C, D, G, P1
R-8040 R-8270	A, C, D, P1
R-8145 R-8184	A, C, F
R-8022 R-8242	A, C, F, G
R-8570	A, C, F, G, H, P1
R-8028 R-8050 R-8051 R-8053 R-8055 R-8056 R-8059 R-8060 R-8061 R-8083 R-8086 R-8087 R-8111 R-8112 R-8113 R-8114 R-8115 R-8116 R-8117 R-8118 R-8119 R-8120 R-8127 R-8136 R-8137 R-8138 R-8139 R-8140 R-8141 R-8187 R-8192 R-8194 R-8197 R-8234 R-8248 R-8253 R-8254 R-8258 R-8273 R-8274 R-8275 R-8276 R-8278 R-8284 R-8290 R-8326 R-8327 R-8328 R-8329 R-8330 R-8331 R-8332 R-8335 R-8336 R-8341 R-8342 R-8343 R-8344 R-8349 R-8350 R-8359 R-8360 R-8362 R-8363 R-8364 R-8365 R-8366 R-8367 R-8369 R-8370 R-8371 R-8372 R-8373 R-8374 R-8375 R-8377 R-8378 R-8379 R-8381 R-8388 R-8396 R-8450 R-8451 R-8452 R-8453 R-8454 R-8455 R-8456 R-8457 R-8458 R-8459 R-8460 R-8461 R-8462 R-8464 R-8466 R-8470 R-8471 R-8472 R-8474 R-8479 R-8480 R-8481 R-8482 R-8488 R-8496 R-8497 R-8508 R-8509 R-8526 R-8545 R-8550 R-8558 R-8559 R-8563 R-8564 R-8566 R-8567 R-8569 R-8571 R-8572 R-8573 R-8594 R-8595 R-8596 R-8597 R-8598 R-8642 R-8643 R-8645 R-8646 R-8647 R-8648 R-8649 R-8650 R-8651 R-8652 R-8653 R-8657 R-8663 R-8664 R-8665 R-8666 R-8667 R-8668 R-8675 R-8676 R-8677 R-8678 R-8679 R-8682 R-8683 R-8684 R-8685 R-8688 R-8689 R-8691 R-8692 R-8693 R-8694 R-8695 R-8696 R-8697 R-8698 R-8699 R-8701 R-8702 R-8703 R-8704 R-8705 R-8706 R-8707 R-8709 R-8710 R-8711 R-8712 R-8713 R-8714 R-8715 R-8716 R-8717 R-8734 R-8795 R-8796 R-8809 R-8824 R-8827 R-8828 R-8829 R-8830 R-8833 R-8842 R-8856 R-8867 R-8870 R-8871 R-8876 R-8877 R-8878 R-8949 R-8950 R-8951 R-8952 R-8953 R-8954 R-8956 R-8957 R-8958 R-8959 R-8960 R-8961 R-8962 R-8963 R-8964 R-8965 R-8966 R-8967 R-8968 R-8969 R-8970 R-8971 R-8972 R-8973 R-8974 R-8976 R-8977	A, C, F, G, P1
R-8058 R-8186 R-8203 R-8233 R-8296 R-8999	A, C, F, P1
R-8193 R-8266	A, D, F, G, H
R-8263	A, D, F, H, P1
R-8448	A, D, P1
R-8011 R-8157 R-8789	A, F
R-8468	A, F, D, P1
R-8123	A, F, G, P1
R-8530	A, F, H, P1
R-8188 R-8305 R-8993 R-8995 R-8997 R-8998	A, F, P1

R-8527	A, G, P1
R-8467 R-8477 R-8525	A, H, P1
R-8048 R-8049 R-8064 R-8065 R-8066 R-8067 R-8068 R-8069 R-8070 R-8071 R-8072 R-8073 R-8074 R-8075 R-8076 R-8077 R-8078 R-8079 R-8080 R-8081 R-8082 R-8084 R-8085 R-8088 R-8089 R-8090 R-8091 R-8092 R-8093 R-8094 R-8095 R-8096 R-8097 R-8098 R-8348 R-8398 R-8436 R-8441 R-8483 R-8484 R-8670 R-8671 R-8672 R-8673 R-8674 R-8732 R-8760 R-8804 R-8806 R-8811 R-8812 R-8813 R-8814 R-8815 R-8816 R-8817 R-8818 R-8819 R-8820 R-8821 R-8822 R-8823 R-8825 R-8826 R-8831 R-8832 R-8848 R-8860 R-8861 R-8862 R-8863 R-8873 R-8874 R-8875 R-8879 R-8880 R-8881 R-8882 R-8883 R-8884 R-8885 R-8886 R-8889 R-8890 R-8891 R-8892 R-8893 R-8894 R-8895 R-8896 R-8897 R-8898 R-8899 R-8900 R-8901 R-8902 R-8903 R-8904 R-8905 R-8906 R-8907 R-8909 R-8910 R-8911 R-8912 R-8913 R-8914 R-8915 R-8916 R-8917 R-8918 R-8919 R-8920 R-8921 R-8922 R-8927 R-8928 R-8929 R-8930 R-8931 R-8932 R-8933 R-8934 R-8935 R-8936 R-8937 R-8938 R-8939	A, P1
R-8007 R-8024 R-8302 R-8779 R-8782 R-8784 R-8941 R-8943 R-8944	B
R-8023 R-8201 R-8321 R-8945	B, C, D, F
R-8345	B, C, D, F, G
R-8036 R-8382	B, C, D, F, G, P1
R-8205	B, C, D, F, H
R-8020 R-8281	B, C, D, F, P1
R-8395	B, C, D, G, P1
R-8035 R-8292 R-8347 R-8659	B, C, D, P1
R-8010 R-8239	B, C, F
R-8265	B, C, F, G
R-8288 R-8574 R-8850	B, C, F, P1
R-8383 R-8536	B, C, G, P1
R-8351 R-8501 R-8512 R-8514 R-8587 R-8602 R-8767 R-8769 R-8981	B, C, P1
R-8021 R-8295 R-8777 R-8990	B, D
R-8016 R-8249 R-8319	B, D, F
R-8780	B, D, F, G
R-8215	B, D, F, H
R-8799	B, D, F, H, P1
R-8200 R-8303 R-8334 R-8397 R-8401 R-8402 R-8503 R-8516 R-8524 R-8551 R-8579 R-8724 R-8803 R-8983	B, D, F, P1
R-8593	B, D, G, H, P1
R-8323	B, D, G, P1
R-8250	B, D, H, P1
R-8026 R-8030 R-8062 R-8246 R-8271 R-8346 R-8353 R-8358 R-8442 R-8444 R-8446	B, D, P1

R-8463 R-8465 R-8533 R-8537 R-8584 R-8605 R-8616 R-8656 R-8751 R-8761	
R-8289	B, F
R-8800	B, D, F, P1
R-8499	B, F, H, P1
R-8004 R-8046 R-8054 R-8057 R-8102 R-8105 R-8106 R-8143 R-8232 R-8391 R-8409 R-8431 R-8433 R-8513 R-8517 R-8549 R-8553 R-8554 R-8556 R-8581 R-8583 R-8585 R-8728 R-8738 R-8740 R-8749 R-8762 R-8766 R-8773 R-8798 R-8847 R-8947	B, F, P1
R-8418 R-8745	B, G, P1
R-8240	B, H
R-8507 R-8522 R-8541	B, H, P1
R-8045 R-8103 R-8104 R-8107 R-8108 R-8109 R-8134 R-8142 R-8244 R-8354 R-8356 R-8357 R-8386 R-8392 R-8414 R-8420 R-8423 R-8425 R-8426 R-8430 R-8475 R-8476 R-8478 R-8500 R-8511 R-8515 R-8523 R-8531 R-8534 R-8542 R-8543 R-8544 R-8552 R-8560 R-8578 R-8641 R-8654 R-8660 R-8661 R-8723 R-8726 R-8727 R-8735 R-8736 R-8739 R-8746 R-8747 R-8748 R-8752 R-8757 R-8759 R-8764 R-8774 R-8775 R-8841 R-8858 R-8859	B, P1
R-8324 R-8989	C
R-8316 R-8992	C, D
R-8042 R-8810	C, D, F
R-8211 R-8229	C, D, F, G
R-8280	C, D, F, G, P1
R-8029 R-8031 R-8033 R-8125 R-8126 R-8128 R-8129 R-8185 R-8191 R-8202 R-8207 R-8208 R-8209 R-8210 R-8212 R-8213 R-8214 R-8216 R-8217 R-8218 R-8219 R-8221 R-8222 R-8223 R-8224 R-8225 R-8226 R-8227 R-8228 R-8268 R-8279 R-8758	C, D, F, H
R-8025 R-8230 R-8251 R-8801	C, D, F, P1
R-8039 R-8132 R-8469 R-8485 R-8562 R-8658 R-8722 R-8754 R-8755 R-8771 R-8908 R-8986	C, D, P1
R-8206 R-8282 R-8283 R-8320 R-8790	C, F
R-8130	C, F, G
R-8198 R-8235 R-8297 R-8408 R-8489 R-8504 R-8592 R-8601 R-8741 R-8802 R-8980	C, F, P1
R-8422 R-8586	C, H, P1
R-8277 R-8384 R-8405 R-8410 R-8413 R-8415 R-8419 R-8427 R-8429 R-8445 R-8473 R-8487 R-8498 R-8502 R-8532 R-8557 R-8561 R-8589 R-8655 R-8743 R-8744 R-8750 R-8756 R-8763 R-8768 R-8770 R-8840	C, P1
R-8008 R-8231 R-8291 R-8299 R-8400 R-8776 R-8785 R-8786 R-8808 R-8940 R-8942 R-8988	D
R-8783 R-8792	D, F
R-8047 R-8255 R-8269 R-8272 R-8788 R-8794	D, F, G, H

R-8287 R-8535 R-8582 R-8637 R-8742 R-8787 R-8791 R-8987	D, F, P1
R-8300 R-8301	D, H
R-8027	D, H, P1
R-8038 R-8387 R-8390 R-8393 R-8403 R-8435 R-8520 R-8600 R-8603 R-8604 R-8606 R-8620 R-8621 R-8622 R-8630 R-8631 R-8632 R-8633 R-8636 R-8638 R-8639 R-8640 R-8719 R-8720 R-8725 R-8836 R-8837 R-8839 R-8846 R-8854 R-8866 R-8868 R-8869 R-8887 R-8888 R-8984	D, P1
R-8019 R-8131 R-8220 R-8317 R-8778	F
R-8236	D, F, P1
R-8924	F, G, P1
R-8529 R-8539	F, H, P1
R-8001 R-8002 R-8003 R-8005 R-8044 R-8133 R-8199 R-8243 R-8308 R-8337 R-8355 R-8404 R-8406 R-8407 R-8411 R-8412 R-8416 R-8417 R-8421 R-8424 R-8428 R-8434 R-8438 R-8440 R-8506 R-8528 R-8538 R-8540 R-8729 R-8730 R-8737 R-8765 R-8772 R-8872	F, P1
R-8376 R-8437	H, P1
R-8793	NIL
R-8144 R-8257 R-8260 R-8333 R-8338 R-8352 R-8361 R-8380 R-8394 R-8432 R-8518 R-8519 R-8521 R-8607 R-8608 R-8609 R-8610 R-8611 R-8612 R-8613 R-8614 R-8615 R-8617 R-8618 R-8619 R-8623 R-8624 R-8625 R-8626 R-8627 R-8628 R-8629 R-8634 R-8635 R-8731 R-8753 R-8805 R-8835 R-8838 R-8843 R-8844 R-8845 R-8851 R-8852 R-8853 R-8855 R-8865 R-8979 R-8985	P1

R9001 – R10000 (不包括 without R9044, R9685)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/ Proposals and Responses (Refer to Annex VIb)
R-9423	A, B, C, D, F, P1
R-9098 R-9327 R-9448	A, B, C, D, P1
R-9211 R-9276 R-9287 R-9299 R-9300 R-9304 R-9318 R-9319 R-9515 R-9652 R-9944	A, B, C, F, G, P1
R-9095 R-9266 R-9597 R-9667 R-9684 R-9748 R-9754 R-9788 R-9789 R-9811 R-9877	A, B, C, F, P1
R-9096	A, B, C, P1
R-9080 R-9090 R-9273 R-9337 R-9338 R-9442	A, B, D, F, P1
R-9059 R-9060	A, B, D, H, P1
R-9024 R-9027 R-9050 R-9052 R-9061 R-9062 R-9063 R-9084 R-9085 R-9094 R-9100 R-9102 R-9103 R-9104 R-9182 R-9183 R-9184 R-9185 R-9186 R-9187 R-9193 R-9194 R-9196 R-9201 R-9202 R-9213 R-9214 R-9215 R-9216 R-9217 R-9218 R-9219 R-9220 R-9221 R-9222 R-9223 R-9224 R-9225 R-9262 R-9274 R-9325 R-9326 R-9340 R-9424 R-9425 R-9426 R-9439 R-9441 R-9445 R-9446 R-9447 R-9997	A, B, D, P1
R-9054 R-9055 R-9065 R-9278 R-9616 R-10000	A, B, F, G, P1
R-9101	A, B, F, H, P1
R-9001 R-9004 R-9005 R-9006 R-9015 R-9016 R-9019 R-9033 R-9039 R-9041 R-9042 R-9043 R-9049 R-9064 R-9072 R-9074 R-9075 R-9076 R-9077 R-9081 R-9087 R-9088 R-9089 R-9091 R-9093 R-9331 R-9332 R-9333 R-9335 R-9339 R-9341 R-9391 R-9392 R-9438 R-9444 R-9621	A, B, F, P1
R-9694	A, C, D, F, G, P1
R-9023 R-9450 R-9635 R-9671 R-9845	A, C, D, F, P1
R-9152	A, C, D, P1
R-9028 R-9029 R-9030 R-9031 R-9032 R-9056 R-9177 R-9180 R-9181 R-9188 R-9189 R-9190 R-9191 R-9195 R-9209 R-9210 R-9212 R-9226 R-9292 R-9293 R-9297 R-9298 R-9301 R-9302 R-9303 R-9305 R-9306 R-9307 R-9308 R-9309 R-9310 R-9311 R-9312 R-9313 R-9314 R-9315 R-9316 R-9317 R-9320 R-9343 R-9344 R-9345 R-9346 R-9347 R-9352 R-9357 R-9381 R-9432 R-9433 R-9434 R-9435 R-9437 R-9497 R-9498 R-9502 R-9503 R-9505 R-9506 R-9508 R-9509 R-9510 R-9511 R-9512 R-9518 R-9519 R-9520 R-9521 R-9522 R-9523 R-9524 R-9526 R-9527	A, C, F, G, P1
R-9534 R-9535 R-9536 R-9537 R-9538 R-9539 R-9540 R-9541 R-9542 R-9545 R-9546 R-9547 R-9548 R-9549 R-9550 R-9552 R-9556 R-9557 R-9558 R-9560 R-9561 R-9564 R-9568 R-9569 R-9570 R-9571 R-9572 R-9576 R-9577 R-9578 R-9579 R-9580 R-9583 R-9584 R-9587 R-9599 R-9607 R-9610 R-9611 R-9612 R-9614 R-9623 R-9626 R-9627 R-9628 R-9629 R-9630 R-9632 R-9633 R-9636 R-9641 R-9642 R-9643 R-9647 R-9648 R-9658 R-9692 R-9693 R-9695 R-9696 R-9697 R-9701 R-9702 R-9708 R-9709 R-9710 R-9712 R-9717 R-9718 R-9719 R-9720 R-9721 R-9722 R-9723 R-9724 R-9725 R-9727 R-9728 R-9732 R-9733 R-9734 R-9735 R-9736 R-9738 R-9739 R-9741 R-9744 R-9757 R-9758 R-9759 R-9760 R-9767 R-9770 R-9778 R-9804 R-9806 R-9807 R-9808 R-9813 R-9819 R-9820 R-9823 R-9833 R-9861 R-9862 R-9890 R-9891 R-9892 R-9895 R-9896 R-9898 R-9899 R-9902 R-9904 R-9908 R-9909 R-9910 R-9911 R-9913 R-9914 R-9921 R-9922 R-9927 R-9930 R-9931 R-9932 R-9933 R-9934 R-9935 R-9936 R-9937 R-9939 R-9941 R-9943 R-9947 R-9948 R-9950 R-9951 R-9961 R-9967 R-9972 R-9977 R-9978 R-9980 R-9995 R-9996 R-9998 R-9999	
R-9035 R-9038	A, C, F, H, P1
R-9010 R-9013 R-9021 R-9057 R-9110 R-9163 R-9164 R-9165 R-9166 R-9167 R-9168 R-9169 R-9170 R-9171 R-9172 R-9173 R-9174 R-9175 R-9176 R-9178 R-9179 R-9192 R-9197 R-9198 R-9199 R-9200 R-9206 R-9207 R-9208 R-9227 R-9281 R-9284 R-9285 R-9286 R-9288 R-9289 R-9290 R-9294 R-9323 R-9324 R-9330 R-9390 R-9428 R-9429 R-9431 R-9436 R-9493 R-9496 R-9499 R-9500 R-9501 R-9504 R-9507 R-9513 R-9514 R-9528 R-9551 R-9553 R-9554 R-9555 R-9559 R-9565 R-9566 R-9567 R-9573 R-9575 R-9582 R-9586 R-9588 R-9589 R-9590 R-9591 R-9592 R-9593 R-9594 R-9595 R-9596 R-9598 R-9600 R-9601 R-9602 R-9603 R-9604 R-9605 R-9606 R-9608 R-9609 R-9613 R-9634 R-9639 R-9640 R-9644 R-9645 R-9649 R-9650 R-9651 R-9653 R-9655 R-9656 R-9657 R-9659 R-9662 R-9663 R-9664 R-9668 R-9669 R-9670 R-9672 R-9673 R-9674 R-9675 R-9676 R-9677 R-9678 R-9679 R-9680 R-9681 R-9682 R-9683 R-9686 R-9690 R-9698 R-9699 R-9704 R-9705 R-9706 R-9711 R-9713 R-9715 R-9716 R-9729 R-9731 R-9740 R-9742 R-9743 R-9745 R-9746 R-9747 R-9749 R-9750 R-9751 R-9752 R-9761 R-9762 R-9763 R-9764 R-9765 R-9768 R-9769 R-9771 R-9772 R-9773 R-9774 R-9775 R-9776 R-9777 R-9779 R-9780 R-9781 R-9782 R-9783 R-9784 R-9785 R-9786 R-9787 R-9790 R-9791 R-9792 R-9793 R-9794 R-9795 R-9797 R-9798 R-9799 R-9800 R-9809 R-9810 R-9812 R-9814 R-9815	A, C, F, P1

R-9817 R-9821 R-9822 R-9825 R-9826 R-9829 R-9830 R-9831 R-9832 R-9834 R-9835 R-9836 R-9837 R-9838 R-9839 R-9840 R-9841 R-9842 R-9843 R-9844 R-9846 R-9847 R-9849 R-9850 R-9851 R-9852 R-9854 R-9855 R-9856 R-9857 R-9859 R-9860 R-9863 R-9864 R-9865 R-9866 R-9867 R-9868 R-9869 R-9870 R-9871 R-9872 R-9873 R-9874 R-9875 R-9878 R-9879 R-9880 R-9881 R-9882 R-9883 R-9884 R-9885 R-9886 R-9887 R-9888 R-9889 R-9893 R-9894 R-9897 R-9900 R-9901 R-9903 R-9905 R-9906 R-9907 R-9912 R-9915 R-9916 R-9917 R-9918 R-9919 R-9920 R-9923 R-9924 R-9925 R-9926 R-9928 R-9938 R-9952 R-9953 R-9954 R-9955 R-9956 R-9959 R-9960 R-9973 R-9974 R-9975 R-9976	
R-9280	A, C, G, P1
R-9040 R-9086 R-9329	A, D, F, P1
R-9277	A, F, G, H, P1
R-9045 R-9046 R-9058 R-9275 R-9279 R-9353 R-9354 R-9355 R-9356 R-9533 R-9631 R-9665 R-9666 R-9962 R-9963 R-9965 R-9966 R-9994	A, F, G, P1
R-9022 R-9034	A, F, H, P1
R-9002 R-9003 R-9014 R-9025 R-9026 R-9051 R-9073 R-9078 R-9079 R-9082 R-9083 R-9092 R-9099 R-9203 R-9267 R-9270 R-9282 R-9336 R-9351 R-9427 R-9440 R-9443 R-9449 R-9529 R-9530 R-9531 R-9532 R-9615 R-9622 R-9818 R-9968 R-9969 R-9970 R-9971	A, F, P1
R-9114 R-9115 R-9116 R-9117 R-9118 R-9119 R-9120 R-9121 R-9122 R-9123 R-9124 R-9125 R-9126 R-9127 R-9128 R-9129 R-9130 R-9131 R-9132 R-9133 R-9134 R-9135 R-9263 R-9264 R-9405 R-9406 R-9407 R-9451 R-9452 R-9453 R-9454 R-9455 R-9456 R-9457 R-9458 R-9459 R-9460 R-9461 R-9462 R-9463 R-9464 R-9465 R-9466 R-9467 R-9468 R-9469 R-9470 R-9471 R-9472 R-9473 R-9474 R-9475 R-9476 R-9990	A, P1
R-9481	B, C, D, H, P1
R-9231 R-9242 R-9382 R-9383 R-9384 R-9385 R-9386 R-9387 R-9388 R-9389	B, C, D, P1
R-9988	B, C, F, H, P1
R-9237 R-9360 R-9414	B, C, F, P1
R-9105 R-9106 R-9107 R-9109 R-9111 R-9112 R-9265 R-9321 R-9322	B, C, G, P1
R-9159 R-9261 R-9380 R-9411 R-9479 R-9485	B, C, P1
R-9036 R-9037 R-9108 R-9113 R-9291 R-9295 R-9296 R-9416 R-9488 R-9617 R-9618 R-9619 R-9620 R-9945 R-9946 R-9993	B, D, F, P1
R-9236 R-9243 R-9365 R-9366 R-9478 R-9492 R-9984 R-9985 R-9986 R-9987	B, D, P1
R-9017 R-9020 R-9097 R-9151 R-9238 R-9245 R-9328 R-9334 R-9349	B, F, P1

R-9484 R-9516	
R-9140 R-9160 R-9249	B, H, P1
R-9141 R-9142 R-9143 R-9148 R-9153 R-9154 R-9157 R-9161 R-9162 R-9205 R-9228 R-9235 R-9239 R-9250 R-9256 R-9259 R-9359 R-9368 R-9372 R-9373 R-9375 R-9376 R-9395 R-9397 R-9399 R-9400 R-9409 R-9410 R-9412 R-9413 R-9415 R-9417 R-9419 R-9420 R-9482 R-9483 R-9486 R-9487 R-9989	B, P1
R-9730	C, D, F, P1
R-9251 R-9983	C, D, P1
R-9367	C, F, G, P1
R-9369 R-9394 R-9477	C, F, P1
R-9007 R-9008 R-9009 R-9011 R-9012 R-9047 R-9048 R-9053 R-9067 R-9068 R-9069 R-9070 R-9071 R-9268 R-9269 R-9271 R-9272	C, G, P1
R-9402 R-9408 R-9490	C, H, P1
R-9137 R-9138 R-9144 R-9147 R-9149 R-9156 R-9158 R-9204 R-9230 R-9233 R-9234 R-9240 R-9244 R-9248 R-9254 R-9260 R-9358 R-9370 R-9377 R-9378 R-9393 R-9396 R-9401 R-9404 R-9422 R-9489 R-9491 R-9992	C, P1
R-9991	D, F, P1
R-9150 R-9155 R-9229 R-9241 R-9247 R-9258 R-9361 R-9362 R-9363 R-9398 R-9982	D, P1
R-9018	F, H, P1
R-9066 R-9139 R-9145 R-9252 R-9253 R-9255 R-9257 R-9283 R-9342 R-9348 R-9350 R-9364 R-9371 R-9374 R-9379 R-9418 R-9421 R-9430 R-9480 R-9494 R-9495 R-9517 R-9525 R-9543 R-9544 R-9562 R-9563 R-9574 R-9581 R-9585 R-9624 R-9625 R-9637 R-9638 R-9646 R-9654 R-9660 R-9661 R-9687 R-9688 R-9689 R-9691 R-9700 R-9703 R-9707 R-9714 R-9726 R-9737 R-9753 R-9755 R-9756 R-9766 R-9796 R-9801 R-9802 R-9803 R-9805 R-9816 R-9824 R-9827 R-9828 R-9848 R-9853 R-9858 R-9876 R-9929 R-9940 R-9942 R-9949 R-9957 R-9958 R-9964 R-9979 R-9981	F, P1
R-9136 R-9146 R-9232 R-9246 R-9403	H, P1

R10001 - R11000

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R10347 R10795	A, B, C, D, F, P1
R10151 R10452 R10782 R10790 R10792 R10794 R10796 R10797 R10798 R10799 R10811 R10836 R10837	A, B, C, D, P1
R10476 R10630	A, B, C, F, G, H, P1
R10038 R10109 R10113 R10175 R10278 R10279 R10382 R10470 R10704 R10934	A, B, C, F, G, P1
R10003 R10004 R10065 R10207 R10209 R10216 R10236 R10251 R10262 R10263 R10264 R10344 R10365 R10366 R10394 R10398 R10462 R10463 R10464 R10806 R10809 R10810 R10816 R10917 R10926 R10938	A, B, C, F, P1
R10059 R10434 R10698 R10699 R10700 R10701 R10711 R10713 R10723 R10724 R10725 R10726 R10773 R10791 R10801 R10829	A, B, D, F, P1
R10800 R10828	A, B, D, H, P1
R10014 R10039 R10046 R10056 R10069 R10080 R10081 R10082 R10114 R10115 R10116 R10117 R10120 R10150 R10176 R10178 R10179 R10180 R10181 R10182 R10185 R10291 R10293 R10294 R10295 R10312 R10317 R10318 R10319 R10320 R10321 R10322 R10323 R10329 R10345 R10346 R10380 R10402 R10403 R10412 R10424 R10428 R10429 R10430 R10431 R10432 R10433 R10457 R10458 R10485 R10486 R10748 R10761 R10769 R10770 R10772 R10783 R10793 R10814 R10820 R10835 R10838 R10839 R10873 R10875 R10876 R10877 R10878 R10879 R10880 R10881 R10882 R10883 R10891 R10892 R10893 R10894 R10895 R10897 R10898 R10899 R10900 R10901 R10909 R10910 R10911 R10939 R10940	A, B, D, P1
R10411	A, B, F, G, H, P1
R10001 R10029 R10057 R10058 R10087 R10089 R10091 R10101 R10110 R10125 R10156 R10205 R10206 R10241 R10243 R10257 R10259 R10261 R10268 R10269 R10272 R10390 R10465 R10466	A, B, F, G, P1
R10774	A, B, F, H, P1
R10007 R10010 R10075 R10076 R10142 R10231 R10232 R10233 R10247 R10248 R10254 R10277 R10302 R10330 R10410 R10421 R10427 R10453 R10454 R10492 R10557 R10714 R10763 R10764 R10765 R10771 R10775 R10776 R10778 R10807 R10819 R10823 R10825 R10826 R10827 R10831 R10908	A, B, F, P1
R10997	A, B, P1
R10022 R10396 R10999	A, C, D, F, P1
R10002 R10006 R10011 R10035 R10040 R10062 R10077 R10079 R10127 R10129 R10166 R10172 R10173 R10197 R10201 R10217 R10218 R10220 R10249 R10250 R10280 R10303 R10307 R10309 R10328 R10338 R10339 R10349 R10351 R10352 R10353 R10371 R10377 R10379 R10383 R10384 R10386 R10469 R10477 R10482 R10484 R10487 R10488 R10529 R10530 R10633 R10703 R10705 R10737 R10738 R10739 R10740 R10742 R10743 R10744 R10745 R10746 R10781 R10784 R10785 R10786 R10787 R10788 R10789 R10866 R10867 R10868 R10871 R10872 R10922 R10924 R10933 R10935 R10936 R10945	A, C, F, G ,P1
R10474	A, C, F, G, H, P1
R10395 R10803	A, C, F, H, P1
R10016 R10021 R10025 R10026 R10031 R10032 R10033 R10054 R10055 R10063 R10064 R10066 R10111 R10121 R10122 R10123 R10128 R10141 R10143 R10157 R10158 R10159 R10164 R10167 R10168 R10169 R10177 R10186 R10188 R10189 R10190 R10192 R10193 R10194 R10195 R10210 R10211 R10215 R10226 R10235 R10244 R10273 R10283 R10299 R10340 R10341 R10342 R10343 R10360 R10361 R10362 R10387 R10388 R10389 R10392 R10397 R10399 R10417 R10419 R10439 R10440 R10441 R10442 R10443 R10459 R10460 R10461 R10467 R10471 R10481 R10490 R10802 R10804 R10805 R10808 R10821 R10834 R10853 R10854 R10858 R10862 R10863 R10865 R10869 R10874 R10884 R10885 R10886 R10887 R10888 R10889 R10890 R10896 R10902 R10904 R10912 R10920 R10921 R10923 R10925 R10932 R10937 R10994 R10996	A, C, F, P1
R10817	A, C, P1
R10009 R10331 R10455 R10683	A, D, F, P1
R10017 R10018 R10024 R10027 R10028 R10030 R10037 R10051 R10052 R10053 R10060 R10061 R10067 R10070 R10074 R10078 R10088 R10092 R10093 R10098 R10100 R10102 R10155 R10171 R10191 R10208 R10230 R10242 R10246 R10252 R10258 R10260 R10305 R10310 R10314 R10332 R10333 R10334 R10350 R10363 R10374 R10375 R10376 R10381 R10400 R10401 R10404 R10405 R10414 R10416 R10418 R10425 R10468 R10491 R10855 R10998	A, F, G, P1
R10047 R10083 R10084 R10085 R10090 R10136 R10137 R10163 R10165 R10170 R10212 R10213 R10214 R10281 R10282 R10284 R10285 R10286 R10287 R10288 R10289 R10290 R10297 R10298 R10300 R10301 R10304 R10316 R10359 R10367 R10368 R10372 R10373 R10378 R10391 R10406 R10407 R10408 R10409 R10423 R10444 R10445 R10446 R10447 R10448 R10449 R10478 R10489 R10760 R10762 R10777 R10780 R10830 R10905 R10906 R10907 R10942 R10993	A, F, P1
R10651	A, H, P1
R10049 R10050 R10237 R10238 R10239 R10240 R10354 R10355 R10420 R10542	A, P1

R10618 R10631 R10639 R10696 R10710 R10731 R10735 R10842 R10851 R10974	
R10086 R10472 R10812 R10815 R10818 R10960	B, C, D, F, P1
R10311 R10736 R10991	B, C, D, P1
R10162	B, C, F, G, P1
R10941	B, C, F, P1
R10036 R10048 R10112 R10118 R10130 R10196 R10202 R10234 R10265 R10270 R10271 R10327 R10393 R10456 R10845 R10857	B, C, G, P1
R10584 R10585 R10593 R10594 R10616 R10689 R10947 R10954 R10955 R10956 R10958 R10959 R10961	B, C, P1
R10008 R10013 R10034 R10041 R10042 R10043 R10044 R10045 R10068 R10099 R10103 R10104 R10105 R10106 R10107 R10108 R10132 R10133 R10134 R10138 R10139 R10140 R10149 R10174 R10183 R10184 R10198 R10199 R10200 R10203 R10204 R10228 R10255 R10292 R10308 R10313 R10356 R10357 R10358 R10369 R10370 R10422 R10435 R10436 R10437 R10438 R10450 R10451 R10475 R10479 R10480 R10483 R10583 R10672 R10856 R10903 R10944 R10957 R10995	B, D, F, P1
R10498 R10610 R10624 R10641 R10653 R10751	B, D, P1
R10615	B, F, G, P1
R10832	B, F, H, P1
R10012 R10071 R10096 R10097 R10146 R10147 R10148 R10152 R10153 R10154 R10229 R10513 R10551 R10553 R10556 R10596 R10597 R10613 R10712 R10759 R10768 R10813 R10833 R10913 R10914 R10962 R10970 R10973 R10976 R10982 R10984	B, F, P1
R10571	B, H, P1
R10516 R10518 R10520 R10522 R10524 R10531 R10532 R10534 R10535 R10536 R10537 R10539 R10540 R10544 R10552 R10563 R10564 R10587 R10591 R10592 R10598 R10599 R10600 R10603 R10604 R10607 R10612 R10617 R10619 R10620 R10621 R10622 R10623 R10625 R10626 R10627 R10628 R10629 R10632 R10634 R10635 R10637 R10638 R10640 R10646 R10648 R10649 R10654 R10656 R10660 R10661 R10673 R10676 R10678 R10679 R10688 R10694 R10695 R10706 R10707 R10709 R10717 R10722 R10728 R10730 R10732 R10733 R10757 R10949 R10952 R10965 R10967 R10968 R10972 R10975 R10988 R10990	B, P1
R10687	C, D, F, P1
R10848	C, D, G, P1
R10605	C, D, P1
R10222 R10245	C, F, G, P1
R10095 R10538 R10562 R10588 R10727 R10822 R10953	C, F, P1
R10005 R10015 R10019 R10020 R10023 R10119 R10124 R10126 R10131 R10135 R10160 R10161 R10187 R10219 R10221 R10223 R10224 R10225 R10227 R10253	C, G, P1
R10256 R10266 R10267 R10274 R10275 R10276 R10306 R10315 R10324 R10325 R10335 R10336 R10337 R10348 R10364 R10385 R10413 R10415 R10426 R10843 R10844 R10846 R10847 R10849 R10850 R10852	
R10964	C, H, P1
R10496 R10523 R10541 R10555 R10575 R10589 R10590 R10601 R10602 R10642 R10643 R10657 R10658 R10664 R10665 R10668 R10669 R10670 R10674 R10675 R10677 R10686 R10690 R10692 R10693 R10702 R10708 R10719 R10720 R10946 R10981 R10983	C, P1
R10581 R10756 R10779	D, F, P1
R10554	D, H, P1
R10494 R10509 R10510 R10514 R10559 R10567 R10574 R10578 R10580 R10609 R10611 R10684 R10685 R10691 R10747 R10750 R10754 R10969 R10989	D, P1
R10145 R10517 R10579 R10650 R10663 R10915	F, H, P1
R10072 R10073 R10094 R10144 R10296 R10473 R10493 R10497 R10500 R10503 R10508 R10511 R10512 R10515 R10521 R10526 R10528 R10546 R10558 R10561 R10565 R10582 R10586 R10636 R10644 R10645 R10647 R10652 R10659 R10662 R10680 R10682 R10715 R10716 R10718 R10721 R10729 R10734 R10752 R10753 R10755 R10758 R10766 R10767 R10824 R10840 R10841 R10859 R10860 R10861 R10864 R10870 R10916 R10918 R10919 R10927 R10928 R10929 R10930 R10931 R10943 R10951 R10966 R10980 R10985 R10986 R10992	F, P1
R10950 R10977 R10978 R10979	G, P1
R10507 R10525 R10550 R10560 R10566 R10570 R10572 R10573 R10595 R10606 R10655 R10666 R10963 R10971 R10987	H, P1
R10326 R10495 R10499 R10501 R10502 R10504 R10505 R10506 R10519 R10527 R10533 R10543 R10545 R10547 R10548 R10549 R10568 R10569 R10576 R10577 R10608 R10614 R10667 R10671 R10681 R10697 R10741 R10749 R10948	P1

R11001 – R12000 (不包括 without R11508)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R11240	A, B, C, D, F, G, H, P1
R11938 R11985	A, B, C, D, F, P1
R11657 R11661 R11682 R11700 R11865 R11894 R11960 R11962 R11964 R11966 R11967 R11968 R11969 R11970 R11971 R11986 R11987	A, B, C, D, P1
R11017 R11023 R11026 R11028 R11029 R11154 R11224 R11241 R11252 R11259 R11403 R11714 R11838 R11842 R11843 R11844 R11888 R11926	A, B, C, F, G, P1
R11839	A, B, C, F, H, P1
R11090 R11101 R11197 R11247 R11528 R11732R11761 R11832 R11870	A, B, C, F, P1
R11040 R11355	A, B, C, P1
R11867	A, B, C, D, P1
R11654 R11658 R11659 R11664 R11675 R11707 R11729 R11764 R11803 R11813 R11815 R11817 R11866 R11892 R11993	A, B, D, F, P1
R11850 R11856 R11871 R11956	A, B, D, H, P1
R11010 R11013 R11014 R11015 R11104 R11106 R11158 R11184 R11223 R11228 R11229 R11230 R11231 R11232 R11233 R11634 R11643 R11645 R11648 R11652 R11660 R11662 R11663 R11667 R11668 R11674 R11676 R11677 R11678 R11679 R11680 R11683 R11689 R11696 R11697 R11698 R11699 R11701 R11705 R11708 R11709 R11717 R11718 R11722 R11730 R11731 R11747 R11748 R11791 R11792 R11793 R11794 R11800 R11801 R11802 R11810 R11811 R11814 R11816 R11845 R11846 R11847 R11851 R11852 R11853 R11854 R11855 R11864 R11869 R11872 R11889 R11890 R11891 R11900 R11903 R11904 R11905 R11906 R11907 R11908 R11909 R11917 R11918 R11936 R11937 R11943 R11950 R11954 R11955 R11961 R11963 R11965	A, B, D, P1
R11144 R11146 R11152 R11215 R11237 R11633 R11642 R11644 R11649 R11655 R11702 R11704 R11721 R11738	A, B, F, G, P1
R11059 R11141 R11211 R11212 R11238 R11703 R11737 R11739 R11745 R11758 R11804 R11858	A, B, F, P1
R11086 R11308	A, B, P1
R11401 R11402 R11415 R11496 R11497 R11506 R11626	A, C, D, F, G, P1
R11762 R11763	A, C, D, F, P1
R11132	A, C, F, G, H, P1
R11006 R11007 R11009 R11018 R11019 R11022 R11024 R11025 R11027 R11055 R11056 R11066 R11067 R11068 R11071 R11073 R11075 R11077 R11088 R11089 R11127 R11128 R11129 R11130 R11131 R11142 R11143 R11145 R11153 R11162 R11163 R11183 R11206 R11208 R11209 R11242 R11248 R11249 R11250 R11251 R11253 R11254 R11256 R11257 R11258 R11260 R11262 R11263 R11267 R11272 R11277 R11278 R11279 R11280 R11281 R11282 R11284 R11285 R11286 R11288 R11289 R11290 R11291 R11292 R11404 R11405 R11495 R11498 R11504 R11516 R11517 R11638 R11639 R11640 R11693 R11695 R11710 R11711 R11715 R11716 R11740 R11795 R11822 R11824 R11825 R11826 R11827 R11836 R11840 R11881 R11882 R11883 R11884 R11885 R11886 R11887 R11893 R11910 R11912 R11913 R11914 R11921 R11932 R11939 R11953 R11975 R11976 R11977 R11979 R11980 R11981 R11982 R11983 R11984	A, C, F, G, P1
R11069 R11076 R11078 R11079 R11080 R11081 R11083 R11096 R11105 R11107 R11137 R11138 R11139 R11140 R11156 R11198 R11199 R11200 R11244 R11245 R11246 R11255 R11261 R11264 R11265 R11266 R11268 R11269 R11270 R11271 R11273 R11274 R11275 R11276 R11287 R11630 R11650 R11651 R11665 R11666 R11669 R11670 R11671 R11672 R11673 R11690 R11724 R11725 R11726 R11728 R11735 R11736 R11742 R11757 R11759 R11760 R11799 R11806 R11809 R11812 R11837 R11849 R11857 R11859 R11860 R11861 R11863 R11895 R11896 R11897 R11898 R11915 R11916 R11919 R11920 R11925 R11927 R11928 R11929 R11930 R11931 R11940 R11944 R11945 R11946 R11959 R11988 R11989 R11992 R11057	A, C, F, P1
R11060 R11061	A, C, P1
R11151	A, D, F, G, P1
R11805	A, D, F, P1
R11082	A, D, P1
R11072 R11074 R11155 R11160 R11161 R11172 R11173 R11174 R11175 R11176 R11177 R11178 R11179 R11180 R11181 R11185 R11186 R11187 R11217 R11219 R11220 R11635 R11828 R11829 R11830 R11834 R11835 R11947 R11949	A, F, G, P1
R11058	A, F, H, P1
R11012 R11048 R11110 R11122 R11123 R11124 R11125 R11213 R11216 R11453 R11637 R11653 R11687 R11727 R11733 R11734 R11741 R11743 R11744 R11746 R11807 R11818 R11819 R11820 R11821 R11848 R11862 R11874 R11875 R11942 R11948 R11994	A, F, P1
R11334	A, H, P1
R11032 R11062 R11063 R11084 R11085 R11087 R11102 R11103 R11120 R11121 R11135 R11136 R11167 R11168 R11169 R11170 R11188 R11189 R11190 R11191 R11192 R11193 R11194 R11195 R11196 R11201 R11202 R11203 R11210 R11351	A, P1

R11382 R11487 R11488 R11511 R11573 R11616 R11780 R11941	
R11483	B, C, D, F, H, P1
R11070 R11126 R11214 R11218 R11492 R11612 R11749 R11797 R11899	B, C, D, F, P1
R11310 R11331 R11482 R11606	B, C, D, P1
R11605 R11782	B, C, F, H, P1
R11039 R11373 R11423 R11454 R11465 R11551 R11788	B, C, F, P1
R11148 R11221 R11225 R11227 R11235 R11750 R11868	B, C, G, P1
R11050 R11342 R11362 R11365 R11407 R11436 R11438 R11449 R11450 R11468 R11472 R11474 R11478 R11518 R11552 R11558 R11586 R11593 R11603 R11608 R11622 R11628 R11771 R11775 R11776	B, C, P1
R11001 R11002 R11003 R11004 R11005 R11065 R11091 R11095 R11097 R11098 R11099 R11100 R11111 R11112 R11113 R11114 R11115 R11116 R11117 R11118 R11119 R11134 R11147 R11164 R11165 R11182 R11204 R11205 R11222 R11234 R11236 R11636 R11641 R11796 R11798 R11823 R11873 R11901 R11902 R11911 R11922 R11923 R11924 R11933 R11934 R11935 R11951 R11952 R11957 R11958 R11972 R11973 R11974 R11978 R11990 R11991 R12000	B, D, F, P1
R11332 R11372 R11390 R11400 R11485 R11512 R11529 R11550 R11598 R11778	B, D, P1
R11302 R11329	B, F, H, P1
R11016 R11021 R11094 R11295 R11298 R11299 R11300 R11321 R11325 R11335 R11356 R11359 R11366 R11367 R11368 R11391 R11398 R11411 R11428 R11440 R11441 R11442 R11458 R11477 R11490 R11519 R11521 R11533 R11544 R11572 R11602 R11610 R11627 R11646 R11656 R11684 R11686 R11706 R11720 R11751 R11752 R11783 R11785 R11787 R11789 R11877 R11995 R11996 R11998 R11999	B, F, P1
R11582	B, G, P1
R11051 R11305 R11345 R11376 R11412 R11457 R11876	B, H, P1
R11020 R11030 R11031 R11033 R11034 R11036 R11037 R11038 R11041 R11042 R11043 R11044 R11045 R11046 R11047 R11049 R11052 R11054 R11294 R11303 R11304 R11306 R11307 R11312 R11313 R11314 R11318 R11319 R11320 R11324 R11327 R11328 R11336 R11338 R11339 R11340 R11341 R11343 R11346 R11347 R11348 R11349 R11350 R11352 R11357 R11358 R11360 R11361 R11379 R11381 R11388 R11389 R11393 R11397 R11408 R11410 R11413 R11419 R11420 R11435 R11437 R11439 R11443 R11444 R11446 R11448 R11451 R11452 R11455 R11456 R11461 R11463 R11464 R11466 R11467 R11471 R11476 R11491 R11499 R11500 R11503 R11507 R11509 R11514 R11523 R11524 R11534 R11535 R11539 R11540 R11541 R11542 R11545 R11546 R11548 R11559 R11560 R11561 R11562 R11565 R11566 R11567 R11568 R11570 R11571 R11576 R11577 R11578 R11579 R11580 R11583 R11584 R11585 R11587 R11588 R11589 R11592 R11594 R11600 R11611 R11613 R11614 R11615 R11617 R11624 R11625 R11629 R11772 R11773 R11779	B, P1

R11781 R11790	
R11513	C, D, F, H, P1
R11431 R11480 R11621	C, D, P1
R11053	C, F, G, P1
R11768	C, F, H, P1
R11008 R11092 R11093 R11322 R11326 R11364 R11369 R11429 R11445 R11525 R11526 R11536 R11601 R11607 R11719 R11754 R11755 R11756	C, F, P1
R11064 R11108 R11109 R11133 R11149 R11150 R11166 R11171 R11207 R11243 R11494 R11688 R11691 R11692 R11694 R11712 R11713 R11878 R11879 R11880	C, G, P1
R11409 R11473	C, H, P1
R11363 R11377 R11394 R11395 R11430 R11432 R11459 R11462 R11469 R11486 R11493 R11501 R11502 R11538 R11543 R11547 R11555 R11557 R11564 R11575 R11581 R11590 R11591 R11595 R11597 R11609 R11618 R11766 R11767 R11774 R11777	C, P1
R11293 R11370 R11416 R11417 R11481 R11997	D, F, P1
R11035 R11296 R11323 R11392 R11418 R11422 R11424 R11425 R11426 R11427 R11447 R11470 R11475 R11484 R11489 R11515 R11530 R11531 R11556 R11574 R11623 R11784	D, P1
R11510	F, G, P1
R11522 R11569 R11647 R11723	F, H, P1
R11011 R11157 R11159 R11226 R11239 R11283 R11315 R11316 R11317 R11337 R11353 R11371 R11374 R11375 R11378 R11387 R11396 R11399 R11406 R11414 R11421 R11433 R11434 R11460 R11479 R11532 R11537 R11549 R11554 R11599 R11620 R11631 R11632 R11681 R11685 R11753 R11769 R11770 R11808 R11831 R11833 R11841	F, P1
R11297 R11301 R11344 R11354 R11520 R11563 R11604 R11786	H, P1
R11309 R11311 R11330 R11333 R11380 R11383 R11384 R11385 R11386 R11505 R11527 R11553 R11596 R11619 R11765	P1

R12001 – R13000 (不包括 without R12158, R12195,R12433, R12504)

申述編號 Rep. No. (TPB/R/S/K18/17-)								申述要點/ 建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R12587								A, B, C, D, F, G, H, P1
R12351	R12964							A, B, C, D, F, G, P1
R12076	R12077	R12078	R12079	R12080	R12081			A, B, C, D, F, P1
R12688	R12689	R12852						A, B, C, D, P1
R12092	R12093	R12095	R12097	R12098	R12100	R12102	R12104	A, B, C, F, G, P1
R12107	R12329	R12335	R12337	R12338	R12339	R12340	R12342	
R12343	R12348	R12354	R12357	R12506	R12535	R12538	R12539	
R12540	R12575	R12791	R12794	R12795	R12798	R12817	R12818	
R12819	R12823	R12827	R12828	R12829	R12894	R12895	R12896	
R12915	R12957	R12965						
R12193	R12194	R12198	R12206	R12207	R12208	R12209	R12210	A, B, C, F, P1
R12213	R12214	R12215	R12216	R12398	R12399	R12400	R12401	
R12402	R12403	R12660	R12673	R12707	R12749	R12758	R12764	
R12873	R12498	R12601	R12608	R12609	R12610	R12686	R12806	A, B, D, F ,P1
R12812	R12814	R12866						
R12067	R12614	R12626	R12629	R12630	R12631	R12632	R12712	A, B, D, P1
R12808	R12813	R12844	R12845	R12872	R12923	R12931	R12932	
R12943								
R12640	R12641	R12777	R12778	R12780	R12781	R12788	R12789	A, B, F, G, P1
R12012	R12031	R12045	R12301	R12611	R12658	R12666	R12680	A, B, F, P1
R12693	R12716	R12717	R12726	R12743	R12752	R12757	R12804	
R12807	R12811	R12850	R12854	R12855	R12856	R12862	R12867	
R12868	R12876	R12877	R12880	R12883	R12919	R12924	R12925	
R12929	R12945	R12946	R12947	R12949	R12970	R12975	R12979	
R12982	R12983	R12997						
R12838								A, B, H, P1
R12020	R12021	R12024	R12039	R12050	R12055	R12056	R12058	A, B, P1
R12059	R12060	R12061	R12062	R12063	R12064	R12068	R12070	
R12071	R12072	R12073	R12074	R12649	R12652	R12654	R12655	
R12659	R12661	R12662	R12663	R12664	R12665	R12668	R12669	
R12670	R12679	R12697	R12698	R12701	R12702	R12720	R12721	
R12724	R12731	R12735	R12739	R12740	R12741	R12748	R12751	
R12763	R12765	R12768	R12769	R12787	R12832	R12833	R12837	
R12839	R12840	R12853	R12858	R12861	R12864	R12869	R12871	
R12885	R12890	R12971	R12972	R13000				
R12099	R12110	R12341	R12572	R12574	R12576	R12577	R12579	A, C, D, F, G, P1
R12580	R12969							
R12879								A, C, D, P1
R12101	R12108	R12336	R12349	R12350	R12537	R12784	R12950	A, C, F, G, H, P1
R12951	R12955	R12967						
R12094	R12096	R12103	R12105	R12106	R12109	R12112	R12328	A, C, F, G, P1
R12330	R12331	R12332	R12334	R12344	R12345	R12346	R12347	
R12353	R12355	R12356	R12358	R12441	R12445	R12449	R12503	
R12530	R12533	R12534	R12536	R12571	R12633	R12634	R12638	
R12690	R12750	R12785	R12792	R12820	R12821	R12822	R12825	
R12826	R12831	R12909	R12927	R12952	R12953	R12954	R12956	
R12958	R12959	R12960	R12961	R12962	R12963	R12966	R12968	
R12211	R12212	R12597	R12625	R12656	R12677	R12692	R12754	A, C, F, P1
R12759	R12857	R12882	R12948					
R12747								A, C, H, P1
R12675	R12678	R12681	R12696	R12699	R12700	R12723	R12766	A, C, P1
R12770	R12836	R12878	R12886	R12928	R12942			
R12644	R12645							A, D, F, G, P1
R12865								A, D, F, P1
R12704	R12977	R12978	R12999					A, D, P1
R12111	R12221	R12222	R12352	R12426	R12427	R12428	R12442	A, F, G, P1
R12443	R12444	R12446	R12447	R12448	R12492	R12494	R12570	
R12603	R12604	R12616	R12617	R12618	R12619	R12620	R12621	
R12636	R12642	R12643	R12646	R12647	R12684	R12691	R12708	
R12713	R12714	R12771	R12772	R12773	R12774	R12775	R12786	
R12790	R12793	R12824	R12830	R12841	R12842	R12843	R12846	
R12847	R12848	R12910	R12911	R12912	R12917	R12933	R12934	
R12935	R12936	R12937	R12984	R12986	R12987	R12989	R12992	
R12926								A, F, H, P1
R12003	R12014	R12018	R12019	R12022	R12023	R12025	R12042	A, F, P1
R12051	R12053	R12054	R12057	R12066	R12196	R12197	R12199	
R12200	R12201	R12202	R12203	R12204	R12205	R12217	R12218	
R12219	R12220	R12223	R12224	R12225	R12226	R12227	R12228	
R12229	R12230	R12231	R12232	R12233	R12234	R12235	R12236	
R12237	R12238	R12239	R12240	R12241	R12242	R12243	R12244	
R12245	R12246	R12247	R12248	R12249	R12250	R12251	R12252	
R12253	R12254	R12255	R12256	R12257	R12258	R12259	R12260	

R12261	R12262	R12263	R12264	R12265	R12266	R12267	R12268	
R12269	R12270	R12271	R12272	R12273	R12274	R12275	R12276	
R12316	R12393	R12394	R12395	R12396	R12397	R12622	R12623	
R12624	R12653	R12667	R12671	R12718	R12722	R12728	R12736	
R12744	R12745	R12753	R12755	R12760	R12761	R12762	R12805	
R12809	R12810	R12849	R12881	R12887	R12888	R12889	R12918	
R12920	R12921	R12922	R12976	R12980	R12996			
R12639	R12776	R12782	R12783	R12800	R12801	R12802	R12815	A, G, P1
R12816	R12916	R12988	R12990	R12991	R12993	R12994		
R12650	R12674	R12973						A, H, P1
R12030	R12065	R12166	R12167	R12473	R12476	R12585	R12588	A, P1
R12599	R12607	R12615	R12648	R12651	R12657	R12672	R12676	
R12682	R12694	R12703	R12705	R12706	R12711	R12715	R12725	
R12730	R12732	R12734	R12737	R12738	R12746	R12756	R12834	
R12835	R12851	R12859	R12860	R12863	R12874	R12875	R12891	
R12897	R12898	R12899	R12900	R12901	R12902	R12903	R12904	
R12905	R12906	R12907	R12908	R12930	R12941	R12974	R12998	
R12188								B, C, D, F, H, P1
R12134	R12302	R12376	R12526	R12596	R12635			B, C, D, F, P1
R12318								B, C, D, P1
R12482								B, C, F, H, P1
R12075	R12085	R12115	R12321	R12555				B, C, F, P1
R12637	R12779	R12796	R12797	R12803	R12913	R12914	R12995	B, C, G, P1
R12084	R12131	R12175	R12178	R12362	R12377	R12387	R12451	B, C, P1
R12484	R12520	R12592	R12595					
R12719	R12729							B, D, F ,P1
R12578								B, D, F, H, P1
R12083	R12132	R12138	R12417	R12515	R12525	R12561	R12581	B, D, F, P1
R12583	R12584	R12594	R12602	R12627	R12687	R12767	R12884	
R12190	R12307	R12311	R12320	R12365	R12384	R12465	R12573	B, D, P1
R12047								B, F, H, P1
R12001	R12004	R12005	R12006	R12008	R12013	R12016	R12017	B, F, P1
R12026	R12028	R12029	R12033	R12034	R12036	R12040	R12041	
R12043	R12048	R12049	R12089	R12090	R12113	R12127	R12135	
R12139	R12149	R12163	R12165	R12171	R12181	R12187	R12366	
R12372	R12375	R12383	R12421	R12430	R12434	R12438	R12456	
R12516	R12532	R12546	R12551	R12582	R12590	R12591	R12593	

R12082	R12087	R12088	R12114	R12117	R12118	R12119	R12122	B, P1
R12126	R12130	R12133	R12137	R12141	R12142	R12143	R12144	
R12154	R12155	R12162	R12170	R12172	R12173	R12174	R12176	
R12177	R12180	R12182	R12277	R12279	R12286	R12291	R12293	
R12294	R12295	R12304	R12305	R12309	R12363	R12367	R12369	
R12371	R12374	R12379	R12380	R12388	R12390	R12391	R12392	
R12404	R12413	R12418	R12422	R12436	R12437	R12439	R12459	
R12462	R12471	R12472	R12475	R12478	R12479	R12480	R12481	
R12483	R12485	R12488	R12489	R12490	R12496	R12501	R12513	
R12514	R12519	R12527	R12554	R12559	R12560	R12562	R12566	
R12567	R12568	R12586	R12605	R12612	R12613	R12870		
R12317								C, D, F, P1
R12296	R12308	R12319	R12415	R12453				C, D, P1
R12799	R12985							C, F, G, P1
R12027	R12037	R12044	R12069	R12121	R12125	R12151	R12152	C, F, P1
R12159	R12289	R12300	R12423	R12429	R12435	R12543	R12544	
R12547	R12549	R12606						
R12150								C, G, P1
R12128	R12183							C, H, P1
R12086	R12091	R12124	R12129	R12146	R12147	R12160	R12161	C, P1
R12164	R12168	R12169	R12280	R12282	R12287	R12297	R12298	
R12303	R12312	R12313	R12314	R12315	R12322	R12359	R12361	
R12364	R12378	R12381	R12385	R12389	R12405	R12408	R12409	
R12412	R12419	R12425	R12450	R12452	R12455	R12461	R12468	
R12474	R12487	R12507	R12510	R12511	R12518	R12541	R12542	
R12497								D, F, H, P1
R12010	R12011	R12186	R12189	R12323	R12523	R12524	R12529	D, F, P1
R12552	R12553	R12598						
R12184	R12360							D, H, P1
R12136	R12153	R12179	R12185	R12281	R12283	R12284	R12285	D, P1
R12292	R12299	R12325	R12326	R12327	R12406	R12414	R12424	
R12454	R12460	R12469	R12477	R12486	R12491	R12499	R12500	
R12512	R12517	R12522	R12531	R12545	R12558	R12589	R12600	
R12695	R12944	R12981						
R12052	R12628	R12685	R12709	R12710	R12727	R12733	R12742	F, B, D, P1
R12892	R12893	R12940						
R12009	R12015	R12035	R12046	R12432				F, H, P1

R12002	R12007	R12032	R12038	R12116	R12120	R12123	R12140	F, P1
R12148	R12191	R12192	R12278	R12306	R12310	R12324	R12368	
R12370	R12382	R12386	R12407	R12410	R12411	R12416	R12420	
R12440	R12458	R12467	R12470	R12493	R12505	R12528	R12548	
R12550	R12564	R12569	R12683	R12938	R12939			
R12145	R12156	R12157	R12288	R12290	R12431	R12457	R12463	H, P1
R12466								
R12464	R12495	R12502	R12508	R12509	R12521	R12556	R12557	P1
R12563	R12565							

R13001 – R14000 (不包括 without R13881, R13977)

申述編號 Rep. No. (TPB/R/S/K18/17-)								申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R13304	R13868							A, B, C, D, F, P1
R13172	R13214	R13617	R13686	R13861	R13932			A, B, C, D, P1
R13396								A, B, C, F, G, H, P1
R13090	R13096	R13104	R13105	R13144	R13147	R13223	R13229	A, B, C, F, G, P1
R13275	R13281	R13282	R13630	R13672	R13812	R13860	R13879	
R13930	R13963	R13966	R13967	R13972				
R13651	R13922							A, B, C, F, H, P1
R13046	R13086	R13094	R13119	R13153	R13191	R13193	R13194	A, B, C, F, P1
R13210	R13222	R13228	R13232	R13244	R13248	R13254	R13267	
R13268	R13320	R13329	R13331	R13451	R13545	R13546	R13581	
R13619	R13673	R13717	R13719	R13834	R13917	R13918	R13919	
R13921	R13968	R13970	R13988					
R13507								A, B, C, G, P1
R13197	R13240	R13369	R13370					A, B, C, P1
R13179								A, B, D, F, G, H, P1
R13493	R13498	R13631	R13635	R13648	R13707	R13926		A, B, D, F, P1
R13620								A, B, D, G, P1
R13822	R13931							A, B, D, H, P1
R13041	R13042	R13103	R13141	R13204	R13205	R13206	R13226	A, B, D, P1
R13227	R13257	R13415	R13516	R13542	R13544	R13579	R13580	
R13642	R13663	R13687	R13688	R13689	R13690	R13694	R13698	
R13715	R13723	R13724	R13725	R13728	R13786	R13814	R13815	
R13816	R13818	R13862	R13875	R13876	R13886	R13923	R13978	
R13993	R14000							
R13176	R13180	R13215	R13233	R13376	R13377	R13669	R13701	A, B, F, G, P1
R13722	R13776	R13777	R13788					
R13220								A, B, F, H, P1
R13010	R13016	R13018	R13023	R13047	R13062	R13070	R13072	A, B, F, P1
R13073	R13074	R13075	R13078	R13108	R13117	R13122	R13159	
R13175	R13183	R13185	R13188	R13189	R13203	R13211	R13213	
R13219	R13221	R13224	R13225	R13237	R13250	R13253	R13258	
R13259	R13271	R13273	R13279	R13286	R13287	R13289	R13290	
R13292	R13293	R13294	R13321	R13327	R13354	R13355	R13356	
R13357	R13358	R13399	R13441	R13452	R13505	R13518	R13530	
R13547	R13575	R13618	R13650	R13655	R13656	R13657	R13658	
R13659	R13660	R13661	R13662	R13665	R13684	R13692	R13693	
R13695	R13696	R13700	R13702	R13704	R13706	R13710	R13712	
R13714	R13720	R13726	R13730	R13735	R13741	R13742	R13758	
R13759	R13784	R13785	R13787	R13798	R13799	R13800	R13801	
R13805	R13807	R13809	R13823	R13882	R13898	R13904	R13907	
R13908	R13909	R13915	R13925	R13936	R13940	R13945	R13953	
R13954	R13973	R13975	R13979	R13982	R13984	R13985		
R13118								A, B, H, P1
R13003	R13004	R13005	R13006	R13007	R13008	R13009	R13013	A, B, P1
R13019	R13022	R13025	R13028	R13053	R13057	R13058	R13061	
R13064	R13068	R13080	R13081	R13083	R13084	R13091	R13098	
R13100	R13101	R13106	R13112	R13120	R13127	R13128	R13132	
R13136	R13138	R13150	R13155	R13158	R13160	R13161	R13163	
R13164	R13165	R13170	R13192	R13198	R13218	R13252	R13264	
R13298	R13371	R13372	R13387	R13388	R13389	R13392	R13576	
R13870	R13883							
R13381								A, C, D, F, G, H, P1
R13079	R13284	R13386	R13671	R13821	R13969			A, C, D, F, G, P1
R13310	R13350	R13393	R13514	R13551				A, C, D, F, P1
R13249								A, C, D, G, P1
R13503								A, C, F, G, H, P1
R13030	R13032	R13033	R13040	R13043	R13044	R13045	R13140	A, C, F, G, P1
R13142	R13143	R13171	R13178	R13195	R13201	R13202	R13207	
R13208	R13260	R13283	R13301	R13373	R13378	R13383	R13384	
R13385	R13394	R13395	R13397	R13398	R13408	R13425	R13427	
R13428	R13430	R13431	R13432	R13433	R13434	R13435	R13436	
R13464	R13465	R13466	R13467	R13468	R13469	R13470	R13471	
R13472	R13473	R13474	R13475	R13476	R13477	R13478	R13479	
R13480	R13485	R13487	R13489	R13639	R13653	R13667	R13668	
R13691	R13748	R13751	R13766	R13778	R13780	R13781	R13825	
R13826	R13828	R13866	R13955	R13964	R13965			
R13442	R13502							A, C, F, H, P1
R13001	R13011	R13015	R13031	R13034	R13035	R13036	R13037	A, C, F, P1
R13038	R13071	R13076	R13077	R13087	R13137	R13182	R13245	
R13246	R13247	R13256	R13272	R13276	R13277	R13285	R13288	
R13322	R13323	R13324	R13374	R13379	R13407	R13409	R13445	
R13504	R13583	R13640	R13641	R13649	R13666	R13678	R13679	
R13682	R13683	R13685	R13705	R13731	R13746	R13747	R13749	
R13750	R13752	R13762	R13763	R13767	R13768	R13769	R13770	
R13771	R13772	R13773	R13782	R13810	R13817	R13855	R13863	

R13867	R13874	R13878	R13900	R13911	R13916	R13947	R13990	
R13991	R13994							
R13116								A, C, H, P1
R13021	R13027	R13050	R13056	R13082	R13093	R13111	R13113	A, C, P1
R13114	R13121	R13123	R13124	R13133	R13154	R13238	R13243	
R13496								
R13157	R13670							A, D, F, G, P1
R13677	R13946							A, D, F, H, P1
R13181	R13311	R13352	R13494	R13674	R13676	R13697	R13709	A, D, F, P1
R13711	R13729	R13797	R13890	R13951				
R13020	R13024	R13063	R13069	R13199	R13296			A, D, P1
R13088	R13089	R13187	R13190	R13209	R13212	R13216	R13217	A, F, G, P1
R13405	R13515	R13727	R13847	R13848	R13849	R13850	R13851	
R13852	R13859	R13942						
R13251	R13328	R13368	R13654	R13732	R13743			A, F, H, P1
R13002	R13048	R13051	R13054	R13060	R13085	R13092	R13102	A, F, P1
R13107	R13129	R13130	R13151	R13152	R13162	R13173	R13174	
R13184	R13265	R13278	R13280	R13291	R13295	R13325	R13326	
R13349	R13351	R13353	R13375	R13390	R13391	R13429	R13444	
R13462	R13550	R13584	R13622	R13629	R13652	R13664	R13675	
R13713	R13734	R13757	R13803	R13869	R13885	R13887	R13906	
R13924	R13962	R13976	R13987					
R13200								A, G, P1
R13099	R13115	R13361	R13414	R13565	R13864			A, H, P1
R13026	R13049	R13052	R13055	R13059	R13065	R13066	R13110	A, P1
R13125	R13131	R13134	R13135	R13139	R13149	R13156	R13239	
R13402	R13453	R13459	R13522	R13572	R13595	R13597		
R13497								B , D, F, P1
R13495	R13824	R13829	R13894	R13950				B, C, D, F, P1
R13512								B, C, D, H, P1
R13166	R13167	R13168	R13169	R13274	R13527			B, C, D, P1
R13365	R13841	R13872	R13981					B, C, F, G, P1
R13553	R13554	R13610						B, C, F, H, P1
R13302	R13303	R13305	R13307	R13308	R13314	R13448	R13556	B, C, F, P1
R13612								
R13266	R13330	R13337	R13338	R13339	R13362	R13364	R13574	B, C, G, P1
R13820	R13832	R13833	R13871	R13905	R13929	R13944	R13949	
R13956	R13961							
R13312	R13313	R13315	R13511	R13524	R13570	R13593	R13615	B, C, P1
R13934								B, D, F, H, P1

R13261	R13262	R13263	R13270	R13306	R13317	R13319	R13335	B, D, F, P1
R13413	R13420	R13421	R13501	R13603	R13681	R13740	R13813	
R13827	R13831	R13837	R13880	R13892	R13893	R13897	R13920	
R13928	R13933	R13937	R13938	R13939	R13948	R13952	R13971	
R13983	R13996							
R13242	R13537	R13569	R13605	R13627				B, D, P1
R13519	R13573	R13611						B, F, H, P1
R13012	R13014	R13017	R13177	R13196	R13231	R13236	R13241	B, F, P1
R13255	R13269	R13332	R13333	R13334	R13336	R13341	R13342	
R13343	R13348	R13438	R13457	R13460	R13529	R13568	R13588	
R13596	R13643	R13755	R13789	R13838	R13856	R13857	R13877	
R13424								B, H, P1
R13230	R13234	R13235	R13400	R13404	R13411	R13418	R13443	B, P1
R13482	R13488	R13521	R13525	R13536	R13577	R13578	R13594	
R13598	R13607	R13609	R13632	R13633	R13644	R13645	R13646	
R13647								
R13555								C, D, F, H, P1
R13316	R13318	R13557						C, D, F, P1
R13359	R13549							C, D, G, P1
R13449	R13604	R13614						C, D, P1
R13360	R13363	R13366	R13830	R13884	R13891	R13992		C, F, G, P1
R13309	R13423	R13454	R13458	R13486	R13520	R13526	R13528	C, F, P1
R13559	R13571	R13586	R13836	R13865	R13585			
R13367								C, G, H, P1
R13067	R13097	R13109	R13126	R13145	R13146	R13148	R13186	C, G, P1
R13382	R13450	R13513	R13517	R13540	R13541	R13543	R13634	
R13636	R13637	R13638	R13699	R13703	R13708	R13716	R13733	
R13737	R13744	R13745	R13791	R13792	R13796	R13802	R13804	
R13806	R13808	R13811	R13819	R13888	R13889	R13896	R13901	
R13902	R13903	R13910	R13912	R13914	R13927	R13935	R13941	
R13957	R13958	R13959	R13960	R13974	R13980	R13986	R13989	
R13455								C, H, P1
R13300	R13401	R13440	R13446	R13461	R13463	R13484	R13506	C, P1
R13508	R13509	R13523	R13532	R13534	R13535	R13539	R13548	
R13558	R13560	R13561	R13562	R13563	R13564	R13566	R13567	
R13602	R13606	R13608	R13616	R13790				
R13552								D, F, G, P1
R13447	R13492							D, F, P1
R13297	R13299	R13416	R13422	R13426	R13437	R13439	R13456	D, P1
R13483	R13533	R13538	R13589	R13590	R13591	R13592	R13599	
R13601	R13621	R13623	R13624	R13625	R13626	R13628		

R13039	R13095	R13736	R13738	R13739	R13764	R13765	R13783	F, B, D, P1
R13895	R13899	R13913	R13943	R13997	R13998	R13999		
R13410	R13613	R13754	R13835					F, H, P1
R13029	R13340	R13344	R13345	R13346	R13347	R13380	R13403	F, P1
R13406	R13417	R13419	R13481	R13499	R13500	R13582	R13587	
R13600	R13680	R13718	R13721	R13753	R13756	R13760	R13761	
R13774	R13775	R13779	R13793	R13794	R13795	R13839	R13840	
R13842	R13843	R13844	R13845	R13846	R13853	R13854	R13858	
R13873	R13995							
R13510								G, H, P1
R13531								G, P1
R13412								H, P1
R13490	R13491							P1

R14001 – R15000 (不包括 without R14090)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應(參見附件 VIb) Representation Points/ Proposals and Responses (Refer to Annex VIb)
R14994	A, B
R14997 R15000	A, B, C, D, F, P1
R14239 R14265 R14289 R14290 R14291 R14378	A, B, C, D, P1
R14993	A, B, C, F
R14054 R14379 R14664 R14794 R14827 R14828 R14865 R14906 R14907 R14908 R14909 R14910 R14912 R14913 R14914 R14915 R14916 R14917 R14926 R14938 R14939 R14948 R14956	A, B, C, F, G, P1
R14242 R14423 R14710 R14843	A, B, C, F, P1
R14970	A, B, C, P1
R14221 R14313 R14358 R14377 R14592 R14593 R14626 R14627 R14712 R14847 R14892	A, B, D, F, P1
R14219	A, B, D, H, P1
R14001 R14003 R14004 R14005 R14006 R14007 R14009 R14010 R14017 R14018 R14019 R14020 R14021 R14022 R14028 R14029 R14031 R14032 R14033 R14039 R14047 R14048 R14049 R14056 R14061 R14107 R14108 R14109 R14125 R14129 R14143 R14144 R14145 R14146 R14148 R14149 R14150 R14168 R14169 R14180 R14181 R14182 R14184 R14194 R14195 R14233 R14234 R14248 R14249 R14250 R14251 R14267 R14268 R14269 R14270 R14271 R14272 R14273 R14274 R14275 R14326 R14327 R14328 R14329 R14330 R14351 R14352 R14353 R14354 R14355 R14356 R14357 R14559 R14566 R14611 R14648 R14690 R14795	A, B, D, P1
R14660	A, B, F, G, H, P1
R14314 R14315 R14428 R14429 R14443 R14555 R14560 R14563 R14569 R14573 R14574 R14577 R14579 R14580 R14581 R14583 R14590 R14630 R14634 R14635 R14657 R14658 R14667 R14668 R14671 R14673 R14674 R14675 R14676 R14678 R14679 R14680 R14681 R14684 R14686 R14694 R14704 R14705 R14706 R14735 R14737 R14740 R14749 R14752 R14753 R14761 R14763 R14765 R14766 R14770 R14773 R14774 R14778 R14781 R14782 R14786 R14787 R14788 R14791 R14792 R14805 R14806 R14814 R14816 R14817 R14819 R14824 R14832 R14836 R14996	A, B, F, G, P1
R14584 R14585 R14588 R14594 R14615 R14625 R14646 R14650 R14651 R14699 R14702 R14713 R14728 R14730 R14796 R14834 R14841 R14845 R14855 R14889 R14890 R14937 R14962 R14976	A, B, F, P1
R14362 R14437 R14683 R14809 R14811 R14963 R14968 R14977 R14982 R14983 R14984 R14986 R14989 R14991 R14992	A, B, P1
R14944	A, C, D, F, G, P1
R14718	A, C, F, G, H, P1
R14002 R14011 R14012 R14013 R14014 R14015 R14016 R14023 R14024 R14025 R14026 R14027 R14030 R14035 R14036 R14037 R14051 R14052 R14053 R14057 R14058 R14059 R14060 R14062 R14064 R14065 R14068 R14069 R14070 R14071 R14072 R14073 R14074 R14075 R14077 R14086 R14087 R14088 R14089 R14091 R14113 R14119 R14120 R14123 R14124 R14126 R14127 R14128 R14132 R14151 R14152 R14153 R14154 R14155 R14156 R14157 R14158 R14159 R14160 R14161 R14173 R14185 R14192 R14198 R14201 R14209 R14227 R14228 R14229 R14230 R14232 R14240 R14243 R14244 R14253 R14254 R14255 R14256 R14257 R14278 R14279 R14280 R14281 R14284 R14285 R14287 R14297 R14298 R14316 R14323 R14331 R14334 R14335 R14336 R14338 R14339 R14340 R14343 R14344 R14345 R14346 R14347 R14348 R14359 R14408 R14410 R14411 R14413 R14414 R14418 R14420 R14422 R14424 R14447 R14449 R14450 R14453 R14454 R14455 R14458 R14459 R14461 R14466 R14468 R14469 R14524 R14531 R14532 R14540 R14542 R14556 R14564 R14572 R14613 R14614 R14631 R14639 R14661 R14663 R14682 R14685 R14691 R14698 R14717 R14719 R14722 R14742 R14745 R14748 R14751 R14764 R14775 R14803 R14810 R14820 R14821 R14825 R14831 R14866 R14867 R14868 R14898 R14899 R14903 R14911 R14935 R14942 R14943 R14945 R14946 R14947 R14949 R14950 R14951 R14952 R14953 R14954 R14957 R14958 R14959 R14988	A, C, F, G, P1
R14463 R14591	A, C, F, H, P1
R14038 R14040 R14041 R14042 R14076 R14078 R14079 R14081 R14082 R14083 R14116 R14117 R14121 R14122 R14130 R14131 R14147 R14171 R14172 R14174 R14175 R14176 R14177 R14178 R14179 R14186 R14187 R14188 R14189 R14193 R14204 R14235 R14236 R14237 R14276 R14286 R14288 R14292 R14293 R14294 R14295 R14296 R14300 R14301 R14332 R14333 R14360 R14394 R14419 R14421 R14445 R14451 R14460 R14464 R14502 R14516 R14528 R14534 R14535 R14536 R14557 R14586 R14587 R14589 R14596 R14597 R14677 R14701 R14707 R14709 R14733 R14734 R14818 R14842 R14852 R14853 R14854 R14861 R14873 R14894 R14896 R14980	A, C, F, P1

R14969	A, C, P1
R14446 R14578 R14757 R14768 R14780	A, D, F, G, P1
R14141 R14703	A, D, F, P1
R14571 R14754 R14755	A, F, G, H, P1
R14203 R14207 R14208 R14210 R14211 R14212 R14213 R14214 R14215 R14216 R14304 R14312 R14407 R14452 R14456 R14457 R14467 R14477 R14478 R14495 R14497 R14498 R14499 R14500 R14514 R14517 R14518 R14519 R14520 R14521 R14522 R14523 R14525 R14527 R14529 R14533 R14537 R14538 R14539 R14541 R14544 R14545 R14546 R14547 R14548 R14549 R14550 R14551 R14553 R14554 R14562 R14568 R14570 R14576 R14659 R14662 R14665 R14666 R14669 R14670 R14672 R14692 R14693 R14695 R14697 R14720 R14721 R14738 R14743 R14744 R14746 R14750 R14756 R14758 R14759 R14760 R14762 R14767 R14771 R14772 R14776 R14777 R14779 R14783 R14784 R14785 R14789 R14790 R14793 R14802 R14804 R14807 R14813 R14822 R14823 R14826 R14829 R14837 R14838 R14839 R14840 R14857 R14858 R14859 R14860 R14862 R14869 R14870 R14895	A, F, G, P1
R14808 R14973	A, F, H, P1
R14191 R14205 R14206 R14303 R14305 R14306 R14307 R14308 R14309 R14310 R14311 R14390 R14391 R14392 R14436 R14486 R14487 R14503 R14601 R14624 R14649 R14696 R14700 R14769 R14871 R14884 R14904 R14905 R14955	A, F, P1
R14034 R14045 R14046 R14183 R14317 R14318 R14319 R14320 R14321 R14322 R14342 R14349 R14350 R14363 R14371 R14372 R14386 R14388 R14395 R14396 R14397 R14398 R14399 R14400 R14401 R14402 R14403 R14404 R14425 R14426 R14427 R14494 R14509 R14510 R14747 R14812 R14897	A, P1
R14170 R14224 R14225 R14241 R14245 R14246 R14247 R14263 R14266 R14277 R14325 R14341 R14373 R14375 R14380 R14381 R14382 R14383 R14384 R14385 R14405 R14629 R14851	B, C, D, F, P1
R14505	B, C, D, G, P1
R14623	B, C, F, G, P1
R14981 R14985	B, C, F, P1
R14442 R14479 R14484 R14501 R14504 R14508 R14565 R14582 R14595 R14598 R14599 R14600 R14602 R14605 R14609 R14612 R14619 R14620 R14632 R14633 R14642 R14643 R14644 R14645 R14647 R14653 R14656 R14714 R14715 R14727 R14729 R14798 R14800 R14801 R14815 R14874 R14876 R14878 R14900 R14901 R14902 R14919 R14922 R14924 R14928 R14929 R14930 R14932 R14933 R14934 R14940 R14961	B, C, G, P1

R14856	B, D, F, H, P1
R14008 R14043 R14044 R14050 R14055 R14063 R14066 R14067 R14080 R14084 R14085 R14092 R14093 R14094 R14095 R14096 R14097 R14098 R14099 R14100 R14101 R14102 R14103 R14110 R14111 R14112 R14114 R14115 R14118 R14133 R14134 R14135 R14136 R14137 R14138 R14139 R14140 R14142 R14162 R14163 R14164 R14165 R14166 R14167 R14190 R14196 R14197 R14199 R14200 R14202 R14218 R14220 R14222 R14223 R14226 R14231 R14238 R14252 R14258 R14259 R14260 R14261 R14262 R14264 R14299 R14302 R14324 R14337 R14364 R14365 R14366 R14367 R14368 R14369 R14370 R14374 R14376 R14387 R14406 R14409 R14412 R14415 R14416 R14417 R14448 R14462 R14465 R14493 R14610 R14687 R14688 R14689 R14708 R14725 R14726 R14731 R14732 R14830 R14835 R14883 R14893	B, D, F, P1
R14964 R14965 R14967 R14974 R14975 R14978 R14979 R14990	B, F, P1
R14506 R14511 R14960	C, D, G, P1
R14998	C, F
R14604 R14608 R14621 R14622 R14636 R14652 R14716 R14886	C, F, G, P1
R14606 R14654 R14888 R14941	C, G, H, P1
R14430 R14431 R14432 R14433 R14434 R14435 R14438 R14439 R14440 R14441 R14444 R14470 R14471 R14472 R14473 R14474 R14475 R14476 R14480 R14481 R14482 R14483 R14485 R14488 R14489 R14490 R14491 R14492 R14496 R14507 R14512 R14513 R14515 R14526 R14543 R14552 R14561 R14567 R14575 R14603 R14607 R14616 R14617 R14618 R14637 R14638 R14640 R14641 R14655 R14711 R14723 R14724 R14736 R14797 R14799 R14833 R14844 R14846 R14848 R14849 R14850 R14875 R14877 R14879 R14880 R14881 R14882 R14885 R14887 R14891 R14918 R14920 R14921 R14923 R14925 R14927 R14931 R14936	C, G, P1
R14995	D
R14972	D, F, P1
R14966	F, H, P1
R14104 R14105 R14106 R14217 R14282 R14283 R14361 R14389 R14393 R14530 R14558 R14628 R14739 R14741 R14863 R14864 R14872 R14971 R14987	F, P1
R14999	P1

R15001 – R16000 (不包括 without R15008, R15038, R15442)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R15010	A, B, C, D, F
R15269	A, B, C, D, F, G, P1
R15022	A, B, C, D, F, P1
R15621	A, B, C, D, H, P1
R15493 R15514 R15542 R15550 R15617	A, B, C, D, P1
R15646 R15665	A, B, C, F, G, H, P1
R15069 R15070 R15072 R15143 R15158 R15160 R15161 R15176 R15202 R15203 R15251 R15257 R15267 R15270 R15273 R15322 R15357 R15405 R15428 R15433 R15435 R15447 R15448 R15452 R15454 R15464 R15471 R15476 R15501 R15637 R15644 R15645 R15664	A, B, C, F, G, P1
R15064 R15846 R15852	A, B, C, F, P1
R15085 R15091 R15100	A, B, C, P1
R15004	A, B, D, F
R15082 R15500 R15538 R15549 R15560 R15563 R15573 R15610 R15611 R15615 R15618	A, B, D, F, P1
R15543 R15567 R15608	A, B, D, H, P1
R15108 R15184 R15185 R15186 R15281 R15284 R15285 R15286 R15290 R15291 R15292 R15337 R15338 R15419 R15423 R15424 R15425 R15426 R15427 R15482 R15488 R15490 R15496 R15513 R15525 R15527 R15536 R15537 R15539 R15544 R15545 R15546 R15548 R15551 R15552 R15558 R15566 R15568 R15569 R15570 R15571 R15609 R15612 R15616 R15619 R15620 R15628 R15629 R15630 R15631 R15635 R15654 R15655 R15667 R15916 R15917 R15918 R15936 R15937 R15988	A, B, D, P1
R15526 R15528	A, B, F, G, P1
R15060 R15090 R15212 R15216 R15220 R15382 R15459 R15491 R15516 R15517 R15518 R15519 R15520 R15529 R15531 R15532 R15540 R15561 R15562 R15564 R15572 R15632 R15984 R15985	A, B, F, P1
R15080 R15088 R15089 R15092 R15096 R15097 R15101 R15103 R15104 R15214 R15219 R15222 R15231 R15235 R15990 R15996	A, B, P1
R15416 R15505 R15993	A, C, D, F, G, P1
R15633 R15722	A, C, F, G, H, P1
R15068 R15073 R15093 R15112 R15113 R15114 R15115 R15116 R15117 R15118 R15119 R15120 R15121 R15122 R15123 R15124 R15125 R15126 R15127 R15128 R15129 R15130 R15131 R15132 R15133 R15134 R15135 R15136 R15137 R15138 R15139 R15140 R15141 R15142 R15144 R15151 R15152 R15153 R15154 R15156 R15157 R15159 R15162 R15163 R15164 R15175 R15197 R15198 R15199 R15204 R15207 R15208 R15209 R15233 R15246 R15247 R15248 R15249 R15250 R15252 R15253 R15254 R15255 R15256 R15263 R15264 R15265 R15266 R15268 R15271 R15275 R15276 R15277 R15278 R15279 R15280 R15289 R15294 R15295 R15296 R15323 R15329 R15347 R15349 R15350 R15352 R15354 R15355 R15356 R15360 R15362 R15363 R15365 R15377 R15387 R15406 R15407 R15408 R15409 R15410 R15411 R15412 R15413 R15414 R15415 R15418 R15429 R15430 R15431 R15432 R15434 R15436 R15437 R15438 R15439 R15440 R15441 R15443 R15445 R15446 R15449 R15450 R15451 R15453 R15455 R15456 R15457 R15458 R15460 R15461 R15463 R15465 R15466 R15467 R15468 R15469 R15480 R15502 R15503 R15504 R15506 R15507 R15508 R15509 R15510 R15511 R15512 R15638 R15639 R15640 R15641 R15642 R15643 R15647 R15648 R15649 R15650 R15652 R15656 R15657 R15658 R15659 R15660 R15661 R15662 R15663 R15724 R15774 R15775 R15776 R15777 R15778 R15779 R15782 R15784 R15785 R15786 R15787 R15788 R15791 R15793 R15794 R15796 R15797 R15800 R15801 R15802 R15807 R15808 R15833 R15834 R15859 R15860 R15861 R15862 R15907 R15908 R15911 R15920 R15921 R15922 R15923 R15924 R15926 R15927 R15928 R15935 R15986	A, C, F, G, P1
R15042 R15065 R15420 R15421 R15422 R15474 R15475 R15477 R15481 R15625 R15627 R15671 R15839 R15840 R15841 R15842 R15843 R15844 R15845 R15847 R15848 R15849 R15850 R15851 R15853 R15854 R15855 R15856 R15857 R15858 R15863 R15910 R15914 R15925 R15929 R15930 R15931 R15932 R15933 R15934	A, C, F, P1
R15078 R15079 R15084 R15087 R15106 R15107 R15394	A, C, P1
R15044	A, D, F, G, H, P1
R15494	A, D, F, H, P1
R15524 R15565	A, D, F, P1
R15215 R15227	A, D, P1
R15094	A, F
R15478 R15485	A, F, G, H, P1
R15484 R15995	A, F, G, P1
R15224	A, F, H, P1
R15058 R15061 R15102 R15210 R15217 R15272 R15383 R15386 R15417 R15486 R15487 R15489 R15495 R15497 R15498 R15499 R15515 R15521 R15522 R15523 R15530 R15533 R15534 R15535 R15547 R15553 R15554 R15555 R15556 R15557 R15559 R15607 R15636 R15666 R15717 R15978 R15987 R16000	A, F, P1

R15003 R15059 R15083 R15086 R15099 R15105 R15218 R15601 R15602 R15623 R15803 R15904 R15964 R15965 R15966 R15967 R15968 R15969 R15970 R15971 R15972 R15973 R15989 R15992 R15994 R15998 R15999	A, P1
R15015	B
R15017	B, C
R15005 R15828 R15902 R15947 R15952	B, C, D, F, P1
R15332	B, C, F, G, P1
R15001 R15230 R15390 R15680 R15726 R15743	B, C, F, P1
R15109 R15110 R15148 R15173 R15192 R15193 R15195 R15196 R15238 R15239 R15240 R15242 R15293 R15299 R15301 R15309 R15311 R15313 R15314 R15315 R15317 R15318 R15321 R15334 R15335 R15339 R15340 R15341 R15342 R15343 R15344 R15345 R15346 R15358 R15364 R15367 R15368 R15369 R15379 R15384 R15385 R15388 R15404 R15462	B, C, G, P1
R15037	B, C, H
R15032 R15586 R15692 R15735 R15748 R15750 R15765 R15823 R15824 R15830 R15867 R15868 R15977	B, C, P1
R15040	B, D, F
R15056 R15057 R15077 R15211 R15213 R15604 R15890 R15960	B, D, F, P1
R15719	B, D, H, P1
R15588 R15737 R15789 R15819 R15865 R15959	B, D, P1
R15033 R15035 R15041	B, F
R15403	B, F, H, P1
R15221 R15223 R15225 R15228 R15232 R15236 R15492 R15541 R15576 R15587 R15606 R15614 R15688 R15691 R15741 R15760 R15766 R15773 R15836 R15873 R15875 R15885 R15900 R15955 R15961	B, F, P1
R15024	B, G
R15401 R15939	B, G, P1
R15048 R15049 R15050 R15051 R15052 R15053 R15054 R15055 R15391 R15393 R15397 R15399 R15574 R15575 R15578 R15582 R15585 R15589 R15590 R15591 R15592 R15593 R15594 R15595 R15596 R15603 R15673 R15679 R15681 R15683 R15693 R15696 R15699 R15702 R15704 R15707 R15709 R15714 R15715 R15720 R15725 R15729 R15744 R15745 R15749 R15751 R15752 R15753 R15758 R15762 R15771 R15783 R15799 R15804 R15805 R15809 R15810 R15811 R15812 R15820 R15821 R15829 R15832 R15869 R15872 R15878 R15880 R15882 R15887 R15889 R15891 R15895 R15896 R15897 R15898 R15899 R15901 R15905 R15943 R15944 R15946 R15948 R15949 R15950 R15953 R15954 R15958 R15962 R15963 R15981	B, P1
R15016 R15025	C
R15002	C, D, F, G, H, P1

R15009 R15034 R15727	C, D, F, P1
R15043 R15678	C, D, P1
R15006 R15014 R15020 R15036	C, F
R15019 R15237 R15336	C, F, G, P1
R15026	C, F, H
R15229 R15392 R15395 R15584 R15599 R15605 R15703 R15711 R15738 R15747 R15764 R15772 R15813 R15818 R15951 R15976 R15982	C, F, P1
R15011 R15031	C, G
R15307	C, G, H, P1
R15062 R15063 R15066 R15067 R15071 R15074 R15075 R15076 R15111 R15145 R15146 R15147 R15149 R15150 R15155 R15165 R15166 R15167 R15168 R15169 R15170 R15171 R15172 R15174 R15177 R15178 R15179 R15180 R15181 R15182 R15183 R15188 R15189 R15190 R15191 R15194 R15200 R15201 R15205 R15206 R15241 R15243 R15244 R15245 R15258 R15259 R15260 R15261 R15262 R15274 R15297 R15298 R15300 R15302 R15303 R15304 R15305 R15306 R15308 R15310 R15312 R15316 R15319 R15320 R15324 R15325 R15326 R15327 R15328 R15330 R15331 R15333 R15348 R15351 R15353 R15359 R15361 R15366 R15370 R15371 R15372 R15373 R15374 R15375 R15376 R15378 R15380 R15381 R15389 R15400 R15444 R15470 R15472 R15473 R15479 R15780 R15781 R15997	C, G, P1
R15713	C, H, P1
R15021 R15396 R15577 R15579 R15580 R15581 R15583 R15597 R15598 R15677 R15687 R15689 R15694 R15695 R15697 R15700 R15701 R15705 R15712 R15721 R15731 R15736 R15739 R15742 R15761 R15767 R15770 R15790 R15795 R15798 R15815 R15816 R15817 R15835 R15866 R15871 R15879 R15883 R15884 R15906 R15938 R15942 R15945 R15957 R15979	C, P1
R15728 R15814 R15893 R15894 R15956	D, F, P1
R15708	D, H, P1
R15675 R15706 R15710 R15763 R15806 R15822 R15870 R15874 R15941 R15975	D, P1

R15030	F
R15081 R15098 R15187 R15234 R15282 R15283 R15287 R15288 R15483 R15622 R15624 R15626 R15651 R15653 R15837 R15838 R15864 R15909 R15912 R15913 R15915 R15919	F, B, D, P1
R15007 R15018	F, G
R15012	F, G, P1
R15600 R15756	F, H, P1
R15013 R15023 R15028 R15029 R15226 R15613 R15634 R15668 R15669 R15670 R15672 R15674 R15676 R15684 R15685 R15686 R15718 R15730 R15740 R15754 R15755 R15757 R15759 R15768 R15769 R15825 R15826 R15877 R15886 R15888 R15892 R15903 R15983 R15991	F, P1
R15723	G, P1
R15039 R15682 R15690 R15698 R15716 R15732 R15733 R15734 R15746 R15827 R15831 R15881 R15974	H, P1
R15027 R15045 R15046 R15047 R15095 R15398 R15402 R15792 R15876 R15940 R15980	P1

R16001 – R17000 (不包括 without R16559)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/ Proposals and Responses (Refer to Annex VIb)
R16641 R16642	A, B , F, P1
R16275	A, B, C, D, F, P1
R16255 R16634 R16658 R16691 R16998	A, B, C, D, P1
R16015 R16020 R16055 R16122 R16176 R16196 R16197 R16202 R16203 R16220 R16230 R16231 R16232 R16233 R16236 R16345 R16408 R16409 R16560 R16587 R16591 R16617	A, B, C, F, G, P1
R16016 R16035 R16036 R16117 R16152 R16436 R16437 R16562 R16581 R16583 R16584 R16593 R16595 R16598 R16609 R16631 R16656 R16674 R16675 R16999	A, B, C, F, P1
R16335	A, B, C, H, P1
R16155	A, B, C, P1
R16025 R16151 R16154 R16561 R16692	A, B, D, F, P1
R16001 R16007 R16014 R16019 R16026 R16150 R16285 R16290 R16291 R16295 R16355 R16547 R16601 R16608 R16646 R16654 R16657 R16659 R16661 R16665 R16676 R16677 R16682 R16882 R16997	A, B, D, P1
R16050 R16058 R16296 R16636	A, B, F, G, P1
R16092 R16600	A, B, F, H, P1
R16009 R16010 R16011 R16012 R16018 R16021 R16024 R16029 R16030 R16031 R16032 R16037 R16039 R16043 R16044 R16045 R16046 R16047 R16048 R16059 R16060 R16085 R16089 R16091 R16103 R16106 R16107 R16109 R16110 R16118 R16119 R16138 R16249 R16250 R16283 R16363 R16403 R16548 R16552 R16553 R16590 R16618 R16619 R16645 R16663 R16673 R16683 R16684 R16686 R16687 R16689 R16690	A, B, F, P1
R16438 R16902	A, B, H, P1
R16038 R16082 R16083 R16086 R16245 R16248 R16251 R16277 R16280 R16284 R16305 R16306 R16308 R16309 R16311 R16313 R16314 R16316 R16317 R16323 R16327 R16333 R16357 R16359 R16365 R16386 R16401 R16402 R16405 R16406 R16407 R16585 R16586 R16588	A, B, P1
R16517	A, C, D, F, P1
R16897	A, C, D, P1
R16042 R16049 R16056 R16057 R16065 R16066 R16080 R16093 R16094 R16095 R16096 R16097 R16098 R16099 R16100 R16101 R16102 R16113	A, C, F, G, P1
R16120 R16121 R16123 R16127 R16132 R16136 R16143 R16157 R16161 R16164 R16165 R16170 R16171 R16172 R16173 R16175 R16177 R16178 R16179 R16180 R16181 R16182 R16183 R16184 R16185 R16186 R16204 R16205 R16206 R16207 R16208 R16209 R16210 R16211 R16212 R16213 R16214 R16215 R16216 R16217 R16218 R16219 R16221 R16222 R16223 R16224 R16225 R16226 R16227 R16228 R16229 R16240 R16247 R16276 R16292 R16330 R16338 R16351 R16352 R16353 R16410 R16411 R16425 R16426 R16427 R16428 R16429 R16430 R16550 R16582 R16602 R16606 R16607 R16624 R16625 R16627 R16638 R16639 R16667 R16668 R16669 R16829	
R16679	A, C, F, H, P1
R16005 R16008 R16034 R16069 R16070 R16075 R16076 R16079 R16114 R16149 R16347 R16349 R16433 R16494 R16495 R16578 R16599 R16605 R16610 R16637 R16680 R16883 R16884	A, C, F, P1
R16913	A, C, H, P1
R16252 R16320 R16332 R16388 R16393	A, C, P1
R16028 R16087 R16115 R16331 R16681	A, D, F, P1
R16088 R16246 R16268 R16279 R16318 R16319	A, D, P1
R16013 R16054 R16166 R16523 R16524 R16525 R16542 R16543 R16544 R16545 R16565 R16566 R16567 R16568 R16569 R16571 R16572 R16573 R16574 R16575 R16576 R16622 R16643 R16644 R16649 R16790 R16791 R16823 R16824 R16825 R16826 R16827 R16885	A, F, G, P1
R16053	A, F, H, P1
R16023 R16027 R16033 R16084 R16105 R16108 R16111 R16112 R16116 R16234 R16307 R16310 R16326 R16339 R16348 R16356 R16366 R16367 R16368 R16369 R16384 R16385 R16397 R16422 R16423 R16424 R16434 R16556 R16557 R16558 R16563 R16596 R16597 R16616 R16628 R16655 R16660 R16662 R16670 R16688 R16792 R16793 R16794 R16795 R16994 R17000	A, F, P1
R16002 R16004 R16006 R16133 R16188 R16235 R16243 R16244 R16364 R16370 R16371 R16372 R16373 R16374 R16375 R16376 R16377 R16378 R16379 R16380 R16381 R16382 R16383 R16439 R16473 R16479 R16594	A, P1
R16064 R16156 R16254 R16435 R16555 R16648 R16787	B, C, D, F, P1
R16139 R16269 R16466 R16512 R16819 R16908 R16962	B, C, D, P1
R16051	B, C, F, G, P1
R16141 R16334 R16725 R16786 R16821 R16905 R16930 R16955 R16968 R16972	B, C, F, P1
R16167 R16549 R16551 R16603 R16604 R16611 R16613 R16614 R16621	B, C, G, P1

R16623 R16626 R16630 R16635 R16650 R16652 R16678 R16995	
R16131 R16135 R16140 R16453 R16474 R16502 R16507 R16755 R16762 R16775 R16778 R16783 R16822 R16828 R16893 R16894 R16909 R16934 R16936 R16958 R16963 R16965 R16971 R16989	B, C, P1
R16579 R16923	B, D, F, H, P1
R16040 R16041 R16052 R16061 R16062 R16063 R16147 R16153 R16159 R16168 R16278 R16282 R16350 R16354 R16496 R16497 R16498 R16499 R16554 R16577 R16580 R16589 R16592 R16620 R16664 R16671 R16672 R16685 R16694 R16830 R16856 R16886 R16996	B, D, F, P1
R16803	B, D, H, P1
R16142 R16272 R16461 R16531 R16535 R16749 R16904 R16916	B, D, P1
R16158 R16195 R16237 R16241 R16242 R16260 R16286 R16287 R16288 R16289 R16293 R16294 R16297 R16298 R16299 R16300 R16302 R16303 R16304 R16312 R16321 R16324 R16325 R16328 R16329 R16336 R16337 R16340 R16341 R16343 R16346 R16361 R16362 R16387 R16389 R16390 R16391R16392 R16394 R16395 R16396 R16398 R16399 R16400 R16444 R16454 R16469 R16471 R16478 R16486 R16492 R16510 R16514 R16515 R16518 R16520 R16522 R16532 R16537 R16539 R16719 R16769 R16773 R16800 R16801 R16833 R16853 R16866 R16892 R16898 R16917 R16932 R16937 R16964 R16974 R16977 R16984	B, F, P1
R16907	B, G, P1
R16708 R16731 R16781 R16912 R16991	B, H, P1
R16022 R16067 R16125 R16134 R16145 R16160 R16163 R16189 R16190 R16192 R16193 R16194 R16198 R16199 R16256 R16259 R16270 R16271 R16440 R16441 R16443 R16446 R16448 R16449 R16451 R16455 R16458 R16459 R16460 R16462 R16464 R16467 R16468 R16470 R16472 R16477 R16481 R16484 R16485 R16488 R16489 R16491 R16493 R16501 R16506 R16508 R16509 R16511 R16528 R16529 R16546 R16696 R16697 R16698 R16701 R16706 R16711 R16720 R16721 R16723 R16727 R16732 R16734 R16736 R16739 R16743 R16747 R16750 R16751 R16752 R16759 R16760 R16766 R16772 R16776 R16777 R16780 R16782 R16796 R16797 R16806 R16807 R16808 R16811 R16812 R16815 R16818 R16820 R16834 R16835 R16839 R16844 R16845 R16848 R16850 R16851 R16852 R16855 R16857 R16858 R16862 R16865 R16868 R16869 R16870 R16871 R16872 R16877 R16878 R16881 R16889 R16890 R16899 R16901 R16911 R16914 R16915 R16918 R16924 R16928 R16929 R16931 R16933 R16938 R16942 R16943 R16949 R16950 R16951 R16952 R16954 R16956 R16957 R16959 R16969 R16970 R16976 R16980 R16981 R16990	B, P1

R16146	C, D, F, P1
R16640	C, D, G, P1
R16148 R16261 R16262 R16768 R16802 R16809	C, D, P1
R16342 R16456 R16615 R16633 R16993	C, F, G, P1
R16238 R16239 R16264 R16322 R16358 R16404 R16465 R16475 R16482 R16541 R16703 R16729 R16753 R16836 R16841 R16843 R16906 R16961 R16967	C, F, P1
R16077 R16081 R16169 R16412 R16413 R16414 R16415 R16416 R16417 R16418 R16419 R16420 R16421 R16431 R16432 R16612 R16629 R16632 R16647 R16651 R16653 R16666	C, G, P1
R16265 R16266 R16774 R16817 R16832 R16861 R16895 R16920	C, H, P1
R16068 R16137 R16162 R16201 R16253 R16257 R16263 R16267 R16273 R16442 R16445 R16447 R16500 R16503 R16504 R16527 R16530 R16533 R16695 R16700 R16702 R16704 R16705 R16709 R16712 R16716 R16718 R16722 R16724 R16730 R16733 R16735 R16742 R16763 R16764 R16765 R16784 R16785 R16788 R16789 R16799 R16804 R16813 R16837 R16838 R16840 R16846 R16849 R16854 R16863 R16864 R16873 R16874 R16880 R16888 R16891 R16919 R16926 R16939 R16941 R16944 R16945 R16947 R16948 R16973 R16978 R16982 R16983	C, P1
R16090 R16144 R16452 R16707 R16867 R16925 R16985 R16986	D, F, P1
R16124 R16126 R16128 R16129 R16130 R16200 R16490 R16538 R16710 R16714 R16726 R16740 R16746 R16757 R16771 R16810 R16876 R16896 R16900 R16987	D, P1
R16910	F, G, P1
R16301 R16847	F, H, P1
R16003 R16071 R16072 R16073 R16074 R16078 R16104 R16174 R16187 R16191 R16258 R16274 R16281 R16315 R16344 R16360 R16450 R16457 R16463 R16480 R16483 R16487 R16505 R16516 R16519 R16521 R16526 R16534 R16536 R16540 R16564 R16570 R16693 R16699 R16748 R16758 R16761 R16767 R16770 R16798 R16805 R16814 R16816 R16831 R16842 R16860 R16875 R16903 R16921 R16927 R16935 R16940 R16953 R16979 R16988 R16992	F, P1
R16922	G, P1
R16476 R16513 R16717 R16728 R16738 R16741 R16859	H, P1
R16017 R16713 R16715 R16737 R16744 R16745 R16754 R16756 R16779 R16879 R16887 R16946 R16960 R16966 R16975	P1

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/ 建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R17291 R17442	A, B, C, D, F, G, P1
R17010 R17055 R17193	A, B, C, D, F, P1
R17018 R17117 R17118 R17156 R17168 R17188	A, B, C, D, P1
R17616	A, B, C, F, G
R17457	A, B, C, F, G, H, P1
R17007 R17038 R17069 R17159 R17166 R17284 R17285 R17289 R17290 R17293 R17302 R17304 R17305 R17306 R17307 R17308 R17309 R17313 R17314 R17316 R17319 R17322 R17323 R17428 R17429 R17434 R17440 R17441 R17443 R17446 R17447 R17448 R17449 R17452 R17454 R17455 R17602 R17605 R17606 R17609 R17611 R17757 R17772 R17839	A, B, C, F, G, P1
R17014 R17028 R17029 R17033 R17037 R17049 R17050 R17057 R17058 R17059 R17071 R17077 R17082 R17083 R17087 R17092 R17093 R17095 R17099 R17106 R17129 R17136 R17139 R17145 R17151 R17158 R17160 R17162 R17167 R17170 R17177 R17178 R17181 R17194 R17195 R17196 R17199 R17775 R17944 R17959 R17960 R17989	A, B, C, F, P1
R17068 R17119 R17179	A, B, D, F, P1
R17003 R17004 R17005 R17006 R17016 R17034 R17035 R17046 R17060 R17066 R17076 R17102 R17103 R17115 R17120 R17121 R17172 R17180 R17186 R17191 R17903 R17904 R17905 R17906 R17907	A, B, D, P1
R17525 R17530 R17822	A, B, F, G, P1
R17002 R17042 R17044 R17105 R17111 R17174 R17175 R17192 R17223 R17224 R17528 R17538	A, B, F, P1
R17024 R17030 R17091 R17123 R17143 R17144 R17150 R17722 R17732 R17733 R17793 R17794	A, B, P1
R17292 R17444 R17453 R17456	A, C, D, F, G, P1
R17149 R17949	A, C, D, F, P1
R17460 R17615 R17634 R17635	A, C, F, G
R17431 R17756	A, C, F, G, H, P1
R17048 R17061 R17100 R17154 R17163 R17165 R17189 R17287 R17288 R17303 R17310 R17311 R17312 R17315 R17317 R17318 R17320 R17321 R17324 R17375 R17426 R17427 R17430 R17432 R17433 R17435 R17436 R17437 R17438 R17439 R17445 R17450 R17451 R17458 R17459 R17461 R17462 R17463 R17464 R17465 R17524 R17526 R17533 R17534 R17603 R17604 R17607 R17608 R17610 R17617 R17618 R17619 R17620 R17632 R17633 R17760 R17761 R17762 R17763 R17773 R17774 R17776 R17777 R17778 R17779 R17780 R17832 R17842 R17843 R17859 R17860 R17861 R17872 R17873 R17908 R17909 R17910	A, C, F, G, P1
R17789	A, C, F, H, P1
R17036 R17063 R17065 R17078 R17086 R17088 R17097 R17108 R17114 R17122 R17126 R17127 R17134 R17137 R17138 R17142 R17161 R17169 R17171 R17176 R17190 R17197 R17200 R17222 R17527 R17770 R17801 R17802 R17803 R17833 R17862 R17877 R17968 R17969 R17970 R17983 R17985 R17987	A, C, F, P1
R17342	A, C, G, P1
R17021 R17148 R17153 R17202 R17373 R17730 R17795	A, C, P1
R17201 R17217 R17218 R17221	A, D, F, P1
R17491 R17510 R17517	A, D, P1
R17025 R17027 R17098 R17529 R17771 R17804 R17815 R17817 R17819 R17820 R17821 R17831 R17835 R17837 R17838 R17840 R17841 R17851 R17853 R17856 R17938 R17942	A, F, G, P1
R17026 R17085 R17146 R17185 R17198 R17219 R17220 R17225 R17226 R17227 R17228 R17229 R17230 R17231 R17232 R17233 R17234 R17235 R17236 R17237 R17238 R17239 R17240 R17485 R17726 R17796 R17797 R17798 R17806	A, F, P1
R17022 R17023 R17281 R17299 R17327 R17361 R17371 R17694 R17744 R17787 R17788 R17792 R17800 R17805 R17808 R17809 R17845 R17846 R17847 R17848 R17849 R17850 R17888 R17889 R17890 R17891 R17936 R17952	A, P1
R17214	B, C, D, F
R17015 R17039 R17040 R17074 R17096 R17155 R17557 R17755 R17957 R17984	B, C, D, F, P1
R17514 R17532 R17728 R17783 R17784 R17829 R17866 R17867 R17868 R17869 R17871 R17875 R17876 R17880 R17881 R17882 R17883 R17884 R17896 R17897 R17898 R17899 R17900 R17901 R17902 R17920 R17921 R17922 R17923 R17924 R17925 R17926 R17927 R17928 R17929 R17930 R17931 R17932 R17933 R17934 R17935	B, C, D, P1
R17130	B, C, F, G, P1
R17259 R17335 R17575 R17870	B, C, F, P1

R17001	R17011	R17013	R17017	R17020	R17032	R17045	R17094 R17104	B, C, G, P1
R17109	R17112	R17116	R17125	R17131	R17133	R17164	R17781 R17785	
R17790	R17791	R17807	R17823	R17852	R17858	R17892	R17895	
R17997								B, C, H, P1
R17269	R17331	R17345	R17352	R17379	R17390	R17413	R17415 R17424	B, C, P1
R17486	R17488	R17566	R17628	R17642	R17724	R17746	R17749	
R17990								B, D, F, G, P1
R17012	R17019	R17041	R17047	R17053	R17054	R17056	R17062 R17064	B, D, F, P1
R17067	R17070	R17072	R17073	R17075	R17079	R17080	R17081 R17084	
R17089	R17090	R17101	R17110	R17124	R17147	R17152	R17157 R17182	
R17183	R17184	R17512	R17729	R17764	R17765	R17766	R17767 R17768	
R17769	R17834	R17893	R17911	R17912	R17913	R17914	R17915 R17916	
R17917	R17918	R17919	R17937	R17945	R17946	R17947	R17948 R17950	
R17951	R17953	R17954	R17955	R17956	R17958	R17961	R17962 R17963	
R17964	R17965	R17966	R17967	R17971	R17972	R17973	R17974 R17975	
R17976	R17977	R17978	R17979	R17980	R17981	R17982	R17986 R17988	
R17991	R17992							
R17215	R17277	R17297	R17339	R17346	R17347	R17349	R17680	B, D, P1
R17051	R17128	R17140	R17141	R17173	R17275	R17276	R17325 R17343	B, F, P1
R17370	R17477	R17483	R17503	R17513	R17531	R17539	R17567 R17576	
R17587	R17591	R17593	R17612	R17626	R17636	R17643	R17688 R17692	
R17717	R17720	R17994						
R17205	R17206	R17208	R17212	R17739				B, H, P1
R17204	R17260	R17266	R17267	R17279	R17296	R17301	R17326 R17329	B, P1
R17330	R17334	R17337	R17338	R17340	R17341	R17348	R17353 R17356	
R17358	R17363	R17364	R17372	R17378	R17382	R17383	R17384 R17385	
R17386	R17388	R17389	R17392	R17394	R17395	R17396	R17397 R17398	
R17399	R17400	R17402	R17403	R17404	R17406	R17407	R17408 R17412	
R17418	R17419	R17420	R17422	R17466	R17467	R17468	R17470 R17471	
R17473	R17474	R17476	R17482	R17484	R17489	R17494	R17496 R17507	
R17511	R17516	R17518	R17519	R17536	R17537	R17543	R17547 R17552	
R17553	R17554	R17555	R17556	R17560	R17568	R17569	R17572 R17577	
R17578	R17579	R17580	R17581	R17583	R17585	R17588	R17589 R17590	
R17592	R17594	R17595	R17601	R17613	R17621	R17622	R17623 R17624	
R17629	R17640	R17644	R17648	R17649	R17650	R17653	R17655 R17658	
R17659	R17662	R17665	R17670	R17679	R17681	R17683	R17686 R17687	
R17689	R17691	R17693	R17698	R17700	R17701	R17702	R17703 R17712	
R17713	R17714	R17715	R17716	R17723	R17735	R17737	R17747 R17748	
R17750	R17751	R17995	R17998					

R17743								C, D, F, P1
R17886								C, D, G, P1
R17254	R17374	R17469	R17515	R17574	R17660	R17667	R17745	C, D, P1
R17417								C, D1, P1
R17132	R17844							C, F, G, P1
R17052	R17280	R17282	R17300	R17328	R17391	R17423	R17425 R17540	C, F, P1
R17562	R17614	R17671	R17721	R17725				
R17885								C, G, H, P1
R17008	R17009	R17187	R17758	R17759	R17782	R17786	R17799 R17810	C, G, P1
R17811	R17812	R17813	R17814	R17816	R17818	R17824	R17825 R17826	
R17827	R17828	R17830	R17836	R17854	R17855	R17857	R17863 R17864	
R17865	R17878	R17879	R17887	R17894	R17939	R17940	R17941 R17943	
R17210	R17211	R17250	R17252	R17256	R17257	R17258	R17262 R17265	C, P1
R17273	R17283	R17294	R17295	R17332	R17333	R17354	R17360 R17365	
R17366	R17367	R17368	R17393	R17414	R17472	R17478	R17479 R17480	
R17481	R17487	R17490	R17497	R17499	R17500	R17501	R17504 R17505	
R17508	R17509	R17520	R17535	R17541	R17542	R17544	R17545 R17546	
R17548	R17558	R17561	R17570	R17582	R17586	R17597	R17598 R17630	
R17631	R17637	R17645	R17646	R17651	R17654	R17656	R17657 R17661	
R17664	R17672	R17675	R17676	R17677	R17690	R17695	R17699 R17704	
R17705	R17706	R17707	R17708	R17709	R17718	R17719	R17727 R17731	
R17734	R17741	R17742	R17752	R17753	R17996			
R17243	R17286	R17369	R17668	R17674	R17999			D, F, P1
R17216	R17241	R17244	R17245	R17246	R17248	R17249	R17251 R17253	D, P1
R17255	R17261	R17268	R17270	R17271	R17272	R17278	R17298 R17336	
R17351	R17357	R17359	R17362	R17377	R17401	R17475	R17495 R17550	
R17647	R17673	R17685	R17754					
R17031	R17043	R17107	R17135	R17207	R17344	R17355	R17381 R17387	F, P1
R17405	R17409	R17410	R17411	R17416	R17421	R17492	R17493 R17498	
R17521	R17522	R17523	R17549	R17551	R17559	R17564	R17565 R17571	
R17573	R17584	R17596	R17599	R17600	R17625	R17627	R17638 R17639	
R17641	R17652	R17663	R17666	R17669	R17682	R17684	R17696 R17697	
R17711	R17740	R17874	R18000					
R17376								G, H, P1
R17710								G, P1
R17203	R17209	R17213	R17242	R17738				H, P1
R17247	R17263	R17264	R17274	R17350	R17380	R17502	R17506 R17563	P1
R17678	R17736	R17993						

R18001 – R19000 (不包括 without R18428, R18598)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R18327 R18786 R18822	A, B, C, D, F, G, P1
R18744	A, B, C, D, F, P1
R18650 R18735 R18736 R18737 R18738 R18787 R18821	A, B, C, D, P1
R18362	A, B, C, F, G, H, P1
R18070 R18076 R18078 R18093 R18096 R18108 R18118 R18123 R18124 R18135 R18136 R18141 R18164 R18169 R18192 R18193 R18194 R18196 R18199 R18200 R18213 R18218 R18228 R18231 R18232 R18236 R18247 R18250 R18294 R18296 R18297 R18300 R18303 R18304 R18306 R18307 R18309 R18310 R18322 R18323 R18326 R18329 R18330 R18343 R18353 R18358 R18363 R18364 R18366 R18367 R18371 R18386 R18388 R18394 R18407 R18409 R18410 R18414 R18415 R18416 R18419 R18420 R18421 R18423 R18424 R18436 R18437 R18438 R18439 R18451 R18462 R18498 R18501 R18515 R18520 R18521 R18522 R18523 R18524 R18526 R18530 R18533 R18552 R18554 R18555 R18575 R18576 R18577 R18578 R18579	A, B, C, F, G, P1
R18658 R18669 R18740	A, B, C, F, P1
R18626 R18653 R18677 R18686 R18711 R18908	A, B, D, F, P1
R18128 R18129 R18446 R18510 R18573 R18574 R18625 R18639 R18652 R18654 R18662 R18667 R18671 R18672 R18673 R18675 R18678 R18679 R18682 R18683 R18684 R18687 R18709 R18733 R18734 R18742 R18751 R18755 R18756 R18791 R18792 R18797 R18801 R18802 R18803 R18805 R18812 R18813 R18815 R18817 R18818 R18820 R18842 R18843 R18844 R18845 R18846 R18847 R18848 R18849 R18954 R18955 R18973 R18974 R18975 R18976 R18979 R18980 R18984	A, B, D, P1
R18449 R18461 R18666 R18681 R18691 R18692 R18757 R18760 R18788 R18819	A, B, F, G, P1
R18127 R18195 R18509 R18622 R18624 R18642 R18643 R18644 R18645 R18648 R18656 R18689 R18695 R18700 R18701 R18704 R18705 R18752 R18776 R18777 R18861 R18862	A, B, F, P1
R18041 R18063 R18824 R18865 R18868 R18870 R18871 R18872 R18874 R18875 R18878 R18879 R18884 R18885 R18886 R18892 R18894 R18895 R18901 R18902 R18903 R18907 R18909	A, B, P1
R18197 R18214 R18393 R18597 R18989	A, C, D, F, G, P1
R18065 R18067 R18068 R18071 R18074 R18075 R18094 R18097 R18113 R18114 R18115 R18119 R18120 R18121 R18122 R18125 R18130 R18131 R18134 R18139 R18142 R18143 R18152 R18153 R18154 R18156 R18159 R18160 R18163 R18165 R18166 R18167 R18168 R18171 R18182 R18183 R18186 R18187 R18189 R18190 R18198 R18201 R18205 R18207 R18208 R18209 R18210 R18211 R18215 R18216 R18217 R18222 R18227 R18229 R18233 R18235 R18237 R18239 R18244 R18246 R18248 R18249 R18251 R18252 R18253 R18254 R18255 R18256 R18257 R18258 R18259 R18260 R18261 R18262 R18263 R18264 R18265 R18266 R18267 R18268 R18269 R18270 R18271 R18275 R18278 R18279 R18280 R18281 R18283 R18284 R18286 R18287 R18288 R18289 R18290 R18292 R18293 R18295 R18298 R18299 R18305 R18308 R18311 R18312 R18313 R18315 R18316 R18317 R18318 R18319 R18320 R18321 R18324 R18325 R18328 R18331 R18332 R18333 R18334 R18337 R18338 R18340 R18341 R18342 R18344 R18345 R18346 R18347 R18348 R18349 R18354 R18356 R18357 R18361 R18365 R18368 R18369 R18372 R18373 R18374 R18375 R18376 R18377 R18378 R18379 R18380 R18381 R18382 R18383 R18384 R18385 R18387 R18392 R18395 R18397 R18399 R18400 R18401 R18402 R18403 R18404 R18405 R18408 R18411 R18412 R18413 R18417 R18418 R18422 R18425 R18426 R18427 R18429 R18430 R18431 R18434 R18435 R18440 R18442 R18443 R18452 R18466 R18467 R18469 R18471 R18472 R18473 R18476 R18487 R18492 R18499 R18500 R18502 R18503 R18516 R18517 R18519 R18525 R18527 R18528 R18529 R18531 R18532 R18534 R18535 R18537 R18538 R18539 R18540 R18541 R18542 R18548 R18549 R18550 R18551 R18553 R18556 R18557 R18558 R18559 R18561 R18565 R18569 R18570 R18571 R18586 R18587 R18588 R18589 R18590 R18592 R18593 R18595 R18599 R18629 R18631 R18634 R18637 R18640 R18641 R18664 R18685 R18707 R18754 R18766 R18767 R18798 R18814 R18816 R18850 R18851 R18852 R18854 R18855 R18856 R18857 R18913 R18914 R18915 R18916 R18917 R18918 R18919 R18920 R18921 R18922 R18923 R18924 R18925 R18926 R18927 R18928 R18929 R18930 R18931 R18933 R18934 R18935	A, C, F, G, P1
R18069 R18396 R18398 R18477	A, C, F, G, H, P1

R18087	R18088	R18089	R18090	R18091	R18132	R18285	R18444	A, C, F, P1
R18445	R18460	R18630	R18632	R18635	R18636	R18638	R18657	
R18668	R18670	R18698	R18743	R18759	R18761	R18795	R18807	
R18808	R18809	R18810	R18811	R18825	R18826	R18831	R18836	
R18837	R18838	R18858	R18859	R18863	R18877	R18887	R18900	
R18906	R18964	R18965	R18968	R18999				
R18888	R18896	R18897						A, C, P1
R18866	R18882	R18889	R18898					A, D, F, P1
R18864	R18867	R18869	R18881	R18890				A, D, P1
R18448	R18455	R18463	R18465	R18665	R18688	R18784		A, F, G, P1
R18095	R18126	R18188	R18191	R18225	R18226	R18242	R18245	A, F, P1
R18543	R18562	R18585	R18591	R18620	R18621	R18623	R18647	
R18649	R18676	R18690	R18694	R18696	R18697	R18699	R18702	
R18703	R18710	R18712	R18741	R18753	R18762	R18765	R18779	
R18780	R18781	R18782	R18783	R18793	R18794	R18799	R18800	
R18873	R18876	R18880	R18899	R18905	R18969	R18970	R18971	
R18972								
R18619								A, H, P1
R18003	R18031	R18454	R18600	R18601	R18602	R18603	R18604	A, P1
R18605	R18606	R18607	R18608	R18609	R18610	R18611	R18612	
R18613	R18614	R18615	R18616	R18617	R18618	R18991	R18992	
R18039								B, C, D, F, P1
R18061	R18720							B, C, D, P1
R18359	R18389	R18480						B, C, F, G, P1
R18001	R18051	R18713						B, C, F, P1
R18066	R18073	R18077	R18079	R18080	R18084	R18086	R18099	B, C, G, P1
R18107	R18111	R18112	R18117	R18138	R18147	R18148	R18149	
R18150	R18151	R18157	R18161	R18170	R18173	R18177	R18178	
R18179	R18180	R18184	R18204	R18272	R18273	R18291	R18352	
R18390	R18391	R18406	R18441	R18453	R18479	R18482	R18483	
R18486	R18490	R18493	R18494	R18495	R18506	R18507	R18508	
R18511	R18514	R18518	R18536	R18544	R18545	R18563	R18564	
R18566	R18567	R18568	R18772	R18778				
R18027	R18036	R18052	R18721					B, C, P1
R18133	R18355	R18458	R18459	R18659	R18660	R18661	R18719	B, D, F, P1
R18745	R18746	R18747	R18748	R18763	R18764	R18768	R18769	
R18830	R18832	R18833	R18834	R18835	R18839	R18840	R18841	
R18853	R18959	R18978	R18993	R18994	R18995	R18996	R18997	
R18998	R19000							

R18033								B, D, P1
R18718	R18007	R18017	R18018	R18026	R18028	R18040	R18043	B, F, P1
R18044	R18045	R18655	R18680	R18725	R18732	R18739	R18750	
R18758	R18790	R18796	R18823	R18827	R18828	R18829		
R18717								B, G, P1
R18002	R18004	R18008	R18014	R18025	R18029	R18032	R18034	B, P1
R18049	R18050	R18053	R18055	R18057	R18058	R18059	R18062	
R18716	R18723	R18726						
R18505	R18513							C, D, G, P1
R18082	R18137	R18144	R18203					C, F, G, P1
R18022								C, F, P1
R18105								C, G, H, P1
R18064	R18072	R18081	R18083	R18092	R18098	R18100	R18101	C, G, P1
R18102	R18103	R18104	R18106	R18109	R18110	R18116	R18140	
R18145	R18146	R18155	R18158	R18162	R18172	R18174	R18175	
R18176	R18181	R18185	R18202	R18206	R18212	R18219	R18220	
R18221	R18223	R18224	R18234	R18238	R18240	R18241	R18243	
R18274	R18276	R18301	R18302	R18314	R18335	R18336	R18339	
R18350	R18351	R18360	R18370	R18432	R18433	R18447	R18450	
R18456	R18457	R18464	R18468	R18470	R18474	R18475	R18478	
R18481	R18484	R18485	R18488	R18489	R18491	R18496	R18497	
R18504	R18512	R18546	R18547	R18560	R18572	R18594	R18596	
R18706	R18770	R18771	R18773	R18774	R18775			
R18005	R18006	R18015	R18016	R18021	R18038	R18048	R18056	C, P1
R18724	R18730	R18731						
R18019	R18024	R18054						D, F, P1
R18035	R18037	R18729						D, P1
R18860								F, G, P1
R18009	R18010	R18013	R18020	R18046	R18047	R18282	R18627	F, P1
R18628	R18633	R18646	R18663	R18674	R18714	R18715	R18727	
R18785	R18789	R18806	R18883	R18891	R18893	R18904	R18910	
R18958	R18982	R18983						
R18042								G, H, P1
R18030	R18728							G, P1
R18011								H, P1
R18012	R18023							P1

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/ Proposals and Responses (Refer to Annex VIb)
R19040 R19041 R19042 R19646	A, B, C, D, P1
R19015 R19120 R19128 R19196 R19313 R19314 R19347 R19380 R19381 R19382 R19469 R19484 R19591 R19592 R19597 R19689	A, B, C, F, G, P1
R19400 R19403	A, B, C, F, H, P1
R19051 R19053 R19178 R19254 R19259 R19276 R19363 R19368 R19372 R19389 R19396 R19399 R19407 R19408 R19409 R19411 R19419 R19432 R19541 R19544 R19554 R19556 R19573 R19575 R19576 R19594 R19606 R19607 R19608 R19614 R19623 R19631 R19634 R19635 R19647 R19655 R19661 R19662 R19664 R19676 R19682 R19692 R19693 R19696 R19699 R19701 R19711 R19714 R19715 R19732 R19734 R19735 R19738 R19741 R19746 R19764	A, B, C, F, P1
R19536 R19551 R19694	A, B, C, P1
R19281 R19282 R19370 R19373 R19398 R19401 R19427 R19430 R19433 R19438 R19526 R19527 R19530 R19535 R19558 R19567 R19572 R19577 R19579 R19583 R19584 R19586 R19605 R19620 R19625 R19638 R19654 R19659 R19665 R19671 R19684 R19686 R19705 R19709 R19712 R19717 R19719 R19721 R19736 R19742 R19744 R19757	A, B, D, F, P1
R19256 R19257 R19279 R19298 R19299 R19300 R19302 R19303 R19323 R19324 R19336 R19337 R19338 R19339 R19340 R19346 R19434 R19435 R19436 R19437 R19475 R19477 R19537 R19539 R19563 R19660 R19752 R19815 R19816 R19817 R19822 R19939	A, B, D, P1
R19441 R19445 R19448 R19451 R19452 R19467 R19468 R19478 R19479 R19480 R19481 R19482 R19483 R19487 R19488 R19489 R19513 R19518 R19520 R19521 R19522 R19523 R19524 R19525 R19644 R19723	A, B, F, G, P1
R19574 R19700	A, B, F, H, P1
R19348 R19385 R19423 R19615 R19632 R19648 R19679 R19680 R19898 R19909 R19919 R19928	A, B, F, P1
R19277 R19349 R19350 R19356 R19420 R19424 R19550 R19552 R19557 R19561 R19564 R19566 R19569 R19571 R19624 R19650 R19663 R19667 R19668 R19672 R19678 R19681 R19690 R19691 R19718 R19722 R19762 R19763 R19922	A, B, P1
R19273	A, C, D, F, G, H, P1
R19983 R19984 R19985 R19986 R19987 R19990	A, C, D, F, G, P1
R19547 R19748 R19756	A, C, D, F, P1
R19138 R19198	A, C, F, G, H, P1
R19009 R19014 R19016 R19017 R19018 R19019 R19020 R19021 R19027 R19028 R19029 R19030 R19031 R19032 R19044 R19046 R19047 R19048 R19049 R19059 R19064 R19065 R19066 R19067 R19073 R19074 R19075 R19076 R19077 R19080 R19083 R19084 R19085 R19091 R19093 R19094 R19095 R19096 R19097 R19098 R19099 R19102 R19104 R19107 R19108 R19115 R19116 R19117 R19118 R19121 R19123 R19124 R19125 R19126 R19129 R19131 R19133 R19141 R19144 R19149 R19154 R19155 R19156 R19160 R19161 R19162 R19165 R19179 R19180 R19181 R19182 R19183 R19184 R19185 R19186 R19187 R19188 R19189 R19194 R19195 R19197 R19201 R19202 R19203 R19211 R19221 R19223 R19226 R19241 R19244 R19248 R19252 R19267 R19284 R19285 R19286 R19287 R19318 R19319 R19320 R19321 R19322 R19325 R19326 R19327 R19328 R19329 R19330 R19331 R19332 R19333 R19334 R19341 R19343 R19344 R19345 R19377 R19378 R19397 R19440 R19444 R19446 R19449 R19450 R19466 R19470 R19485 R19498 R19503 R19542 R19640 R19730 R19798 R19799 R19803 R19933 R19934 R19988 R19989 R19997 R19998 R19999 R20000	A, C, F, G, P1
R19392 R19611	A, C, F, H, P1
R19022 R19023 R19024 R19025 R19033 R19034 R19035 R19037 R19038 R19039 R19043 R19050 R19052 R19054 R19057 R19058 R19060 R19061 R19063 R19069 R19070 R19071 R19072 R19079 R19081 R19100 R19101 R19103 R19105 R19110 R19111 R19112 R19113 R19127 R19130 R19134 R19135 R19139 R19145 R19147 R19148 R19150 R19151 R19152 R19153 R19157 R19158 R19159 R19166 R19167 R19168 R19169 R19170 R19171 R19172 R19173 R19174 R19175 R19176 R19177 R19191 R19192 R19193 R19200 R19204 R19205 R19206 R19208 R19209 R19210 R19215 R19216 R19217 R19219 R19222 R19224 R19225 R19227 R19228 R19229 R19230 R19231 R19233 R19234 R19235 R19236 R19237 R19239 R19243 R19245 R19246 R19247 R19249 R19250 R19253 R19262 R19268 R19283 R19295 R19296 R19297 R19301 R19308 R19309 R19310 R19312 R19335 R19366 R19369 R19374 R19379 R19384 R19395 R19405 R19416 R19417 R19418 R19422 R19425 R19454 R19519 R19529 R19533 R19585 R19610 R19642 R19649 R19683 R19687 R19702 R19708 R19720 R19743 R19745 R19758 R19761 R19818 R19819 R19936 R19937 R19938	A, C, F, P1
R19351 R19361 R19388 R19546 R19548 R19652	A, C, P1
R19439 R19460 R19493	A, D, F, G, P1
R19630	A, D, F, P1
R19362 R19387 R19410	A, D, P1

R19367	A, F, C, P1
R19265 R19269 R19443 R19464 R19465 R19471 R19486 R19501 R19509 R19514 R19515 R19516 R19517 R19598 R19599 R19601 R19639 R19641 R19724 R19725 R19726 R19731	A, F, G, P1
R19604 R19618	A, F, H, P1
R19003 R19261 R19274 R19386 R19412 R19413 R19414 R19500 R19543 R19595 R19602 R19603 R19658 R19666 R19669 R19716 R19737 R19740 R19749 R19750 R19751 R19760	A, F, P1
R19263 R19271 R19657	A, H, P1
R19007 R19008 R19352 R19353 R19354 R19355 R19357 R19358 R19359 R19360 R19375 R19442 R19447 R19568 R19587 R19589 R19637 R19670 R19685 R19710 R19747 R19821 R19881 R19994 R19995 R19996	A, P1
R19002 R19311 R19390 R19415 R19421 R19540 R19555 R19582 R19656 R19674 R19675 R19677 R19688 R19704 R19707 R19766	B, C, D, F, P1
R19770 R19804 R19857	B, C, D, P1
R19371 R19383 R19431 R19559 R19713	B, C, F, G, P1
R19769 R19979	B, C, F, P1
R19280 R19462 R19474 R19491 R19492 R19494 R19495 R19502 R19505 R19507 R19508 R19510 R19511 R19512 R19534 R19538 R19643	B, C, G, P1
R19858	B, C, H, P1
R19765 R19773 R19774 R19778 R19787 R19789 R19795 R19797 R19808 R19810 R19814 R19862 R19883 R19888 R19906 R19912 R19915 R19954 R19958 R19975 R19977 R19982	B, C, P1
R19364	B, D, F, G, H, P1
R19636 R19695	B, D, F, H, P1
R19001 R19010 R19270 R19275 R19278 R19288 R19289 R19290 R19291 R19292 R19293 R19294 R19304 R19305 R19306 R19307 R19315 R19316 R19317 R19342 R19365 R19376 R19391 R19394 R19402 R19404 R19406 R19426 R19428 R19429 R19528 R19531 R19532 R19549 R19553 R19560 R19562 R19565 R19578 R19580 R19581 R19588 R19590 R19593 R19596 R19627 R19651 R19653 R19673 R19697 R19698 R19703 R19727 R19728 R19729 R19733 R19739 R19753 R19754 R19755 R19767 R19820 R19835 R19920 R19935	B, D, F, P1
R19806 R19842 R19866 R19887 R19955	B, D, P1
R19617	B, F, H, P1
R19260 R19612 R19616 R19619 R19621 R19622 R19645 R19792 R19796 R19826 R19851 R19863 R19871 R19882 R19885 R19902 R19905 R19910 R19911 R19921 R19929 R19931 R19943 R19947 R19959 R19960 R19966 R19976	B, F, P1
R19026 R19045 R19146 R19768 R19772 R19775 R19776 R19777 R19779 R19782	B, P1

R19785 R19788 R19790 R19807 R19809 R19825 R19828 R19830 R19843 R19844 R19845 R19848 R19849 R19850 R19860 R19865 R19868 R19869 R19870 R19875 R19876 R19889 R19890 R19892 R19893 R19895 R19897 R19899 R19900 R19907 R19908 R19917 R19918 R19923 R19924 R19926 R19927 R19930 R19941 R19942 R19946 R19948 R19950 R19953 R19961 R19963 R19967 R19969 R19971 R19973 R19980 R19991	
R19570	C, B, F, G, P1
R19629	C, D, F, G, P1
R19864	C, D, F, P1
R19272 R19393 R19458 R19628 R19633	C, D, G, P1
R19901	C, D, P1
R19993	C, F
R19258 R19759 R19800	C, F, G, P1
R19805 R19854 R19886 R19916	C, F, P1
R19004 R19005 R19006 R19011 R19012 R19013 R19453 R19456 R19461 R19463 R19472 R19473 R19476 R19490 R19496 R19497 R19499 R19506 R19609 R19706 R19801 R19802	C, G, P1
R19874	C, H, P1
R19771 R19780 R19784 R19791 R19811 R19847 R19867 R19872 R19873 R19878 R19880 R19884 R19925 R19944 R19951 R19957 R19964 R19965 R19974	C, P1
R19813 R19831 R19832 R19833 R19834 R19836 R19837 R19838 R19839 R19840	D, F, P1
R19940	D, H, P1
R19143 R19783 R19786 R19793 R19794 R19812 R19823 R19824 R19856 R19859 R19861 R19877 R19879 R19956 R19968 R19970 R19972 R19981	D, P1
R19827	F, G, P1
R19036 R19055 R19056 R19062 R19068 R19078 R19082 R19086 R19087 R19088 R19089 R19090 R19092 R19106 R19109 R19114 R19119 R19132 R19136 R19137 R19140 R19142 R19163 R19164 R19190 R19199 R19207 R19212 R19213 R19214 R19218 R19220 R19232 R19238 R19240 R19242 R19251 R19255 R19264 R19266 R19455 R19457 R19459 R19504 R19545 R19600 R19613 R19626 R19829 R19841 R19846 R19853 R19855 R19891 R19894 R19903 R19904 R19913 R19914 R19932 R19949 R19952 R19962 R19992	F, P1
R19781 R19945	H, P1
R19122 R19852 R19896 R19978	P1

R20001 - R21000 (不包括 without R20145)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R20567 R20778 R20779 R20780 R20782 R20783 R20786 R20879	A, B, C, D, F, G, P1
R20463 R20496 R20582	A, B, C, D, P1
R20785	A, B, C, F, G, H, P1
R20009 R20011 R20013 R20019 R20021 R20022 R20026 R20033 R20046 R20057 R20058 R20077 R20078 R20091 R20098 R20103 R20110 R20111 R20112 R20114 R20286 R20743 R20744 R20745 R20746 R20747 R20748 R20749 R20750 R20751 R20752 R20753 R20754 R20755 R20756 R20757 R20758 R20759 R20760 R20761 R20762 R20763 R20768 R20772 R20773 R20774 R20784 R20788 R20789 R20808 R20828 R20861 R20862 R20863 R20864 R20865 R20866 R20867 R20868 R20874 R20875 R20876 R20877 R20880 R20944 R20945 R20953 R20956 R20957 R20958 R20959 R20960	A, B, C, F, G, P1
R20251 R20424 R20429 R20435 R20587	A, B, C, F, P1
R20513	A, B, C, P1
R20486 R20530 R20537 R20586 R20592 R20851 R20854	A, B, D, F, P1
R20048 R20049 R20051 R20052 R20053 R20054 R20350 R20449 R20483 R20504 R20588 R20589 R20590 R20591 R20593 R20594 R20601 R20815 R20912 R20913 R20914 R20915 R20917 R20919 R20920 R20921 R20927 R20928	A, B, D, P1
R20413 R20909	A, B, F, G, P1
R20118 R20327 R20341 R20377 R20384 R20398 R20403 R20404 R20414 R20420 R20438 R20476 R20495 R20506 R20508 R20512 R20560 R20568 R20584 R20612 R20626 R20631 R20816 R20822 R20824 R20833 R20838 R20839 R20841 R20843 R20850	A, B, F, P1
R20329 R20385 R20510	A, B, H, P1
R20330 R20331 R20332 R20333 R20335 R20336 R20337 R20340 R20366 R20368 R20369 R20374 R20376 R20391 R20392 R20393 R20397 R20399 R20400 R20401 R20402 R20409 R20410 R20411 R20412 R20415 R20417 R20421 R20425 R20426 R20428 R20430 R20431 R20436 R20437 R20439 R20440 R20441 R20442 R20443 R20473 R20474 R20475 R20477 R20478 R20479 R20484 R20489 R20491 R20494 R20503 R20505 R20507 R20514 R20515 R20524 R20525 R20526 R20563 R20595 R20598 R20599 R20600 R20602 R20604 R20605 R20607 R20609 R20610 R20613 R20616 R20617 R20619 R20621 R20625 R20628 R20630	A, B, P1
R20027 R20037 R20097 R20124 R20781 R20790	A, C, D, F, G, P1
R20889	A, C, D, F, P1
R20557	A, C, D, P1
R20005 R20017 R20067 R20075	A, C, F, G, H, P1
R20001 R20002 R20003 R20004 R20006 R20007 R20008 R20010 R20012 R20014 R20015 R20016 R20018 R20020 R20023 R20024 R20025 R20028 R20029 R20030 R20031 R20032 R20034 R20035 R20036 R20038 R20039 R20040 R20041 R20042 R20043 R20044 R20045 R20047 R20059 R20060 R20061 R20062 R20063 R20064 R20065 R20066 R20068 R20069 R20070 R20071 R20072 R20073 R20074 R20076 R20079 R20080 R20081 R20082 R20083 R20084 R20085 R20086 R20087 R20088 R20089 R20090 R20092 R20093 R20094 R20095 R20096 R20099 R20100 R20101 R20102 R20104 R20105 R20106 R20107 R20108 R20109 R20113 R20115 R20116 R20122 R20123 R20125 R20126 R20127 R20128 R20129 R20130 R20131 R20132 R20133 R20134 R20135 R20136 R20137 R20138 R20139 R20140 R20141 R20142 R20143 R20144 R20146 R20147 R20148 R20149 R20150 R20151 R20152 R20153 R20154 R20155 R20156 R20157 R20158 R20344 R20460 R20461 R20464 R20465 R20466 R20467 R20518 R20521 R20522 R20577 R20578 R20632 R20633 R20654 R20733 R20738 R20742 R20764 R20765 R20766 R20767 R20769 R20770 R20771 R20775 R20776 R20777 R20787 R20796 R20797 R20798 R20799 R20800 R20801 R20802 R20803 R20804 R20805 R20806 R20807 R20809 R20812 R20857 R20859 R20878 R20881 R20882 R20890 R20892 R20895 R20896 R20899 R20916 R20918 R20923 R20924 R20930 R20931 R20932 R20933 R20934 R20935 R20936 R20937 R20938 R20939 R20940 R20941 R20942 R20943 R20946 R20947 R20948 R20949 R20950 R20951 R20952 R20954 R20955 R20962 R20965 R20967 R20968 R20975 R20976 R20977 R20978 R20983 R20984 R20989 R20990 R20993	A, C, F, G, P1
R20055 R20343 R20492 R20502 R20576 R20581 R20671 R20818 R20855 R20856 R20858 R20885 R20925 R20926 R20974 R20979 R20980 R20981 R20982 R20985 R20986 R20987 R20991 R20992	A, C, F, P1
R20555	A, C, G, P1
R20596	A, C, H, P1
R20338 R20339 R20351 R20352 R20365 R20378 R20419 R20498 R20614	A, C, P1
R20886	A, D, F, G, P1
R20364 R20367 R20371 R20386 R20388 R20408 R20485 R20500 R20579 R20580 R20611 R20820 R20842 R20848 R20849	A, D, F, P1
R20264 R20370 R20379 R20380 R20427 R20481 R20482 R20493 R20511 R20566 R20620 R20830	A, D, P1
R20730 R20736 R20737	A, F, G, H, P1
R20535 R20562 R20573 R20722 R20728 R20735 R20887 R20888 R20894	A, F, G, P1
R20497	A, F, H, P1
R20342 R20375 R20381 R20396 R20406 R20407 R20416 R20418 R20455 R20456 R20457 R20458 R20459 R20509 R20585 R20603 R20608 R20615 R20618 R20623	A, F, P1

R20624 R20627 R20817 R20819 R20821 R20825 R20826 R20827 R20834 R20835 R20840 R20844 R20845 R20846 R20847 R20852 R20853 R20883 R20884 R20903	
R20572	A, G, P1
R20173 R20245 R20328 R20334 R20405 R20422 R20423 R20432 R20433 R20434 R20446 R20447 R20448 R20469 R20470 R20471 R20472 R20480 R20487 R20488 R20499 R20501 R20517 R20527 R20571 R20597 R20606 R20622 R20629 R20664 R20832 R20836 R20837 R20907 R20908 R20911	A, P1
R20258 R20324 R20823 R20897	B, C, D, F, P1
R20634	B, C, D, G, P1
R20266 R20275 R20294 R20528 R20893	B, C, D, P1
R20569	B, C, F, P1
R20252	B, C, F, G, P1
R20284 R20303 R20548 R20550	B, C, F, P1
R20709	B, C, H, P1
R20163 R20175 R20176 R20283 R20299 R20355 R20574 R20687 R20704 R20998 R20999	B, C, P1
R20649	B, D, F, H, P1
R20117 R20274 R20345 R20346 R20347 R20348 R20349 R20444 R20445 R20452 R20462 R20468 R20523 R20529 R20531 R20532 R20549 R20551 R20553 R20665 R20734 R20831 R20996 R20997	B, D, F, P1
R20201	B, D, H, P1
R20194 R20199 R20232 R20254 R20257 R20292 R20542 R20543 R20655 R20680 R20718 R20720	B, D, P1
R20307 R20321 R20565	B, F, H, P1
R20119 R20120 R20164 R20170 R20186 R20230 R20234 R20240 R20246 R20249 R20296 R20304 R20305 R20306 R20308 R20361 R20382 R20389 R20395 R20490 R20534 R20536 R20540 R20544 R20545 R20556 R20583 R20647 R20674 R20689 R20702 R20795 R20829 R20871 R20995	B, F, P1
R20218 R20690	B, H, P1
R20159 R20161 R20165 R20166 R20168 R20179 R20188 R20192 R20195 R20196 R20198 R20205 R20207 R20210 R20212 R20215 R20216 R20225 R20228 R20229 R20233 R20235 R20237 R20243 R20244 R20247 R20248 R20278 R20280 R20281 R20289 R20297 R20301 R20302 R20309 R20312 R20313 R20316 R20317 R20318 R20325 R20326 R20353 R20354 R20356 R20357 R20539 R20541 R20554 R20644 R20646 R20656 R20662 R20675 R20677 R20678 R20682 R20686 R20691 R20694 R20696 R20697 R20699 R20701 R20703 R20705 R20706 R20707 R20711 R20712 R20715 R20717 R20739 R20740 R20741 R20791 R20794 R20811 R20869 R20870 R20872 R20873	B, P1
R20676 R20688	B, H, P1
R20672	C, D, F, G, H, P1
R20291 R20673	C, D, F, P1
R20270 R20271 R20272 R20719	C, D, P1
R20910	C, F, G, P1
R20200 R20206 R20219 R20220 R20319 R20362 R20373 R20561 R20648 R20683 R20685 R20695 R20698 R20710 R20714	C, F, P1
R20450 R20451 R20453 R20454 R20516 R20519 R20520 R20891 R20898 R20900 R20901 R20902 R20904 R20905 R20906 R20922	C, G, P1
R20167 R20181 R20183 R20184 R20187 R20190 R20193 R20197 R20204 R20208 R20209 R20211 R20214 R20217 R20221 R20222 R20223 R20224 R20227 R20238 R20239 R20255 R20256 R20273 R20276 R20282 R20285 R20287 R20288 R20295 R20310 R20314 R20315 R20320 R20358 R20359 R20547 R20559 R20570 R20684 R20692 R20693 R20700 R20708 R20716 R20792 R20860 R20929 R21000	C, P1
R20661 R20666	D, F, H, P1
R20172 R20177 R20259 R20262 R20263 R20390 R20639 R20640 R20643 R20645 R20650 R20663	D, F, P1
R20538	D, G, P1
R20668	D, H, P1
R20056 R20160 R20169 R20171 R20174 R20180 R20182 R20185 R20202 R20226 R20231 R20250 R20253 R20260 R20261 R20265 R20267 R20268 R20269 R20290 R20298 R20546 R20635 R20636 R20637 R20638 R20641 R20642 R20651 R20657 R20658 R20659 R20660 R20667 R20669 R20679 R20681 R20713 R20793	D, P1
R20242 R20279	D, F, P1
R20670	F, G, H, P1
R20050 R20121 R20162 R20178 R20189 R20203 R20236 R20241 R20277 R20293 R20300 R20311 R20322 R20323 R20363 R20372 R20383 R20387 R20394 R20533 R20552 R20575 R20652 R20721 R20723 R20724 R20725 R20726 R20727 R20729 R20731 R20732 R20961 R20963 R20964 R20966 R20969 R20970 R20971 R20972 R20973 R20988	F, P1
R20994	G, H, P1
R20558	G, P1
R20360	H, P1
R20191 R20213 R20564 R20653 R20810 R20813 R20814	P1

R21001 – R22000 (不包括 without R21034, R21060, R21166, R21280, R21351)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R21215 R21789	A, B, C, D, F, P1
R21352 R21498 R21579 R21678 R21683 R21735 R21977	A, B, C, D, P1
R21061 R21281 R21293 R21310 R21312 R21324 R21339 R21350 R21375 R21399 R21400 R21410 R21414 R21421 R21442 R21444 R21445 R21455 R21457 R21464 R21466 R21467 R21469 R21472 R21473 R21475 R21485 R21487 R21488 R21504 R21531 R21583 R21585 R21587 R21600 R21602 R21604 R21608 R21613 R21614 R21615 R21647 R21703 R21771 R21772 R21784 R21838 R21905	A, B, C, F, G, P1
R21176 R21289 R21290 R21291 R21388 R21526 R21561 R21568 R21570 R21581 R21589 R21750 R21751 R21758 R21349	A, B, C, F, P1
R21349 R21802	A, B, C, P1
R21527	A, B, D, F, G, P1
R21285 R21292 R21620 R21752 R21978 R21979	A, B, D, F, P1
R21258 R21259 R21260 R21261 R21278 R21279 R21294 R21295 R21325 R21326 R21327 R21328 R21353 R21354 R21355 R21359 R21360 R21390 R21392 R21393 R21394 R21429 R21430 R21432 R21523 R21533 R21537 R21551 R21552 R21553 R21556 R21628 R21629 R21656 R21658 R21705 R21710 R21737 R21738 R21749 R21753 R21754 R21755 R21836 R21951 R21952 R21965 R21973 R21981	A, B, D, P1
R21068 R21636 R21637 R21638 R21642 R21643 R21644 R21651 R21653 R21660 R21661 R21676 R21677 R21687 R21691 R21692 R21694 R21739 R21862 R21865	A, B, F, G, P1
R21574	A, B, F, H, P1
R21023 R21272 R21275 R21277 R21283 R21286 R21296 R21303 R21331 R21338 R21341 R21357 R21358 R21362 R21364 R21368 R21495 R21499 R21515 R21517 R21518 R21535 R21543 R21544 R21550 R21563 R21566 R21569 R21571 R21572 R21573 R21575 R21577 R21590 R21591 R21667 R21668 R21717 R21720 R21741 R21794	A, B, F, P1
R21927	A, B, G, P1
R21019 R21020 R21021 R21022 R21274 R21302 R21305 R21306 R21307 R21309 R21313 R21315 R21316 R21320 R21370 R21371 R21492 R21493 R21494 R21496 R21511 R21529 R21542 R21548 R21549 R21580 R21652 R21829 R21934 R21938	A, B, P1
R21456 R21774 R21775 R21779	A, C, D, F, G, P1
R21174 R21287	A, C, D, F, P1
R21470 R21606	A, C, F, G, H, P1
R21003 R21010 R21035 R21036 R21037 R21038 R21059 R21071 R21072 R21073 R21149 R21256 R21332 R21333 R21346 R21347 R21348 R21374 R21397 R21398 R21401 R21402 R21403 R21404 R21405 R21406 R21407 R21408 R21409 R21411 R21415 R21416 R21417 R21420 R21422 R21424 R21425 R21426 R21427 R21433 R21434 R21435 R21436 R21437 R21438 R21439 R21440 R21441 R21443 R21446 R21447 R21448 R21449 R21450 R21451 R21452 R21453 R21454 R21458 R21459 R21460 R21461 R21462 R21463 R21468 R21471 R21474 R21486 R21489 R21490 R21500 R21501 R21502 R21503 R21505 R21506 R21532 R21557 R21558 R21559 R21560 R21564 R21582 R21584 R21586 R21588 R21592 R21593 R21594 R21595 R21596 R21597 R21598 R21599 R21601 R21603 R21605 R21607 R21609 R21610 R21611 R21612 R21616 R21617 R21619 R21621 R21645 R21648 R21650 R21659 R21674 R21689 R21690 R21695 R21708 R21715 R21742 R21770 R21773 R21776 R21777 R21778 R21780 R21781 R21782 R21783 R21785 R21786 R21835 R21837 R21839 R21840 R21841 R21842 R21843 R21844 R21845 R21848 R21849 R21856 R21858 R21859 R21860 R21863 R21874 R21875 R21876 R21877 R21878 R21879 R21880 R21881 R21882 R21883 R21884 R21885 R21886 R21887 R21888 R21889 R21891 R21941 R21942 R21950 R21955 R21956 R21957 R21958 R21959 R21962 R21963 R21966 R21968 R21969 R21970	A, C, F, G, P1
R21030 R21039 R21045 R21046 R21047 R21054 R21058 R21077 R21134 R21135 R21182 R21183 R21184 R21190 R21192 R21199 R21213 R21214 R21216 R21217 R21252 R21273 R21284 R21288 R21342 R21343 R21344 R21345 R21383 R21385 R21386 R21387 R21389 R21395 R21412 R21413 R21516 R21554 R21555 R21641 R21740 R21744 R21767 R21768 R21769 R21846 R21847 R21852 R21853 R21854 R21855 R21857 R21904 R21949 R21953 R21954 R21960 R21961 R21971 R21974 R21980 R21993 R21994 R21995 R21998 R21999 R22000	A, C, F, P1
R21311 R21376	A, C, P1
R21271 R21576	A, D, F, P1
R21308 R21314 R21318 R21319	A, D, P1
R21009 R21299 R21356 R21361 R21639 R21646 R21649 R21675 R21686 R21688 R21693 R21696 R21697 R21698 R21699 R21700 R21714 R21761 R21762 R21763 R21764 R21765 R21766 R21870 R21873 R21975 R21992	A, F, G, P1
R21301 R21363	A, F, H, P1
R21025 R21067 R21074 R21075 R21115 R21122 R21138 R21187 R21270 R21276 R21304 R21317 R21323 R21335 R21337 R21340 R21513 R21525 R21541 R21565 R21704 R21850 R21869 R21932 R21933 R21972	A, F, P1
R21547	A, G, P1

R21024 R21026 R21180 R21181 R21201 R21202 R21203 R21209 R21210 R21220 R21221 R21222 R21223 R21226 R21227 R21237 R21238 R21239 R21240 R21241 R21246 R21247 R21248 R21249 R21253 R21254 R21263 R21297 R21298 R21366 R21367 R21369 R21497 R21507 R21508 R21509 R21510 R21524 R21538 R21627 R21803 R21964	A, P1
R21094	B, C, D, H, P1
R21051 R21107	B, C, D, P1
R21546	B, C, F, G, P1
R21049	B, C, F, H, P1
R21029 R21031 R21167 R21465 R21899 R21940	B, C, F, P1
R21156	B, C, F, G, P1
R21530 R21536 R21540 R21618 R21622 R21623 R21624 R21625 R21626 R21631 R21640 R21663 R21664 R21666 R21669 R21672 R21673 R21682 R21711 R21722 R21730 R21732 R21746 R21748 R21759 R21867 R21871	B, C, G, P1
R21011 R21012 R21048 R21100 R21112 R21155 R21169 R21194 R21229 R21790 R21800 R21806 R21809 R21810 R21900 R21946	B, C, P1
R21736	B, D, F, H, P1
R21056 R21057 R21148 R21161 R21173 R21175 R21250 R21251 R21255 R21257 R21268 R21269 R21322 R21329 R21365 R21373 R21382 R21384 R21391 R21396 R21428 R21512 R21630 R21632 R21633 R21654 R21662 R21665 R21680 R21681 R21685 R21709 R21724 R21726 R21728 R21729 R21733 R21734 R21743 R21760 R21796 R21890 R21892 R21897 R21944 R21967 R21976	B, D, F, P1
R21079 R21910	B, D, H, P1
R21091 R21108 R21179 R21787 R21807 R21814 R21893 R21986 R21991	B, D, P1
R21567	B, F, H, P1
R21032 R21089 R21095 R21109 R21110 R21111 R21113 R21136 R21139 R21158 R21188 R21230 R21282 R21300 R21377 R21381 R21479 R21514 R21519 R21520 R21545 R21578 R21804 R21827 R21828 R21830 R21833 R21896 R21923 R21937 R21989	B, F, P1
R21004 R21914	B, H, P1
R21002 R21005 R21008 R21013 R21014 R21015 R21016 R21018 R21027 R21028 R21033 R21052 R21063 R21066 R21078 R21080 R21084 R21085 R21086 R21092 R21097 R21098 R21099 R21103 R21104 R21106 R21114 R21120 R21121 R21127 R21133 R21137 R21140 R21147 R21150 R21151 R21154 R21157 R21165 R21168 R21170 R21178 R21189 R21198 R21205 R21206 R21207 R21208 R21212 R21219 R21225 R21228 R21231 R21233 R21242 R21243 R21264 R21265 R21266 R21267 R21476 R21478 R21481 R21483 R21484 R21791 R21792 R21795 R21797 R21798 R21799 R21811 R21813 R21816 R21817 R21820 R21821 R21822 R21823 R21824	B, P1
R21826 R21831 R21834 R21894 R21898 R21901 R21903 R21906 R21908 R21911 R21912 R21913 R21915 R21917 R21918 R21919 R21920 R21921 R21925 R21928 R21929 R21930 R21931 R21945 R21947 R21948 R21987 R21988 R21990	
R21380 R21926 R21943	C, D, F, P1
R21706	C, D, G, P1
R21050	C, D, H, P1
R21232	C, D, P1
R21534 R21723	C, F, G, P1
R21132 R21144 R21146 R21793 R21936	C, F, P1
R21702 R21731	C, G, H, P1
R21040 R21041 R21042 R21043 R21044 R21055 R21069 R21070 R21193 R21200 R21321 R21418 R21419 R21423 R21431 R21528 R21634 R21635 R21655 R21657 R21670 R21671 R21679 R21701 R21707 R21713 R21716 R21718 R21719 R21721 R21725 R21727 R21745 R21747 R21756 R21757 R21864 R21866 R21868 R21872	C, G, P1
R21007	C, H, P1
R21001 R21082 R21090 R21101 R21117 R21124 R21128 R21131 R21143 R21171 R21185 R21191 R21196 R21211 R21234 R21235 R21236 R21477 R21482 R21491 R21562 R21788 R21805 R21812 R21818 R21819 R21832 R21984	C, P1
R21126	D, F, H, P1
R21186 R21204 R21378 R21480	D, F, P1
R21808	D, H, P1
R21006 R21053 R21062 R21065 R21083 R21088 R21102 R21125 R21141 R21153 R21162 R21172 R21262 R21379 R21815 R21907 R21916 R21982 R21983	D, P1
R21336	F, G, H, P1
R21064 R21076 R21081 R21087 R21093 R21096 R21116 R21119 R21123 R21129 R21130 R21142 R21145 R21152 R21159 R21160 R21163 R21164 R21177 R21195 R21197 R21218 R21244 R21245 R21330 R21334 R21521 R21522 R21539 R21684 R21712 R21801 R21851 R21861 R21895 R21922 R21924 R21935 R21939 R21985 R21996	F, P1
R21017 R21372	G, P1
R21105 R21118 R21224 R21825 R21902 R21909 R21997	P1

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R22530	A, B, C, D, F, G, H, P1
R22119 R22287 R22386 R22905 R22916	A, B, C, D, P1
R22819	A, B, C, F, G, H, P1
R22022 R22033 R22036 R22039 R22040 R22041 R22042 R22044 R22053 R22058 R22060 R22062 R22065 R22075 R22076 R22078 R22082 R22226 R22228 R22231 R22275 R22348 R22354 R22361 R22362 R22364 R22365 R22367 R22368 R22396 R22398 R22408 R22504 R22667 R22669 R22673 R22786 R22841 R22842 R22847 R22858 R22862 R22863 R22868 R22874 R22892 R22925 R22929 R22931 R22939 R22945 R22959	A, B, C, F, G, P1
R22096 R22099 R22102 R22152 R22256 R22302 R22377 R22438 R22896 R22924 R22947 R22948	A, B, C, F, P1
R22499	A, B, C, H, P1
R22288 R22326 R22447 R22574	A, B, C, P1
R22605 R22704 R22804 R22810 R22812 R22890 R22895	A, B, D, F, P1
R22085 R22109 R22111 R22115 R22116 R22117 R22118 R22128 R22138 R22140 R22141 R22142 R22159 R22160 R22178 R22221 R22222 R22223 R22235 R22391 R22392 R22418 R22419 R22662 R22721 R22724 R22805 R22809 R22811 R22813 R22849 R22879 R22880 R22881 R22886 R22887 R22893 R22894 R22898 R22917 R22976	A, B, D, P1
R22244 R22245 R22246 R22247 R22254 R22257 R22604	A, B, F, G, P1
R22089 R22095 R22098 R22100 R22104 R22107 R22112 R22113 R22114 R22121 R22122 R22123 R22126 R22127 R22129 R22135 R22139 R22143 R22144 R22145 R22146 R22149 R22151 R22165 R22169 R22172 R22176 R22177 R22179 R22184 R22185 R22186 R22187 R22188 R22189 R22190 R22191 R22192 R22193 R22194 R22195 R22196 R22220 R22243 R22252 R22253 R22303 R22384 R22385 R22403 R22565 R22571 R22576 R22611 R22615 R22617 R22631 R22634 R22798 R22802 R22803 R22888 R22899 R22922 R22961 R22963 R22965 R22968 R22969 R22971 R22983 R22984 R22985 R22986 R22987 R22991 R22992	A, B, F, P1
R22610	A, B, H, P1
R22251 R22268 R22416 R22417 R22420 R22421 R22424 R22448 R22540 R22549	A, B, P1
R22559 R22561 R22563 R22564 R22570 R22572 R22577 R22580 R22582 R22583 R22584 R22586 R22587 R22596 R22597 R22598 R22606 R22607 R22612 R22614 R22620 R22628 R22629 R22632 R22639 R22644 R22793 R22794 R22795 R22796 R22934 R22937 R22940 R22941 R22942	
R22009 R22074 R22229 R22286 R22345 R22366 R22395 R22397 R22399 R22531 R22784 R22825 R22988	A, C, D, F, G, P1
R22382 R22703	A, C, D, F, P1
R22064 R22285 R22838 R22839	A, C, F, G, H, P1
R22006 R22015 R22016 R22019 R22021 R22027 R22029 R22030 R22031 R22032 R22034 R22035 R22037 R22038 R22043 R22045 R22046 R22047 R22048 R22049 R22050 R22051 R22052 R22054 R22055 R22056 R22059 R22061 R22063 R22066 R22067 R22068 R22069 R22070 R22071 R22072 R22073 R22077 R22079 R22080 R22081 R22083 R22084 R22197 R22202 R22203 R22207 R22210 R22211 R22212 R22213 R22214 R22217 R22218 R22219 R22227 R22230 R22232 R22263 R22264 R22270 R22271 R22272 R22273 R22274 R22276 R22277 R22278 R22279 R22280 R22281 R22282 R22283 R22284 R22312 R22313 R22314 R22342 R22346 R22347 R22349 R22350 R22351 R22352 R22353 R22355 R22356 R22357 R22358 R22359 R22360 R22363 R22370 R22371 R22372 R22400 R22401 R22407 R22433 R22434 R22435 R22442 R22443 R22527 R22601 R22603 R22623 R22626 R22668 R22670 R22671 R22672 R22691 R22697 R22782 R22783 R22785 R22787 R22788 R22789 R22790 R22791 R22800 R22814 R22815 R22816 R22817 R22818 R22820 R22821 R22822 R22823 R22824 R22826 R22827 R22828 R22829 R22830 R22831 R22832 R22833 R22834 R22835 R22836 R22837 R22840 R22843 R22844 R22845 R22846 R22852 R22853 R22855 R22857 R22859 R22860 R22861 R22866 R22867 R22869 R22870 R22871 R22872 R22873 R22875 R22876 R22907 R22910 R22921 R22930 R22932 R22933 R22944 R22972 R22974	A, C, F, G, P1
R22001 R22002 R22003 R22004 R22005 R22017 R22018 R22020 R22023 R22024 R22025 R22026 R22028 R22088 R22090 R22091 R22093 R22094 R22103 R22124 R22134 R22137 R22147 R22150 R22170 R22171 R22174 R22180 R22181 R22198 R22199 R22200 R22201 R22204 R22205 R22206 R22208 R22209 R22260 R22340 R22341 R22343 R22344 R22376 R22378 R22379 R22380 R22383 R22439 R22440 R22441 R22618 R22621 R22633 R22707 R22712 R22713 R22719 R22726 R22806 R22848 R22854 R22856 R22891 R22897 R22902 R22912 R22915 R22967	A, C, F, P1
R22664	A, C, G, P1
R22248 R22411 R22444 R22578 R22579 R22599 R22608 R22630 R22911 R22935 R22943	A, C, P1
R22258	A, D, F, G, P1
R22092 R22097 R22136 R22182 R22259 R22964	A, D, F, P1

R22413 R22422 R22906 R22946	A, D, P1
R22255	A, F, G, H, P1
R22236 R22265 R22412 R22706 R22708 R22709	A, F, G, P1
R22087 R22101 R22105 R22106 R22108 R22110 R22120 R22125 R22148 R22164 R22166 R22167 R22168 R22173 R22175 R22183 R22224 R22225 R22233 R22250 R22269 R22336 R22337 R22338 R22339 R22390 R22558 R22569 R22573 R22581 R22588 R22590 R22635 R22636 R22637 R22638 R22640 R22641 R22663 R22700 R22715 R22717 R22718 R22792 R22914 R22920 R22938 R22962 R22970 R22973 R22989 R22990	A, F, P1
R22560	A, H, P1
R22153 R22156 R22157 R22327 R22445 R22446 R22467 R22520 R22525 R22619 R22678 R22689 R22734 R22903 R22908 R22913 R22918 R22936 R22949 R22950 R22951 R22952 R22953 R22954 R22955 R22956 R22957 R22958 R22960 R22977	A, P1
R22627	B, C, D, F, P1
R22237 R22238 R22239 R22240 R22241 R22242 R22656 R22657	B, C, D, P1
R22318	B, C, F, G, H, P1
R22901	B, C, F, G, P1
R22299 R22457 R22458 R22480 R22484 R22529 R22676 R22766 R22767	B, C, F, P1
R22130 R22131 R22132 R22133 R22675 R22685 R22686 R22687 R22688 R22710 R22711 R22979	B, C, G, P1
R22010	B, C, H, P1
R22321 R22332 R22454 R22489 R22498 R22502 R22507 R22510 R22526 R22539 R22544 R22547 R22550 R22680 R22747 R22753 R22758	B, C, P1
R22797	B, D, F, H, P1
R22154 R22155 R22158 R22161 R22162 R22163 R22234 R22261 R22267 R22309 R22410 R22423 R22501 R22705 R22728 R22765 R22799 R22801 R22850 R22889 R22909 R22919 R22966 R22978	B, D, F, P1
R22296 R22330 R22471 R22517 R22679 R22699 R22714 R22737	B, D, P1
R22472	B, F, H, P1
R22086 R22249 R22291 R22293 R22305 R22317 R22319 R22325 R22335 R22381 R22414 R22415 R22431 R22449 R22468 R22482 R22483 R22495 R22503 R22511 R22512 R22533 R22534 R22535 R22536 R22537 R22538 R22543 R22552 R22567 R22568 R22575 R22585 R22589 R22593 R22594 R22613 R22643 R22681 R22690 R22725 R22729 R22750 R22764 R22772 R22773 R22779 R22808 R22900 R22904 R22927 R22994	B, F, P1
R22320	B, G, P1
R22654 R22754	B, H, P1
R22012 R22290 R22304 R22307 R22324 R22331 R22374 R22375 R22406 R22426	B, P1

R22428 R22430 R22432 R22459 R22460 R22461 R22462 R22463 R22464 R22470 R22473 R22474 R22475 R22476 R22478 R22487 R22490 R22491 R22493 R22494 R22496 R22497 R22505 R22506 R22513 R22518 R22519 R22522 R22524 R22528 R22541 R22542 R22546 R22650 R22651 R22652 R22653 R22655 R22659 R22682 R22683 R22694 R22702 R22727 R22732 R22735 R22736 R22739 R22741 R22742 R22744 R22745 R22746 R22752 R22756 R22757 R22759 R22761 R22768 R22769 R22771 R22774 R22775 R22778 R22780 R22993 R22996 R22997	
R22514	C, B, P1
R22289 R22333 R22394 R22740	C, D, F, P1
R22311 R22405 R22429 R22451 R22684 R22698	C, D, P1
R22509	C, F, G, P1
R22298 R22479 R22556 R22592 R22660 R22677 R22695 R22730 R22731 R22770 R22928	C, F, P1
R22262 R22665 R22666 R22674 R22716	C, G, P1
R22334	C, H, P1
R22008 R22300 R22315 R22322 R22323 R22328 R22329 R22369 R22404 R22425 R22427 R22466 R22485 R22515 R22521 R22523 R22551 R22645 R22649 R22658 R22692 R22696 R22701	C, P1
R22297 R22316 R22387 R22409 R22508 R22548 R22562 R22923 R22926 R22998	D, F, P1
R22292 R22308 R22388 R22402 R22450 R22455 R22456 R22465 R22469 R22488 R22532 R22751 R22760 R22763 R22777	D, P1
R22295 R22554 R22807	F, H, P1
R22013 R22215 R22216 R22266 R22294 R22306 R22310 R22373 R22389 R22393 R22436 R22437 R22452 R22453 R22477 R22481 R22486 R22492 R22500 R22545 R22555 R22557 R22566 R22591 R22595 R22600 R22602 R22609 R22616 R22622 R22624 R22625 R22642 R22661 R22693 R22720 R22722 R22723 R22738 R22743 R22748 R22749 R22755 R22762 R22776 R22781 R22851 R22864 R22865 R22877 R22878 R22882 R22883 R22884 R22885 R22975 R22980 R22981 R22982 R22995 R23000	F, P1
R22516	G, H, P1
R22553	G, P1
R22057	H, P1
R22007 R22011 R22014 R22301 R22646 R22647 R22648 R22733 R22999	P1

R23001 – R24000 (不包括 without R23304, R23810, R23929)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R23635	A, B, C, D, F, G, P1
R23190 R23191 R23192	A, B, C, D, P1
R23063 R23120 R23122 R23137 R23144 R23151 R23216 R23299 R23300 R23302 R23307 R23313 R23355 R23508 R23511 R23513 R23514 R23527 R23551 R23559 R23597 R23634 R23656 R23852 R23853 R23859 R23870 R23877 R23880 R23967 R23968 R23971	A, B, C, F, G, P1
R23316	A, B, C, F, H, P1
R23100 R23152 R23155 R23209 R23218 R23312 R23344 R23351 R23372 R23387 R23560 R23774 R23787 R23831 R23873 R23883 R23887 R23902 R23904 R23938 R23963	A, B, C, F, P1
R23071	A, B, C, P1
R23103 R23242 R23265 R23520 R23534	A, B, D, F, P1
R23108 R23111 R23112 R23123 R23124 R23125 R23126 R23131 R23132 R23133 R23134 R23135 R23136 R23138 R23139 R23158 R23159 R23160 R23163 R23188 R23189 R23211 R23212 R23213 R23214 R23220 R23221 R23241 R23261 R23262 R23263 R23264 R23266 R23268 R23271 R23315 R23324 R23325 R23326 R23327 R23346 R23347 R23348 R23350 R23386 R23466 R23485 R23502 R23507 R23521 R23522 R23533 R23550 R23561 R23563 R23620 R23625 R23626 R23627 R23628 R23629 R23679 R23680 R23856 R23862 R23863 R23875 R23915 R23916 R23933 R23934 R23935 R23966	A, B, D, P1
R23495 R23854	A, B, F, G, H, P1
R23395 R23415 R23417 R23419 R23421 R23444 R23451 R23452 R23462 R23477 R23486 R23505 R23594 R23601 R23608 R23609 R23611 R23612 R23617 R23631 R23704 R23707 R23801 R23802 R23808 R23809 R23814 R23819 R23838 R23839 R23840 R23844 R23845 R23849 R23851 R23858 R23885 R23890 R23927 R23944 R23948 R23958 R23990 R23991	A, B, F, G, P1
R23427 R23463 R23615 R23616 R23789 R23791 R23973 R23974 R23989	A, B, F, P1
R23893	A, B, P1
R23064 R23412 R23878 R23970	A, C, D, F, G, P1
R23544	A, C, D, F, P1
R23816	A, C, F, G, H, P1
R23102 R23107 R23110 R23118 R23119 R23121 R23140 R23141 R23142 R23143 R23147 R23148 R23149 R23154 R23156 R23157 R23161 R23164 R23165 R23168 R23170 R23173 R23181 R23182 R23183 R23184 R23185 R23186 R23187 R23210 R23215 R23223 R23267 R23293 R23294 R23295 R23298 R23301 R23303 R23306 R23309 R23310 R23311 R23319 R23320 R23321 R23322 R23329 R23330 R23334 R23338 R23340 R23342 R23343 R23354 R23356 R23357 R23358 R23359 R23360 R23361 R23370 R23373 R23374 R23375 R23376 R23381 R23393 R23396 R23405 R23406 R23411 R23449 R23457 R23465 R23479 R23487 R23496 R23506 R23509 R23523 R23524 R23543 R23583 R23596 R23598 R23602 R23632 R23642 R23643 R23647 R23650 R23651 R23652 R23653 R23668 R23685 R23719 R23732 R23733 R23736 R23742 R23768 R23771 R23803 R23804 R23805 R23806 R23807 R23817 R23857 R23861 R23876 R23879 R23888 R23889 R23891 R23894 R23896 R23907 R23926	A, C, F, G, P1
R23203	A, C, F, H, P1
R23097 R23098 R23099 R23101 R23104 R23105 R23106 R23109 R23113 R23129 R23145 R23146 R23153 R23162 R23167 R23169 R23174 R23175 R23199 R23200 R23201 R23202 R23204 R23205 R23206 R23207 R23208 R23217 R23219 R23222 R23225 R23231 R23232 R23244 R23245 R23246 R23251 R23252 R23253 R23254 R23255 R23256 R23257 R23258 R23259 R23260 R23269 R23270 R23272 R23273 R23274 R23275 R23276 R23277 R23278 R23279 R23280 R23281 R23282 R23283 R23284 R23305 R23308 R23314 R23317 R23328 R23336 R23337 R23339 R23341 R23345 R23371 R23383 R23385 R23390 R23391 R23392 R23518 R23519 R23540 R23541 R23542 R23545 R23546 R23547 R23548 R23549 R23554 R23555 R23558 R23603 R23621 R23630 R23633 R23675 R23720 R23749 R23751 R23772 R23773 R23778 R23779 R23781 R23793 R23795 R23826 R23829 R23830 R23855 R23871 R23900 R23901 R23903 R23905 R23969	A, C, F, P1
R23587 R23961	A, D, F, G, P1
R23848	A, D, P1
R23150 R23362 R23363 R23367 R23394 R23397 R23410 R23413 R23414 R23418 R23420 R23422 R23429 R23430 R23431 R23432 R23433 R23434 R23435 R23436 R23437 R23438 R23439 R23440 R23441 R23442 R23443 R23447 R23448 R23453 R23459 R23510 R23512 R23577 R23578 R23579 R23580 R23588 R23589 R23592 R23593 R23595 R23599 R23604 R23605 R23606 R23607 R23610 R23613 R23618 R23619 R23623 R23638 R23639 R23640 R23641 R23655 R23657 R23658 R23659 R23660 R23661 R23662 R23663 R23664 R23665 R23666 R23667 R23676 R23677 R23678 R23681 R23682 R23683 R23688 R23690 R23692 R23693 R23694 R23695 R23696 R23697 R23698 R23699 R23700 R23701 R23703 R23705 R23706 R23708	A, F, G, P1

R23709 R23710 R23711 R23712 R23713 R23731 R23734 R23735 R23744 R23746 R23747 R23748 R23753 R23754 R23755 R23756 R23760 R23762 R23763 R23765 R23766 R23797 R23812 R23815 R23818 R23820 R23824 R23841 R23846 R23847 R23850 R23860 R23874 R23886 R23892 R23906 R23908 R23909 R23942 R23943 R23953 R23959 R23960 R23962 R23982 R23986	
R23365 R23366 R23368 R23369 R23398 R23399 R23400 R23401 R23402 R23403 R23404 R23407 R23408 R23409 R23416 R23423 R23424 R23425 R23426 R23428 R23445 R23446 R23467 R23481 R23488 R23494 R23582 R23584 R23585 R23586 R23590 R23591 R23600 R23614 R23636 R23637 R23644 R23645 R23648 R23649 R23654 R23669 R23670 R23671 R23672 R23673 R23674 R23684 R23686 R23687 R23689 R23702 R23714 R23715 R23716 R23717 R23718 R23721 R23722 R23723 R23724 R23725 R23726 R23727 R23728 R23729 R23730 R23737 R23738 R23739 R23740 R23741 R23743 R23745 R23750 R23752 R23757 R23758 R23759 R23761 R23764 R23767 R23769 R23770 R23786 R23827 R23836 R23868 R23872 R23937 R23988	A, F, P1
R23016 R23290 R23842	A, P1
R23172 R23384 R23483 R23780 R23790 R23835 R23865	B, C, D, F, P1
R23010	B, C, D, P1
R23788 R23923	B, C, F, G, P1
R23020 R23021	B, C, F, P1
R23984	B, C, G, H, P1
R23455 R23458 R23470 R23471 R23473 R23474 R23489 R23497 R23515 R23517 R23622 R23782 R23783 R23784 R23796 R23798 R23800 R23823 R23825 R23843 R23866 R23869 R23897 R23899 R23910 R23912 R23913 R23914 R23917 R23921 R23922 R23925 R23928 R23930 R23931 R23945 R23951 R23952 R23956 R23957 R23972 R23976 R23985 R23987	B, C, G, P1
R23006 R23030 R23564 R23571 R23575	B, C, P1
R23478	B, D, F, H, P1
R23093 R23094 R23095 R23096 R23114 R23115 R23116 R23117 R23127 R23128 R23130 R23166 R23171 R23176 R23177 R23178 R23179 R23180 R23193 R23194 R23195 R23196 R23197 R23198 R23224 R23226 R23227 R23228 R23229 R23230 R23233 R23234 R23235 R23236 R23237 R23238 R23239 R23240 R23243 R23247 R23248 R23249 R23250 R23285 R23286 R23287 R23296 R23297 R23318 R23323 R23331 R23332 R23333 R23335 R23349 R23352 R23353 R23377 R23378 R23379 R23380 R23382 R23388 R23389 R23450 R23482 R23484 R23525 R23526 R23528 R23529 R23530 R23531 R23532 R23535 R23536 R23537 R23538 R23539 R23552 R23553 R23556 R23557 R23562 R23581 R23691 R23775 R23777 R23828 R23924 R23932 R23939 R23941 R23946	B, D, F, P1
R23015 R23072 R23078	B, D, P1
R23009 R23022 R23023 R23039 R23080 R23081 R23085 R23289 R23566 R23996	B, F, P1
R23012	B, H, P1
R23001 R23002 R23003 R23005 R23007 R23011 R23017 R23025 R23026 R23028 R23032 R23034 R23040 R23041 R23042 R23043 R23044 R23045 R23048 R23051 R23053 R23057 R23058 R23060 R23062 R23065 R23067 R23070 R23075 R23076 R23079 R23086 R23087 R23089 R23090 R23091 R23292 R23565 R23567 R23572 R23993 R23999	B, P1
R23799	C, D, G, P1
R23074	C, D, P1
R23475 R23792 R23864 R23954	C, F, G, P1
R23014	C, F, H, P1
R23013 R23061 R23069 R23088	C, F, P1
R23460 R23476 R23832 R23834 R23981	C, G, H, P1
R23454 R23456 R23461 R23464 R23468 R23469 R23472 R23480 R23490 R23491 R23492 R23493 R23498 R23499 R23500 R23501 R23503 R23504 R23516 R23624 R23776 R23785 R23794 R23811 R23813 R23821 R23822 R23833 R23837 R23867 R23881 R23882 R23884 R23895 R23898 R23911 R23918 R23919 R23920 R23936 R23940 R23947 R23949 R23950 R23955 R23964 R23965 R23975 R23977 R23978 R23979 R23980 R23983	C, G, P1
R23029 R23036 R23037 R23046 R23047 R23049 R23050 R23052 R23055 R23056 R23059 R23066 R23068 R23082 R23288 R23570 R23573 R23574 R23994	C, P1
R23008 R23024 R23027 R23031 R23033 R23083 R23291 R23569 R23995	D, P1
R23646	F, H, P1
R23018 R23019 R23035 R23038 R23054 R23073 R23077 R23084 R23092 R23364 R23568 R23576 R23992 R23997 R23998 R24000	F, P1
R23004	P1

R24001 – R25000 (不包括 without R24916, R24944)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R-24393 R-24538	A, B, C, D, F, P1
R-24190 R-24544 R-24645 R-24716 R-24725	A, B, C, D, P1
R-24872	A, B, C, F, G
R-24777	A, B, C, F, G, H, P1
R-24299 R-24300 R-24343 R-24364 R-24383 R-24719 R-24722 R-24833 R-24836 R-24869 R-24871 R-24880 R-24940 R-24954 R-24963	A, B, C, F, G, P1
R-24784 R-24786 R-24788 R-24789 R-24790 R-24945 R-24947	A, B, C, F, P1
R-24810	A, B, C, P1
R-24662 R-24663 R-24675 R-24676 R-24677 R-24726	A, B, D, F, P1
R-24408 R-24708	A, B, D, H, P1
R-24183 R-24186 R-24204 R-24306 R-24407 R-24448 R-24449 R-24450 R-24464 R-24472 R-24473 R-24474 R-24475 R-24502 R-24510 R-24539 R-24602 R-24603 R-24606 R-24607 R-24608 R-24609 R-24621 R-24622 R-24678 R-24706 R-24707 R-24709 R-24710 R-24711 R-24712 R-24713 R-24714 R-24715 R-24723 R-24724 R-24738 R-24739 R-24750 R-24754 R-24755 R-24756 R-24758 R-24759 R-24764 R-24770 R-24779 R-24780 R-24781 R-24792 R-24793 R-24794 R-24795 R-24796 R-24797 R-24798 R-24799 R-24800 R-24801 R-24802 R-24803 R-24894 R-24951 R-24990 R-24991 R-24992	A, B, D, P1
R-24807 R-24892 R-24937 R-24941 R-24943 R-24956 R-24957 R-24961 R-24962 R-24971	A, B, F, G, P1
R-24146 R-24192 R-24208 R-24209 R-24357 R-24638 R-24670 R-24900 R-24946	A, B, F, P1
R-24170 R-24171 R-24172 R-24173 R-24174 R-24175 R-24176 R-24177 R-24179 R-24180 R-24181 R-24182 R-24187 R-24188 R-24189 R-24195 R-24200 R-24203 R-24205 R-24206 R-24281 R-24631 R-24632 R-24642 R-24644 R-24650 R-24651 R-24853 R-24854 R-24855 R-24857 R-24858 R-24860 R-24861 R-24907 R-24933 R-24975 R-24977 R-24980	A, B, P1
R-24337	A, C, D, F, G, P1
R-24824	A, C, D, F, P1
R-24285 R-24292 R-24295 R-24590 R-24875 R-24881	A, C, F, G
R-24297	A, C, F, G, H, P1
R-24054 R-24055 R-24056 R-24057 R-24058 R-24059 R-24060 R-24063 R-24184 R-24185 R-24210 R-24211 R-24216 R-24220 R-24221 R-24222 R-24223 R-24224 R-24225 R-24226 R-24227 R-24228 R-24286 R-24287 R-24288 R-24290 R-24293 R-24294 R-24296 R-24298 R-24338 R-24339 R-24340 R-24341 R-24342 R-24344 R-24345 R-24354 R-24382 R-24385 R-24386 R-24389 R-24390 R-24391 R-24392 R-24456 R-24457 R-24461 R-24462 R-24463 R-24501 R-24508 R-24509 R-24541 R-24542 R-24546 R-24547 R-24548 R-24549 R-24550 R-24551 R-24552 R-24553 R-24554 R-24555 R-24556 R-24557 R-24558 R-24576 R-24579 R-24591 R-24592 R-24594 R-24595 R-24604 R-24610 R-24612 R-24613 R-24614 R-24615 R-24616 R-24617 R-24618 R-24619 R-24620 R-24646 R-24649 R-24679 R-24696 R-24721 R-24749 R-24751 R-24753 R-24757 R-24771 R-24772 R-24773 R-24774 R-24775 R-24776 R-24778 R-24782 R-24783 R-24804 R-24808 R-24809 R-24834 R-24837 R-24838 R-24839 R-24840 R-24841 R-24842 R-24843 R-24844 R-24845 R-24846 R-24870 R-24873 R-24874 R-24876 R-24877 R-24878 R-24879 R-24882 R-24883 R-24884 R-24885 R-24886 R-24887 R-24888 R-24891 R-24898 R-24909 R-24925 R-24938 R-24942 R-24948 R-24949 R-24950 R-24952 R-24953 R-24955 R-24959 R-24964 R-24965 R-24968 R-24969 R-24970 R-24972	A, C, F, G, P1
R-24198 R-24199 R-24289 R-24405 R-24458 R-24477 R-24486 R-24504 R-24505 R-24506 R-24545 R-24562 R-24569 R-24596 R-24597 R-24598 R-24599 R-24600 R-24601 R-24611 R-24623 R-24624 R-24647 R-24673 R-24686 R-24702 R-24703 R-24704 R-24705 R-24718 R-24720 R-24752 R-24785 R-24787 R-24791 R-24850 R-24851 R-24852 R-24862 R-24911 R-24912 R-24913 R-24914 R-24915 R-24928 R-24932 R-24989	A, C, F, P1
R-24191 R-24207 R-24214 R-24637 R-24905 R-24979 R-24981 R-24983	A, C, P1
R-24890 R-24897 R-24939 R-24958 R-24960	A, D, F, G, P1
R-24640 R-24680	A, D, F, P1
R-24639 R-24904	A, D, P1
R-24194 R-24201 R-24202 R-24565 R-24566 R-24568 R-24570 R-24575 R-24578 R-24580 R-24581 R-24582 R-24583 R-24689 R-24690 R-24691 R-24692 R-24693 R-24694 R-24695 R-24805 R-24806 R-24901 R-24922 R-24923 R-24924 R-24967 R-24974 R-24997 R-25000	A, F, G, P1
R-24009 R-24062 R-24197 R-24476 R-24478 R-24479 R-24487 R-24532 R-24543 R-24572 R-24573 R-24574 R-24577 R-24671 R-24681 R-24682 R-24683 R-24687 R-24730 R-24856 R-24895 R-24917 R-24918 R-24919 R-24920 R-24934 R-24935 R-24936	A, F, P1
R-24196 R-24356 R-24379 R-24459 R-24460 R-24733 R-24734 R-24735 R-24736 R-24737 R-24769 R-24906	A, P1
R-24648 R-24746 R-24747 R-24818	B, C, D, F, P1

R-24129 R-24156 R-24559 R-24816 R-24866 R-24996	B, C, D, P1
R-24064 R-24660	B, C, F, G, P1
R-24165	B, C, F, H, P1
R-24023 R-24118 R-24134 R-24326 R-24443 R-24523 R-24588 R-24589 R-24819 R-24826 R-24966	B, C, F, P1
R-24061 R-24067 R-24076 R-24387 R-24655 R-24659 R-24664 R-24667 R-24685 R-24688 R-24889	B, C, G, P1
R-24010 R-24028 R-24033 R-24034 R-24038 R-24051 R-24112 R-24113 R-24117 R-24122 R-24125 R-24127 R-24132 R-24147 R-24153 R-24160 R-24217 R-24245 R-24247 R-24253 R-24257 R-24263 R-24264 R-24265 R-24268 R-24269 R-24314 R-24331 R-24332 R-24350 R-24352 R-24418 R-24421 R-24426 R-24429 R-24519 R-24526 R-24527 R-24530 R-24586 R-24820 R-24825 R-24835 R-24865 R-24868	B, C, P1
R-24143 R-24249 R-24250 R-24308 R-24310 R-24406 R-24419 R-24451 R-24465 R-24466 R-24503 R-24563 R-24564 R-24605 R-24672 R-24684 R-24697 R-24698 R-24699 R-24700 R-24701 R-24717 R-24731 R-24732 R-24740 R-24741 R-24742 R-24743 R-24744 R-24745 R-24748 R-24765 R-24766 R-24767 R-24768 R-24822 R-24973	B, D, F, P1
R-24012 R-24019 R-24105 R-24138 R-24139 R-24244 R-24246 R-24251 R-24282 R-24309 R-24370 R-24423 R-24444 R-24446 R-24484 R-24507	B, D, P1
R-24283	B, D1, F, P1
R-24004 R-24008 R-24030 R-24044 R-24128 R-24142 R-24150 R-24152 R-24157 R-24178 R-24231 R-24255 R-24275 R-24276 R-24312 R-24346 R-24355 R-24358 R-24363 R-24368 R-24381 R-24397 R-24425 R-24441 R-24471 R-24491 R-24511 R-24536 R-24593 R-24641 R-24643 R-24728 R-24729 R-24760 R-24817 R-24859 R-24902 R-24908 R-24978 R-24993	B, F, P1
R-24124 R-24830	B, G, P1
R-24002 R-24003 R-24005 R-24007 R-24011 R-24013 R-24016 R-24017 R-24018 R-24024 R-24027 R-24031 R-24035 R-24036 R-24037 R-24039 R-24040 R-24041 R-24043 R-24046 R-24049 R-24050 R-24052 R-24053 R-24093 R-24094 R-24096 R-24100 R-24101 R-24102 R-24107 R-24109 R-24114 R-24116 R-24120 R-24121 R-24123 R-24135 R-24136 R-24141 R-24145 R-24155 R-24158 R-24164 R-24167 R-24168 R-24215 R-24218 R-24230 R-24236 R-24237 R-24239 R-24243 R-24252 R-24254 R-24256 R-24258 R-24259 R-24261 R-24267 R-24270 R-24272 R-24278 R-24279 R-24280 R-24302 R-24304 R-24305 R-24313 R-24316 R-24317 R-24319 R-24320 R-24321 R-24322 R-24323 R-24324 R-24325 R-24328 R-24333 R-24335 R-24347 R-24351 R-24361 R-24362 R-24365 R-24366 R-24373 R-24374 R-24395 R-24400 R-24402 R-24403 R-24410 R-24413 R-24415 R-24424 R-24430 R-24433 R-24434 R-24435 R-24438 R-24442 R-24445 R-24447 R-24454 R-24470 R-24482	B, P1

R-24488 R-24490 R-24493 R-24494 R-24495 R-24496 R-24497 R-24498 R-24500 R-24512 R-24515 R-24516 R-24517 R-24518 R-24520 R-24522 R-24529 R-24535 R-24560 R-24585 R-24587 R-24625 R-24626 R-24627 R-24812 R-24813 R-24821 R-24847 R-24848 R-24986 R-24987	
R-24893	C, D, F, G, P1
R-24232 R-24815	C, D, F, P1
R-24154 R-24159 R-24394 R-24467 R-24633	C, D, P1
R-24661 R-24669 R-24674	C, F, G, P1
R-24022 R-24108 R-24119 R-24130 R-24162 R-24233 R-24242 R-24360 R-24369 R-24404 R-24528 R-24533 R-24534 R-24652 R-24653 R-24827 R-24864	C, F, P1
R-24065 R-24066 R-24068 R-24069 R-24070 R-24071 R-24072 R-24073 R-24074 R-24075 R-24077 R-24078 R-24079 R-24080 R-24081 R-24082 R-24083 R-24084 R24085 R-24086 R-24087 R-24088 R-24089 R-24090 R-24091 R-24092 R-24291 R-24384 R-24388 R-24654 R-24656 R-24657 R-24658 R-24665 R-24666 R-24668 R-24896 R-24899 R-24929 R-24930 R-24931	C, G, P1
R-24001 R-24014 R-24015 R-24032 R-24042 R-24047 R-24097 R-24098 R-24099 R-24103 R-24104 R-24106 R-24126 R-24140 R-24148 R-24149 R-24151 R-24161 R-24163 R-24166 R-24169 R-24212 R-24219 R-24229 R-24248 R-24271 R-24274 R-24284 R-24303 R-24311 R-24315 R-24318 R-24327 R-24329 R-24330 R-24334 R-24353 R-24367 R-24371 R-24375 R-24376 R-24377 R-24396 R-24399 R-24409 R-24411 R-24412 R-24414 R-24416 R-24417 R-24427 R-24431 R-24436 R-24439 R-24452 R-24455 R-24468 R-24481 R-24492 R-24499 R-24513 R-24514 R-24531 R-24636 R-24811 R-24814 R-24823 R-24828 R-24829 R-24831 R-24867 R-24982 R-24985	C, P1
R-24006 R-24238 R-24453 R-24489 R-24976	D, F, P1
R-24021 R-24025 R-24026 R-24095 R-24110 R-24111 R-24131 R-24133 R-24137 R-24234 R-24240 R-24301 R-24336 R-24359 R-24398 R-24428 R-24440 R-24469 R-24483 R-24628 R-24832 R-24849 R-24984	D, P1
R-24020 R-24029 R-24144 R-24193 R-24213 R-24235 R-24241 R-24260 R-24262 R-24266 R-24273 R-24277 R-24307 R-24348 R-24349 R-24372 R-24378 R-24380 R-24420 R-24422 R-24432 R-24437 R-24480 R-24485 R-24521 R-24525 R-24537 R-24540 R-24561 R-24567 R-24571 R-24629 R-24630 R-24634 R-24635 R-24727 R-24761 R-24762 R-24763 R-24863 R-24903 R-24910 R-24921 R-24926 R-24927 R-24994 R-24995 R-24998 R-24999	F, P1
R-24401 R-24524 R-24584 R-24988	H, P1
R-24045 R-24048 R-24115	P1

R25001 – R25884 (不包括 without R25520)

申述編號 Rep. No. (TPB/R/S/K18/17-)	申述要點/建議及回應 (參見附件 VIb) Representation Points/Proposals and Responses (Refer to Annex VIb)
R-25226 R-25587	A, B, C, D, F, G, P1
R-25871	A, B, C, D, F, P1
R-25108 R-25600 R-25647 R-25650 R-25651 R-25660	A, B, C, D, P1
R-25031 R-25134	A, B, C, F, G, H, P1
R-25009 R-25018 R-25020 R-25029 R-25047 R-25048 R-25051 R-25052 R-25057 R-25059 R-25070 R-25071 R-25076 R-25078 R-25079 R-25112 R-25117 R-25118 R-25119 R-25121 R-25131 R-25133 R-25135 R-25136 R-25138 R-25142 R-25143 R-25153 R-25154 R-25155 R-25157 R-25158 R-25167 R-25168 R-25180 R-25182 R-25251 R-25284 R-25354 R-25397 R-25415 R-25417 R-25442 R-25545 R-25568 R-25622 R-25688 R-25785 R-25807 R-25811 R-25883	A, B, C, F, G, P1
R-25102 R-25087 R-25664 R-25853	A, B, C, F, P1
R-25085 R-25089 R-25104 R-25495 R-25554 R-25555 R-25556 R-25557 R-25558 R-25559 R-25560 R-25561 R-25562 R-25563 R-25564 R-25565 R-25566 R-25578 R-25579 R-25580 R-25581 R-25582 R-25583 R-25584 R-25585 R-25596 R-25597 R-25601 R-25614 R-25620 R-25631 R-25633 R-25648 R-25649 R-25652 R-25653 R-25654 R-25656 R-25657 R-25658 R-25661 R-25665 R-25667 R-25668 R-25676 R-25677 R-25681 R-25682 R-25683	A, B, D, P1
R-25543	A, B, F, G, H, P1
R-25369 R-25388 R-25390 R-25399 R-25401 R-25433 R-25463 R-25472 R-25510 R-25528 R-25640 R-25761 R-25799	A, B, F, G, P1
R-25386 R-25619	A, B, F, H, P1
R-25004 R-25005 R-25080 R-25081 R-25082 R-25090 R-25095 R-25096 R-25097 R-25099 R-25100 R-25101 R-25103 R-25313 R-25618 R-25659 R-25666 R-25669 R-25873	A, B, F, P1
R-25235	A, B, G, P1
R-25001 R-25003 R-25302 R-25615 R-25617	A, B, P1
R-25021 R-25139 R-25141 R-25225	A, C, D, F, G, P1
R-25854	A, C, D, F, P1
R-25690	A, C, F, G
R-25782	A, C, F, G, H, P1
R-25007 R-25008 R-25010 R-25011 R-25012 R-25013 R-25014 R-25015 R-25019 R-25022 R-25023 R-25024 R-25025 R-25026 R-25027 R-25030 R-25032 R-25033 R-25034 R-25035 R-25036 R-25037 R-25038 R-25039 R-25040 R-25041 R-25042 R-25043 R-25044 R-25045 R-25046 R-25049 R-25050 R-25053 R-25054 R-25055 R-25056 R-25058 R-25064 R-25065 R-25066 R-25067 R-25068 R-25069 R-25072 R-25073 R-25074 R-25075 R-25077 R-25115 R-25116 R-25120 R-25122 R-25123 R-25124 R-25125 R-25126 R-25127 R-25128 R-25129 R-25130 R-25132 R-25137 R-25140 R-25144 R-25145 R-25146 R-25156 R-25159 R-25160 R-25161 R-25162 R-25163 R-25164 R-25165 R-25166 R-25169 R-25170 R-25171 R-25172 R-25173 R-25174 R-25175 R-25176 R-25177 R-25178 R-25179 R-25181 R-25183 R-25184 R-25185 R-25186 R-25187 R-25188 R-25189 R-25190 R-25191 R-25192 R-25193 R-25194 R-25195 R-25196 R-25197 R-25198 R-25199 R-25200 R-25202 R-25252 R-25274 R-25350 R-25445 R-25448 R-25453 R-25456 R-25458 R-25483 R-25498 R-25512 R-25535 R-25536 R-25537 R-25538 R-25539 R-25540 R-25541 R-25542 R-25547 R-25548 R-25553 R-25569 R-25570 R-25571 R-25572 R-25573 R-25574 R-25575 R-25576 R-25577 R-25586 R-25588 R-25589 R-25590 R-25592 R-25593 R-25594 R-25595 R-25602 R-25603 R-25612 R-25628 R-25632 R-25684 R-25685 R-25686 R-25687 R-25689 R-25691 R-25692 R-25693 R-25694 R-25702 R-25723 R-25742 R-25743 R-25748 R-25800 R-25801 R-25810 R-25812 R-25813 R-25815	A, C, F, G, P1
R-25098 R-25208 R-25209 R-25275 R-25340 R-25341 R-25355 R-25356 R-25373 R-25387 R-25419 R-25420 R-25421 R-25447 R-25449 R-25450 R-25457 R-25459 R-25465 R-25466 R-25492 R-25493 R-25494 R-25567 R-25591 R-25634 R-25635 R-25655 R-25724 R-25725 R-25745 R-25808 R-25809 R-25884	A, C, F, P1
R-25083 R-25303 R-25663	A, D, F, P1
R-25344 R-25777	A, D, P1
R-25460 R-25461	A, F, G, H, P1
R-25088 R-25351 R-25352 R-25353 R-25359 R-25360 R-25363 R-25364 R-25365 R-25366 R-25367 R-25368 R-25370 R-25371 R-25372 R-25375 R-25376 R-25377 R-25380 R-25381 R-25384 R-25385 R-25389 R-25391 R-25392 R-25393 R-25394 R-25395 R-25396 R-25398 R-25400 R-25402 R-25403 R-25404 R-25405 R-25406 R-25407 R-25408 R-25409 R-25410 R-25411 R-25412 R-25413 R-25414 R-25422 R-25423 R-25430 R-25431 R-25432 R-25435 R-25436 R-25438 R-25439 R-25441 R-25443 R-25452 R-25464 R-25467 R-25468 R-25469 R-25470 R-25471 R-25473 R-25474 R-25475 R-25476 R-25477 R-25478 R-25479 R-25485 R-25486 R-25487 R-25488 R-25489 R-25490 R-25491 R-25496 R-25497 R-25499 R-25500 R-25501 R-25503 R-25504 R-25505 R-25513 R-25515 R-25516 R-25517 R-25518 R-25519 R-25521 R-25522 R-25523 R-25524 R-25525 R-25526 R-25529 R-25530 R-25531 R-25532 R-25533 R-25534 R-25544 R-25604 R-25609 R-25610 R-25611 R-25641	A, F, G, P1

R-25642 R-25643 R-25645 R-25753 R-25754 R-25755 R-25756 R-25762 R-25763 R-25764 R-25765 R-25766 R-25767 R-25768 R-25781 R-25783 R-25784 R-25787 R-25790 R-25791 R-25792 R-25793 R-25794 R-25795 R-25796 R-25802 R-25805 R-25806 R-25814 R-25824 R-25826 R-25827 R-25828 R-25829 R-25835 R-25836 R-25843 R-25844 R-25845 R-25846 R-25847 R-25848	
R-25002 R-25006 R-25084 R-25086 R-25091 R-25092 R-25093 R-25094 R-25105 R-25201 R-25261 R-25440 R-25462 R-25480 R-25481 R-25508 R-25511 R-25514 R-25621 R-25623 R-25624 R-25625 R-25644 R-25674 R-25752 R-25778 R-25818 R-25819 R-25820 R-25821 R-25822 R-25823 R-25825 R-25833 R-25834 R-25849 R-25850 R-25851 R-25852	A, F, P1
R-25773 R-25776 R-25865	A, P1
R-25861	B
R-25222 R-25874	B, C, D, F, P1
R-25741 R-25879	B, C, D, P1
R-25249 R-25283 R-25323 R-25698 R-25881	B, C, F, P1
R-25147 R-25882	B, C, G, P1
R-25285	B, C, H, P1
R-25241 R-25269 R-25279 R-25287 R-25288 R-25299 R-25300 R-25712 R-25731 R-25779	B, C, P1
R-25858	B, D
R-25106 R-25107 R-25109 R-25110 R-25111 R-25221 R-25223 R-25232 R-25234 R-25237 R-25259 R-25276 R-25277 R-25309 R-25374 R-25613 R-25626 R-25627 R-25629 R-25630 R-25636 R-25637 R-25638 R-25670 R-25671 R-25672 R-25673 R-25675 R-25678 R-25679 R-25680	B, D, F, P1
R-25250 R-25255 R-25315 R-25316 R-25336 R-25339 R-25730 R-25869	B, D, P1
R-25224 R-25231 R-25233 R-25304 R-25328 R-25331 R-25357 R-25509 R-25551 R-25662 R-25696 R-25697 R-25703 R-25713 R-25727 R-25732 R-25735 R-25737 R-25739 R-25740 R-25771 R-25855 R-25878	B, F, P1
R-25244 R-25717	B, H, P1
R-25060 R-25238 R-25242 R-25243 R-25245 R-25248 R-25253 R-25265 R-25270 R-25273 R-25280 R-25282 R-25286 R-25294 R-25295 R-25297 R-25310 R-25312 R-25314 R-25317 R-25318 R-25321 R-25324 R-25334 R-25335 R-25338 R-25343 R-25346 R-25695 R-25701 R-25706 R-25710 R-25714 R-25716 R-25719 R-25720 R-25733 R-25734 R-25749 R-25769 R-25772 R-25774 R-25864 R-25866 R-25876 R-25877	B, P1
R-25856	C, D
R-25227 R-25267	C, D, F, P1
R-25616	C, D, G, P1

R-25246 R-25305 R-25708 R-25770 R-25857	C, D, P1
R-25704	C, F, H, P1
R-25260 R-25262 R-25264 R-25268 R-25271 R-25322 R-25326 R-25729	C, F, P1
R-25016 R-25017 R-25061 R-25062 R-25063 R-25113 R-25114 R-25148 R-25149 R-25150 R-25151 R-25152 R-25210 R-25211 R-25212 R-25213 R-25214 R-25215 R-25216 R-25217 R-25218 R-25257 R-25605 R-25606 R-25607 R-25608 R-25639 R-25646	C, G, P1
R-25293 R-25736	C, H, P1
R-25239 R-25240 R-25247 R-25256 R-25263 R-25278 R-25281 R-25289 R-25290 R-25292 R-25311 R-25325 R-25332 R-25342 R-25345 R-25711 R-25715 R-25718 R-25728 R-25870 R-25880	C, P1
R-25859 R-25860 R-25862	D
R-25266	D, F, H, P1
R-25205 R-25207 R-25220 R-25258 R-25700 R-25775	D, F, P1
R-25203 R-25204 R-25206 R-25228 R-25230 R-25236 R-25301 R-25329 R-25330 R-25333 R-25337 R-25722 R-25875	D, P1
R-25291	F, H, P1
R-25219 R-25229 R-25254 R-25272 R-25306 R-25307 R-25308 R-25319 R-25320 R-25327 R-25347 R-25348 R-25349 R-25358 R-25361 R-25362 R-25378 R-25379 R-25382 R-25383 R-25416 R-25418 R-25424 R-25425 R-25426 R-25427 R-25428 R-25429 R-25434 R-25437 R-25444 R-25446 R-25451 R-25454 R-25455 R-25482 R-25484 R-25502 R-25506 R-25507 R-25527 R-25546 R-25549 R-25550 R-25552 R-25598 R-25599 R-25699 R-25705 R-25707 R-25709 R-25721 R-25726 R-25744 R-25746 R-25747 R-25750 R-25751 R-25757 R-25758 R-25759 R-25760 R-25780 R-25786 R-25788 R-25789 R-25797 R-25798 R-25803 R-25804 R-25816 R-25817 R-25830 R-25831 R-25832 R-25837 R-25838 R-25839 R-25840 R-25841 R-25842 R-25863 R-25868 R-25872	F, P1
R-25867	G, P1
R-25028 R-25296 R-25298 R-25738	P1

Comments on Representations

Comment No.	Reason	PlanD's Response
C1	Support all of the representations that object to Items A and B. (no reason provided)	Noted.
C2	Regarding Item A : A. Support HKBU's proposal for the Site. B. Support HKBU's goal of establishing a CMTH on the southern part of the LWL Site. Not only would the hospital provide accredited course-work for training Chinese medicine doctors, it would satisfy the needs of the community for in-patient Chinese medicine services and provide hospital internships for Hong Kong and Mainland Chinese medicine students. This is the kind of innovative program that will contribute to Hong Kong's continuing leadership and prosperity in the Asian region. C. Rezoning of the Site would be an irrecoverable loss to the education sector and the Hong Kong community as a whole.	See points A, C and D in Annex VIb.
C3	Object to Item A. To retain the site as "G/IC(9)" for HKBU's various uses, such as for future expansion, i.e. building a Chinese medicine teaching hospital, or building a student hostel, but not for PolyU or other uses.	See points C and D in Annex VIb.
C4	A. Providing comments on R1 to R7 which support Item A. Comments are: i. Alternative sites for residential development can be found elsewhere in Hong Kong; however, alternative "G/IC" sites to meet future education needs are extremely limited. HKBU, whose existing campus surrounds the Site on 3 sides, requires a comprehensive and sustainable campus development solution. Residential development on the Site would be irreversible and a permanent loss to Hong Kong. The development of 495 private residential flats on the LWL site would not alleviate the acute public housing shortage. The proposed luxury housing would not improve the lives of those Hong Kong residents most in need. It would have a negligible impact in stabilising property prices in the area, but pushing up property prices in the District. These flats would therefore not be affordable for the majority of the 'middle classes'. Rezoning the site to "R(A)" would be inappropriate given the predominantly low to medium density character of the local area. "R(A)" is unsuitable for this area which is predominantly zoned "G/IC" and even in other parts of Kowloon Tong where typical residential is restricted	A. Noted and see points B, C and D in Annex VIb.

Comment No.	Reason	PlanD's Response
	under the "Residential (Group C)" ("R(C)") zone. The "R(B)" zoning of the Site is out-of-character and incompatible with the immediate area and results in a piecemeal and illogical zoning pattern. The development of private residential housing directly adjacent to over 3,500 student hostel spaces is considered an inappropriate use of land and a cause for potential noise and nuisance complaints from future residents due to the land use conflict. ii. A recent survey found that there was significant support (81% of interviewees) for the establishment of a CMTH in Hong Kong to train local practitioners. 36.6% stated that they felt it was necessary for the CMTH to be located near the University campus. HKBU is requesting the Site so as to develop a self-financed, public university operated, non-profit making CMTH. The CMTH will provide internship places for the three CM Schools in Hong Kong and will undertake clinical research in CM and inter-disciplinary research in Chinese and Western medicine. The CMTH will offer affordable treatment to the local community. The TST District Kai Fong Welfare Association site was no longer feasible for a CMTH. The Site being convenient and close to existing Chinese medicine facilities is the most suitable location for a CMTH. The School of Chinese Medicine of HKBU, already provides a CM Clinic for the community, therefore the proposed cooperation with the Hong Kong Baptist Hospital is not necessary. iii. HKBU need the Site, see point C in AnnexVIb iv. Points stated in R3 and R6 are related to land (not planning) considerations. The benefits of education will influence the generation to come, whereas the land sale will result in a one-off revenue benefit. v. R1's view on the quality of local tertiary education is not a planning consideration. vi. R2's view that HKBU's land use is subject to Government Property Agency's consideration fails to appreciate land use is a consideration of the TPB. B. Providing analysis of the representations that object to Item A.	B. Noted.
C5	A. HKBU should be offered the land for the future development of education instead of using it for building another block of luxurious flats. This relatively small site is surrounded on three sides by HKBU campus. There is no additional unoccupied spaces in	A. See point C in Annex VIb.

Comment No.	Reason	PlanD's Response
	the vicinity of HKBU for the expansion and future development for higher education. City University of Hong Kong, enjoys rather large outlay of land both in Yau Yat Chuen and Beacon Hill. I want to highlight to the TPB the importance of wise land allotment for the community. We must decide to place young people's future above developers' padded pockets. B. Attached a list with the names of 175 people supporting the commenter.	B. Noted.
C6	A. Does not indicate which representations the comment is related to. B. Object to Item A. C. Retain the Site as "G/IC(9)".	See point P1 in Annex VIb
C7	A. Does not indicate which representations the comment is related to. B. Support to use the Site for educational development and oppose to use the education site for building luxury apartments.	See point B in Annex VIb
C8	A. Same as C15 below. B. Comment on R1: R1's logic is absurd. If an education institution is not to the standard, we need to improve it rather than demolishing it. HK's future is in education that we must by all means help to improve, rather to destruct! C. Comment on R3: not agree with R3. First, this piece of land would not help to ease the shortage of residence in HK. Building a teaching hospital or maintaining the land for educational use, in contrast, will benefit whole HK society. HKSAR government is for HK people, not the other way round! So is the government income!	See C15
C9	Comment on R1 to R7 A. A number of the representations voiced their dissatisfaction with either HKBU or the Hong Kong tertiary system as a whole, or both. None of these are relevant to the land use and town planning process. B. Some representations mentioned the current need for housing as their reason for supporting the subject matter. This rezoning does not help towards providing more affordable housing for the everyday Hong Kong people. Hong Kong education institutions are also gravely lacking education land. Thus, the Site should be	A. Noted B. See point F in Annex VIb.

Comment No.	Reason	PlanD's Response
	retained for education use and not be rezoned for residential building.	
C10	A. Support those representations that object to Item A. Reasons are: The public opinions are loud and clear, and the oppositions expressed by them are overwhelming. There are well-articulated and validly-based arguments. The supporting representations amount to only 0.03% of the total number of representations. B. The arguments stated in the 7 supporting representations are very weak : - Inappropriateness for the Site to be granted to HKBU is not a reason at all for supporting the Site to be rezoned from "G/IC" to residential use; - Rezoning of the Site would bring in additional government revenue is neither a solid reason in the context of town planning nor addressing the planning merits. The revenue would be insignificant. - The argument that rezoning of the Site may alleviate housing problem is in lack of a vision for a large picture, in that there would only be a small number of luxurious residential apartments which could not help alleviate the general housing problem and not be used for helping the "upgrading market".	Noted. See Annex VIb
C11	- Same as C15. - Additional comment: The Hong Kong society has a need for Chinese medicine. Chinese medicine students need to go to Mainland frequently to practice. This needs to be improved.	See C15 See point D in Annex VIb
C12	Providing comments on representation no. R25: A. Mary Rose School concurs with R25 of HKBU. Regarding the part on environmental quality, rezoning of the Site to "R(B)" would have adverse impact on the environment, including : - Traffic flow in the area would be increased. This would increase the risk of traffic accident during student picking up/dropping off from school buses. There would also be higher traffic noise and more vehicle emission causing downgrading of local environmental quality; and - Higher plot ratio would usually be adopted for commercial luxury development and would likely block natural lighting and air ventilation.	Noted. See point F in Annex VIb.

Comment No.	Reason	PlanD's Response
	B. Thus, support retain the Site as "G/IC(9)".	
C13, C14, C55 & C2729 – C2981 (total 256 comments)	Support those representations that object to Item A. (no reason provided)	Noted.
C15, C20 – C54 C56 – C1890	Support those representations that object to Item A and Support retaining the Site as "G/IC(9)". Reasons are: A. Allowing HKBU to undertake integrated and coherent planning of the entire Site for its future development. B. Allowing HKBU to build a CMTH on the Site which would benefit society at large.	See points C, D and P1 in Annex VIb.
C16, C17, C19 C1891 – C2728 (total 841 comments)	Support those representations that object to Item A and Support retaining the Site as "G/IC(9)". Reasons same as A of C15 above.	See C15 above.
C18	Support those representations that object to Item A. Support retaining the Site as "G/IC(9)", planning of the entire Site for its future development which would benefit the society at large.	See point P1 in Annex VIb.

Annex VIII
of TPB Paper No. 9585

Demand for and Planned Provision of Major GIC Facilities and Open Space in Kowloon Tong

Type of Facilities	Hong Kong Planning Standards and Guidelines (HKPSG)	HKPSG Requirement (based on planned population)	Provision		Surplus/ Shortfall (against planned provision)
			Existing Provision	Planned Provision	
Secondary School	1 whole-day classroom for 40 persons aged 12-17	31 classrooms	439	445	+414 classrooms
Primary School	1 whole-day classroom for 25.5 persons aged 6-11	44 classrooms	469	469	+424 classrooms
Kindergarten/ Nursery	26 classrooms for 1,000 children ages 3 to 6	13 classrooms	353	353	+339 classrooms
District Police Station	1 per 200,000 to 500,000 persons	0	0	0	0
Divisional Police Station	1 per 100,000 to 200,000 persons	0	0	0	0
Clinic/ Health Centre	1 per 100,000 persons	0	1	1	+1
Post Office[#]	1 per 30,000 persons	1	0	0	-1
Magistracy (with 8 courtrooms)	1 per 660,000 persons	0	0	0	0
Integrated Children and Youth Services Centre	1 for 12,000 persons aged 6-24	0	0	0	0
Integrated Family Services Centre	1 for 100,000 to 150,000 persons	0	0	0	0
Library	1 district library for every 200,000 persons	0	0	0	0
Sport Centre	1 per 50,000 to 65,000 persons	0	0	0	0

Type of Facilities	Hong Kong Planning Standards and Guidelines (HKPSG)	HKPSG Requirement (based on planned population)	Provision		Surplus/ Shortfall (against planned provision)
			Existing Provision	Planned Provision	
Leisure Centre* (Urban and New Town Area, alternative to Sports Centre)	1 per 50,000 persons	1	0	0	-1*
Sports Ground/ Sport Complex	1 per 200,000 to 250,000 persons	0	1	1	+1
Swimming Pool Complex - standard	1 complex per 287,000 persons	0	1	1	+1
District Open Space	10 ha per 100,000 persons	2.82ha	19.57	19.57	+16.75ha
Local Open Space	10 ha per 100,000 persons	2.82ha	6.62	8.72	+5.9ha

Note:

(1) Based on latest projection, the planned population for the area is 29,150.

(2) Some facilities are assessed on a wider district basis by the relevant departments, e.g. secondary school, primary school, sports ground.

As Post Office could be incorporated into a non-domestic building or the non-domestic part of a commercial/residential building, it was considered not necessary to reserve the whole Site for standalone development of a post office.

* Leisure centre is provided only as an alternative to Sports Centre. There is 8 Sports Centre in the Kowloon City district which already satisfy the demand of the whole district (i.e. 7.05 Sports Centre) including Kowloon Tong area. Provision of leisure centre as an alternative is not required.

Proposed Amendment to the Notes of the draft Kowloon Tong Outline Zoning Plan No. S/K18/18

Annex IX of TPB Paper No. 9585

The Notes for "R(B)" zone is proposed to be deleted

~~RESIDENTIAL (GROUP B)~~

~~Column 1~~ ~~Uses always permitted~~	~~Column 2~~ ~~Uses that may be permitted with or without conditions on application to the Town Planning Board~~
~~Flat~~ ~~House~~ ~~Residential Institution~~ ~~Utility Installation for Private Project~~	~~Eating Place~~ ~~Educational Institution~~ ~~Government Use~~ ~~Hotel~~ ~~Institutional Use~~ ~~Library~~ ~~Office~~ ~~Place of Entertainment~~ ~~Place of Recreation, Sports or Culture~~ ~~Public Utility Installation~~ ~~Public Vehicle Park (excluding container vehicle)~~ ~~Recyclable Collection Centre~~ ~~Religious Institution~~ ~~School~~ ~~Shop and Services~~ ~~Social Welfare Facility~~ ~~Training Centre~~

~~Planning Intention~~

~~This zone is intended primarily for medium-density residential developments where commercial uses serving the residential neighbourhood may be permitted on application to the Town Planning Board.~~

~~(Please see next page)~~

RESIDENTIAL (GROUP B) (Cont'd)

Remarks

(1) No new development, or addition, alteration and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum plot ratio of 4.5 and building height of 50m, to be measured from the mean level of Renfrew Road.

(2) In determining the relevant maximum plot ratio for the purposes of paragraph (1) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded.

(3) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio/building height restriction stated in paragraph (1) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

Proposed Amendments to the Explanatory Statement of the draft Kowloon Tong Outline Zoning Plan No. S/K18/18

Paragraphs 6, 7.1, 8.3 and 8.5 of the Explanatory Statement are proposed to be amended:

6. POPULATION

According to the 2011 Census, the population of the Area was about 27,200 persons. If the planned uses on the OZP are developed, the planned population of the Area would be about ~~30,590~~ *29,150* persons.

7. BUILDING HEIGHT RESTRCTIONS IN THE AREA

7.1 In order to provide better planning control on the development intensity and building height upon development/redevelopment and to meet public aspirations for greater certainty and transparency in the statutory planning system, the Kowloon OZPs are subject to revisions to incorporate building height restrictions to guide future development/redevelopment. Some of the high-rise redevelopments erected in the Area in the recent years following the relocation of the airport in Kai Tak and the removal of the relevant airport height restrictions are considered undesirable from the visual point of view, and are also incompatible and out-of-context with the local built environment. In order to prevent excessive tall or out-of-context buildings, and to instigate control on the overall building height profile of the Area, appropriate building height restrictions have been incorporated into the Kowloon Tong OZP for the "Commercial" ("C"), ~~"R(B)",~~ "R(C)", "G/IC" and "OU" annotated "Sports and Recreation Club" and "Petrol Filling Station" zones on the Plan.

8. LAND USE ZONINGS

~~8.3 "Residential (Group B)" ("R(B)") : Total Area 0.88 ha~~

~~8.3.1 This zone is intended primarily for medium-density residential development where commercial uses serving the residential neighbourhood may be permitted on application to the Board.~~

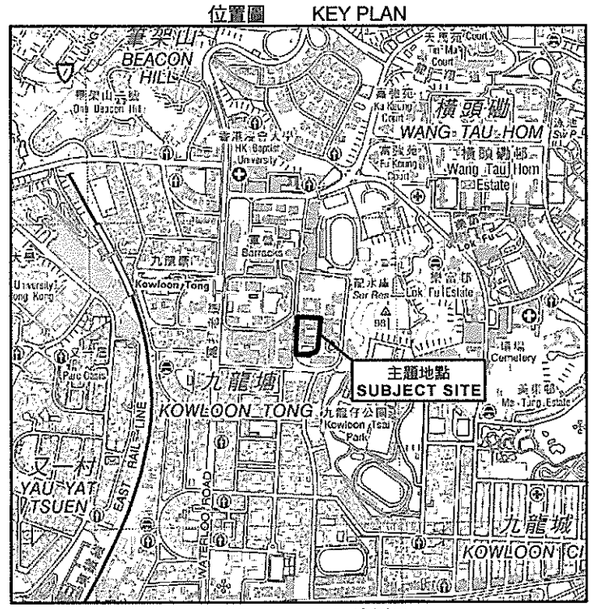
~~8.3.2 A site abutting the Hong Kong Baptist University (HKBU) Baptist University Road campus at Renfrew Road is zoned "R(B)" and subject to a maximum plot ratio of 4.5 and a maximum building height restriction of 50m to be measured from the mean level of Renfrew Road. The building height restriction of 50m is broadly comparable with the adjacent existing buildings of the HKBU within the same street block.~~

~~8.3.3 To provide design/architectural flexibility, minor relaxation of the plot ratio restriction for the zone may be considered by the Board on application under section 16 of the Ordinance taking into account its own merits. Moreover, for development with special design merits, minor relaxation of the building height restriction for the zone may be considered by the Board on application under section 16 of the Ordinance taking into account its own merits and relevant criteria set out in paragraphs 7.3 and 7.4 above.~~

8.~~5~~*4* "Government, Institution or Community" ("G/IC") : Total Area ~~39.59~~ *40.47* ha

[with deletion of paragraph 8.3, paragraphs 8.4 to 8.8 to be renumbered accordingly]

位置圖 KEY PLAN



SCALE 1 : 20 000 比例尺

草圖編號 S/K18/18 的建議修訂
PROPOSED AMENDMENT TO DRAFT PLAN No. S/K18/18

根據城市規劃條例第6C(2)條公布的建議修訂
PROPOSED AMENDMENT PUBLISHED UNDER SECTION 6C(2)
OF THE TOWN PLANNING ORDINANCE

A項 ITEM A

把位於聯禧道的一塊土地，由「住宅（乙類）」地帶改劃為「政府、機構或社區(9)」地帶
REZONING OF A SITE AT RENFREW ROAD FROM "RESIDENTIAL (GROUP B)"
TO "GOVERNMENT, INSTITUTION OR COMMUNITY(9)"

夾附的《註釋》屬這份圖則的一部分，
《註釋》的建議修訂已根據城市規劃條例第6C(2)條公布。
THE ATTACHED NOTES ALSO FORM PART OF THIS PLAN
AND THE PROPOSED AMENDMENT THERETO HAS BEEN PUBLISHED
UNDER SECTION 6C(2) OF THE TOWN PLANNING ORDINANCE

（參看附表）
(SEE ATTACHED SCHEDULE)

九龍塘分區計劃大綱草圖編號 S/K18/18 的建議修訂
PROPOSED AMENDMENT TO DRAFT KOWLOON TONG OUTLINE ZONING PLAN No. S/K18/18

SCALE 1 : 5 000 比例尺

米 METRES 100 0 100 200 300 400 METRES 米

規劃署遵照城市規劃委員會指示擬備
PREPARED BY THE PLANNING DEPARTMENT UNDER
THE DIRECTION OF THE TOWN PLANNING BOARD

圖則編號 PLAN No. R/S/K18/17 - A1