

This document is received on \_\_\_\_\_  
The Town Planning Board will formally acknowledge  
the date of receipt of the application only upon receipt  
of all the required information and documents.

Form No. S16-I  
表格第 S16-I 號

**APPLICATION FOR PERMISSION  
UNDER SECTION 16 OF  
THE TOWN PLANNING ORDINANCE  
(CAP.131)**

根據《城市規劃條例》(第131章)  
第16條遞交的許可申請

**Applicable to proposals not involving or not only involving:**  
適用於建議不涉及或不祇涉及:

- (i) **Construction of "New Territories Exempted House(s)";**  
興建「新界豁免管制屋宇」;
- (ii) **Temporary use/development of land and/or building not exceeding 3 years in rural areas; and**  
位於鄉郊地區土地上及/或建築物內進行為期不超過三年的臨時用途/發展;及
- (iii) **Renewal of permission for temporary use or development in rural areas**  
位於鄉郊地區的臨時用途或發展的許可續期

Applicant who would like to publish the notice of application in local newspapers to meet one of the Town Planning Board's requirements of taking reasonable steps to obtain consent of or give notification to the current land owner, please refer to the following link regarding publishing the notice in the designated newspapers: [https://www.info.gov.hk/tpb/en/plan\\_application/apply.html](https://www.info.gov.hk/tpb/en/plan_application/apply.html)

申請人如欲在本地報章刊登申請通知,以採取城市規劃委員會就取得現行土地擁有人的同意或通知現行土地擁有人所指定的其中一項合理步驟,請瀏覽以下網址有關在指定的報章刊登通知:  
[https://www.info.gov.hk/tpb/tc/plan\\_application/apply.html](https://www.info.gov.hk/tpb/tc/plan_application/apply.html)

**General Note and Annotation for the Form**  
**填寫表格的一般指引及註解**

# "Current land owner" means any person whose name is registered in the Land Registry as that of an owner of the land to which the application relates, as at 6 weeks before the application is made  
「現行土地擁有人」指在提出申請前六星期,其姓名或名稱已在土地註冊處註冊為該申請所關乎的土地的擁有人的人

& Please attach documentary proof 請夾附證明文件

^ Please insert number where appropriate 請在適當地方註明編號

Please fill "NA" for inapplicable item 請在不適用的項目填寫「不適用」

Please use separate sheets if the space provided is insufficient 如所提供的空間不足,請另頁說明

Please insert a 「✓」 at the appropriate box 請在適當的方格內上加上「✓」號

For Official Use Only 請勿填寫此欄	Application No. 申請編號	A/NE-716/702
	Date Received 收到日期	- 4 FEB 2021

- The completed form and supporting documents (if any) should be sent to the Secretary, Town Planning Board (the Board), 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong.  
申請人須把填妥的申請表格及其他支持申請的文件 (倘有), 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(下稱「委員會」)秘書收。
- Please read the "Guidance Notes" carefully before you fill in this form. The document can be downloaded from the Board's website at <http://www.info.gov.hk/tpb/>. It can also be obtained from the Secretariat of the Board at 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).  
請先細閱《申請須知》的資料單張, 然後填寫此表格。該份文件可從委員會的網頁下載 (網址: <http://www.info.gov.hk/tpb/>), 亦可向委員會秘書處 (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 樓及新界沙田上禾輦路 1 號沙田政府合署 14 樓) 索取。
- 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. The processing of the application may be refused if the required information or the required copies are incomplete.  
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。申請人須以打印方式或以正楷填寫表格。如果申請人所提交的資料或文件副本不齊全, 委員會可拒絕處理有關申請。

<b>1. Name of Applicant 申請人姓名/名稱</b>
( <input type="checkbox"/> Mr. 先生 / <input type="checkbox"/> Mrs. 夫人 / <input type="checkbox"/> Miss 小姐 / <input type="checkbox"/> Ms. 女士 / <input type="checkbox"/> Company 公司 / <input checked="" type="checkbox"/> Organisation 機構)
The Lok Sin Tong Benevolent Society, Kowloon 九龍樂善堂

<b>2. Name of Authorised Agent (if applicable) 獲授權代理人姓名/名稱 (如適用)</b>
( <input type="checkbox"/> Mr. 先生 / <input type="checkbox"/> Mrs. 夫人 / <input type="checkbox"/> Miss 小姐 / <input type="checkbox"/> Ms. 女士 / <input checked="" type="checkbox"/> Company 公司 / <input type="checkbox"/> Organisation 機構)
Ove Arup & Partners Hong Kong Limited 奧雅納工程顧問有限公司

<b>3. Application Site 申請地點</b>	
(a) Full address / location / demarcation district and lot number (if applicable) 詳細地址/地點/丈量約份及地段號碼 (如適用)	Lot Nos. 252 S.A, 252 S.A ss.1, 252 S.B, 253, 256 (Part), 257 (Part), 259 (Part), 260 (Part), 261 (Part), 274 (Part), 275 S.A, 275 S.B, 275 S.C, 276 S.A ss.1, 276 S.B ss.1, 278 RP, 279 S.B, 280 S.A RP, 280 S.B ss.1 RP, 280 S.B RP and 538 (Part) in D.D. 26 and Adjoining Government Land, Wong Yue Tan, Tai Po
(b) Site area and/or gross floor area involved 涉及的地盤面積及/或總樓面面積	<input checked="" type="checkbox"/> Site area 地盤面積 14,517 sq.m 平方米 <input checked="" type="checkbox"/> About 約 <input checked="" type="checkbox"/> Gross floor area 總樓面面積 21,675 sq.m 平方米 <input checked="" type="checkbox"/> About 約
(c) Area of Government land included (if any) 所包括的政府土地面積 (倘有)	730 sq.m 平方米 <input checked="" type="checkbox"/> About 約

(d) Name and number of the related statutory plan(s) 有關法定圖則的名稱及編號	Approved Ting Kok Outline Zoning Plan No. S/NE-TK/19
(e) Land use zone(s) involved 涉及的土地用途地帶	"Green Belt" and "Village Type Development"
(f) Current use(s) 現時用途	Vacant land with parts previously operated by a plant nursery  (If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)

#### 4. "Current Land Owner" of Application Site 申請地點的「現行土地擁有人」

The applicant 申請人 -

- ☐ is the sole "current land owner"<sup>#&</sup> (please proceed to Part 6 and attach documentary proof of ownership).  
是唯一的「現行土地擁有人」<sup>#&</sup> (請繼續填寫第 6 部分，並夾附業權證明文件)。
- ☐ is one of the "current land owners"<sup>#&</sup> (please attach documentary proof of ownership).  
是其中一名「現行土地擁有人」<sup>#&</sup> (請夾附業權證明文件)。
- ☒ is not a "current land owner"<sup>#</sup>.  
並不是「現行土地擁有人」<sup>#</sup>。

- ☐ The application site is entirely on Government land (please proceed to Part 6).  
申請地點完全位於政府土地上 (請繼續填寫第 6 部分)。

#### 5. Statement on Owner's Consent/Notification

就土地擁有人的同意/通知土地擁有人的陳述

- (a) According to the record(s) of the Land Registry as at 27/01/2021 (DD/MM/YYYY), this application involves a total of 2 "current land owner(s)"<sup>#</sup>.  
根據土地註冊處截至 2021 年 1 月 27 日的記錄，這宗申請共牽涉 2 名「現行土地擁有人」<sup>#</sup>。

(b) The applicant 申請人 -

- ☒ has obtained consent(s) of 2 "current land owner(s)"<sup>#</sup>.  
已取得 2 名「現行土地擁有人」<sup>#</sup>的同意。

Details of consent of "current land owner(s)" <sup>#</sup> obtained 取得「現行土地擁有人」 <sup>#</sup> 同意的詳情		
No. of 'Current Land Owner(s)' 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where consent(s) has/have been obtained 根據土地註冊處記錄已獲得同意的地段號碼/處所地址	Date of consent obtained (DD/MM/YYYY) 取得同意的日期 (日/月/年)
1	Lot Nos. 253, 256, 257, 260, 261, 274, 275 S.A, 275 S.B, 275 S.C, 276 S.A ss.1, 276 S.B ss.1, 278 RP, 279 S.B, 280 S.A RP, 280 S.B ss.1 RP, 280 S.B RP and 538, in D.D. 26	19 January 2021
1	Lot Nos. 252 S.A, 252 S.A ss.1, 252 S.B and 259 in D.D. 26	19 January 2021

(Please use separate sheets if the space of any box above is insufficient. 如上列任何方格的空間不足，請另頁說明)

- ☐ has notified ..... "current land owner(s)"<sup>#</sup>  
已通知 ..... 名「現行土地擁有人」<sup>#</sup>。

Details of the "current land owner(s)" <sup>#</sup> notified 已獲通知「現行土地擁有人」 <sup>#</sup> 的詳細資料		
No. of 'Current Land Owner(s)' 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where notification(s) has/have been given 根據土地註冊處記錄已發出通知的地段號碼／處所地址	Date of notification given (DD/MM/YYYY) 通知日期(日/月/年)

(Please use separate sheets if the space of any box above is insufficient. 如上列任何方格的空間不足，請另頁說明)

- ☐ has taken reasonable steps to obtain consent of or give notification to owner(s):  
已採取合理步驟以取得土地擁有人的同意或向該人發給通知。詳情如下：

Reasonable Steps to Obtain Consent of Owner(s) 取得土地擁有人的同意所採取的合理步驟

- ☐ sent request for consent to the "current land owner(s)" on ..... (DD/MM/YYYY)<sup>#&</sup>  
於 ..... (日/月/年)向每一名「現行土地擁有人」<sup>#</sup>郵遞要求同意書<sup>&</sup>

Reasonable Steps to Give Notification to Owner(s) 向土地擁有人發出通知所採取的合理步驟

- ☐ published notices in local newspapers on ..... (DD/MM/YYYY)<sup>&</sup>  
於 ..... (日/月/年)在指定報章就申請刊登一次通知<sup>&</sup>
- ☐ posted notice in a prominent position on or near application site/premises on ..... (DD/MM/YYYY)<sup>&</sup>  
於 ..... (日/月/年)在申請地點／申請處所或附近的顯明位置貼出關於該申請的通知<sup>&</sup>
- ☐ sent notice to relevant owners' corporation(s)/owners' committee(s)/mutual aid committee(s)/management office(s) or rural committee on ..... (DD/MM/YYYY)<sup>&</sup>  
於 ..... (日/月/年)把通知寄往相關的業主立案法團／業主委員會／互助委員會或管理處，或有關的鄉事委員會<sup>&</sup>

Others 其他

- ☐ others (please specify)  
其他（請指明）

Note: May insert more than one 「✓」.

Information should be provided on the basis of each and every lot (if applicable) and premises (if any) in respect of the application.

註：可在多於一個方格內加上「✓」號

申請人須就申請涉及的每一地段（倘適用）及處所（倘有）分別提供資料



## 6. Type(s) of Application 申請類別

- ☐ Type (i) Change of use within existing building or part thereof  
第(i)類 更改現有建築物或其部分內的用途
- ☒ Type (ii) ~~Diversion of stream~~ / excavation of land / filling of land / ~~filling of pond~~ as required under Notes of Statutory Plan(s)  
第(ii)類 根據法定圖則《註釋》內所要求的河道改道／挖土／填土／填塘工程
- ☐ Type (iii) Public utility installation / Utility installation for private project  
第(iii)類 公用事業設施裝置/私人發展計劃的公用設施裝置
- ☐ Type (iv) Minor relaxation of stated development restriction(s) as provided under Notes of Statutory Plan(s)  
第(iv)類 略為放寬於法定圖則《註釋》內列明的發展限制
- ☒ Type (v) Use / development other than (i) to (iii) above  
第(v)類 上述的(i)至(iii)項以外的用途／發展

Note 1: May insert more than one 「✓」.

註 1：可在多於一個方格內加上「✓」號

Note 2: For Development involving columbarium use, please complete the table in the Appendix.

註 2：如發展涉及靈灰安置用途，請填妥於附件的表格。

**(i) For Type (i) application 供第(i)類申請**

(a) Total floor area involved 涉及的總樓面面積	sq.m 平方米		
(b) Proposed use(s)/development 擬議用途/發展	(If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)		
(c) Number of storeys involved 涉及層數	Number of units involved 涉及單位數目		
(d) Proposed floor area 擬議樓面面積	Domestic part 住用部分 .....		sq.m 平方米 □About 約
	Non-domestic part 非住用部分 .....		sq.m 平方米 □About 約
	Total 總計 .....		sq.m 平方米 □About 約
(e) Proposed uses of different floors (if applicable) 不同樓層的擬議用途(如適用) (Please use separate sheets if the space provided is insufficient) (如所提供的空間不足，請另頁說明)	Floor(s) 樓層	Current use(s) 現時用途	Proposed use(s) 擬議用途

**(ii) For Type (ii) application 供第(ii)類申請**

(a) Operation involved 涉及工程	<input type="checkbox"/> Diversion of stream 河道改道				
	<input type="checkbox"/> Filling of pond 填塘				
	Area of filling 填塘面積 .....	sq.m 平方米	<input type="checkbox"/> About 約		
	Depth of filling 填塘深度 .....	m 米	<input type="checkbox"/> About 約		
	<input type="checkbox"/> Filling of land 填土				
	Area of filling 填土面積 .....	sq.m 平方米	<input type="checkbox"/> About 約		
	Depth of filling 填土厚度 .....	m 米	<input type="checkbox"/> About 約		
	<input type="checkbox"/> Excavation of land 挖土 Area of excavation 挖土面積 .....			sq.m 平方米	<input type="checkbox"/> About 約
	Depth of excavation 挖土深度 .....			m 米	<input type="checkbox"/> About 約
(Please indicate on site plan the boundary of concerned land/pond(s) and particulars of stream diversion, the extent of filling of land/pond(s) and/or excavation of land) (請用圖則顯示有關土地/池塘界線, 以及河道改道、填塘、填土及/或挖土的細節及/或範圍))					
(b) Intended use/development 有意進行的用途/發展					

**(iii) For Type (iii) application 供第(iii)類申請**

(a) Nature and scale 性質及規模	<input type="checkbox"/> Public utility installation 公用事業設施裝置 <input type="checkbox"/> Utility installation for private project 私人發展計劃的公用設施裝置 Please specify the type and number of utility to be provided as well as the dimensions of each building/structure, where appropriate 請註明有關裝置的性質及數量, 包括每座建築物/構築物(倘有)的長度、高度和闊度		
	Name/type of installation 裝置名稱/種類	Number of provision 數量	Dimension of each installation /building/structure (m) (LxWxH) 每個裝置/建築物/構築物的尺寸 (米)(長 x 闊 x 高)
(Please illustrate on plan the layout of the installation 請用圖則顯示裝置的布局)			

**(iv) For Type (iv) application 供第(iv)類申請**

- (a) Please specify the proposed minor relaxation of stated development restriction(s) and also fill in the proposed use/development and development particulars in part (v) below –  
請列明擬議略為放寬的發展限制並填妥於第(v)部分的擬議用途/發展及發展細節

- ☐ Plot ratio restriction 地積比率限制 From 由 ..... to 至 .....
- ☐ Gross floor area restriction 總樓面面積限制 From 由 .....sq. m 平方米 to 至 .....sq. m 平方米
- ☐ Site coverage restriction 上蓋面積限制 From 由 .....% to 至 .....
- ☐ Building height restriction 建築物高度限制  
From 由 .....m 米 to 至 ..... m 米  
From 由 ..... mPD 米 (主水平基準上) to 至 .....mPD 米 (主水平基準上)  
From 由 ..... storeys 層 to 至 ..... storeys 層
- ☐ Non-building area restriction 非建築用地限制 From 由 .....m to 至 .....
- ☐ Others (please specify) 其他 (請註明) .....

**(v) For Type (v) application 供第(v)類申請**

(a) Proposed use(s)/development  
擬議用途/發展

Proposed Temporary Residential Institution (Transitional Housing)  
with Filling and Excavation of Land for a Period of 5 Years

(Please illustrate the details of the proposal on a layout plan 請用平面圖說明建議詳情)

**(b) Development Schedule 發展細節表**

Proposed gross floor area (GFA) 擬議總樓面面積	21,675	..... sq.m 平方米	<input checked="" type="checkbox"/> About 約
Proposed plot ratio 擬議地積比率	1.493	.....	<input checked="" type="checkbox"/> About 約
Proposed site coverage 擬議上蓋面積	Not more than 66.6 %	.....	<input type="checkbox"/> About 約
Proposed no. of blocks 擬議座數	13 (including 11 domestic blocks and 2 non-domestic blocks for ancillary commercial/communal uses, but exclude E/M blocks)		
Proposed no. of storeys of each block 每座建築物的擬議層數	Domestic Blocks: not more than 不多於 4 storeys 層 Non-Domestic Blocks: not more than 不多於 1 storey 層		
	<input type="checkbox"/> include 包括 NA storeys of basements 層地庫		
	<input type="checkbox"/> exclude 不包括 NA storeys of basements 層地庫		
Proposed building height of each block 每座建築物的擬議高度	Domestic Blocks: not more than 不多於 20mPD 米 (主水平基準上) Non-Domestic Blocks: not more than 不多於 10.6mPD 米 (主水平基準上)		
	Domestic Blocks: not more than 不多於 13.5m 米 Non-Domestic Blocks: not more than 不多於 4.5m 米		

☒ Domestic part 住用部分

GFA 總樓面面積

21,551 ..... sq. m 平方米

☒ About 約

number of Units 單位數目

About 1,236.....

average unit size 單位平均面積

17.5 ..... sq. m 平方米

☒ About 約

estimated number of residents 估計住客數目

About 1,962.....

☒ Non-domestic part 非住用部分

GFA 總樓面面積

☐ eating place 食肆

..... sq. m 平方米

☐ About 約☐ hotel 酒店

..... sq. m 平方米

☐ About 約

(please specify the number of rooms

請註明房間數目) .....

☐ office 辦公室

..... sq. m 平方米

☐ About 約☐ shop and services 商店及服務行業

..... sq. m 平方米

☐ About 約☐ Government, institution or community facilities

(please specify the use(s) and concerned land area(s)/GFA(s) 請註明用途及有關的地面面積／總樓面面積)

政府、機構或社區設施

.....  
.....  
.....☒ other(s) 其他

(please specify the use(s) and concerned land area(s)/GFA(s) 請註明用途及有關的地面面積／總樓面面積)

Ancillary commercial/communal uses to domestic use: about 124 sq.m.

.....  
.....☒ Open space 休憩用地

(please specify land area(s) 請註明地面面積)

☒ private open space 私人休憩用地

1,962 ..... sq. m 平方米

☒ Not less than 不少於☐ public open space 公眾休憩用地

..... sq. m 平方米

☐ Not less than 不少於

## (c) Use(s) of different floors (if applicable) 各樓層的用途 (如適用)

[Block number] [座數]	[Floor(s)] [層數]	[Proposed use(s)] [擬議用途]
.....	.....	.....
.....	.....	.....
.....	.....	.....
.....	.....	.....
.....	.....	.....

## (d) Proposed use(s) of uncovered area (if any) 露天地方 (倘有) 的擬議用途

Local Landscaped Area, Internal Roads and Emergency Vehicular Access.

.....  
.....  
.....  
.....

7. Anticipated Completion Time of the Development Proposal  
擬議發展計劃的預計完成時間

Anticipated completion time (in month and year) of the development proposal (by phase (if any)) (e.g. June 2023)  
 擬議發展計劃預期完成的年份及月份 (分期 (倘有)) (例: 2023 年 6 月)  
 (Separate anticipated completion times (in month and year) should be provided for the proposed public open space and Government, institution or community facilities (if any))  
 (申請人須就擬議的公眾休憩用地及政府、機構或社區設施 (倘有) 提供個別擬議完成的年份及月份)

End of year 2022.

8. Vehicular Access Arrangement of the Development Proposal  
擬議發展計劃的行車通道安排

<p>Any vehicular access to the site/subject building?</p> <p>是否有車路通往地盤／有關建築物？</p>	<p>Yes 是</p> <p>No 否</p>	<p><input type="checkbox"/> There is an existing access. (please indicate the street name, where appropriate) 有一條現有車路。(請註明車路名稱(如適用))</p> <p>.....</p> <p><input checked="" type="checkbox"/> There is a proposed access. (please illustrate on plan and specify the width) 有一條擬議車路。(請在圖則顯示，並註明車路的闊度) (Please refer to the Supporting Planning Statement for more details)</p>
<p>Any provision of parking space for the proposed use(s)?</p> <p>是否有為擬議用途提供停車位？</p>	<p>Yes 是</p> <p>No 否</p>	<p><input type="checkbox"/> (Please specify type(s) and number(s) and illustrate on plan) 請註明種類及數目並於圖則上顯示</p> <p>Private Car Parking Spaces 私家車車位 _____</p> <p>Motorcycle Parking Spaces 電單車車位 _____</p> <p>Light Goods Vehicle Parking Spaces 輕型貨車泊車位 _____</p> <p>Medium Goods Vehicle Parking Spaces 中型貨車泊車位 _____</p> <p>Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 _____</p> <p>Others (Please Specify) 其他 (請列明) _____</p> <p>_____</p> <p>_____</p> <p><input checked="" type="checkbox"/> (Please specify type(s) and number(s) and illustrate on plan) 請註明種類及數目並於圖則上顯示</p> <p>Taxi Spaces 的士車位 _____ NA</p> <p>Coach Spaces 旅遊巴車位 _____ NA</p> <p>Light Goods Vehicle Spaces 輕型貨車車位 _____ 2</p> <p>Medium Goods Vehicle Spaces 中型貨車車位 _____ NA</p> <p>Heavy Goods Vehicle Spaces 重型貨車車位 _____ NA</p> <p>Others (Please Specify) 其他 (請列明) _____ NA</p> <p><u>Medium/Heavy Goods Vehicle Space</u> _____ 1</p> <p>_____</p>
<p>Any provision of loading/unloading space for the proposed use(s)?</p> <p>是否有為擬議用途提供上落客貨車位？</p>	<p>Yes 是</p> <p>No 否</p>	<p><input checked="" type="checkbox"/> (Please specify type(s) and number(s) and illustrate on plan) 請註明種類及數目並於圖則上顯示</p> <p>Taxi Spaces 的士車位 _____ NA</p> <p>Coach Spaces 旅遊巴車位 _____ NA</p> <p>Light Goods Vehicle Spaces 輕型貨車車位 _____ 2</p> <p>Medium Goods Vehicle Spaces 中型貨車車位 _____ NA</p> <p>Heavy Goods Vehicle Spaces 重型貨車車位 _____ NA</p> <p>Others (Please Specify) 其他 (請列明) _____ NA</p> <p><u>Medium/Heavy Goods Vehicle Space</u> _____ 1</p> <p>_____</p> <p><input type="checkbox"/></p>



## 9. Impacts of Development Proposal 擬議發展計劃的影響

If necessary, please use separate sheets to indicate the proposed measures to minimise possible adverse impacts or give justifications/reasons for not providing such measures.

如需要的话，請另頁表示可盡量減少可能出現不良影響的措施，否則請提供理據/理由。

Does the development proposal involve alteration of existing building? 擬議發展計劃是否包括現有建築物的改動?	Yes 是  No 否	<input type="checkbox"/> Please provide details 請提供詳情 ..... ..... ..... ..... ..... <input checked="" type="checkbox"/>
Does the development proposal involve the operation on the right? 擬議發展是否涉及右列的工程? (Note: where Type (ii) application is the subject of application, please skip this section. 註：如申請涉及第(ii)類申請，請跳至下一條問題。)	Yes 是  No 否	<input checked="" type="checkbox"/> (Please indicate on site plan the boundary of concerned land/pond(s), and particulars of stream diversion, the extent of filling of land/pond(s) and/or excavation of land) (Attachment 1 refers) (請用地盤平面圖顯示有關土地、池塘界線，以及河道改道、填塘、填土及／或挖土的細節及／或範圍)  <input type="checkbox"/> Diversion of stream 河道改道  <input type="checkbox"/> Filling of pond 填塘 Area of filling 填塘面積 ..... sq.m 平方米 <input type="checkbox"/> About 約 Depth of filling 填塘深度 ..... m 米 <input type="checkbox"/> About 約  <input checked="" type="checkbox"/> Filling of land 填土 Area of filling 填土面積 ..... 1,200 ..... sq.m 平方米 <input checked="" type="checkbox"/> About 約 Depth of filling 填土厚度 ..... 1-3 ..... m 米 <input checked="" type="checkbox"/> About 約  <input checked="" type="checkbox"/> Excavation of land 挖土 Area of excavation 挖土面積 ..... 13,400 ..... sq.m 平方米 <input checked="" type="checkbox"/> About 約 Depth of excavation 挖土深度 ..... 3-7 ..... m 米 <input checked="" type="checkbox"/> About 約  <input type="checkbox"/>
Would the development proposal cause any adverse impacts? 擬議發展計劃會否造成不良影響？		On environment 對環境 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> On traffic 對交通 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> On water supply 對供水 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> On drainage 對排水 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> On slopes 對斜坡 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> Affected by slopes 受斜坡影響 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> Landscape Impact 構成景觀影響 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> Tree Felling 砍伐樹木 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> Visual Impact 構成視覺影響 Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/> Others (Please Specify) 其他 (請列明) Yes 會 <input type="checkbox"/> No 不會 <input checked="" type="checkbox"/>  Please state measure(s) to minimise the impact(s). For tree felling, please state the number, diameter at breast height and species of the affected trees (if possible) 請註明盡量減少影響的措施。如涉及砍伐樹木，請說明受影響樹木的數目、及胸高度的樹幹直徑及品種(倘可) Please refer to the Supporting Planning Statement. ..... ..... ..... ..... .....

**10. Justifications 理由**

The applicant is invited to provide justifications in support of the application. Use separate sheets if necessary.  
現請申請人提供申請理由及支持其申請的資料。如有需要，請另頁說明。


Please refer to the Supporting Planning Statement.

**11. Declaration 聲明**

I hereby declare that the particulars given in this application are correct and true to the best of my knowledge and belief.  
本人謹此聲明，本人就這宗申請提交的資料，據本人所知及所信，均屬真實無誤。

I hereby grant a permission to the Board to copy all the materials submitted in an application to the Board and/or to upload such materials to the Board's website for browsing and downloading by the public free-of-charge at the Board's discretion.  
本人現准許委員會酌情將本人就此申請所提交的所有資料複製及/或上載至委員會網站，供公眾免費瀏覽或下載。

Signature  
簽署

  
.....  
Yeung Wing Shan, Theresa  
.....  
Name in Block Letters  
姓名（請以正楷填寫）

☐ Applicant 申請人 / ☒ Authorised Agent 獲授權代理人

Director of Planning  
.....

Position (if applicable)  
職位（如適用）

Professional Qualification(s)  
專業資格

☐ Member 會員 / ☒ Fellow of 資深會員  
☒ HKIP 香港規劃師學會 / ☐ HKIA 香港建築師學會 /  
☐ HKIS 香港測量師學會 / ☐ HKIE 香港工程師學會 /  
☐ HKILA 香港園境師學會 / ☐ HKIUD 香港城市設計學會

Others 其他 ..... MRTPI, RPP

on behalf of  
代表 Ove Arup & Partners Hong Kong Limited

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

Date 日期

29/01/2021

..... (DD/MM/YYYY 日/月/年)

**Remark 備註**

The materials submitted in an application to the Board and the Board's decision on the application would be disclosed to the public. Such materials would also be uploaded to the Board's website for browsing and free downloading by the public where the Board considers appropriate.

委員會會向公眾披露申請人所遞交的申請資料和委員會對申請所作的決定。在委員會認為合適的情況下，有關申請資料亦會上載至委員會網頁供公眾免費瀏覽及下載。

**Warning 警告**

Any person who knowingly or wilfully makes any statement or furnish any information in connection with this application, which is false in any material particular, shall be liable to an offence under the Crimes Ordinance.

任何人在明知或故意的情況下，就這宗申請提出在任何要項上是虛假的陳述或資料，即屬違反《刑事罪行條例》。

**Statement on Personal Data 個人資料的聲明**

1. The personal data submitted to the Board in this application will be used by the Secretary of the Board and Government departments for the following purposes:

委員會就這宗申請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) the processing of this application which includes making available the name of the applicant for public inspection when making available this application for public inspection; and  
處理這宗申請，包括公布這宗申請供公眾查閱，同時公布申請人的姓名供公眾查閱；以及
- (b) facilitating communication between the applicant and the Secretary of the Board/Government departments.  
方便申請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 applicant in this application may also be disclosed to other persons for the purposes mentioned in paragraph 1 above.

申請人就這宗申請提供的個人資料，或亦會向其他人士披露，以作上述第 1 段提及的用途。

3. An applicant 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，申請人有權查閱及更正其個人資料。如欲查閱及更正個人資料，應向委員會秘書提出有關要求，其地址為香港北角渣華道 333 號北角政府合署 15 樓。

**For Developments involving Columbarium Use, please also complete the following:**  
**如發展涉及靈灰安置所用途，請另外填妥以下資料：**

Ash interment capacity 骨灰安放容量<sup>@</sup>

Maximum number of sets of ashes that may be interred in the niches

在龕位內最多可安放骨灰的數量

Maximum number of sets of ashes that may be interred other than in niches

在非龕位的範圍內最多可安放骨灰的數量

Total number of niches 龕位總數

Total number of single niches

單人龕位總數

Number of single niches (sold and occupied)

單人龕位數目 (已售並佔用)

Number of single niches (sold but unoccupied)

單人龕位數目 (已售但未佔用)

Number of single niches (residual for sale)

單人龕位數目 (待售)

Total number of double niches

雙人龕位總數

Number of double niches (sold and fully occupied)

雙人龕位數目 (已售並全部佔用)

Number of double niches (sold and partially occupied)

雙人龕位數目 (已售並部分佔用)

Number of double niches (sold but unoccupied)

雙人龕位數目 (已售但未佔用)

Number of double niches (residual for sale)

雙人龕位數目 (待售)

Total no. of niches other than single or double niches (please specify type)

除單人及雙人龕位外的其他龕位總數 (請列明類別)

Number of niches (sold and fully occupied)

龕位數目 (已售並全部佔用)

Number of niches (sold and partially occupied)

龕位數目 (已售並部分佔用)

Number of niches (sold but unoccupied)

龕位數目 (已售但未佔用)

Number of niches (residual for sale)

龕位數目 (待售)

Proposed operating hours 擬議營運時間

@ Ash interment capacity in relation to a columbarium means –

就靈灰安置所而言，骨灰安放容量指：

- the maximum number of containers of ashes that may be interred in each niche in the columbarium;  
每個龕位內可安放的骨灰容器的最高數目；
- the maximum number of sets of ashes that may be interred other than in niches in any area in the columbarium; and  
在該靈灰安置所並非龕位的範圍內，總共最多可安放多少份骨灰；以及
- the total number of sets of ashes that may be interred in the columbarium.  
在該靈灰安置所內，總共最多可安放多少份骨灰。

## Gist of Application 申請摘要

(Please provide details in both English and Chinese as far as possible. This part will be circulated to relevant consultees, uploaded to the Town Planning Board's Website for browsing and free downloading by the public and deposited at the Planning Enquiry Counters of the Planning Department for general information.)

(請盡量以英文及中文填寫。此部分將會發送予相關諮詢人士、上載至城市規劃委員會網頁供公眾免費瀏覽及下載及存放於規劃署規劃資料查詢處以供一般參閱。)

Application No. 申請編號	(For Official Use Only) (請勿填寫此欄)		
Location/address 位置/地址	Lot Nos. 252 S.A, 252 S.A ss.1, 252 S.B, 253, 256 (Part), 257 (Part), 259 (Part), 260 (Part), 261 (Part), 274 (Part), 275 S.A, 275 S.B, 275 S.C, 276 S.A ss.1, 276 S.B ss.1, 278 RP, 279 S.B, 280 S.A RP, 280 S.B ss.1 RP, 280 S.B RP and 538 (Part) in D.D. 26 and Adjoining Government Land, Wong Yue Tan, Tai Po 大埔黃魚灘丈量約份第26約地段第252號A分段、第252號A分段第1小分段、第252號B分段、第253號、第256號(部分)、第257號(部分)、第259號(部分)、第260號(部分)、第261號(部分)、第274號(部分)、第275號A分段、第275號B分段、第275號C分段、第276號A分段第1小分段、第276號B分段第1小分段、第278號餘段、第279號B分段、第258號A分段餘段、第280號B分段第1小分段餘段、第280號B分段餘段及第538號(部分)及毗鄰政府土地		
Site area 地盤面積	14,517 sq. m 平方米 <input checked="" type="checkbox"/> About 約 (includes Government land of 包括政府土地 730 sq. m 平方米 <input checked="" type="checkbox"/> About 約)		
Plan 圖則	Approved Ting Kok Outline Zoning Plan No. S/NE-TK/19 汀角分區計劃大綱核准圖編號S/NE-TK/19		
Zoning 地帶	"Green Belt" and "Village Type Development" 「綠化地帶」及「鄉村式發展」		
Applied use/ development 申請用途/發展	Proposed Temporary Residential Institution (Transitional Housing) with Filling and Excavation of Land for a Period of 5 Years 擬議臨時住宿機構(過渡性房屋) 以及填土和挖土工程 (為期5年)		
(i) Gross floor area and/or plot ratio 總樓面面積及/或地積比率		sq.m 平方米	Plot Ratio 地積比率
	Domestic 住用	21,551 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	1.485 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
	Non-domestic 非住用	124* <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	0.008* <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
(ii) No. of block 幢數	Domestic 住用	11	
	Non-domestic 非住用	2 (Excluding E&M plant rooms)	
	Composite 綜合用途		

\*for ancillary commercial/communal uses to domestic use



(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	13.5	m 米 <input checked="" type="checkbox"/> (Not more than 不多於)
		20	mPD 米(主水平基準上) <input checked="" type="checkbox"/> (Not more than 不多於)
		4	Storeys(s) 層 <input checked="" type="checkbox"/> (Not more than 不多於) ( <input type="checkbox"/> Include 包括/ <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
	Non-domestic 非住用	4.5	m 米 <input checked="" type="checkbox"/> (Not more than 不多於)
		10.6	mPD 米(主水平基準上) <input checked="" type="checkbox"/> (Not more than 不多於)
		1	Storeys(s) 層 <input checked="" type="checkbox"/> (Not more than 不多於) ( <input type="checkbox"/> Include 包括/ <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
	Composite 綜合用途		m 米 <input type="checkbox"/> (Not more than 不多於)
			mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)
			Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) ( <input type="checkbox"/> Include 包括/ <input type="checkbox"/> Exclude 不包括 <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
(iv) Site coverage 上蓋面積		Not more than 66.6	% <input type="checkbox"/> About 約
(v) No. of units 單位數目		1,236	
(vi) Open space 休憩用地	Private 私人	1,962	sq.m 平方米 <input checked="" type="checkbox"/> Not less than 不少於
	Public 公眾		sq.m 平方米 <input type="checkbox"/> Not less than 不少於

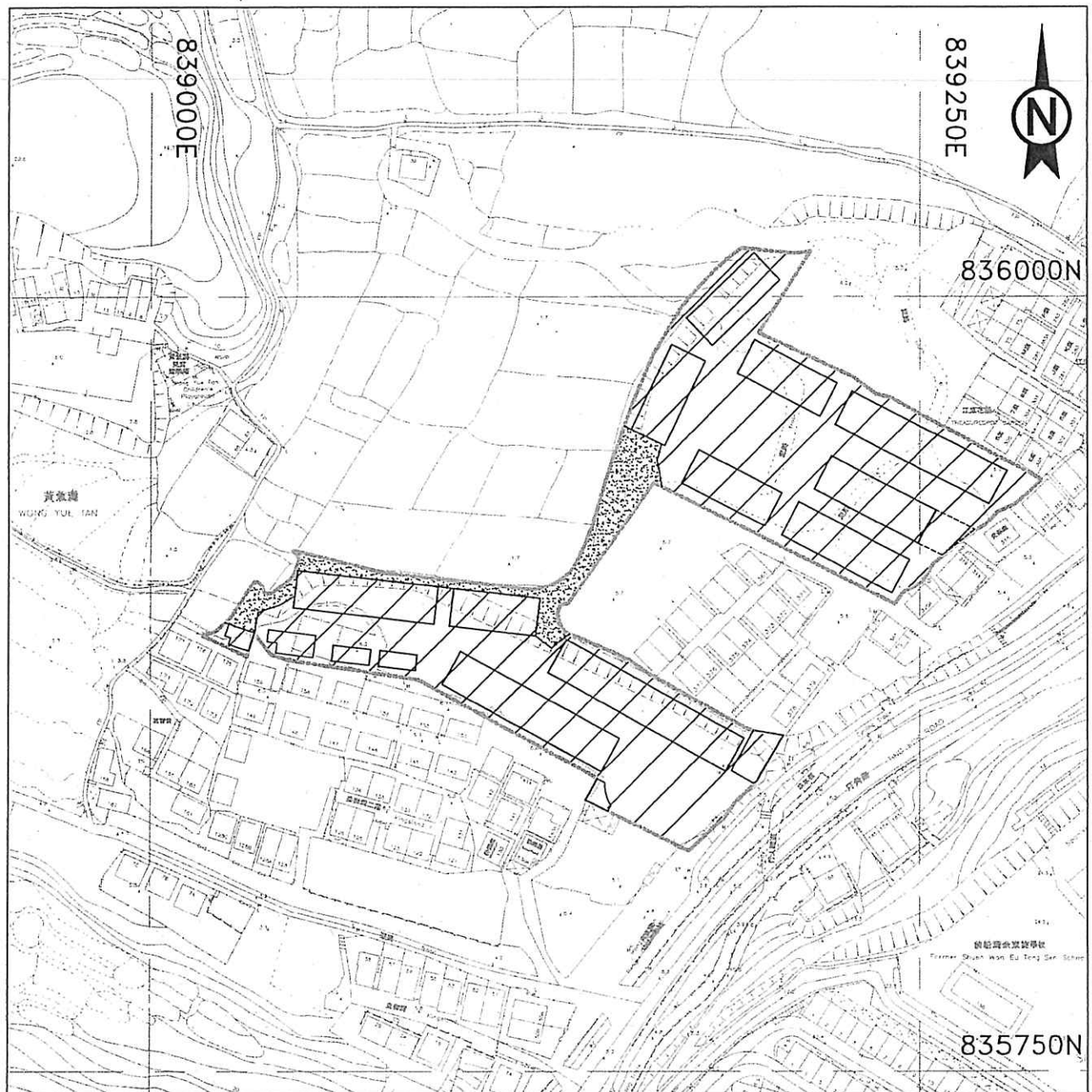
(vii) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數  Private Car Parking Spaces 私家車車位 Motorcycle Parking Spaces 電單車車位 Light Goods Vehicle Parking Spaces 輕型貨車泊車位 Medium Goods Vehicle Parking Spaces 中型貨車泊車位 Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 Others (Please Specify) 其他 (請列明)  _____	NA
	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數  Taxi Spaces 的士車位 Coach Spaces 旅遊巴車位 Light Goods Vehicle Spaces 輕型貨車車位 Medium Goods Vehicle Spaces 中型貨車車位 Heavy Goods Vehicle Spaces 重型貨車車位 Others (Please Specify) 其他 (請列明)  _____	2 Light Goods Vehicle Spaces  1 Medium/Heavy Goods Vehicle Space

### Submitted Plans, Drawings and Documents 提交的圖則、繪圖及文件

	Chinese 中文	English 英文
<b>Plans and Drawings 圖則及繪圖</b>		
Master layout plan(s)/Layout plan(s) 總綱發展藍圖／布局設計圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Block plan(s) 樓宇位置圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Floor plan(s) 樓宇平面圖	<input type="checkbox"/>	<input type="checkbox"/>
Sectional plan(s) 截視圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Elevation(s) 立視圖	<input type="checkbox"/>	<input type="checkbox"/>
Photomontage(s) showing the proposed development 顯示擬議發展的合成照片	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Master landscape plan(s)/Landscape plan(s) 園境設計總圖／園境設計圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Others (please specify) 其他 (請註明)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<hr/>		
<b>Reports 報告書</b>		
Planning Statement/Justifications 規劃綱領/理據	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental assessment (noise, air and/or water pollutions) 環境評估 (噪音、空氣及／或水的污染)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on vehicles) 就車輛的交通影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on pedestrians) 就行人的交通影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Visual impact assessment 視覺影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Landscape impact assessment 景觀影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Tree Survey 樹木調查	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Geotechnical impact assessment 土力影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Drainage impact assessment 排水影響評估 (Included in Environmental Assessment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sewerage impact assessment 排污影響評估 (Included in Environmental Assessment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Risk Assessment 風險評估	<input type="checkbox"/>	<input type="checkbox"/>
Others (please specify) 其他 (請註明)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Landscape Master Plan and Tree Preservation Proposal, Ecological Assessment Report and Water Supply Impact Assessment		
Note: May insert more than one '✓'. 註：可在多於一個方格內加上「✓」號		


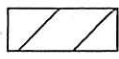

Note: The information in the Gist of Application above is provided by the applicant for easy reference of the general public. Under no circumstances will the Town Planning Board accept any liabilities for the use of the information nor any inaccuracies or discrepancies of the information provided. In case of doubt, reference should always be made to the submission of the applicant.

註：上述申請摘要的資料是由申請人提供以方便市民大眾參考。對於所載資料在使用上的問題及文義上的歧異，城市規劃委員會概不負責。若有任何疑問，應查閱申請人提交的文件。



SITE LOCATION PLAN (1:2000)

LEGEND

-  APPLICATION SITE
-  POTENTIAL EXCAVATION
-  POTENTIAL FILLING

Your ref  
Our ref 276279/01/WSKY/MYNL/KYAC/04245

ARUP

By Email (tpbpd@pland.gov.hk) and By Hand

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

Level 5, Festival Walk  
80 Tat Chee Avenue  
Kowloon Tong  
Kowloon  
Hong Kong  
t +852 2528 3031  
f +852 2779 8428  
d +852 2268 3721  
thersea.yeung@arup.com  
www.arup.com

3 February 2021

Dear Sir/Madam,

**S16 Planning Application for  
Proposed Temporary Residential Institution (Transitional Housing)  
for a Period of 5 Years  
in Various Lots in D.D. 26 and Adjoining Government Land, Wong Yue Tan, Tai Po**

**Submission of Supplementary Information**

We refer to the submission of S.16 Planning Application for the subject development dated 29 January 2021 (Our ref: 276279/01/WSKY/MYNL/KYAC/04232).

In response to the Planning Department (PlanD)'s request for more information on flat mix with flat sizes and details on non-domestic uses, we would like to supplement the following:

1. At this planning stage, the Applicant intends to provide a flat mix of about 1,182 1-to-2-person units with a size of about 14m<sup>2</sup>, 27 3-person units with a size of about 28m<sup>2</sup> and 27 4-person units with a size of about 31m<sup>2</sup> to suit the needs of society. Please note flat mix/flat size are subject to changes at the detailed design. Please refer to the typical floor plan which was included in Appendix A of the S.16 Planning Application submitted on 29 January 2021 for reference.
2. Subject to detail design and funding availability for the Proposed Transitional Housing Development project, the two non-domestic blocks for ancillary commercial/communal use would include small-scale flea market, convenience store, self-service laundry, multi-purpose community room, health corner (including Chinese Medicine service, dental service and oral care education services and self-service health kiosk), after school care centre, integrated social service centre, estate office, communal pantry and shared goods library. Guardhouse/management house will also be set up as part of the ancillary communal facilities, with actual size subject to detailed design.

We would also like to supersede the Master Layout Plan (MLP) included in the S.16 Planning Application made on 29 January 2021 with the updated version enclosed in **Attachment A**. The updated MLP includes a minor adjustment of one (1) Light Goods Vehicle loading/unloading bay to a Medium/Heavy Goods Vehicle loading/unloading bay and minor refinement to the cul-de-sac layout. The associated replacement pages in the Application Form and Traffic Impact Assessment are provided in **Attachment B** and **C** for your consideration. Please be advised that the minor update to the Master Layout Plan will

2021年 2月 4日  
此文件在 收到。城市規劃委員會  
只會在收到所有必要的資料及文件後才正式確認收到  
申請的日期。  
- 4 FEB 2021  
This document is received on  
The Town Planning Board will formally acknowledge  
the date of receipt of the application only upon receipt  
of all the required information and documents.

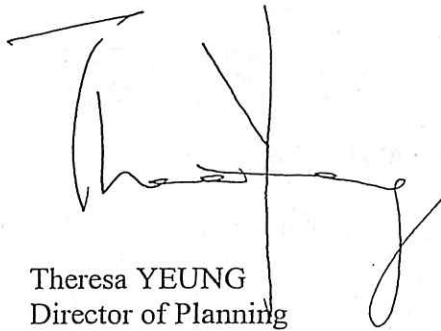


276279/01/WSTY/MYNL/KYAC/04245  
3 February 2021

not affect the findings of the technical assessment submitted in support of the Proposed Transitional Housing Development.

Should you have any queries, please contact the undersigned or our Ms. Aileen CHENG at 2908 4011.

Yours faithfully

A handwritten signature in black ink, appearing to be 'Theresa YEUNG', written over a horizontal line.

Theresa YEUNG  
Director of Planning

Encl. - Attachment A-C  
cc - DPO/STN, PlanD – Mr. Harris Liu (email: [hkcliu@pland.gov.hk](mailto:hkcliu@pland.gov.hk)/ fax: 2691 2806)

## **Attachment A**

### **Updated Master Layout Plan**



## **Attachment B**

Replacement Pages of  
Application Form

## 7. Anticipated Completion Time of the Development Proposal

### 擬議發展計劃的預計完成時間

Anticipated completion time (in month and year) of the development proposal (by phase (if any)) (e.g. June 2023)

擬議發展計劃預期完成的年份及月份 (分期 (倘有)) (例：2023 年 6 月)

(Separate anticipated completion times (in month and year) should be provided for the proposed public open space and Government, institution or community facilities (if any))

(申請人須就擬議的公眾休憩用地及政府、機構或社區設施 (倘有) 提供個別擬議完成的年份及月份)

End of year 2022.

## 8. Vehicular Access Arrangement of the Development Proposal

### 擬議發展計劃的行車通道安排

<p>Any vehicular access to the site/subject building?          是否有車路通往地盤／有關建築物？</p>	<p>Yes 是</p> <p>No 否</p>	<p><input type="checkbox"/> There is an existing access. (please indicate the street name, where appropriate)          有一條現有車路。(請註明車路名稱(如適用))</p> <p>.....</p> <p><input checked="" type="checkbox"/> There is a proposed access. (please illustrate on plan and specify the width)          有一條擬議車路。(請在圖則顯示，並註明車路的闊度)          (Please refer to the Supporting Planning Statement for more details)</p> <p><input type="checkbox"/></p>
<p>Any provision of parking space for the proposed use(s)?          是否有為擬議用途提供停車位？</p>	<p>Yes 是</p> <p>No 否</p>	<p><input type="checkbox"/> (Please specify type(s) and number(s) and illustrate on plan)          請註明種類及數目並於圖則上顯示)</p> <p>Private Car Parking Spaces 私家車車位 _____</p> <p>Motorcycle Parking Spaces 電單車車位 _____</p> <p>Light Goods Vehicle Parking Spaces 輕型貨車泊車位 _____</p> <p>Medium Goods Vehicle Parking Spaces 中型貨車泊車位 _____</p> <p>Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 _____</p> <p>Others (Please Specify) 其他 (請列明) _____</p> <p>_____</p> <p>_____</p> <p><input checked="" type="checkbox"/></p>
<p>Any provision of loading/unloading space for the proposed use(s)?          是否有為擬議用途提供上落客貨車位？</p>	<p>Yes 是</p> <p>No 否</p>	<p><input checked="" type="checkbox"/> (Please specify type(s) and number(s) and illustrate on plan)          請註明種類及數目並於圖則上顯示)</p> <p>Taxi Spaces 的士車位 <u>NA</u></p> <p>Coach Spaces 旅遊巴車位 <u>NA</u></p> <p>Light Goods Vehicle Spaces 輕型貨車車位 <u>2</u></p> <p>Medium Goods Vehicle Spaces 中型貨車車位 <u>NA</u></p> <p>Heavy Goods Vehicle Spaces 重型貨車車位 <u>NA</u></p> <p>Others (Please Specify) 其他 (請列明) <u>NA</u></p> <p><u>Medium/Heavy Goods Vehicle Space</u> <u>1</u></p> <p>_____</p> <p><input type="checkbox"/></p>

(vii) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數  Private Car Parking Spaces 私家車車位 Motorcycle Parking Spaces 電單車車位 Light Goods Vehicle Parking Spaces 輕型貨車泊車位 Medium Goods Vehicle Parking Spaces 中型貨車泊車位 Heavy Goods Vehicle Parking Spaces 重型貨車泊車位 Others (Please Specify) 其他 (請列明) <hr/> <hr/>	NA
	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數  Taxi Spaces 的士車位 Coach Spaces 旅遊巴車位 Light Goods Vehicle Spaces 輕型貨車車位 Medium Goods Vehicle Spaces 中型貨車車位 Heavy Goods Vehicle Spaces 重型貨車車位 Others (Please Specify) 其他 (請列明) <hr/> <hr/>	2 Light Goods Vehicle Spaces   1 Medium/Heavy Goods Vehicle Space

Submitted Plans, Drawings and Documents 提交的圖則、繪圖及文件		
	Chinese 中文	English 英文
<b>Plans and Drawings 圖則及繪圖</b>		
Master layout plan(s)/Layout plan(s) 總綱發展藍圖／布局設計圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Block plan(s) 樓宇位置圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Floor plan(s) 樓宇平面圖	<input type="checkbox"/>	<input type="checkbox"/>
Sectional plan(s) 截視圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Elevation(s) 立視圖	<input type="checkbox"/>	<input type="checkbox"/>
Photomontage(s) showing the proposed development 顯示擬議發展的合成照片	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Master landscape plan(s)/Landscape plan(s) 園境設計總圖／園境設計圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Others (please specify) 其他 (請註明)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<hr/>		
<hr/>		
<b>Reports 報告書</b>		
Planning Statement/Justifications 規劃綱領/理據	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental assessment (noise, air and/or water pollutions) 環境評估 (噪音、空氣及／或水的污染)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on vehicles) 就車輛的交通影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on pedestrians) 就行人的交通影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Visual impact assessment 視覺影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Landscape impact assessment 景觀影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Tree Survey 樹木調查	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Geotechnical impact assessment 土力影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Drainage impact assessment 排水影響評估 (Included in Environmental Assessment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sewerage impact assessment 排污影響評估 (Included in Environmental Assessment)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Risk Assessment 風險評估	<input type="checkbox"/>	<input type="checkbox"/>
Others (please specify) 其他 (請註明)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Landscape Master Plan and Tree Preservation Proposal, Ecological Assessment Report and Water Supply Impact Assessment		

Note: May insert more than one 「✓」. 註：可在多於一個方格內加上「✓」號



## **Attachment C**

### **Replacement Pages of Traffic Impact Assessment**

## 2 PROPOSED DEVELOPMENT

### 2.1 Development Schedule

- 2.1.1 The Master Layout Plan (MLP) of the Application Site is shown in **Figure 2.1**. The indicative development schedule of the Application Site is summarized in **Table 2.1**.

**Table 2.1 Indicative Development Schedule**

Key Development Parameters	Comprehensive Transitional Housing Village Development
Site Area	About 14,517m <sup>2</sup>
Proposed Use	Temporary Residential Institution (Transitional Housing) for a Period of 5 Years
Total GFA	21,675 m <sup>2</sup>
Domestic GFA	21,551 m <sup>2</sup>
Non-Domestic GFA	124 m <sup>2</sup>
No. of Transitional Housing Blocks	11
No. of Units	About 1,236

### 2.2 Development Access

- 2.2.1 As shown in **Figure 2.1**, the vehicular access of the proposed transitional housing development is proposed connecting to the access road of Wong Yue Tan Village and made use of the existing priority junction at Ting Kok Road only. For the pedestrian access, entrance is proposed at Ting Kok Road near the existing subway across Ting Kok Road and a 2m wide footpath will be provided along the eastern kerb of the vehicular access road. The pedestrian route within the site and to the nearby public transport provision are indicated in **Figure 2.1**.
- 2.2.2 A two-way vehicular access road with a cul-de-sac at its northern end will be provided to serve the proposed transitional housing development. EVA will connect to the said cul-de-sac and will be used as a pedestrian way in normal day.

### 2.3 Parking and Servicing Facilities

- 2.3.1 Currently, there is no standard parking/servicing facilities requirement for transitional housing development under the Hong Kong Planning Standards and Guidelines (HKPSG). Therefore, HKPSG's requirements for private housing are referenced (i.e. minimum 1 loading/unloading bay for goods vehicles for every 800 flats). With 1236 units of transitional housing, 2 loading/unloading bays would be required. Taking into consideration (1) the temporary nature of the proposed transitional housing development; (2) the potential tenants of the transitional housing are mainly the people who are waiting for public housing or people who come from inadequately housed households (i.e. low income group); and (3) the loading/unloading bays mainly serve the move-in and move-out of the future tenants, the demand for loading/unloading of goods would not be high. To account for daily operational need, 2 nos. loading/unloading bays (one 7m x 3.5m and one 11m x 3.5m) would be provided for residential use.

- 2.3.2 Furthermore, there are shops and communal space with only 124m<sup>2</sup> GFA. Based on the HKPSG's requirements for retail, 1 no. loading/unloading bay (7m x 3.5m) would be provided for the above ancillary commercial / communal use which shall be sufficient to serve the operation need of the above shops taking into consideration they are small in scale and the amount of goods to be sold is small. Where necessary, the aforementioned HGV loading/unloading bay for the residential portion could be shared-use with the retail portion. The proposed servicing facilities are shown in **Figure 2.1**.
- 2.3.3 Similarly, in view of the temporary nature of the proposed transitional housing development and the income group to be housed, the possibility for the future tenants to own a car is low. As a result, residential car parking space is not proposed within the proposed transitional housing development.

---

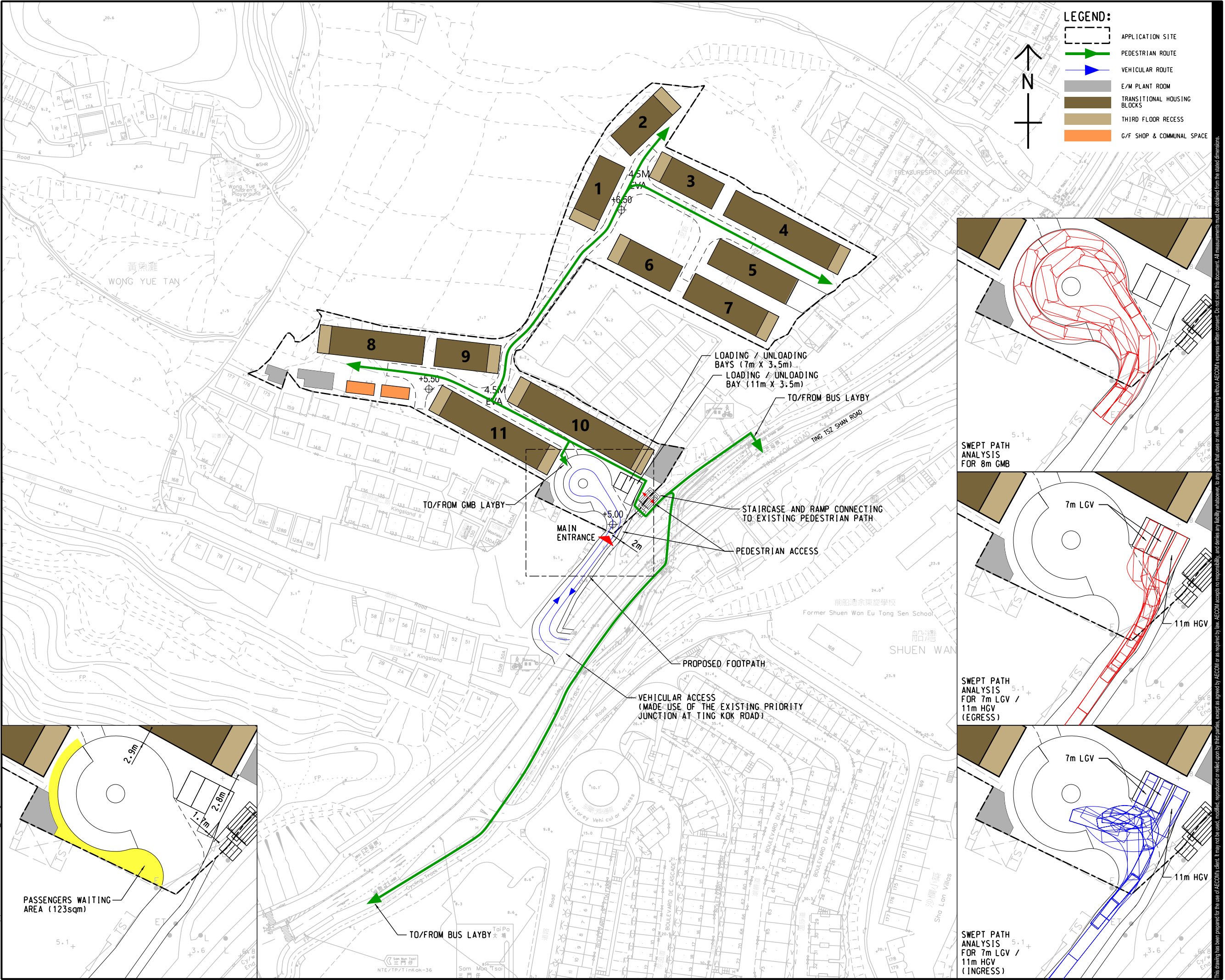
## **7 SUMMARY AND CONCLUSION**

### **7.1 Summary**

- 7.1.1 The S16 Planning Application is submitted to seek approval from the Town Planning Board for proposed temporary residential institution (transitional housing) for a period of 5 years at various lots in D.D. 26 Wong Yue Tan, Tai Po (“the Application Site”). The Application Site is located to the west of Ting Kok Road near Wong Yue Tan Village as shown in **Figure 1.1**. The Application Site is currently formed with some vegetation and has a site area of about 14,517m<sup>2</sup>.
- 7.1.2 The Application Site is within the Green Belt” (“GB”) zone and “Village Type Development” (“V”) zone of the Approved Ting Kok Outline Zoning Plan No. S/NE-TK/19 (“the Ting Kok OZP”). The proposed Comprehensive Transitional Housing Village Development will provide about 1,236 transitional housing units. This Traffic Impact Assessment (TIA) has studied the cumulative impact of the Comprehensive Transitional Housing Village Development and ascertained the technical feasibility of the whole development and impact to the surroundings.
- 7.1.3 The Comprehensive Transitional Housing Village Development will be constructed, operated and managed by the Lok Sin Tong Benevolent Society, Kowloon, in efforts to expedite the delivery of much needed housing supply in the short-term. The Comprehensive Transitional Housing Village Development is anticipated to be completed by year 2022.
- 7.1.4 The vehicular access of the proposed transitional housing development is proposed connecting to the access road of Wong Yue Tan Village and made use of the existing priority junction at Ting Kok Road only. For the pedestrian access, entrance is proposed at Ting Kok Road near the existing subway across Ting Kok Road and a 2m wide footpath will be provided along the eastern kerb of the vehicular access road.
- 7.1.5 To account for daily operational need for both residential and ancillary commercial/communal use, 3 nos. loading/unloading bays (two 7m x 3.5m and one 11m x 3.5m) would be provided within the proposed transitional housing development.
- 7.1.6 A total of 10 critical junctions and 8 road links were identified in the vicinity of the proposed transitional housing development for assessment in this TIA. Junction capacity analysis were carried out for the critical junctions to appraise the existing traffic condition based on the 2019 observed peak hour traffic flows. At present, all critical junctions are operating within capacity.
- 7.1.7 The overall population of the proposed transitional housing development (1,236 transitional housing units) is about 3,585. Reference has been made to the published “*Travel Characteristics Survey (TCS) 2011 Final Report*”. The additional public transport demand in outbound direction in AM peak hour was estimated to be about 709 pax/hr (i.e. 3,585 x 1.83 x 0.12 x 0.9).
- 7.1.8 According to **Table 3.3**, the destination points of the current franchised bus and GMB services are Tai Po Market Station, Tsuen Wan (Nina Tower) and Kwun Tong Ferry. By making reference to the observed passenger boarding behaviour at bus stop at Ting Kok Road westbound near Sum Mun Tsai Road, the additional public transport demand in different destinations was estimated.

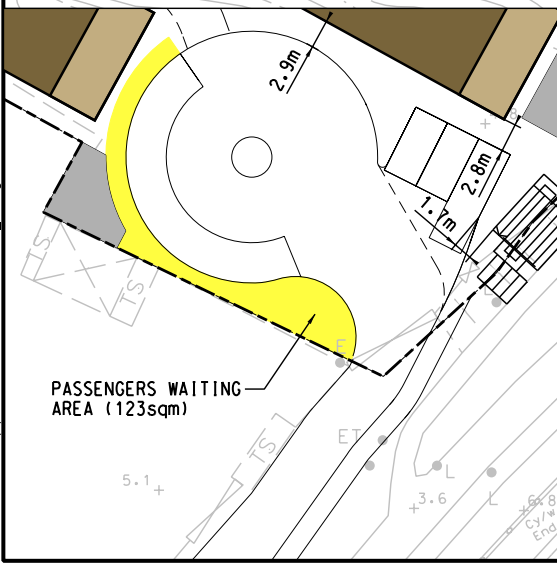
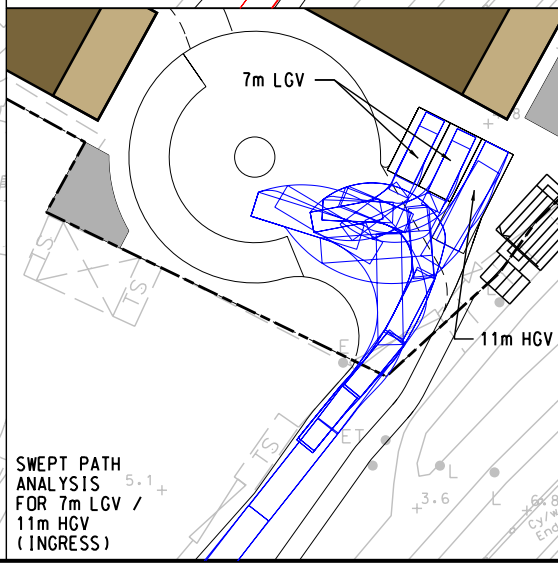
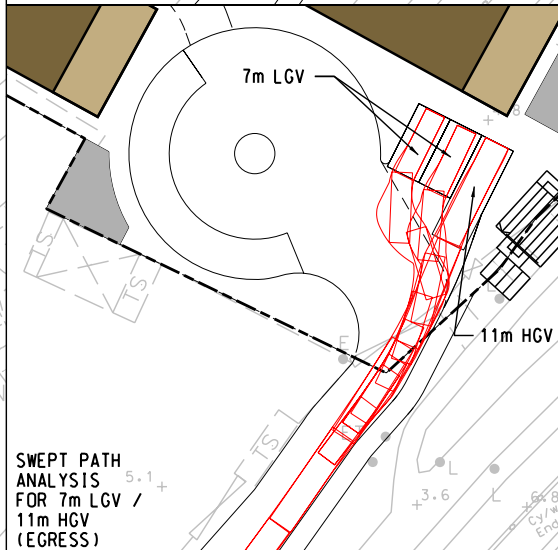
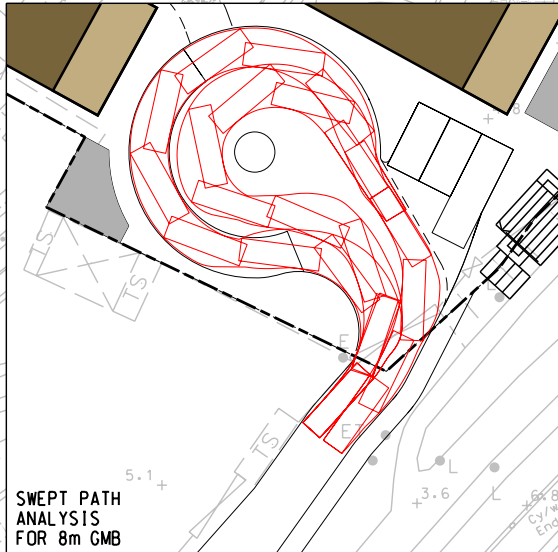
ISO A1 594mm x 841mm  
Approved: \_\_\_\_\_  
Checked: \_\_\_\_\_  
Designer: \_\_\_\_\_  
Project Management Initials: \_\_\_\_\_

Plot File by: chaneviva 29/12/2021  
PATH F:BACK UP (E)SAMTING KOKDRAWINGTIA 502.dgn



**LEGEND:**

- APPLICATION SITE
- PEDESTRIAN ROUTE
- VEHICULAR ROUTE
- E/M PLANT ROOM
- TRANSITIONAL HOUSING BLOCKS
- THIRD FLOOR RECESS
- G/F SHOP & COMMUNAL SPACE



**AECOM**

**PROJECT**

SECTION 16 PLANNING  
APPLICATION FOR PROPOSED  
TRANSITIONAL HOUSING  
DEVELOPMENT AT VARIOUS  
LOTS IN SHUEN WAN, TAI PO,  
NEW TERRITORIES

**CLIENT**

\_\_\_\_\_

**CONSULTANT**

AECOM Asia Company Ltd.  
www.aecom.com

**SUB-CONSULTANTS**

分判工程顧問公司

ISSUE/REVISION			
NO.	DATE	DESCRIPTION	CHK.
C	DEC2020	TD'S COMMENTS	STH
B	OCT2020	REVISED LAYOUT	STH
A	SEP2020	REVISED LAYOUT	STH

**STATUS**

\_\_\_\_\_

**SCALE**

A3 1: 1500

**KEY PLAN**

不可用

**PROJECT NO.**

\_\_\_\_\_

**CONTRACT NO.**

\_\_\_\_\_

**SHEET TITLE**

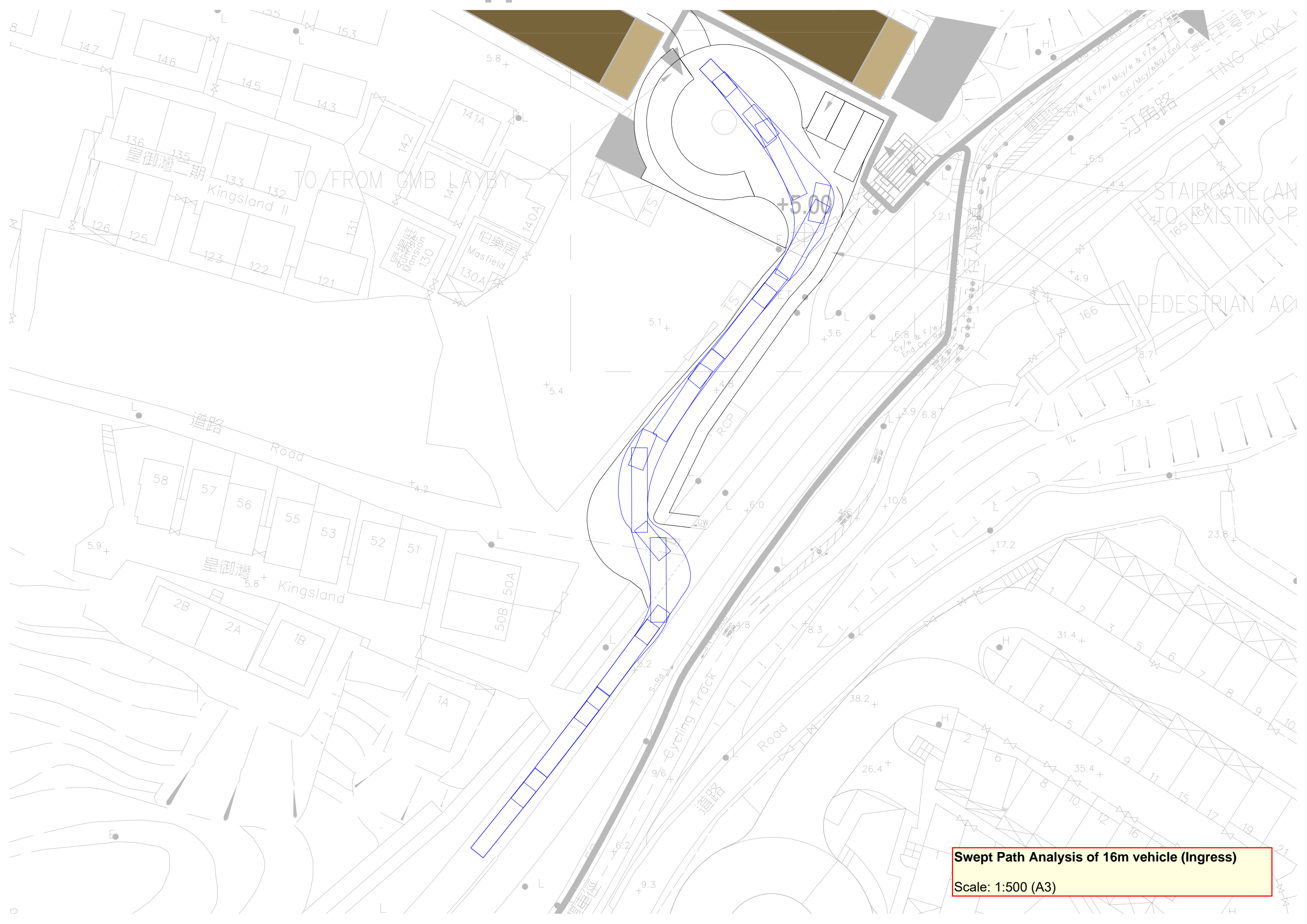
INDICATIVE MASTER LAYOUT PLAN

**SHEET NUMBER**

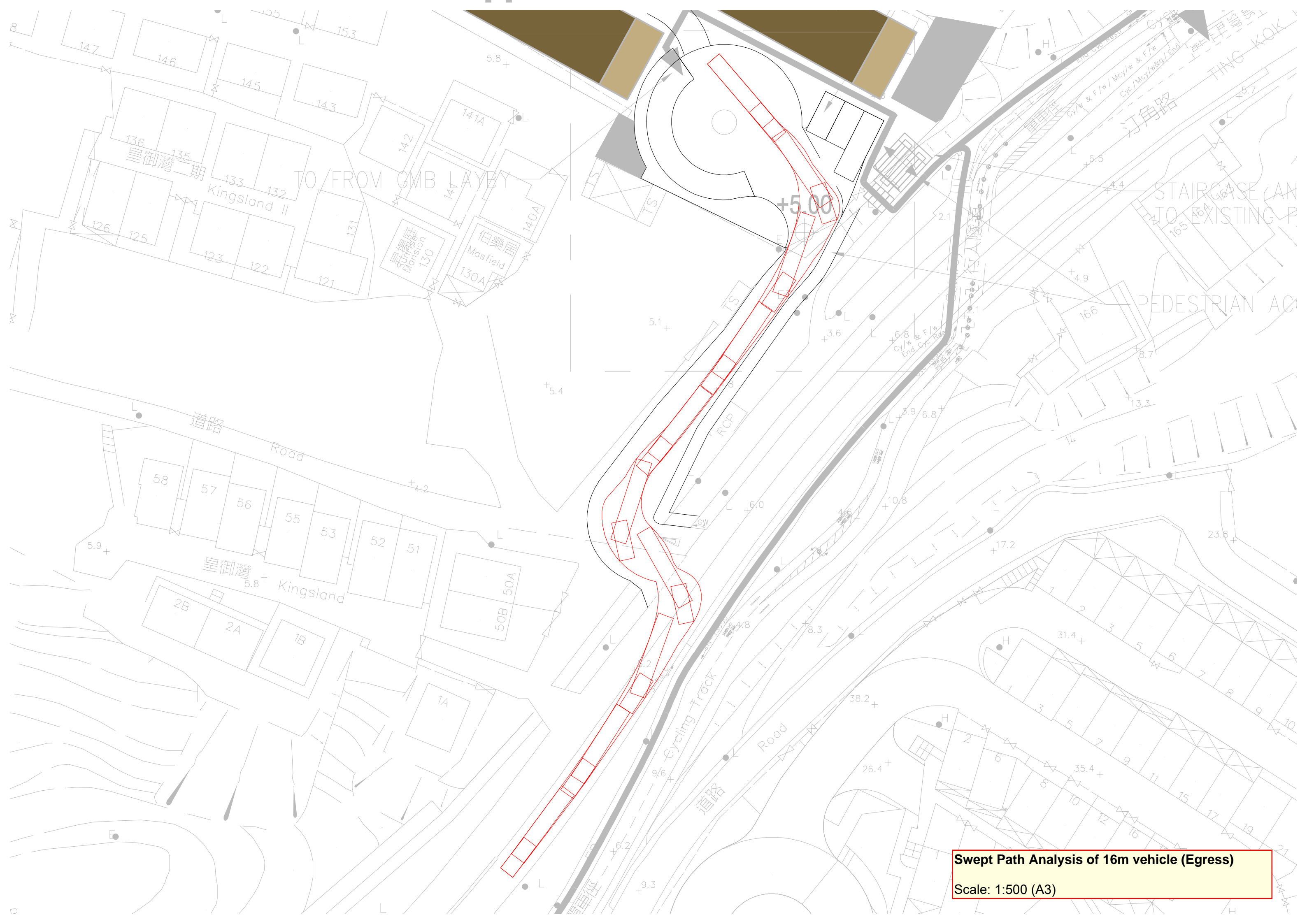
FIGURE 2.1

This drawing has been prepared for the use of AECOM's client. It may not be used, modified, reproduced or relied upon by third parties, except as agreed by AECOM or as required by law. AECOM accepts no responsibility, and denies any liability whatsoever, to any party that uses or relies on this drawing without AECOM's express written consent. Do not scale this document. All measurements must be obtained from the stated dimensions.









☐ Urgent ☐ Return receipt ☐ Sign ☐ Encrypt ☐ Mark Subject Restricted ☐ Expand personal&public groups



**S16 Planning Application for Proposed Temporary Residential Institution  
(Transitional Housing) for a Period of 5 Years in Various Lots in D.D. 26 and  
Adjoining Government Land, Wong Yue Tan, Tai Po - Technical Clarifications**  
05/02/2021 16:03

From: Aileen Cheng <aileen.cheng@arup.com>  
To: "tpbpd@pland.gov.hk" <tpbpd@pland.gov.hk>  
Cc: Theresa Yeung <theresa.yeung@arup.com>, Natalie Leung <natalie.leung@arup.com>, "hkcliu@pland.gov.hk" <hkcliu@pland.gov.hk>  
Sent by: prvs=663f0351e=aileen.cheng@arup.com

Dear TPB Secretariat,

**S16 Planning Application for  
Proposed Temporary Residential Institution (Transitional Housing)  
for a Period of 5 Years  
in Various Lots in D.D. 26 and Adjoining Government Land, Wong Yue Tan, Tai Po**

**Technical Clarifications**

As requested by the Sha Tin, Tai Po and North District Planning Office, we hereby clarify the full address of the captioned Planning Application should be amended (as underlined) as "Lot Nos. 252 S.A, 252 S.A ss.1, 252 S.B, 253, 256 (Part), 257 (Part), 259 (Part), 260 (Part), 261 (Part), 274 (Part), 275 S.A (Part), 275 S.B, 275 S.C, 276 S.A ss.1, 276 S.B ss.1, 278 RP, 279 S.B, 280 S.A RP, 280 S.B ss.1 RP, 280 S.B RP and 538 (Part) in D.D. 26 and Adjoining Government Land, Wong Yue Tan, Tai Po" in the Application Form, Authorisation Letter, Letter of Owners Consent of Land Owner and Supporting Planning Statement submitted on 29 January 2021. This is to supersede our letter under the same subject (Our ref: 276279/01/WSTY/MYNL/KYAC/04251) dated 4 February 2021.

We sincerely seek for the favourable consideration from the Town Planning Board to approve the captioned S16 Planning Application.

Should you have any queries, please contact the undersigned at 2908 4011.

Best Regards,

Aileen Cheng  
Assistant Town Planner | Planning

Arup

Level 5 Festival Walk 80 Tat Chee Avenue Kowloon Tong Kowloon Hong Kong  
t: +852 2528 3031 f: +852 2779 8428  
d: +852 2908 4011  
[www.arup.com](http://www.arup.com)

cc      • DPO/STN, PlanD – Mr. Harris Liu (email: [hkcliu@pland.gov.hk](mailto:hkcliu@pland.gov.hk)/ fax: 2691 2806)

---

Electronic mail messages entering and leaving Arup business systems are scanned for viruses and acceptability of content.

Your ref TPB/A/NE-TK/702  
Our ref 276279/01/WSTY/MYNL/KYAC/04283

**ARUP**

Level 5, Festival Walk  
80 Tat Chee Avenue  
Kowloon Tong  
Kowloon  
Hong Kong  
t +852 2528 3031  
f +852 2779 8428  
d +852 2268 3721  
thersea.yeung@arup.com  
www.arup.com

**By Email (tpbpd@pland.gov.hk) and By Hand**

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

19 March 2021

Dear Sir/Madam,

**S16 Planning Application for  
Proposed Temporary Residential Institution (Transitional Housing)  
for a Period of 5 Years in Various Lots in D.D. 26 and Adjoining Government Land,  
Wong Yue Tan, Tai Po  
(Planning Application No. A/NE-TK/702)**

#### **Technical Clarifications**

We refer to the comments from various Government Departments received on 24 February, 26 February, 1 March, 5 March and 10 March 2021 on the captioned Planning Application.

We are pleased to submit our responses in the form of a Response-to-Comments Table (**Attachment A**) and relevant supplementary information (**Attachment B-J**) for your consideration.

As per requests from the Sha Tin, Tai Po and North District Planning Office of Planning Department, we would also like to take this opportunity to provide a comparison of the existing and proposed extension of bus layby at Ting Kok Road Westbound near Sum Mun Tsai Road (**Attachment K** refers) as well as the following technical clarifications on the captioned Planning Application:

- 1) The filling and excavation of land required for the Proposed Development respectively cover an area of about 1,156m<sup>2</sup> and 13,361m<sup>2</sup>. The general depth of excavation of land will reach about 1-2.5m except at the proposed underground E&M plant room and on-site sewage treatment plant where a depth of about 5m and 7m will be required for the accommodation of installations such as tanks/chambers, filtering/screening systems, reactor/treatment system, pumping system, dewatering system etc. (**Attachment L** refers). Based on preliminary review and with reference to nearby ground investigation, topsoil layer consists of weak material such as fill or marine deposit. Hence, deeper excavation may be needed below bottom level of the foundation for soil enhancement/replacement.
- 2) With reference to **Attachment M**, please note that adverse conflict of the location of fence wall, landscape treatment and drainage pipes along the periphery of the Application Site are not anticipated. The fence wall will be provided in the form of wired fencing and is not expected to cause any visual obstructions to the surrounding users. Offset of 300mm from the boundary of the Application Site has also been adopted for the installation of temporary shoring to facilitate minor excavation or other site construction. In view of the level difference between the existing ground level and the final excavation level mainly within 2.5m, sheet pile with struts would likely be adopted to retain the level difference. These ELS works would be designed during detailed design stage in a manner that the effect of the proposed works should be minimal and does not cause significant effects on adjacent grounds. With such arrangement, please note that any encroachment on the "Conservation Area" zone by either permanent works, temporary support nor construction works is not anticipated.

- 3) The proposed 3/F recesses at all transitional housing blocks except Block 5 are incorporated as design features to provide stepping effect in building height and to break the visual monotony of the transitional housing blocks and provide a more interesting view to viewers.
- 4) The Proposed Development is designed to be a self-sustained development. Shared use of the refuse collection point currently serving Wong Yue Tan Village is not expected. The Applicant will also ensure that the operation of the concerned RCP will not be affected by the proposed vehicular access. Coordination and liaison with relevant government departments will be undertaken on the detail arrangement at the detailed design stage.
- 5) Subject to further liaison with and consent from relevant landowner, the exact design of the proposed peripheral drainage pipeline of the Proposed Development will be reviewed and determined at the detailed design stage.
- 6) In regard to the period of temporary use, please be clarified that the captioned Planning Application is for temporary residential institution for a period of 5 years, with subsequent renewal up to a total of 8 years (subject to TPB's approval of the current and subsequent renewal applications). The temporary use is proposed for a period of 5 years to allow for review of the operational efficiency and mode of the proposed transitional housing development with respect to the changing circumstances and needs of the society. As such, the Applicant could further assess whether or not to continue with the operation of the Proposed Development near the end of the period of temporary use and to seek TPB's approval for subsequent renewal applications as necessary.
- 7) The Proposed Development is expected to receive funding from the Funding Scheme to Support Transitional Housing Projects by Non-government Organisations. According to the Guide to Application of the Funding Scheme, a maximum amount of 0.55 million funding subsidy will be granted to each transitional housing unit to be provided through erection of temporary structure on vacant land (i.e. about 680 million for the Proposed Development). The funding received will be used to cover the consultancy services and essential construction required for the proposed development. As such, no adverse concerns with the financial viability of the Proposed Development are expected.
- 8) Careful considerations have been given to community needs in deciding the flat mix of the Proposed Development. According to the community research conducted by the Applicant prior to the submission of this Planning Application, many deprived families or elderly in Tai Po are living at the subdivided units (SDUs) at Kwong Fuk Road, Wai Yan Street, Tai Kwong Lane, On Fu Road and Nam Shing Street. Most of these households living in SDUs are couples, single parents or single elderly persons who have been waiting for public rental housing for over 3 years.

It is also noted from the statistics that there are about 210,000 persons living in SDUs in Hong Kong, with over 10% as single youth aged 18 to 25 and 5% as young old persons aged 55 to 65 living alone. The average waiting time for elderly one-person applicants of public rental housing is 3.4 years. As in Tai Po, there are about 3,400 families living in SDUs, contributing to a population of about 7,790 persons. Most of the persons living in SDUs are 2-person households, single youth and young elderly persons aged 55 to 65 living alone.

Considering that the Application Site at Wong Yue Tan is located in Tai Po, deprived families, youth or elderly living in SDUs in Tai Po are the Applicant's priority group to serve. In view of the above, majority of the transitional housing units at the Proposed Development are designed as 1-to-2-person units to meet the hot demand in society.

- 9) Please be clarified that the transitional housing blocks with provision of one staircase within the Proposed Development has duly fulfilled the requirements under Clause B6.1 of Code of Practice for Fire Safety in Buildings 2011.

- 10) Subject to exact provision and arrangement at detailed design stage, E&M plant rooms at the Proposed Development will include FS plant room, FS control room, genset room, water meter cabinet, Tx room, TBE & water pump room and underground sewage treatment plant (**Attachment N** refers).
- 11) In response to public concerns on insufficient ancillary retail/commercial facilities to support the anticipated population, please be clarified the Proposed Development has provided about 124m<sup>2</sup> GFA for ancillary commercial/communal uses to domestic use. The commercial portion is intended to accommodate physical stores which offer daily necessities to future residents. On top of this, the online shops managed by various social enterprises under the Applicant will be responsible for the provision of food, necessity goods, health and care and other products to the residents. Taking into account that e-commerce is growing at a fast clip and its predominance during the COVID-19 pandemic, online retail and commercial platform will highly likely become a common shopping tool for the target service users who need to take care of their children and family members.
- 12) Please note that the Applicant will reinstate the Application Site with the 165 nos. proposed new trees retained upon expiry of the planning permission.

In addition to the above, further elaboration on the significance of the Proposed Development in providing relief to vulnerable households living in SDUs in Tai Po is provided at the letter from Applicant at **Attachment O**. We would also like to supplement that the Planning Application is fully supported by the Hong Kong Council of Social Service (HKCSS) for its contribution to the alleviation of the housing hardship of many low-income families and persons. The supporting letter from HKCSS is appended at **Attachment P** for your consideration.

This submission only serves as technical clarifications without changing the scheme or the technical assessments, and thus should be exempted from recounting requirement.

We sincerely seek for the favourable consideration from the Town Planning Board to approve the captioned S16 Planning Application.

Should you have any queries, please contact the undersigned or our Ms Natalie LEUNG at 2268 3612 or our Ms. Aileen CHENG at 2908 4011.

Yours faithfully



Theresa YEUNG  
Director of Planning

Encl. Attachment A-P  
cc. - DPO/ST, TP & N, PlanD - Ms. Kathy Chan (email: kclchan@pland.gov.hk / fax: 2691 2806)  
- DPO/ST, TP & N, PlanD - Mr. Harris Liu (email: hkcliu@pland.gov.hk / fax: 2691 2806)



Your ref TPB/A/NE-TK/702  
Our ref 276279/01/WSTY/MYNL/KYAC/04301

**ARUP**

Level 5, Festival Walk  
80 Tat Chee Avenue  
Kowloon Tong  
Kowloon  
Hong Kong  
t +852 2528 3031  
f +852 2779 8428  
d +852 2268 3721  
thersea.yeung@arup.com  
www.arup.com

**By Email (tpbpd@pland.gov.hk) and By Fax (2877 0245)**

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

22 March 2021

Dear Sir/Madam,

**S16 Planning Application for  
Proposed Temporary Residential Institution (Transitional Housing)  
for a Period of 5 Years in Various Lots in D.D. 26 and Adjoining Government Land,  
Wong Yue Tan, Tai Po  
(Planning Application No. A/NE-TK/702)**

**Technical Clarifications**

We refer to our submission of technical clarifications for the captioned Planning Application dated 19 March 2021.

As per request from the Sha Tin, Tai Po and North District Planning Office of Planning Department, we hereby supplement the list of flora and fauna from the 2009 Ecological Baseline Survey Report for the S.12A rezoning application for Sustainable Nature Conservation and Development at Shuen Wan, Tai Po for your consideration (**Attachment A** refers).

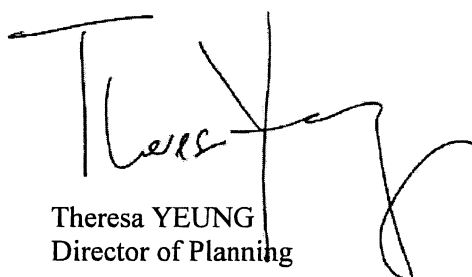
We would also like to take this opportunity to supplement a letter from Dr. Peter Pang, the Chairman of The Lok Sin Tong Benevolent Society, Kowloon (the Applicant), seeking support from the community for the captioned Planning Application (**Attachment B** refers).

This submission only serves as technical clarifications without changing the scheme or the technical assessments, and thus should be exempted from recounting requirement.

We sincerely seek for the favourable consideration from the Town Planning Board to approve the captioned S16 Planning Application.

Should you have any queries, please contact the undersigned or our Ms Natalie LEUNG at 2268 3612 or our Ms. Aileen CHENG at 2908 4011.

Yours faithfully



Theresa YEUNG  
Director of Planning

Encl. Attachment A-C  
cc. - DPO/ST, TP & N, PlanD - Ms. Kathy Chan (email: kclchan@pland.gov.hk / fax: 2691 2806)  
- DPO/ST, TP & N, PlanD - Mr. Harris Liu (email: hkeliu@pland.gov.hk / fax: 2691 2806)

## **Attachment A**

List of Flora and Fauna from 2009  
Ecological Baseline Survey Report

## Appendix 1 Plant Species Recorded in Shuen Wan Marsh Study Area

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Abrus mollis</i>	C	Native			O							
<i>Acacia auriculiformis</i>	T	Exotic	S	C							S	
<i>Acacia confusa</i>	T	Exotic		A								
<i>Acacia mangium</i>	T	Exotic		S	S	S						
<i>Acronychia pedunculata</i>	T	Native	C	S								
<i>Acrostichum aureum</i>	F	Native					C			S	S	
<i>Adiantum flabellatum</i>	F	Native	O	S		O						
<i>Adiantum malesianum</i>	F	Native	O		S							
<i>Aegiceras corniculatum</i>	S	Native					A					
<i>Aglaia odorata</i>	S	Exotic										
<i>Ailanthus fordii</i>	T	Native									S	
<i>Alangium chinense</i>	T	Native	C	O		O				S		
<i>Albizia lebbbeck</i>	T	Exotic		O								
<i>Alchornea trewioides</i>	S	Native	C		O							
<i>Aleurites moluccana</i>	T	Exotic								S		
<i>Alnus japonica</i>	T	Exotic		S								
<i>Alocasia macrorrhiza</i>	H	Native	C	C	O			O		C		
<i>Alpinia sp.</i>	H	Native										
<i>Annona squamosa</i>	T	Exotic									S	
<i>Antidesma bunius</i>	T	Native			S							
<i>Antidesma ghaesembilla</i>	S	Native				C						
<i>Apluda mutica</i>	G	Native					C	A				
<i>Aporosa dioica</i>	T	Native	C	O	C	C						
<b><i>Aquilaria sinensis</i></b>	T	Native	C		C	S						
<i>Aralia decaisneana</i>	T	Native	S	S								
<i>Araucaria heterophylla</i>	T	Exotic		S								
<i>Archidendron clypearia</i>	T	Native	O		S							
<i>Ardisia crenata</i>	S	Native	C									
<i>Ardisia punctata</i>	S	Native	S									
<i>Ardisia quinqueгона</i>	S	Native	C		C							
<i>Artocarpus altilis</i>	T	Exotic	S									
<i>Artocarpus heterophylla</i>	T	Exotic	S									

# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Asparagus cochinchinensis</i>	C	Native		S								
<i>Averrhoa carambola</i>	T	Exotic			S							
<i>Avicennia marina</i>	S	Native					O			S		
<i>Baeckea frutescens</i>	S	Native				C						
<i>Bamboo of unknown sp.</i>	B	Native	O		O		S			O	O	
<i>Bauhinia blakeana</i>	T	Native	S									
<i>Bauhinia sp.</i>	T	Native									S	
<i>Bidens pilosa</i>	H	Native		A			C	C	O		C	
<i>Bischofia javanica</i>	T	Native	C					O				
<i>Blechnum orientale</i>	F	Native	C	C								
<i>Bombax ceiba</i>	T	Exotic									S	
<i>Brassica chinensis</i>	H	Exotic										O
<i>Brassica parachinensis</i>	H	Exotic										S
<i>Breynia fruticosa</i>	S	Native	O	S	O	O						
<i>Bridelia tomentosa</i>	T	Native	C	O	O					O		
<i>Brucea javanica</i>	T	Native	S									
<i>Buettneria aspera</i>	C	Native	S									
<i>Callicarpa nudiflora</i>	S	Native	C									
<i>Callistemon viminalis</i>	T	Exotic									O	
<b><i>Camellia salicifolia</i></b>	T	Native			S							
<i>Canna indica</i>	H	Exotic						S				
<i>Carica papaya</i>	T	Exotic					S				S	O
<i>Cassia surattensis</i>	T	Exotic									O	
<i>Cassia tora</i>	S	Native									S	
<i>Cassytha filiformis</i>	C	Native				O		S				
<i>Castanopsis fissa</i>	T	Native										
<i>Casuarina equisetifolia</i>	T	Exotic		A								
<i>Celosia argentea</i>	H	Native						S				
<i>Celtis sinensis</i>	T	Native	C	O	O		S	S		C	O	
<i>Celtis timorensis</i>	T	Native			S							
<i>Cerbera manghas</i>	T	Native			C			S				
<i>Chloris batata</i>	G	Native						S				
<i>Choerospondias axillaris</i>	T	Native	C									

# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Christella parasitica</i>	F	Native	C	O	O					C		
<i>Cibotium barometz</i>	F	Native	S									
<i>Cinnamomum camphora</i>	T	Native	C	S	C						O	
<i>Citrus maxima</i>	T	Exotic							S			
<i>Citrus reticulata</i>	T	Exotic		S				S			S	
<i>Clausena lansium</i>	T	Exotic					S	S		S	S	
<i>Cleistocalyx operculata</i>	T	Native	C		S		S	S		C	S	
<i>Clerodendrum fortuneatum</i>	S	Native				O						
<i>Clerodendrum inerme</i>	S	Native					O					
<i>Coaedium variegata</i>	S	Exotic									O	
<i>Coix lachryma-jobi</i>	G	Native						O				
<i>Colocasia esculenta</i>	H	Exotic						C				
<i>Commelina nudiflora</i>	H	Native					O	C		C		
<i>Cordyline fruticosa</i>	S	Exotic									O	
<i>Cratoxylum cochinchinense</i>	T	Native	O			C						
<i>Crotalaria mucronata</i>	H	Native		O								
<i>Cyrtococcum patens</i>	G	Native	C							C		
<i>Cyclosorus interruptus</i>	F	Native					C	C				
<i>Cynodon dactylon</i>	G	Native					O					
<i>Cyperus flabelliformis</i>	SE	Exotic						O				
<i>Cyperus malaccensis</i>	SE	Native					O					
<i>Cyperus spp.</i>	SE	Native						O		O	O	
<i>Cyrtococcum patens</i>	G	Native		O				C				
<i>Daemonorops margaritae</i>	F	Native	S									
<i>Dalbergia hancei</i>	C	Native	O			C						
<i>Daphniphyllum calycinum</i>	T	Native		S	O							
<i>Delonix regia</i>	T	Exotic									S	
<i>Dendrotrophe frutescens</i>	C	Native		S								
<i>Desmos chinensis</i>	S	Native	C		O							
<i>Dianella ensifolia</i>	H	Native	O	S								
<i>Dicranopteris pedata</i>	F	Native	C	A		A						
<i>Dimocarpus longan</i>	T	Exotic	O	O	C					O		
<i>Dioscorea sp.</i>	C	Native		O								

# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Diploclisia glaucescens</i>	C	Native	S	S								
<i>Diplospora dubia</i>	S	Native	O									
<i>Dracaena fragrans</i>	T	Exotic				S						
<i>Dracaena sanderiana</i>	H	Exotic				S						
<i>Duranta repens</i>	S	Exotic						S			O	
<i>Echinochloa crus-galli</i>	G	Native						C				
<i>Eleocharis dulcis</i>	SE	Exotic						O				
<i>Elephantopus tomentosa</i>	S	Native				C						
<i>Embellia laeta</i>	C	Native	O	O		O						
<i>Embellia ribes</i>	C	Native	S		S							
<i>Eriobotrya japonica</i>	T	Exotic									S	
<i>Erythrina sp.</i>	T	Exotic							S			
<i>Eucalyptus citriodora</i>	T	Exotic	S	C							C	
<i>Eucalyptus tereticornis</i>	T	Exotic		S								
<i>Eucalyptus torelliana</i>	T	Exotic		A								
<i>Eupatorium catarium</i>	H	Exotic		O		O		O			S	
<i>Euphorbia hirta</i>	H	Native								O		
<i>Euphorbia pulcherrima</i>	S	Exotic									S	
<i>Eurya chinensis</i>	S	Native		S								
<i>Eurya nitida</i>	S	Native				C						
<i>Ficus altissima</i>	T	Native		S					S			
<i>Ficus benjamina</i>	T	Exotic								S	S	
<i>Ficus elastica</i>	T	Exotic	S									
<i>Ficus fistulosa</i>	T	Native								O		
<i>Ficus hirta</i>	S	Native	C	O	O							
<i>Ficus hispida</i>	T	Native	C	O	O		S	S		C		
<i>Ficus microcarpa</i>	T	Native									O	
<i>Ficus pumila</i>	C	Native								O		
<i>Ficus superba</i>	T	Native					S		S	O		
<i>Ficus variegata</i>	T	Native	C		O					S		
<i>Ficus variolosa</i>	S	Native				S						
<i>Fimbristylis ferruginea</i>	SE	Native								O		
<i>Fraxinus insularis</i>	T	Native	O									



# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Glochidion eriocarpum</i>	S	Native	C	C	O							
<i>Glochidion hirsutum</i>	S	Native						S				
<i>Glochidion lanceolatum</i>	S	Native				O						
<i>Glochidion wightianum</i>	S	Native	O		S	O						
<i>Glochidion zeylanicum</i>	T	Native	O					S				
<i>Gnetum montanum</i>	C	Native	S									
<i>Gordonia axillaris</i>	S	Native	O	C								
<i>Hedychium coronarium</i>	H	Exotic					O	C				
<i>Hedyotis hedyotideia</i>	H	Native	O									
<i>Helicteres angustifolia</i>	S	Native				O						
<i>Hibiscus rosa-sinensis</i>	S	Exotic						S			O	
<i>Hibiscus tiliaceus</i>	T	Native									O	
<i>Ilex asprella</i>	S	Native	C	O	O	C						
<i>Ilex pubescens</i>	S	Native	C	S	O							
<i>Ilex rotunda</i>	T	Native	C		O	C				S		
<i>Imperata cylindrica</i>	G	Native						S				
<i>Inula cappa</i>	S	Native				O						
<i>Ipomoea cairica</i>	C	Native	O					C			C	
<i>Isachne globosa</i>	G	Native						C				
<i>Itea chinensis</i>	T	Native			S							
<i>Ixora coccinea</i>	S	Native									O	
<i>Jasminum mesnyi</i>	C	Exotic		S								
<i>Juniperus chinensis</i>	T	Exotic		S					S			
<i>Kandelia obovata</i>	S	Native					A			O		
<i>Kyllinga sp.</i>	SE	Native						S		S		
<i>Lactuca sativa</i>	H	Exotic										O
<i>Lagerstroemia speciosa</i>	T	Native									S	
<i>Lantana camara</i>	S	Exotic	O	O	S			S		O	O	
<i>Lasianthus chinensis</i>	T	Native	C									
<i>Leucaena leucocephala</i>	T	Exotic	C	C				O	S		C	S
<i>Ligustrum sinensis</i>	S	Native		O								
<i>Liquidambar formosana</i>	T	Native				S						
<i>Liriope spicata</i>	H	Native	C		S	S						

# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Litchi chinensis</i>	T	Exotic	O								S	
<i>Litsea cubeba</i>	T	Native	C		C	C						
<i>Litsea glutinosa</i>	T	Native	S	O		C						
<i>Litsea monopetala</i>	T	Native	C							C		
<i>Litsea rotundifolia</i>	S	Native	C	S	O	C						
<i>Lophatherum gracile</i>	G	Native	C	O								
<i>Lophostemon conferta</i>	T	Exotic		A								
<i>Ludwigia adscendens</i>	H	Native						S				
<i>Ludwigia octovalvis</i>	S	Native						S				
<i>Ludwigia perennis</i>	H	Native						S		O		
<i>Lumnitzera racemosa</i>	S	Native					C			O		
<i>Lygodium japonicum</i>	C	Native	O	C	S	O						
<i>Lygodium microphyllum</i>	C	Native	S	C								
<i>Macaranga tanarius</i>	T	Native	C	C	O		S	O		O	C	
<i>Machilus breviflora</i>	T	Native	O		O							
<i>Machilus chekiangensis</i>	T	Native	C		O							
<i>Maesa perlarius</i>	S	Native	C		O	O						
<i>Mallotus paniculatus</i>	T	Native	C			S						
<i>Mangifera indica</i>	T	Native	O						S	S	S	
<i>Manilkara zapota</i>	T	Exotic								S		
<i>Melaleuca quinquenervia</i>	T	Exotic		A							C	
<i>Melastoma candidum</i>	S	Native	O	S		C						
<i>Melastoma sanguineum</i>	S	Native	O	O		O		S				
<i>Melia azedarach</i>	T	Exotic								S		
<i>Melicope pteleifolia</i>	T	Native		S	S							
<i>Michelia alba</i>	T	Exotic									S	
<i>Microcos paniculata</i>	T	Native	C		O							
<i>Microstegium ciliatum</i>	G	Native	C	C		A		A		A	O	
<i>Mikania micrantha</i>	C	Exotic	C	C	O	O	C	A		C	C	
<i>Millettia nitida</i>	C	Native		S								
<i>Millettia speciosa</i>	C	Native	S									
<i>Mimosa pudica</i>	C	Native					O					
<i>Miscanthus floridulus</i>	G	Native		O			O			O	C	

# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Miscanthus sinensis</i>	G	Native	C	C		A	O				O	
<b><i>Monochoria hastata</i></b>	H	Native					S	S				
<i>Morinda umbellata</i>	C	Native				S						
<b><i>Mucuna championii</i></b>	C	Native	S		S							
<i>Murraya paniculatus</i>	S	Exotic			S							
<i>Musa paradisiaca</i>	T	Exotic			S		S	O	S	O		
<i>Mussaenda pubescens</i>	S	Native		O	S	O						
<i>Neyraudia reynaudiana</i>	G	Native				C		S	S			
<i>Osmanthus sp.</i>	T	Native			S							
<i>Oxalis corniculata</i>	H	Native					O					
<i>Oxalis corymbosa</i>	H	Native						S				
<i>Paedaria scandens</i>	C	Native				O						
<i>Paedaria tomentosa</i>	C	Native		O								
<i>Pandanus sp.</i>	S	Native	O									
<i>Pandanus tectorius</i>	S	Native					S	S				
<i>Panicum maximum</i>	G	Native					O		S	C	O	
<i>Panicum repens</i>	G	Native					O	A		C		
<i>Paspalum conjugatum</i>	G	Exotic						C				
<i>Paspalum paspaloides</i>	G	Exotic						C				
<i>Paspalum sp.</i>	G	Native						O				
<b><i>Pavetta hongkongensis</i></b>	S	Native	O		S							
<i>Pennisetum purpureum</i>	G	Exotic								C		
<i>Phoenix roebelenii</i>	T	Exotic									S	
<i>Phragmites australis</i>	G	Native					A	C				
<i>Phyllanthus emblica</i>	T	Native		S		C						
<i>Phyllanthus urinaria</i>	S	Native		C				S				
<i>Phyllodium pulchellum</i>	S	Native				O						
<i>Pinus elliotii</i>	T	Native		C								
<i>Piper hancei</i>	H	Native			S							
<i>Pistia stratiotes</i>	H	Native						S				
<i>Polygonum barbatum</i>	H	Native						S				
<i>Polygonum chinensis</i>	H	Native		S	O			S				
<i>Polygonum sp.</i>	H	Native						S				

# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Pronephrium simplex</i>	F	Native	O									
<i>Psychotria asiatica</i>	S	Native	A	S	C	O						
<i>Psychotria serpens</i>	C	Native	O									
<i>Pteridium aquilinum</i>	F	Native				O						
<i>Pteris biaurita</i>	F	Native		O								
<i>Pteris ensiformis</i>	F	Native				S						
<i>Pteris semipinnata</i>	F	Native	C	C	O							
<i>Pteris vittata</i>	F	Native		O								
<i>Pueraria lobata</i>	C	Native					O	C		C		
<i>Pycnus flavidus</i>	H	Native						S				
<i>Reevesia thyrsoidea</i>	T	Native		S								
<i>Rhaphiolepis indica</i>	S	Native	O			C						
<i>Rhodomyrtus tomentosa</i>	S	Native	O	O		A						
<i>Rhoeo discolor</i>	H	Exotic						S			O	
<i>Rhus chinensis</i>	T	Native	C									
<i>Rhus hypoleuca</i>	T	Native		O		O						
<i>Rhus succedanea</i>	T	Native	C	S		C						
<i>Rhynchelytrum repens</i>	G	Exotic						O				
<i>Ricinus communis</i>	S	Exotic						S				
<i>Rosa laevigata</i>	C	Native	O		O							
<i>Rourea microphylla</i>	C	Native	O									
<i>Rubus parvifolius</i>	C	Native				S						
<i>Rubus reflexus</i>	C	Native	O	O	O							
<i>Sageretia thea</i>	C	Native					S			S		
<i>Sansevieria trifasciata</i>	H	Exotic									O	
<i>Sapium discolor</i>	T	Native	C	C								
<i>Sapium sebiferum</i>	T	Native	O	O				S		S		
<i>Sarcandra glabra</i>	S	Native	O	S	C	S						
<i>Schefflera heptaphylla</i>	T	Native	A	S	C		S					
<i>Schima superba</i>	T	Native	C	S		S						
<i>Schizoloma orbiculatum</i>	F	Native	S									
<i>Scirpus littoralis</i>	SE	Native					C					
<i>Scleria sp.</i>	SE	Native	O									

# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

<i>Species</i>	Habit	Exotic	Native Woodland	Plantation Woodland	Fung Shui Wood	Shrubland/ Grassland	Brackish Marsh/ Mangrove	Freshwater Marsh	Pond	Stream	Vegetated fill/ Developed Area	Agricultural Land
<i>Scolopia chinensis</i>	T	Native						S				
<i>Sida rhombifolia</i>	S	Native					O					
<i>Smilax china</i>	C	Native	O	O		C						
<i>Smilax glabra</i>	C	Native	O			O						
<i>Stephania longa</i>	C	Native	S									
<i>Sterculia lanceolata</i>	T	Native	C		C		S	S		C		
<i>Strelitzia nicolai</i>	H	Exotic									S	
<i>Strophanthus divaricatus</i>	C	Native			S							
<i>Symplocos cochinchinensis</i>	T	Native				S						
<i>Symplocos glauca</i>	T	Native	O			S						
<i>Symplocos lancifolia</i>	T	Native	O									
<i>Syzygium hancei</i>	T	Native	S									
<i>Syzygium jambos</i>	T	Exotic	C		C			S		O		
<i>Syzygium levinei</i>	T	Native	O		O							
<i>Tadehagi triquetrum</i>	S	Native		S								
<i>Tetracera asiatica</i>	C	Native	O		O	S						
<i>Tetradium glabrifolium</i>	T	Native	O		O							
<i>Thysanolaena agrostis</i>	G	Native	S	S								
<i>Toddalia asiatica</i>	C	Native	O									
<i>Urena lobata</i>	H	Native			S							
<i>Urochloa mutica</i>	G	Exotic						C				
<i>Uvaria microcarpa</i>	S	Native	C	C	O							
<i>Viburnum odoratissimum</i>	T	Native	S									
<i>Viburnum sempervirens</i>	T	Native	O			S						
<i>Vitex negundo</i>	S	Native	S		O		C	O				
<i>Vitex quinata</i>	T	Native	O									
<i>Wedelia chinense</i>	C	Native					O					
<i>Wedelia trilobata</i>	C	Exotic	O	A			O	O		O		
<i>Wikstroemia nutans</i>	S	Native		S								
<i>Zanthoxylum avicennae</i>	T	Native	C									
<i>Zanthoxylum nitidum</i>	C	Native	O									
<i>Zoysia sp.</i>	G	Native					O					

T = tree; S = Shrub, G = Grass, H = Herb, C = Climber, SE = Sedge, A = abundant, C = common, O = occasional, S = scarce; Species in boldface = of conservation interest



**Appendix 2 Waterbird species and their abundance recorded in Waterfowl Count between January 1993 and Feb 2006 (data from Hong Kong Bird Watching Society).**

Common names	Latin names	Abundance	Commonness
Little Grebe	<i>Tachybaptus ruficollis</i>	72	CL
Great Crested Grebe	<i>Podiceps cristatus</i>	16	R
Great Cormorant	<i>Phalacrocorax carbo</i>	307	CL
Grey Heron	<i>Ardea cinerea</i>	988	CL
Great Egret	<i>Casmerodius albus</i>	3292	CW
Intermediate Egret	<i>Mesophoyx intermedia</i>	45	CL
Little Egret	<i>Egretta garzetta</i>	2995	CW
Swinhoe's Egret	<i>Egretta eulophotes</i>	1	R
Pacific Reef Egret	<i>Egretta sacra</i>	23	CL
Cattle Egret	<i>Bubulcus ibis</i>	427	CW
Chinese Pond Heron	<i>Ardeola bacchus</i>	1051	CW
Striated Heron	<i>Butorides striatus</i>	36	CL
Black-crowned Night Heron	<i>Nycticorax nycticorax</i>	497	CL
Yellow Bittern	<i>Ixobrychus sinensis</i>	6	CL
Cinnamon Bittern	<i>Ixobrychus cinnamomeus</i>	1	R
Common Teal	<i>Anas crecca</i>	209	CL
Northern Pintail	<i>Anas acuta</i>	1	CL
Northern Shoveler	<i>Anas clypeata</i>	2	CL
Common Pochard	<i>Aythya ferina</i>	1	R
Red-breasted Merganser	<i>Mergus serrator</i>	1	R
Osprey	<i>Pandion haliaetus</i>	40	CL
Black Kite	<i>Milvus lineatus</i>	346	CW
White-bellied Sea Eagle	<i>Haliaeetus leucogaster</i>	30	CL
Eastern Marsh Harrier	<i>Circus spilonotus</i>	2	CL
Common Buzzard	<i>Buteo buteo</i>	26	CW
Common Kestrel	<i>Falco tinnuculus</i>	2	CW
Peregrine Falcon	<i>Falco peregrinus</i>	11	R
Water Rail	<i>Rallus aquaticus</i>	1	R
White-breasted Waterhen	<i>Amaurornis phoenicurus</i>	112	CW
Watercock	<i>Gallicrex cinerea</i>	1	R

Common names	Latin names	Abundance	Commonness
Common Moorhen	<i>Gallinula chloropus</i>	46	CL
Eurasian Coot	<i>Fulica atra</i>	22	CL
Black-winged Stilt	<i>Himantopus himantopus</i>	3	CL
Oriental Pratincole	<i>Glareola maldivarum</i>	3	CL
Northern Lapwing	<i>Vanellus vanellus</i>	2	R
Pacific Golden Plover	<i>Pluvialis fulva</i>	1	CL
Little Ringed Plover	<i>Charadrius dubius</i>	409	CW
Kentish Plover	<i>Charadrius alexandrinus</i>	302	CL
Greater Sand Plover	<i>Charadrius leschenaultii</i>	4	CL
Whimbrel	<i>Numenius phaeopus</i>	11	CL
Eurasian Curlew	<i>Numenius arquata</i>	33	CL
Common Redshank	<i>Tringa totanus</i>	2	CL
Marsh Sandpiper	<i>Tringa stagnatilis</i>	4	CL
Common Greenshank	<i>Tringa nebularia</i>	2	CL
Nordmann's Greenshank	<i>Tringa guttifer</i>	2	R
Green Sandpiper	<i>Tringa ochropus</i>	6	CL
Wood Sandpiper	<i>Tringa glareola</i>	24	CW
Terek Sandpiper	<i>Xenus cinereus</i>	14	R
Common Sandpiper	<i>Actitis hypoleucos</i>	154	CW
Grey-tailed Tattler	<i>Heteroscelus brevipes</i>	74	CL
Ruddy Turnstone	<i>Arenaria interpres</i>	5	CL
Red-necked Phalarope	<i>Phalaropus lobatus</i>	1	CL
Common Snipe	<i>Gallinago gallinago</i>	13	CL
Long-billed Dowitcher	<i>Limnodromus scolopaceus</i>	1	R
Red-necked Stint	<i>Calidris ruficollis</i>	2	CL
Little Stint	<i>Calidris minuta</i>	3	R
Long-toed Stint	<i>Calidris subminuta</i>	2	R
Dunlin	<i>Calidris alpina</i>	2	CL
Black-headed Gull	<i>Larus ridibundus</i>	826	CW
Whiskered Tern	<i>Chidonias hybridus</i>	34	R
White-winged Tern	<i>Chidonias leucopterus</i>	1	CL
Gull-billed Tern	<i>Gelochelidon nilotica</i>	1	CL
Common Kingfisher	<i>Alcedo atthis</i>	80	CW
Pied Kingfisher	<i>Ceryle rudis</i>	50	CL

Common names	<i>Latin names</i>	Abundance	Commonness
White-throated Kingfisher	<i>Halcyon smyrnensis</i>	65	CW
Black-capped Kingfisher	<i>Halcyon pileata</i>	45	CL
Red-billed Starling	<i>Sturnus sericeus</i>	3200	CW
Collared Crow	<i>Corvus torquatus</i>	245	CW

**Commonness:** CW = common and widespread, CL = common/uncommon and localised, R = uncommon/rare and localised.

## Appendix 3a Bird species and abundance at the Study Area

Common name	Latin name	FM	BM	S	U	W	PI	Sh/Gr	P	Commonness
Chinese Pond Heron	<i>Ardeola bacchus</i>	3	3	0	0	0	0	0	1	CW
Black-crowned Night Heron	<i>Nycticorax nycticorax</i>	1	6	0	0	0	0	0	0	CL
Little Egret	<i>Egretta garzetta</i>	2	48	0	0	0	0	0	4	CW
Intermediate Egret	<i>Egretta intermedia</i>	0	1	0	0	0	0	0	0	CL
Great Egret	<i>Ardea alba</i>	0	14	0	0	0	0	0	1	CW
Cattle Egret	<i>Bubulcus ibis</i>	8	2	0	0	0	0	0	0	CW
Grey Heron	<i>Ardea cinerea</i>	0	17	0	0	0	0	0	2	CL
Yellow Bittern	<i>Ixobrychus sinensis</i>	0	1	0	0	0	0	0	0	CL
Black Kite	<i>Milvus lineatus</i>	2	1	0	0	2	0	0	0	CW
Crested Goshawk	<i>Accipiter trivirgatus</i>	0	0	0	0	1	0	0	0	R
Crested Serpent Eagle	<i>Spilornis cheela</i>	0	0	0	0	1	0	0	0	R
Common Buzzard	<i>Buteo buteo</i>	0	0	0	0	1	0	0	0	CL
Oriental Turtle-dove	<i>Streptopelia orientalis</i>	0	0	0	0	0	0	1	1	CW
Spotted Dove	<i>Streptopelia chinensis</i>	12	6	1	2	5	3	2	1	CW
Large Hawk Cuckoo	<i>Hierococcyx sparveroides</i>	0	0	0	0	2	0	0	0	CW
Greater Coucal	<i>Centropus sinensis</i>	1	0	0	0	0	0	0	0	CW
White-breasted Waterhen	<i>Amaurornis phoenicurus</i>	3	3	0	0	0	0	0	1	CW
Common Kingfisher	<i>Alcedo atthis</i>	0	1	0	0	0	0	0	0	CW
Koel	<i>Eudynamis scolopacea</i>	0	3	0	1	3	0	1	0	CW
Pacific Swift	<i>Apus pacificus</i>	3	0	0	0	0	0	0	0	CW
Barn Swallow	<i>Hirundo rustica</i>	19	23	0	12	0	0	3	0	CW
White Wagtail	<i>Motacilla alba</i>	0	1	0	1	0	0	0	0	CW
Grey Wagtail	<i>Motacilla cinerea</i>	2	2	1	0	0	0	0	0	CW
Yellow Wagtail	<i>Motacilla flava</i>	0	4	0	0	0	0	0	0	CW
Olive-backed Pipit	<i>Anthus hodgsoni</i>	0	4	0	0	0	0	0	0	CW
Grey-throated Minivet	<i>Pericrocotus solaris</i>	0	0	0	0	12	0	0	0	CL
Chestnut Bulbul	<i>Hypsipetes castanonotus</i>	0	0	0	0	16	0	0	0	CL
Chinese Bulbul	<i>Pycnonotus sinensis</i>	87	42	2	8	31	3	12	0	CW
Crested Bulbul	<i>Pycnonotus jocosus</i>	74	29	0	6	26	2	16	0	CW
Red-vented Bulbul	<i>Pycnonotus aurigaster</i>	0	0	2	0	0	0	6	0	CW
Magpie Robin	<i>Copsychus saularis</i>	10	6	1	0	3	5	1	0	CW
Daurian Redstart	<i>Phoenicurus aureus</i>	1	0	0	0	0	0	0	0	CL

# S12(A) REZONING FOR A SUSTAINABLE NATURE CONSERVATION AND DEVELOPMENT AT SHUEN WAN, TAI PO

Common name	Latin name	FM	BM	S	U	W	PI	Sh/Gr	P	Commonness
Grey-backed Thrush	<i>Turdus hortulorum</i>	0	0	1	0	12	0	0	0	CL
Grey Thrush	<i>Turdus cardis</i>	0	0	0	0	2	1	0	0	CL
Common Blackbird	<i>Turdus merula</i>	0	1	0	0	3	2	0	0	CL
Siberian Stonechat	<i>Saxicola maurus</i>	1	1	0	0	0	0	0	0	CL
Masked Laughingthrush	<i>Garrulax perspicillatus</i>	6	7	0	0	5	3	0	0	CW
Common Tailorbird	<i>Orthotomus sutorius</i>	19	7	0	1	6	5	2	1	CW
Yellow-bellied Prinia	<i>Prinia flaviventris</i>	47	46	0	0	4	2	6	5	CW
Plain Prinia	<i>Prinia inornata</i>	0	1	0	0	0	0	0	0	CL
Arctic Warbler	<i>Phylloscopus borealis</i>	0	0	0	0	1	0	0	0	CL
Yellow-browed Warbler	<i>Phylloscopus inornatus</i>	1	0	2	0	3	3	0	0	CW
Pallas' Leaf Warbler	<i>Phylloscopus proregulus</i>	0	0	0	0	3	0	0	0	CL
Dusky Warbler	<i>Phylloscopus fuscatus</i>	3	5	1	0	1	0	0	0	CL
Japanese White-eye	<i>Zosterops japonica</i>	23	7	3	0	26	9	2	0	CW
Fork-tailed Sunbird	<i>Aethopyga christinae</i>	3	1	1	0	1	0	2	0	CW
Scarlet-backed Flowerpecker	<i>Dicaeum cruentatum</i>	1	0	0	0	1	0	0	0	CL
Great Tit	<i>Parus major</i>	6	1	2	0	8	6	0	0	CW
Black-throated Tit	<i>Aegithalos concinnus</i>	0	0	0	0	1	0	0	0	R
Rufous-capped Babbler	<i>Stachyris ruficeps</i>	0	0	0	0	2	0	0	0	R
Black-necked Starling	<i>Sturnus nigricollis</i>	17	5	0	2	3	0	0	0	CW
White-shouldered Starling	<i>Sturnus sinensis</i>	0	6	0	0	0	0	0	0	R
Crested Myna	<i>Acridotheres cristatellus</i>	3	14	0	6	1	3	2	0	CW
Rufous-backed Shrike	<i>Lanius schach</i>	4	10	0	0	0	0	2	0	CW
Black Drongo	<i>Dicrurus macrocercus</i>	8	0	0	0	0	0	0	0	CW
Blue Magpie	<i>Urocissa erythrorhyncha</i>	0	0	0	0	2	0	0	0	CW
Magpie	<i>Pica pica</i>	1	4	0	1	0	0	0	0	CW
Eurasian Tree Sparrow	<i>Passer montanus</i>	9	16	0	15	0	0	0	0	CW
Spotted Munia	<i>Lonchura punctulata</i>	35	1	0	1	0	8	0	0	CL
Jungle Crow	<i>Corvus macrorhynchos</i>	1	1	0	2	2	0	0	0	CW
Total birds		416	351	17	58	190	55	58	17	
Total species		33	39	11	13	32	14	14	9	

**Habitats:** FM = freshwater marsh, BM = brackish marsh, U = urban, W = woodland (including *fung shui* wood), P = plantation, Sh/Gr = shrubland/grassland, P = fishponds

**Commonness:** CW = common and widespread, UCW = uncommon and widespread, CL = common and localised, UCL = uncommon and localised, R = rare and localised.

Appendix 3b      Records of birds at the Study Area during night surveys

Common name	Latin name	FM	BM	S	U	W	PI	Sh/Gr	P	Commonness
Chinese Pond Heron	<i>Ardeola bacchus</i>			+						CW
Grey Heron	<i>Ardea cinerea</i>		+							CL
Black-crowned Night Heron	<i>Nycticorax nycticorax</i>	+	++	+						CL
Large Hawk Cuckoo	<i>Hierococcyx sparveroides</i>					+				CW
Collared Scops Owl	<i>Ottus lettia</i>					+				CL
Magpie Robin	<i>Copsychus saularis</i>				+	+				CW
Rufous-backed Shrike	<i>Lanius schach</i>		+			+				CW

**Commonness:** CW = common and widespread, UCW = uncommon and widespread, CL = common and localised, UCL = uncommon and localised, R = rare and localised.

Abundance: + = < 5 individuals, ++ = 5 – 20 individuals

Appendix 3c    Breeding records of birds at the Study Area

Species	Observations	Habitat / Location	Date	Commonness
Chinese Pond Heron	Nests found	Woodland on Shuen Wan Egretty SSSI	June 09	CW
Spotted Dove	Carrying nesting materials	Shrubland/grassland	Feb 09	CW
Yellow-bellied Prinia	Recently fledged juveniles; Adult carrying food	Marsh 6;  Marsh 4	May 09  Jun 09	CW
Chinese Bulbul	Adult carrying food	Plantation	May 09	CW
Red-whiskered Bulbul	Recently fledged juveniles	Woodland, ravine woodland	May 09	CW
Great Tit	Recently fledged juveniles	Woodland, ravine woodland	May 09	CW
Japanese White-eye	Adults feeding juveniles	Woodland, ravine woodland	May 09	CW
Eurasian Tree Sparrow	Carrying nesting materials	Developed area	May 09	CW
Spotted Munia	Carrying nesting materials	Shrubland/grassland	Feb 09	CW



Appendix 4 Herptofauna recorded at the Study Area

Common Name	Latin Name	FM	BM	S	U	W	PI	Sh/Gr	P	Commonness
<b>Amphibians</b>										
Asian Common Toad	<i>Bufo melanostictus</i>	+++	+++			+	+			C
Gunther's Frog	<i>Rana guentheri</i>	+	+	+					+	C
Paddy Frogs	<i>Fejervarya limnocharis</i>	+				++				C
Asiatic Painted Frog	<i>Kaloula pulchra</i>	+		+						C
Brown Tree Frog	<i>Polypedates megacephalus</i>			+		+				C
<b>Reptiles</b>										
Red-eared Slider	<i>Trachemys scripta</i>								+	VC
Bowring's Gecko	<i>Hemidactylus bowringii</i>				+					C
Changeable Lizard	<i>Calotes versicolor</i>				+		+	+		C
Grass Lizard	<i>Takydromus sexlineatus</i>						+			UC
Chinese Skink	<i>Eumeces chinensis</i>					+				C
Blue-tailed Skink	<i>Eumeces quadrilineatus</i>					+				C
Long-tailed Skink	<i>Mabuya longicaudata</i>				+	+	++	+	+	C
Reeves' Smooth Skink	<i>Scincella reevesii</i>					+				C
Indo-Chinese Rat Snake	<i>Ptyas korros</i>	+								C
Common Rat Snake	<i>Ptyas mucosus</i>				*					C

**Habitats:** FM = freshwater marsh, BM = brackish marsh, U = urban, W = woodland (including *fung shui* wood), P = plantation, sh/Gr = shrubland/grassland, P = fishponds

Status: VC = very common, C = common, UC = uncommon.

Abundance: + = < 5 individuals, ++ = 5 – 20 individuals, +++ = > 20 individuals

\* a dead individual found

Appendix 5 Mammal recorded at the Study Area

Common Name	Latin Name	FM	BM	S	U	W	PI	Sh/Gr	P	Commonness
Japanese Pipistrelle	<i>Pipistrellus abramus</i>	+	+	++	++	+	+		+	VC
Wild Boar	<i>Sus scrofa</i>					*			*	C
Small Indian Civet	<i>Viverricula indica</i>							**		C

**Habitats:** FM = freshwater marsh, BM = brackish marsh, U = urban, W = woodland (including *fung shui* wood), P = plantation, sh/Gr = shrubland/grassland, P = fishponds

Status: VC = very common, C = common, UC = uncommon.

Relative abundance of bats: + = < 10 individuals, ++ = 10 -20 individuals; \* = digging signs, \*\* = scats found

Appendix 6 Butterfly species recorded at the Study Area

Common name	Latin name	FM	BM	S	U	W	PI	Sh/Gr	P	status
Water Snow Flat	<i>Tagiades litigiosus</i>	1	0	0	0	0	0	0	0	C
Chinese Dart	<i>Potanthus confucius</i>	0	1	0	0	3	0	0	0	C
Bush Hopper	<i>Ampittia dioscorides</i>	0	1	0	0	1	0	0	0	UC
Formosan Swift	<i>Borbo cinnara</i>	0	0	0	0	2	0	0	0	UC
Tailed Jay	<i>Graphium agamemnon</i>	0	0	0	0	2	0	0	0	VC
Common Jay	<i>Graphium doson</i>	2	0	0	0	0	0	0	0	C
Lime Butterfly	<i>Papilio demoleus</i>	0	0	1	0	0	0	1	2	C
Red Helen	<i>Papilio helenus</i>	0	0	0	0	1	0	1	0	VC
Great Mormon	<i>Papilio memnon</i>	4	2	1	1	0	2	0	0	C
Paris Peacock	<i>Papilio paris</i>	0	0	0	0	1	0	0	0	VC
Common Mormon	<i>Papilio polytes</i>	4	4	0	1	2	4	0	1	VC
Spangle	<i>Papilio protenor</i>	0	0	0	0	2	0	0	0	VC
Great Orange Tip	<i>Hebomoia glaucippe</i>	0	0	1	1	2	0	0	0	C
Lemon Emigrant	<i>Catopsilia pomona</i>	0	1	0	0	0	1	0	0	C
Indian Cabbage White	<i>Pieris canidia</i>	2	2	1	2	0	2	7	2	VC
Common Grass Yellow	<i>Eurema hercabe</i>	7	3	2	2	0	7	6	5	VC
Purple Sapphire	<i>Heliophorous epicles</i>	0	0	0	0	2	0	0	0	C
Lime Blue	<i>Chilades lajus</i>	9	1	2	2	2	0	0	3	VC
Punchinello	<i>Zemeros flegyas</i>	0	0	0	0	1	4	3	0	C
Plum Judy	<i>Abisara echerius</i>	0	0	0	0	1	0	1	0	VC
Banded Tree Brown	<i>Lethe confusa</i>	0	0	0	0	2	0	0	0	VC
Dark-banded Bush Brown	<i>Mycalesis mineus</i>	0	12	0	0	2	0	0	1	VC
Rustic	<i>Cupha erymanthis</i>	1	0	0	0	0	0	0	0	VC
Tawny Rajah	<i>Charaxes bernardus</i>	0	0	0	0	1	0	0	0	C
Peacock Pansy	<i>Junonia almana</i>	0	0	0	0	1	0	0	0	C
Lemon Pansy	<i>Junonia lemonias</i>	0	0	0	0	1	0	0	0	C
Blue Admiral	<i>Kaniska canace</i>	0	0	0	0	1	0	0	0	C
Common Mapwing	<i>Cyrestis thyodamas</i>	0	0	0	1	1	0	0	0	C
Black Prince	<i>Rohana parisatis</i>	0	0	0	0	2	0	1	0	C
Common Five-ring	<i>Ypthima baldus</i>	0	2	1	0	0	2	0	0	VC
Straight Five-ring	<i>Ypthima lisandra</i>	1	0	2	0	0	0	0	0	C
Large Faun	<i>Faunis eumeus</i>	1	0	0	0	2	1	0	0	VC
Ceylon Blue tiger	<i>Ideopsis similis</i>									
Blue-spotted Crow	<i>Euploea midamus</i>	1	0	0	0	0	3	0	0	VC

Common name	Latin name	FM	BM	S	U	W	PI	Sh/Gr	P	status
Total butterflies		33	32	11	10	36	26	20	14	
Total species		11	11	8	7	23	9	7	6	

**Habitats:** FM = freshwater marsh, BM = brackish marsh, U = urban, W = woodland (including *fung shui* wood), P = plantation, sh/Gr = shrubland/grassland, P = fishponds  
Status: VC = very common, C = common, UC = uncommon.

Appendix 7 Dragonflies recorded at the Study Area

Common names	Latin name	FM	BM	S	U	W	PI	Sh/Gr	P	Status
Chinese Greenwing	<i>Neurobasis chinensis</i>	0	0	2	0	0	0	0	0	C
Common Blue Jewel	<i>Rhinocypha perforata</i>	1	0	2	0	0	0	0	0	A
Black-banded Gossamerwing	<i>Euphaea decorata</i>	0	0	2	0	0	0	0	0	A
Orange-tailed Midget	<i>Agriocnemis femina</i>	54	12	2	0	0	0	0	4	A
Wandering Midget	<i>Agriocnemis pygmaea</i>	40	11	0	0	0	0	0	5	C
Common Bluetail	<i>Ischnura senegalensis</i>	41	0	0	0	0	0	0	13	A
Marsh Dancer	<i>Onychargia atrocyana</i>	0	0	0	0	0	1	0	0	C
Orange-tailed Sprite	<i>Ceragrion auranticum</i>	11	10	0	0	0	0	0	3	A
Yellow Featherleg	<i>Copera marginipes</i>	0	0	2	0	0	0	0	0	A
Black Threadtail	<i>Prodasineura autumnalis</i>	2	0	2	0	0	0	0	0	A
Blue Dasher	<i>Brachydiplax chalybea</i>	8	3	1	0	0	0	0	0	C
Marsh Skimmer	<i>Orthetrum luzonicum</i>	2	2	0	0	0	0	0	1	A
Red-faced Skimmer	<i>Orthetrum chrysis</i>	3	5	0	0	0	0	0	0	C
Green Skimmer	<i>Orthetrum sabina</i>	6	0	1	2	0	1	1	1	C
Common Blue Skimmer	<i>Orthetrum glaucum</i>	2	0	1	0	2	1	0	0	A
Common Red Skimmer	<i>Orthetrum pruinosum</i>	1	0	0	0	0	0	0	0	A
Saddlebag Glider	<i>Tamea virginia</i>	0	1	0	0	0	0	0	0	C
Wandering Glider	<i>Pantala flavescens</i>	47	2	2	0	0	1	2	0	A
Variegated Flutterer	<i>Rhyothemis variegata</i>	42	17	0	0	0	0	0	0	C
Crimson Dropwing	<i>Trithemis aurora</i>	6	0	3	0	0	0	0	0	A
Total dragonflies		266	63	20	2	2	4	3	27	
Total species		15	9	11	1	1	4	2	6	

**Habitats:** FM = freshwater marsh, BM = brackish marsh, U = urban, W = woodland (including *fung shui* wood), P = plantation, sh/Gr = shrubland/grassland, P = fishponds  
Status: C = common, A = abundant

Appendix 8 Aquatic species recorded along Wai Ha River

Species	Common Name	1997	Aug/Oct 2008	Jan 09
<b>Pisces</b>				
<i>Cirrhinus molitorella</i>	Mud Carp		+	
<i>Liniparhomaloptera disparis</i>	Broken-band Hillstream Loach		+	+
<i>Hemiculter leucisculus</i>	Wild Carp		+	+
<i>Monodactylus</i> sp.	Moony	✓		
<i>Mugil cephalus</i>	Mullet	✓	++	+++
<i>Oreochromis mossambicus</i>	Tilapia	✓		+
<i>Oreochromis niloticus</i>	Tilapia		+++	++
<i>Puntius semifasciolatus</i>	Six-banded Barb	✓	+++	+++
<i>Rhinogobius duospilus</i>			++	+
<i>Rhinogobius giurinus</i>	Barcheek goby		+	++
<i>Xiphophorus hellerii</i>	Swordtail		+++	+++
<b>Crustacea</b>				
<i>Eriocheir japonicus</i>	Mitten Crab	✓	+	+
<i>Macrobrachium</i> sp.	Long-armed Shrimp	✓	+	+
<i>Nanhaipotamon hongkongensis</i>	Freshwater Crab	✓		
<i>Cryptopotamon anacoluthon</i>	Freshwater Crab		+	
<b>Gastropoda</b>				
<i>Cerithidea cingulata</i>		✓	++	+
<i>Clithon oualaniensis</i>		✓	++	+
<i>Hippeutis cantonensis</i>				+

✓ = present, + = Sparse, ++ = Common, +++ = Abundant

Appendix 9 Aquatic species recorded along Wong Yue Tan Stream

Species	Common Name	1997	Aug/ Oct 2008	Jan 2009
<b>Pisces</b>				
<i>Glossogobius giuris</i>	Goby	✓		
<i>Mugil cephalus</i>	Grey Mullet	✓	+++	+++
<i>Oreochromis mossambicus</i>	Tilapia	✓	++	+
<i>Oreochromis niloticus</i>	Tilapia		++	++
<i>Periophthalmus cantonensis</i>	Mudskipper	✓	+	
<i>Poecilia reticulata</i>	Guppy	✓		+
<i>Puntius semifasciolatus</i>			++	+
<i>Scatophagus argus</i>	Scat	✓		
<i>Therapon jurbua</i>	Tiger Fish	✓		+
<i>Tridentiger trigoncephalus</i>	Goby	✓		
<i>Xiphophorus hellerii</i>			+++	+
<b>Crustacea</b>				
<i>Caridina cantonensis</i>			+	+
<i>Macrobrachium</i> sp.			+	
<i>Metaplex</i> sp.	Fiddler crab	✓	++	+
<i>Uca</i> spp.				+
<b>Gastropoda</b>				
<i>Cerithidea rhizophorarum</i>			+	+

✓ = present, + = Sparse, ++ = Common, +++ = Abundant

Appendix 10 Aquatic species recorded in the Marsh

Species	Common Name	1997	Aug/Oct 2008	Jan 09
<b>Pisces</b>				
<i>Apogon</i> sp.	Cardinal fish		++	+++
<i>Oreochromis mossambicus</i>	Tilapia		++	
<i>Oreochromis niloticus</i>	Tilapia		+	+++
<i>Periophthalmus cantonensis</i>	Mudskipper		+	+
<b>Crustacea</b>				
<i>Chasmagnathus convexus</i>		✓		
<i>Holometopus dehannii</i>			+	
<i>Perisesarma bidens</i>				++
<i>Scopimera</i> sp.			++	++
<b>Gastropoda</b>				
<i>Cassidula aurifelis</i>			+	+
<i>Cerithidea rhizophorarum</i>		✓	+++	++
<i>Clithon</i> spp.		✓	+	+
<i>Littorina</i> spp.		✓	++	+
<b>Bivalvia</b>				
<i>Geloina erosa</i>			+	

✓ = present, + = Sparse, ++ = Common, +++ = Abundant

## **Attachment B**

Letter from the Chairman of the Lok  
Sin Tong Benevolent Society, Kowloon





Since 1880 成立

九龍樂善堂 The Lok Sin Tong Benevolent Society, Kowloon

九龍城龍崗道六十一號 61, Lung Kong Road, Kowloon City

電話Tel: (852) 2382 1576 傳真Fax: (852) 2718 4634

網址Web Site: <http://www.loksintong.org>

申請編號: A/NE-TK/702

致城市規劃委員會：

## 九龍樂善堂籲支持大埔黃魚灘過渡性社會房屋項目

九龍樂善堂(簡稱「樂善堂」)自 2017 年開始配合政府施政下，推出過渡性社會房屋項目「樂屋」，以短期過渡性形式紓緩輪候公屋基層家庭之住屋和經濟壓力，「樂屋」推行了三年多，由於項目中有不少基層孩子，過程中顯著地看見孩子和家庭的正面轉變。

本人除擔任九龍樂善堂 2021 年度主席，同時為新界總商會事務委員會主席、新界扶輪社前地區總監、仁安醫院「仁心仁術」慈善計劃主席等，一直積極參與各類型慈善事務，特別在新界區的民生工作上，親睹不同基層個案需要，發現只要在他們艱難時候，伸出援手，受惠人十分樂意回饋社會，為社會注入和諧和善心動力。

在入住「樂屋」的其中一個家庭中，一位單親媽媽照顧著兩名分別就讀幼稚園及小學的兒子，一家三口原本居住於一個不多於一百呎的劏房中，空間不多加上經濟壓力，而就讀幼稚園的幼子仍未懂說話，擔心幼子有學習障礙，長子因為沒有學習空間，做功課和活動也在劏房附近的體育館內，令長子未能專注學習，致成績較差，親子關係緊張，精神健康亦受到影響，她曾因看不見前景下，欲與兩名兒子自尋短見。幸在生活最艱難的一刻，看到「樂屋」的申請招募，其後成功入住了「樂屋」，由一百呎劏房空間遷到九龍城一個二百六十呎的唐樓空間，有獨立廚廁，更可放置學習書枱和床鋪，租金壓力亦大幅減輕。

除了居住空間提升和經濟壓力減低，項目內的共享服務空間讓孩子能享有課後托管、親子活動、醫社服務支援等，漸漸地那位單親媽媽與鄰里建立了非常良好的關係。

關 懷 情 真 • 樂 善 同 行



Social Capital Builder Awards  
2018-20  
社會資本動力獎

二零二零年度常務總理會  
Executive Committee 2020/2021

主席  
Chairlady  
陳李玉佩女士  
Mrs. CHAN LEE Yuk Pui, Kawina

第一副主席  
1st Vice-chairman  
彭志宏醫生  
Dr. PANG Chi Wang, Peter

第二副主席  
2nd Vice-chairman  
蘇裕康博士  
Dr. SU Yu Hong

第三副主席  
3rd Vice-chairman  
陳健平先生，太平紳士  
Mr. CHAN Kin Ping, JP

第四副主席  
4th Vice-chairman  
李聖根先生  
Mr. LEE Shing Kan

常務總理  
Executive Committee Members

李聖根先生，銅紫荊星章  
Mr. LEE Shing Put, BBS

郭子宏先生，榮譽勳章  
Ir. KWOK Yu Won, Eric, MH

施家殷先生，榮譽勳章  
Mr. SZE Kyrin, MH

梁紹安先生，榮譽勳章  
Mr. LEUNG Siu On, Clifford, MH

陳婉儀女士  
Ms. CHAN Jeanette

董脫謹先生  
Mr. TUNG Fong Ngai

李茂銘博士  
Dr. LI Mow Ming, Sonny

溫文蕙女士  
Ms. WAN Man Wai, Rowena

李培堃女士  
Ms. LEE Pui Ah

莫文韜先生  
Mr. MOK Michael Man Too

黃影影女士  
Ms. WONG Ying Ying

董志鋒先生  
Mr. TUNG Chi Fung

黃家恒先生  
Mr. WONG Ka Hang

關嘉游先生  
Mr. KWAN Ka Yau, Keith

鍾子權先生  
Mr. CHUNG Tsi Kuen

黃樹源先生  
Mr. WONG Shu Yuen

王紹基先生  
Mr. WONG Ivan Siu Kei

徐英偉先生  
Mr. CHUI Ying Wai

陳承邦先生  
Mr. CHAN Shing Bong

名譽總幹事  
Hon. Chief Executive  
陳仲海先生，榮譽勳章  
Mr. GARCIA Stanley J., MH

總幹事  
Chief Executive  
劉愛詩女士，榮譽勳章  
Ms. LAU Oi Sze, Alice, MH



Since 1880 成立

# 九龍樂善堂 The Lok Sin Tong Benevolent Society, Kowloon

九龍城龍崗道六十一號 61, Lung Kong Road, Kowloon City

電話 Tel: (852) 2382 1576 傳真 Fax: (852) 2718 4634

網址 Web Site: <http://www.loksintong.org>

## 二零二零年度常務總理會 Executive Committee 2020/2021

**主席**  
**Chairlady**  
陳李玉佩女士  
Mrs. CHAN LEE Yuk Pui, Kawina

**第一副主席**  
**1st Vice-chairman**  
彭志宏醫生  
Dr. PANG Chi Wang, Peter

**第二副主席**  
**2nd Vice-chairman**  
蘇裕康博士  
Dr. SU Yu Hong

**第三副主席**  
**3rd Vice-chairman**  
陳健平先生，太平紳士  
Mr. CHAN Kin Ping, JP

**第四副主席**  
**4th Vice-chairman**  
李聖根先生  
Mr. LEE Shing Kan

## 常務總理 Executive Committee Members

李聖發先生，銅紫荊星章  
Mr. LEE Shing Put, BBS

郭予宏先生，榮譽勳章  
Ir. KWOK Yu Won, Eric, MH

施家殷先生，榮譽勳章  
Mr. SZE Kyran, MH

梁紹安先生，榮譽勳章  
Mr. LEUNG Siu On, Clifford, MH

陳婉儀女士  
Ms. CHAN Jeanette

董曉蓮先生  
Mr. TUNG Fong Ngai

李茂銘博士  
Dr. LI Mow Ming, Sonny

溫文蕙女士  
Ms. WAN Man Wai, Rowena

李培堃女士  
Ms. LEE Pui Ah

莫文韜先生  
Mr. MOK Michael Man Too

黃影影女士  
Ms. WONG Ying Ying

董志鋒先生  
Mr. TUNG Chi Fung

黃家恒先生  
Mr. WONG Ka Hang

關嘉游先生  
Mr. KWAN Ka Yau, Keith

鍾子權先生  
Mr. CHUNG Tsi Kuen

黃樹源先生  
Mr. WONG Shu Yuen

王紹基先生  
Mr. WONG Ivan Siu Kei

徐英偉先生  
Mr. CHUI Ying Wai

陳承邦先生  
Mr. CHAN Shing Bong

**名譽總幹事**  
**Hon. Chief Executive**  
陳仲海先生，榮譽勳章  
Mr. GARCIA Stanley J., MH

**總幹事**  
**Chief Executive**  
劉愛詩女士，榮譽勳章  
Ms. LAU Oi Sze, Alice, MH

個案中的幼子與其他小朋友玩樂多了，說話技巧也進步；長子有了學習空間，讀書也進步了，還由全班最差的成績考獲全班第一名。媽媽有時間亦會到共享服務間擔任義工，回饋本堂慈善工作，做一個好榜樣讓兒子學習感恩和回饋。

這個個案分享，希望讓社會人士知道過渡性社會房屋不僅僅是一個具體性地將居住空間提升的項目，是一個能將原本有可能發生的家庭悲劇轉化成家庭正能量的建設性項目。

一個好項目得以推行，實有賴各方攜手合作，包括政府政策推動、商界資源和技術性投入、社區人士無私支持以及非政府機構的用心推行。

在新型冠狀病毒疫情下，經濟出現下行，不少人失業或開工不足，本港地少人多，居住問題嚴峻，樂善堂不斷推陳出新，推出不同過渡性社會房屋項目，配合社會需要，服務基層家庭，但單靠本堂力量是不足夠的，希望政府和社區人士共同攜手一同推動，支持樂善堂於大埔黃魚灘計劃推動的過渡性社會房屋項目。

二零二一年度主席

彭志宏醫生

謹啟

*Pete Pang*

二零二一年三月十九日



關 懷 情 真 • 樂 善 同 行



Social Capital Builder Awards  
2018-20  
社會資本動力獎





城市規劃委員會：

### 支持推行「大埔黃魚灘村興建過渡性社會房屋項目」

本人為現居於大埔區居民及現正輪候公屋，較早前於報章及通告上獲悉樂善堂將於大埔黃魚灘村興建過渡性社會房屋。本人十分支持此項目，以及認為過渡性社會房屋，有效地協助我們及其他基層家庭，改善居住環境及經濟壓力。

- 1) 身為大埔區居民，我覺得這個項目選址合適。項目在汀角路旁，有直接的路和交通接駁。從申請的效果圖可見，將興建的過度性房屋無論在樓高或房屋外型的設計上都與周邊的村屋和環境相當配合。
- 2) 輪候公營房屋的時間有增無減，而基層家庭被迫居於環境惡劣和狹窄的居所或劏房，承受沉重的租金和生活的壓力，興建過度性房屋能在短時間內提供一個適切及環境良好的居所，以及可負擔的租金，直接幫助我們。
- 3) 在疫情嚴重打擊經濟的情況下，香港的失業率大幅上升，使基層人士的生活苦不堪言，提供更多不同類型的社會房屋是刻不容緩！這個項目能提供一共 1,236 個單位，而且會提供一些生活所需的設施及休憩空間，絕對能幫助不少基層家庭，暫時舒緩我們住屋和經濟的壓力。希望項目能早日落成！
- 4) 九龍樂善堂是一個營運社會房屋富有相當經驗的非牟利機構。我對於他們能興建一個優質的社會房屋項目非常有信心。若有機會成為受惠家庭租住社會房屋，也會配合機構營運的法則並遵守承諾，與鄰近居民一同守望相助，維持社區安寧。

姓名： Li Sau Yin

簽署： [Signature]

日期： 20/1/31 2021

城市規劃委員會：



支持推行「大埔黃魚灘村興建過渡性社會房屋項目」

(申請編號：A/NE-TK/702)

本人為曾居於樂善堂社會房屋計劃「樂屋」之家庭，較早前於報章及通告上獲悉樂善堂將於大埔黃魚灘村，興建過渡性社會房屋。本人十分支持此項目，以及認為過渡性社會房屋，有效地協助我們及其他基層家庭，改善居住環境及經濟壓力。

- 1) 在輪候公屋的時間變得越來越長的情況下，基層家庭需承受沉重的租金和生活的壓力，居於環境惡劣和狹窄的居所或劏房，嚴重影響兒童發展和家庭關係。在樂善堂的協助下，我們一家遷入「樂屋」，除了減輕租金壓力外，生活環境和質素均得以改善。故本人贊成興建過渡性房屋能短時間幫助我們。
- 2) 經過幾波疫情影響，嚴重打擊香港經濟，失業率上升，開工不足，基層家庭收入大幅減少，面對沉重經濟和生活壓力，百上加斤！此項目採用組合屋模式興建，可以加快社會房屋的供應，而項目中的 1,236 個單位必定能惠及很多現在住在惡劣環境居所或劏房的家庭，希望項目要盡快推行！
- 3) 九龍樂善堂是一個營運社會房屋富有相當經驗的非牟利機構，除了社會房屋外，樂善堂亦提供社會服務及家庭支援，我對於他們能興建及管理一個優質的社會房屋項目非常有信心。

姓名： 張麗雯

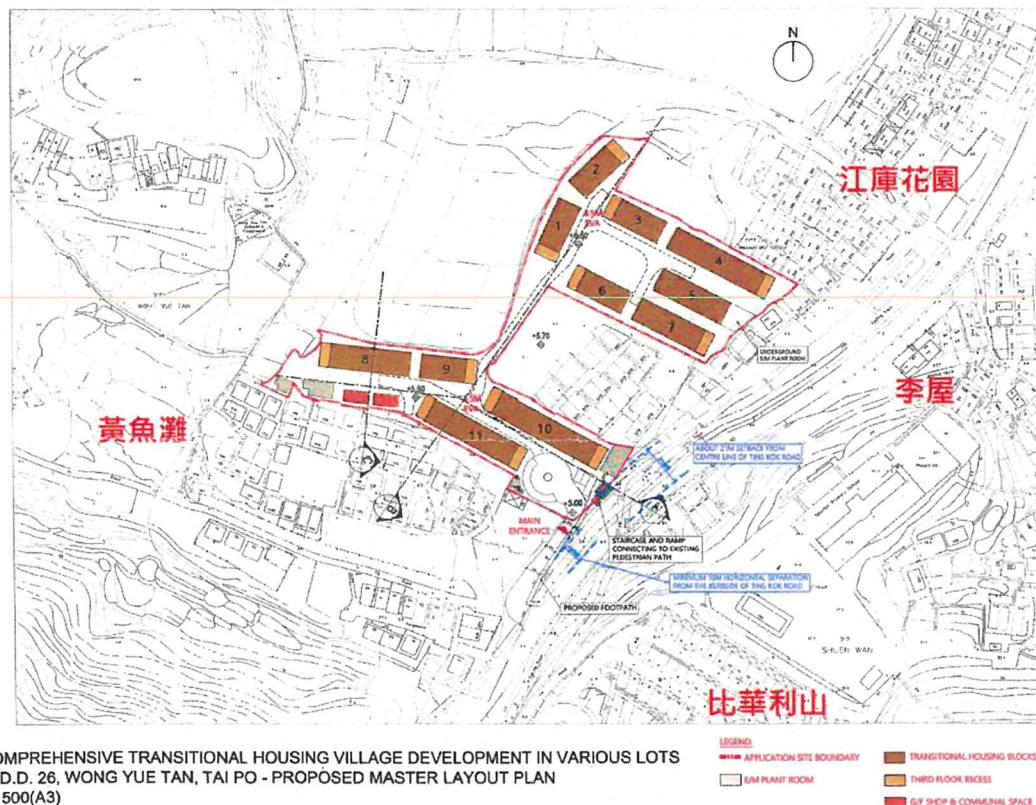
簽署： 張麗雯

日期： 1-3-2021



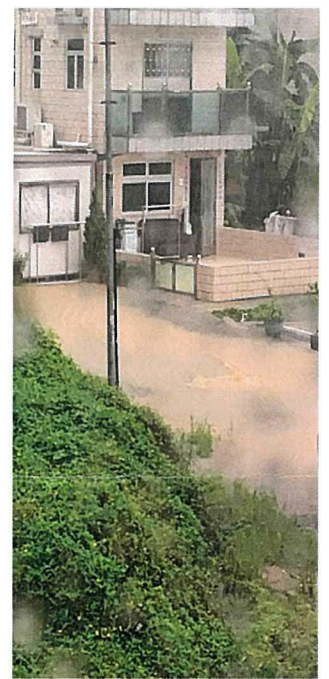
## 強烈反對於大埔船灣興建過渡性房屋

- 項目規模相當龐大，地盤面積 14,517 平方米(約 15 萬 6 千平方呎)，將**長遠影響區內每位居民生活**、居住環境和活動空間。絕對不容忽視。
- 政府漠視我們反對意見，夥同樂善堂，強推於船灣黃魚灘一帶興建過渡性房屋。城市規劃委員會（城規會）已**收到樂善堂的規劃許可申請（編號：A/NE-TK/702）**，現正邀請公眾於**3 月 2 日**前提交意見。
- 有關計劃擬興建 **11 棟三至四層高**的建築物，總共提供 **1,236 個單位**，供約**三千多人入住**。



- 農曆新年期間汀角路嚴重塞車，車龍長達 4 公里(由雅景花園至龍尾泳灘)，**額外三千多人口入住**，對汀角路一帶各村及屋苑帶來深遠及**嚴重的負面影響**。
- **影響包括造成交通擠塞，居民乘車困難；影響排水，加劇水浸問題；排污不足，產生污染；嚴重影響環境及自然生態；造成嚴重景觀及視覺影響；新舊社區難以融合，引發治安問題等**
- 項目有假借「臨時」及「非牟利機構」為名，企圖蒙混過關
- 涉嫌為發展商鋪路，將「生地」轉為「熟地」，有官商勾結之嫌
- 雙重標準，容許樂善堂在「綠化地帶」興建大型屋苑





**公共交通難以負荷，汀角路塞車勢必惡化**

**影響排水，勢必加劇水浸**

➤ 大家可透過下列方法向城規會表達意見：

1. 經城規會有關申請的**網頁**，以特定**表格**提交（不多於 8000 中文字或英文字母，包括空格）：

[https://www.info.gov.hk/tpb/tc/plan\\_application/A\\_NE-TK\\_702.html](https://www.info.gov.hk/tpb/tc/plan_application/A_NE-TK_702.html)

2. **親身**或利用**郵寄**方式，把意見（不限字數，可附圖）送交城市規劃委員會秘書（地址：**香港北角渣華道 333 號北角政府合署 15 樓**）

3. 也可以**傳真**（傳真號碼：2877 0245 或 2522 8426）或**電郵**（電郵地址：[tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk)）送交

➤ **意見必須在限期（3 月 2 日）之前交到城規會，並須引述申請編號**

➤ 可使用此單張夾附的**反對信**，簽署後交回**關注組**轉交城規會

## 汀角路民生關注組

地址: 新界大埔船灣詹屋村 30 號

電話: 2658-1238

傳真: 2658-1236

WhatsApp: [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 / 2522 8426)  
(電郵：tpbpd@pland.gov.hk)

執事先生 / 女士：

**強烈反對在大埔黃魚灘村興建過渡性房屋及填土和挖土工程**

**申請編號：A/NE-TK/702**

本人是居住沿汀角路的居民，得知樂善堂向城規會申請在大埔黃魚灘興建過渡性房屋。有關項目涉及興建 11 棟三至四層高的建築物，總共提供 1,236 個單位，供不少於 3,000 人入住。本人強烈反對上述申請，理由如下：

1. **選址**—建議的選址位處被一群村屋所包圍的「綠化」地及「鄉村式發展」地帶，若 11 棟四層高的過渡性組合房屋建成後，該群村屋(超過 100 戶)的景觀由現時遠觀綠油油一片沼澤地變成近在咫尺的貨櫃屋。坐落於市區(例如深水埗中轉房)的組合屋對環境影響相對比較細，坐落於寧靜鄉郊的組合屋(1,236 個單位)對環境影響(包括景觀、交通、噪音)帶來破壞性的滋擾非常之大，這個選址非常之有問題。
2. **路面交通**—沿汀角路已有 20,000 多人居住，在黃魚灘村對出的一段汀角路由來回四線收窄為兩線是交通問題所在，多次向運輸署反映爭取擴闊路面和路口都無回應。黃魚灘過渡性房屋(1,236 戶)連同沿汀角路的另一個改劃申請(位於鳳園 Y/TP/30—1,462 戶 200 車位)，合共提供 2,698 個單位(人口增加約 10,000 人)。汀角路/露輝路及汀角路/鳳園路兩個往大埔方向的樽頸路口位置至今還未有改善方案。龍尾泳灘開放前的農曆新年多天假期，汀角路交通非常擠塞，車龍由雅景花園塞至龍尾泳灘(長達 4 公里)，平日 5 分鐘的車程居民要花 45 分鐘在車龍中才能回到家中，兩個發展疊加效應對汀角路帶來的交通擠塞影響評估報告未有提交。
3. **公共交通**—第 2 項提及沿汀角路兩個住宅改劃申請，合共提供 2,698 個單位，將會令現在沿汀角路的 20,000 多人口增加至 30,000 多人，對每天的公共交通需求百上加斤。過去有透過議員提出要求增加公共巴士及小巴班次，都未見有加密班次服務的改善。
4. **排水**—項目涉及的土地大部分都是棄耕農地，有一定的儲水能力，若要建屋必須填平農地及加高，對鄰近一群村屋造成嚴重水浸影響。現時黃魚灘村每逢大雨都容易水浸，渠務署網頁明確表示黃魚灘是水浸黑點，有關發展必然會加劇水浸問題。這低窪農地原是黃魚灘村唯一雨水蓄水庫，每當大雨來臨，此蓄水庫便會擔當重要功能，將暴增的兩

水臨時儲存，逐漸地排放至大海。若然蓄水庫被填平建過渡性房屋，蓄水庫功能盡失，黃魚灘村發生的水浸情況加劇百倍。

5. **排污**—現時黃魚灘村及蝦地下村一帶，都缺乏排污設施，未能接駁到政府污水渠。過渡性房屋項目將自設污水處理設施，處理後的污水，亦未知如何排放，既不會改善本區現有排污設施不足的問題，亦不清楚會否影響周遭環境。
6. **社會融合及治安**—新增人口大部份並非慣常在鄉郊生活，未必能融入鄉村寧靜生活的模式；目前黃魚灘村全村只有約二百多居民，新增人口卻多達三千多人，竟是黃魚灘村原有的 10 倍以上！勢必完全摧毀現有的寧靜鄉村的面貌和居民和諧共處的風氣。村民亦會擔心新增的人口，在缺乏社區設施的情況下，必定對社區造成壓力，引發治安問題。
7. **景觀**—現時黃魚灘村及詹屋江庫是寧靜的鄉郊，同一時間在農田興建 11 棟大型房屋必然大幅改變現有的景觀，增加大量人口亦會改變現時寧靜環境。一經被填平的濕地、綠化地是不可以逆轉並回復原貌，村民將永遠失去現時的自然生態環境。
8. **環境影響**—過渡性房屋項目採用組合屋形式興建，正如前面所述，有關土地是荒廢農地，大部份更是濕地，下面是淤泥，若要建屋需大量填土。施工期間必然對環境造成重大影響，包括噪音、污水、灰塵等，而工地貼近現有村屋，亦會對村民造成不便和影響村民健康。雖然項目刻意避開自然保育區(CA)，但對附近生態環境的影響亦不容忽視，尤其是水文改變、施工期間的污染、噪音等都會影響鄰近濕地，對保育區的生態造成破壞。

[其他意見：

---

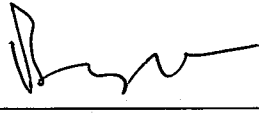
---

---

---

1

基於上述種種問題，本人是反對在黃魚灘興建過渡性房屋項目，謝謝。

「提意見人」姓名：歐美明 簽名： 日期：23/2/2021  
通訊地址 / 電郵地址：\_\_\_\_\_

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 / 2522 8426)  
(電郵：tpbpd@pland.gov.hk)

執事先生 / 女士：

**強烈反對於大埔船灣興建過渡性房屋及填土和挖土工程**

**申請編號：A/NE-TK/702**

我 / 我們強烈反對上述申請，理由如下：

- 選址錯誤，破壞整體規劃。**有關申請擬於「綠化地帶」(GB) 及「鄉村式發展」(V) 地帶 (超過 90% 在 GB)，興建 11 棟三至四層高的建築物，提供 1,236 個單位，供三千多人入住，規模相當龐大，並不符合《汀角分區計劃大綱核准圖編號 S/NE-TK/19》的整體規劃意向，也不符合 GB 和 V 地帶的規劃要求。
- 規模過大，基建及社區設施無法負荷。**申請項目將為船灣區帶來三千多新人口，必然會嚴重影響當地交通、排污等基建設施，不單會嚴重影響現有居民的日常生活，亦無法滿足新增人口的基本生活需求。
- 黑箱作業，缺乏諮詢，漠視當地居民意見。**政府一直都將當地居民蒙在鼓裡，雖曾兩次諮詢船灣各村代表，但並無提供項目細節，亦無披露一些技術評估的資料，令外界完全無法得知詳情。
- 導致交通擠塞，居民乘車困難。**當區只有汀角路一條主要通道，突然加增了三千多人口，對公共交通的需求必然十分強烈，增加居民乘車的困難。增加巴士及小巴班次，亦未必能有效地疏導龐大的新增乘客數量，反而令已非常繁忙的汀角路更加擠塞，更會使原本的交通擠塞問題加劇惡化。
- 影響排水，加劇水浸問題。**船灣一帶是水浸黑點，項目涉及填土和挖土，石屎鋪平地面，砍伐樹木，勢必大幅減少土壤吸收雨水功能，改變現有水文系統，增加排水量，加劇鄰近鄉村水浸問題。現時渠務署對在項目地點附近興建村屋的申請，都質疑有水浸問題，審批異常嚴苛，是次申請如此龐大，將增加如此大量的人口，肯定水浸問題會惡化。
- 排污不足，易生污染。**現時船灣一帶排污設施超出負荷，有關項目必然增加當區排污壓力，而每日產生及排放的大量污水，必加重現有水體的排水負荷，導致水浸，並造成污染，影響河溪及鄰近沼澤濕地，包括下游的汀角紅樹林和三門仔養魚區。
- 嚴重影響環境及自然生態。**申請地點的東南面緊貼現有村屋，施工期間產生的污水、噪音、塵土等，不但影響環境，亦會對村民造成不便和影響村民健康。而申請地點西北面則緊貼劃為自然保育區 (CA) 的濕地，並且只是鬆散的土坡，進行工程時很難不影響到保育區的濕地。而平整土地亦須砍伐大量樹木，勢必造成負面生態及景觀影響。

8. 嚴重影響景觀。項目擬議興建 11 棟四層高的大型房屋，比鄰近村屋大幾倍至十多倍，必然大幅改變現有的鄉郊景觀，造成負面景觀及視覺影響。其中幾座大樓更十分貼近現有村屋，部分只得數米距離，建成後將阻礙這些貼近村屋的採光，使屋內沒有足夠光線，影響居民健康。這些大型房屋亦會完全遮擋鄰近村屋的視野，對現有居民必然造成非常嚴重及無法緩解的視覺影響！

9. 社區難以融合及治安問題。申請地點大致分為兩塊土地，與現有村落及屋苑夾雜，部分更非常貼近村屋，在基礎設施及道路使用方面，容易與村民產生衝突。新增人口是當地村落的十數倍，將會改變現時寧靜環境，勢必完全摧毀現有寧靜鄉村的面貌和居民和諧共處的風氣。缺乏社區設施容易對社區造成壓力，並引發治安問題。

10. 假借「臨時」及「住宿機構」為名，蒙混過關，亦有官商勾結之嫌。現時的申請聲稱屬「臨時」「住宿機構」項目，為期 5 年（與先前諮詢說的 8 年不同），實有取巧之嫌。建成房屋入伙之後，米已成炊，隨時可向城規會申請延期，五年又五年，隨時一幌十多二十年。項目實則涉及興建大量住宅單位，絕不能視作臨時土地用途，也非「住宿機構」。再者，項目完結之後需交還土地給發展商，將「生地」轉為「熟地」，有助發展商將來向城規會申請改劃住宅，給人「官商勾結」的感覺。

11. 從申請書提交的文件，清楚可見有兩座一大一小的機電房，其中一座巨型的機電房就座落在我住所的前面，而且非常接近我的住所，機電房發出的噪音及幅射，對我和我的家人的健康造成極大的傷害。

根據城規會的綠化地帶規劃意向：

此地帶的規劃意向，主要是利用天然地理環境作為市區和近郊的發展區的界限，以抑制市區範圍的擴展，並提供土地作靜態康樂場地。根據一般推定，此地帶不宜進行發展。

擬建的組合屋(第 1 棟至第 11 棟)，大約有 98%座落在綠化地帶，而且超過 90%是 4 層高。在綠化地帶挖土、填英泥，興建高密度住宿單位，這些行徑與市民大眾對綠化地帶的期望有很大的落差。

基於上述種種原因，我們強烈反對是次項目，期望城規會能夠否決是次申請。謝謝。

「提意見人」姓名： LEE CHIMING  
GEORGE 簽名：  日期： 22-02-21

通訊地址： 

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 / 2522 8426)  
(電郵：tpbpd@pland.gov.hk)

執事先生 / 女士：

**強烈反對於大埔船灣興建過渡性房屋及填土和挖土工程**

**申請編號：A/NE-TK/702**

我 / 我們強烈反對上述申請，理由如下：

- 1. 選址錯誤，破壞整體規劃。**有關申請擬於「綠化地帶」(GB) 及「鄉村式發展」(V) 地帶（超過 90% 在 GB），興建 11 棟三至四層高的建築物，提供 1,236 個單位，供三千多人入住，規模相當龐大，並不符合《汀角分區計劃大綱核准圖編號 S/NE-TK/19》的整體規劃意向，也不符合 GB 和 V 地帶的規劃要求。
- 2. 規模過大，基建及社區設施無法負荷。**申請項目將為船灣區帶來三千多新人口，必然會嚴重影響當地交通、排污等基建設施，不單會嚴重影響現有居民的日常生活，亦無法滿足新增人口的基本生活需求，
- 3. 黑箱作業，缺乏諮詢，漠視當地居民意見。**政府一直都將當地居民蒙在鼓裡，雖曾兩次諮詢船灣各村代表，但並無提供項目細節，亦無披露一些技術評估的資料，令外界完全無法得知詳情。
- 4. 導致交通擠塞，居民乘車困難。**當區只有汀角路一條主要通道，突然加增了三千多人口，對公共交通的需求必然十分強烈，增加居民乘車的困難。增加巴士及小巴班次，亦未必能有效地疏導龐大的新增乘客數量，反而令已非常繁忙的汀角路更加擠塞，更會使原本的交通擠塞問題加劇惡化。
- 5. 影響排水，加劇水浸問題。**船灣一帶是水浸黑點，項目涉及填土和挖土，石屎鋪平地面，砍伐樹木，勢必大幅減少土壤吸收雨水功能，改變現有水文系統，增加排水量，加劇鄰近鄉村水浸問題。現時渠務署對在項目地點附近興建村屋的申請，都質疑有水浸問題，審批異常嚴苛，是次申請如此龐大，將增加如此大量的人口，肯定水浸問題會惡化。
- 6. 排污不足，易生污染。**現時船灣一帶排污設施超出負荷，有關項目必然增加當區排污壓力，而每日產生及排放的大量污水，必加重現有水體的排水負荷，導致水浸，並造成污染，影響河溪及鄰近沼澤濕地，包括下游的汀角紅樹林和三門仔養魚區。
- 7. 嚴重影響環境及自然生態。**申請地點的東南面緊貼現有村屋，施工期間產生的污水、噪音、塵土等，不但影響環境，亦會對村民造成不便和影響村民健康。而申請地點西北面則緊貼劃為自然保育區 (CA) 的濕地，並且只是鬆散的土坡，進行工程時很難不影響到保育區的濕地。而平整土地亦須砍伐大量樹木，勢必造成負面生態及景觀影響。





# 黃魚灘村事務管理委員會

大埔黃魚灘村 17 號 電話: 2948 2001, [REDACTED] 傳真: 2662 5442  
17 WONG YUE TAN VILLAGE, TAI PO TEL: 2948 2001, [REDACTED] FAX: 2662 5442

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



執事先生 / 女士：

**強烈反對於大埔黃魚灘興建過渡性房屋及填土和挖土工程**

**申請編號：A/NE-TK/702**

我們代表黃魚灘村所有村民強烈反對上述申請，理由如下：

- 選址錯誤，破壞整體規劃。**有關申請擬於「綠化地帶」(GB) 及「鄉村式發展」(V) 地帶 (超過 90% 在 GB)，興建 11 棟三至四層高的建築物，提供 1,236 個單位，供三千多人入住，規模相當龐大，並不符合《汀角分區計劃大綱核准圖編號 S/NE-TK/19》的整體規劃意向，也不符合 GB 和 V 地帶的規劃要求。
- 規模過大，基建及社區設施無法負荷。**申請項目將為船灣區帶來三千多新人口，必然會嚴重影響當地交通、排污等基建設施，不單會嚴重影響現有居民的日常生活，亦無法滿足新增人口的基本生活需求，
- 黑箱作業，缺乏諮詢，漠視當地居民意見。**政府一直都將當地居民蒙在鼓裡，雖曾兩次諮詢船灣各村代表，但並無提供項目細節，亦無披露一些技術評估的資料，令外界完全無法得知詳情。
- 導致交通擠塞，居民乘車困難。**當區只有汀角路一條主要通道，突然加增了三千多人口，對公共交通的需求必然十分強烈，增加居民乘車的困難。增加巴士及小巴班次，亦未必能有效地疏導龐大的新增乘客數量，反而令已非常繁忙的汀角路更加擠塞，更會使原本的交通擠塞問題加劇惡化。

# 黃魚灘村事務管理委員會

大埔黃魚灘村 17 號 電話: 2948 2001,

傳真: 2662 5442

17 WONG YUE TAN VILLAGE, TAIPO TEL: 2948 2001,

FAX: 2662 5442

5. **錯誤估算交通需求。**申請書估算每天早上繁忙時段，每小時只會增加 709 人乘車往大埔 [  $1,236 \text{ 單位} \times 2.9 \text{ (每戶人口)} \times 1.83 \text{ (人均每天車程)} \times 12\% \text{ (早上乘車比率)} \times 0.9 \text{ (往大埔方向)}$  ]，所用數據 / 比率大都是以全港平均值計算，嚴重忽略了新增人口及船灣區的特質。項目以 2 人單位佔大多數 (96%)，住戶應該是雙職家庭為主，因區內缺乏就業機會，亦無學校、街市等設施，因此居民無論上班、上學、買餸、消閒等，都必須先乘車往大埔，因此每天每人應超過 2 次車程，而且應集中在早上 ( > 50% )，較準確的估算應為： $2,553 \text{ 人 (實際人口)} \times 2.0 \text{ (每天車程)} \times 50\% \text{ (早上乘車比率)} \times 0.98 \text{ (往大埔方向)}$  = 每小時 2,502 人，即原有估算的 3.6 倍！現時早上在船灣一帶的車站，乘車已經非常困難，建議增加的小量小巴和巴士班次，無法緩解交通不足問題，尤其是特別路線 73P 及 74E 等各增一班，根本不是對症下藥，非居民所需。

6. **影響排水，加劇水浸問題。**船灣一帶是水浸黑點，項目涉及填土挖土，用三合土鋪平地面，砍代樹木，勢必大幅減少土壤吸收雨水功能，改變現有水文系統，增加排水量，加劇鄰近鄉村水浸問題。現時渠務署對在項目地點附近興建村屋的申請，都質疑有水浸問題，審批異常嚴苛，是次申請如此龐大，將增加如此大量的人口，肯定水浸問題會惡化。

7. **低估排水影響，緩解措施成效存疑。**項目主要以綠化屋頂為減少表面徑流措施，以緩解因興建大樓導致土地吸收雨水能力減少的問題，但綠化屋頂的土壤厚度有限，吸水能力成疑，遇上大雨時（例如黃雨、紅雨），很快就會飽和，無助減少排水。若加增土壤厚度，則隨時有重蹈城大體育館綠化屋頂倒塌事件。申請書上引述綠化屋頂能助吸收雨水的文獻，屬歐洲實驗結果，未必完全適用於本港暴雨頻繁的環境。此外，申請書亦無排水系統的詳細設計，能否有效排水成疑，隨時令當區水浸問題惡化！

8. **排污不足，易生污染。**現時船灣一帶排污設施超出負荷，有關項目必然增加當區排污壓力，而每日產生及排放的大量污水，必加重現有水體的排水負荷，導致水浸，並造成污染，影響河溪及鄰近沼澤濕地，包括下游的汀角紅樹林和三門仔養魚區。



# 黃魚灘村事務管理委員會

大埔黃魚灘村 17 號 電話: 2948 2001,   
17 WONG YUE TAN VILLAGE, TAI PO TEL: 2948 2001, 

傳真: 2662 5442  
FAX: 2662 5442

9. **嚴重影響環境及自然生態。**申請地點的東南面緊貼現有村屋，施工期間產生的污水、噪音、塵土等，不但影響環境，亦會對村民造成不便和影響村民健康。而申請地點西北面則緊貼劃為自然保育區 (CA) 的濕地，並且只是鬆散的土坡，進行工程時很難不影響到保育區的濕地。而平整土地亦須砍伐大量樹木，勢必造成負面生態及景觀影響。

10. **嚴重影響景觀。**建議興建的 11 棟大樓，典型面積為 4,000 平方呎 (100 呎 x 40 呎)，比鄰近村屋 (700 平方呎) 大 60 倍，高度 (13.5m) 亦比村屋 (8.23m) 高 1.6 倍，明顯與現有鄉郊環境格格不入，必然大幅改變現有的鄉郊景觀，造成負面景觀及視覺影響。

11. **嚴重影響現有村屋視覺及通風。**項目擬議興建 11 棟四層高的大型房屋，其中幾座大樓 (第 4、7、10 及 11 棟) 非常貼近現有江庫花園及黃魚灘村屋，根據申請書資料 (噪音評估部分)，最近距離只得 3 至 5m，建築期間難以阻隔工程對鄰近村屋的影響。大樓建成之後就成為一巨大屏障，不但會**阻礙通風**，亦將完全**阻礙這些村屋的採光**，使屋內沒有足夠光線，影響居民健康。這些大型房屋亦會完全遮擋鄰近村屋的視野，對現有居民必然造成非常嚴重及無法緩解的視覺影響！

12. **社區難以融合及治安問題。**申請地點大致分為兩塊土地，與現有村落及屋苑夾雜，部分更非常貼近村屋，在基礎設施及道路使用方面，容易與村民產生衝突。新增人口是當地村落的十數倍，將會改變現時寧靜環境，勢必完全摧毀現有寧靜鄉村的面貌和居民和諧共處的風氣。缺乏社區設施容易對社區造成壓力，並引發治安問題。

13. **假借「臨時」及「住宿機構」為名，蒙混過關，亦有官商勾結之嫌。**現時的申請聲稱屬「臨時」「住宿機構」項目，為期 5 年 (與先前諮詢說的 8 年不同)，實有取巧之嫌。建成房屋入伙之後，米已成炊，隨時可向城規會申請延期，五年又五年，隨時一幌十多二十年。項目實則涉及興建大量住宅單位，**絕不能視作臨時土地用途**，也非「住宿機構」。再者，項目完結之後需交還土地給發展商，將「生地」轉為「熟地」，有助發展商向城規會改劃住宅申請，給人「官商勾結」的感覺。

# 黃魚灘村事務管理委員會

大埔黃魚灘村 17 號 電話: 2948 2001,  
17 WONG YUE TAN VILLAGE, TAIPO TEL: 2948 2001,

傳真: 2662 5442  
FAX: 2662 5442

14. 錯誤估算人口。項目聲稱總人口為 1,962 人，但從單位數目推算 ( 1,182 個 2 人單位，27 個 3 人單位，27 個 4 人單位 )，實際最高人口應為 2,553 人 ( 1,182x2 + 27x3 + 27x4 )，比預算高 1.3 倍，項目因而低估對交通、排污、公共空間等需求。現時黃魚灘村只有約二百居民，新增人口是原有的 12 倍，怎能不會對區內的民生造成負面影響！

15. 缺乏成本數據，效益存疑。申請書並無提及建築及維護成本，而根據運房局的立法會文件 ( CB(1)299/20-21 )，每單位平均成本為 55 萬元，是次項目成本即約 6 億 7,980 萬元，但實際成本應不止於此。申請地點缺乏基建，如排污就需建一個二級處理的污水廠，起碼要數千萬元，每年保養維修也要數十萬。一個聲稱是五年的臨時項目，如此昂貴，還需由公帑支付，完全不符成本效益，還是項目根本不是臨時性質！

16. 缺乏土力工程數據。項目並無作出土力工程調查，只推說在詳細設計階段才作研究。但申請地點為填平農地，周邊都是鬆散的土坡，在這裏興建 11 棟比村屋大數十倍的大樓，可能需要加固斜坡或建護土牆，項目是否可行存疑。由於大樓極接近村屋及自然保育區，這些土力工程極有可能滋擾居民，也可能入侵保育區，影響生態環境。

17. 大量砍伐樹木，補償植樹無法執行。項目將會移除申請地點全部 147 棵樹木及外圍 18 棵樹木，對區內的景觀造成不良影響。申請書聲稱會進行 1:1 補償種植，但卻無提供詳細計劃，事實上要在發展區內種植 165 棵樹木並不可行，整個地盤已用作興建大樓，通道及其他設施。根據景觀大綱圖，只能在地盤邊沿種樹，但大樓已非常緊貼現有村屋 ( 3 至 5m ) 或保育區，而這係條狹窄邊沿地帶，還須保留興建排水系統，亦有可能要進行土力工程加固斜坡，根本無法植樹！

18. 不符合《城市規劃委員會規劃指引編號 10：擬在綠化地帶進行發展》的主要規劃準則。建議發展的地積比為 1.493，遠超指引的「住宅發展的地積比率不得超逾 0.4 倍」。另外發展項目將會移除申請地點全部 147 棵樹木及外圍 18 棵樹木，亦違反指引另一準則：「進行有關發展不得廣泛砍伐現有天然樹木，影響現有天然景緻」。



# 黃魚灘村事務管理委員會

大埔黃魚灘村 17 號 電話: 2948 2001,  
17 WONG YUE TAN VILLAGE, TAI PO TEL: 2948 2001,

傳真: 2662 5442  
FAX: 2662 5442

19. 立下不良先例。過往村民多次在申請地點附近的「綠化地帶」興建村屋，都被城規會否決（例如 A/TP/613，A/NE-TK/215，A/NE-TK/352），主要原因是 (1) 擬議的發展不符合「綠化地帶」的規劃意向；(2) 不符合《規劃指引編號 10》，因為擬議的發展涉及大規模清除植被，對區內的景觀造成不良影響；及 (3) 批准申請會為「綠化地帶」內其他同類發展立下不良先例。若果連一間村屋都不合當局要求，這次申請項目規模大數十倍，城規會應一視同仁，否決申請！

20. 雙重標準，對其他申請人不公。處理規劃申請，應一視同仁，不應因申請人是慈善機構而有所偏頗。過往涉及 GB 的規劃許可申請，即使只是一間丁屋，絕大多數都被當局拒絕。是次建議項目規模龐大，若然獲批，實在是雙重標準，對其他申請人不公。居民誓必追究到底，並保留一切法律追究權利。

若當局有心發展，應該以整個船灣重新作規劃，徹底解決當區房屋及基建配套等問題。若說項目屬緊急及臨時性質，為何不選擇在大埔區內少人使用的設施，例如廣福公園球場，或工業邨一些臨時停車場，來興建過渡性房屋？基於上述種種原因，我們強烈反對是次項目，期望城規會能夠否決是次申請。謝謝。

張子強  
張國強

張華  
張詠棠  
張錦元  
張國生  
張國群

張錦波

黃魚灘村事務管理委員會

2021 年 2 月 23 日



張小明

5-324 to 1215

Appendix II-8 of RNTPC

Paper No. A/NE-TK/702

(傳真號碼：2877 0245 / 2522 8426)

(電郵：tpbpd@pland.gov.hk)

致：城市規劃委員會  
香港北角渣華道 333 號  
北角政府合署 15 樓

城規會秘書先生 / 女士：

**強烈反對在大埔黃魚灘村興建過渡性房屋及填土和挖土工程**  
**申請編號：A/NE-TK/702**

「大埔船灣聯村村公所」及「汀角路民生關注組」就上述規劃申請諮詢本區的居民，收集到 892 封反對信，現向城規會遞交 892 封反對信，請城規會細閱反對內容，並安排特別會議讓「提意見人」向城規會委員親述反對理據。



大埔船灣聯村村公所

葉志良主席

[ 聯村 12 村 — 黃魚灘村、  
沙欄村、陳屋村、李屋村、  
詹屋村、蝦地下村、圍下村、  
洞梓村、井頭村、鴉山村、  
礮頭角村、布心排村 ]



汀角路民生關注組

劉志成主席

日期：2021 年 3 月 1 日





香港北角渣華道 333 號  
北角政府合署 15 樓  
城市規劃委員會秘書



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

執事先生 / 女士：

**強烈反對在大埔黃魚灘村興建過渡性房屋及填土和挖土工程**  
**申請編號：A/NE-TK/702**


船灣聯村村公所得知樂善堂向城規會申請在大埔黃魚灘興建過渡性房屋。有關項目涉及地盤面積 14,517 平方米(約 15 萬 6 千平方呎)，興建 11 棟三至四層高的建築物，總共提供 1,236 個單位，供約 3,600 人入住。本村公所強烈反對上述申請，理由如下：

1. **選址**—建議的選址位處被一群村屋所包圍的「綠化」地及「鄉村式發展」地帶，若 11 棟四層高的過渡性組合房屋建成後，該群村屋(超過 100 戶)的景觀由現時遠觀綠油油一片沼澤地變成近在咫尺的組合屋。坐落於市區(例如深水埗中轉房)的組合屋對環境影響相對比較細，坐落於鄉村式發展地帶的高密度組合屋(1,236 個單位)對環境影響(包括景觀、交通、噪音)帶來破壞性的滋擾非常之大，這個選址非常之有問題。
2. **交通**—船灣區只有汀角路一條主要幹道，近年船灣區發展迅速，私人屋苑及各村丁屋林立，人口激增，一直以來汀角路的車流量不勝負荷，經常遇上交通擠塞，加上龍尾泳灘預計今年 4 月啟用，開放前的農曆新年多天假期，汀角路交通非常擠塞，〔電台都有廣播交通呼籲汀角路非常擠塞，車龍由雅景花園塞至龍尾泳灘(長達 4 公里)〕，平日 5 分鐘的車程居民要花 45 分鐘擠塞在車龍中才能回到家中。申請項目將為船灣帶來約 3,600 新人口，項目只提供 3 個貨車泊位，但 1,236 戶不乏從事運輸行業，入住後將運輸車泊在村口或汀角路兩旁，種種交通和泊車問題對社區造成壓力，由誰引起呢？〔鳳園嵐山是一個活生生的例子，因車位不足，違例泊車嚴重，住戶車輛晚上泊在路旁，引致交通擠塞，最終要報警處理〕。另外，3,600 多人口仍需乘搭巴士、小巴上班、上學、買餸，必然會加重汀角路車流量，引致交通擠塞，其嚴重性難以想像。根據申請文件的交通影響評估報告(TIA)建議增加巴士及專線小巴(由「中轉房」至大埔)，由於交通顧問預測乘客數量偏低，我們深信這些緩解措施仍然不足夠，現時居民經常投訴巴士及小巴班次追不上船灣區的人口增長，爭搭巴士、小巴返工返學及放工放學是常態，若城規會批准此項目申請，爭搭巴士小巴返工返學及放工放學的情況會更加惡化，真係悲哀!!!
3. **排水**—項目涉及的土地大部分都是棄耕農地，有一定的儲水能力，若要建屋必須填平農地及加高，對鄰近一群村屋造成嚴重水浸影響。現時黃魚灘村每逢大雨都容易水浸，

渠務署網頁明確表示黃魚灘是水浸黑點，有關發展必然會加劇水浸問題。這低窪農地原是黃魚灘村唯一雨水蓄水庫，每當大雨來臨，此蓄水庫便會擔當重要功能，將暴增的雨水臨時儲存，逐漸地排放至大海。若然蓄水庫被填平建過渡性房屋，蓄水庫功能盡失，黃魚灘村發生的水浸情況加劇百倍。

4. **排污**—現時黃魚灘村及蝦地下村一帶，都缺乏排污設施，未能接駁到政府污水渠。根據申請文件的污水排放評估報告(SIA)，過渡性房屋項目將自設污水處理設施，位置在汀角路旁離民居只有3米。處理後的污水，排入政府雨水渠，居民擔心污水處理廠發出的臭味造成空氣污染及有損居民健康。
5. **社會融合及治安**—新增人口大部份並非慣常在鄉郊生活，未必能融入鄉村寧靜生活的模式；目前黃魚灘村全村只有約二百多居民，新增人口卻多達三千多人，竟是黃魚灘村原有的10倍以上！勢必完全摧毀現有的寧靜鄉村的面貌和居民和諧共處的風氣。村民亦會擔心新增的人口，在缺乏社區設施的情況下，必定對社區造成壓力，引發治安問題。
6. **景觀**—現時黃魚灘村及詹屋江庫是寧靜的鄉郊，同一時間在農田興建11棟大型房屋必然大幅改變現有的景觀，增加大量人口亦會改變現時寧靜環境。一經被填平的濕地、綠化地是不可以逆轉並回復原貌，村民將永遠失去現時的自然生態環境。
7. **環境影響**—過渡性房屋項目採用組合屋形式興建，正如前面所述，有關土地是荒廢農地，大部份更是濕地，下面是淤泥，若要建屋需大量填土。施工期間必然對環境造成重大影響，包括噪音、污水、灰塵等，而工地貼近現有村屋，亦會對村民造成不便和影響村民健康。雖然項目刻意避開自然保育區(CA)，但對附近生態環境的影響亦不容忽視，尤其是水文改變、施工期間的污染、噪音等都會影響鄰近濕地，對保育區的生態造成破壞。

基於上述種種問題，本村公所強烈反對在黃魚灘興建過渡性房屋項目。

  
大埔船灣聯村村公所  
葉志良主席



〔聯村12村—黃魚灘村、沙欄村、陳屋村、李屋村、  
詹屋村、蝦地下村、圍下村、洞梓村、  
井頭村、鴉山村、礮頭角村、布心排村〕

回郵地址: \_\_\_\_\_ 日期: 01/03/2021

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 / 2522 8426)  
(電郵：tpbpd@pland.gov.hk)

執事先生 / 女士：

**強烈反對在大埔黃魚灘村興建過渡性房屋及填土和挖土工程**  
**申請編號：A/NE-TK/702**

汀角路民生關注組一直關注船灣選區的民生事項，得知樂善堂向城規會申請在大埔黃魚灘興建過渡性房屋。有關項目涉及地盤面積 14,517 平方米(約 15 萬 6 千平方呎)，興建 11 棟三至四層高的建築物，總共提供 1,236 個單位，供約 3,600 人入住。本村公所強烈反對上述申請，理由如下：

1. **交通**—船灣區只有汀角路一條主要幹道，近年船灣區發展迅速，私人屋苑及各村丁屋林立，人口激增，一直以來汀角路的車流量不勝負荷，經常遇上交通擠塞，加上龍尾泳灘預計今年 4 月啟用，開放前的農曆新年多天假期，汀角路交通非常擠塞，〔電台都有廣播交通呼籲汀角路非常擠塞，車龍由雅景花園塞至龍尾泳灘(長達 4 公里)〕，平日 5 分鐘的車程居民要花 45 分鐘擠塞在車龍中才能回到家中。申請項目將為船灣帶來約 3,600 新人口，項目只提供 3 個貨車泊位，但 1,236 戶不乏從事運輸行業，入住後將運輸車泊在村口或汀角路兩旁，種種交通和泊車問題對社區造成壓力，由誰引起呢？〔鳳園嵐山是一個活生生的例子，因車位不足，違例泊車嚴重，住戶車輛晚上泊在路旁，引致交通擠塞，最終要報警處理〕。另外，3,600 多人口仍需乘搭巴士、小巴上班、上學、買餸，必然會加重汀角路車流量，引致交通擠塞，其嚴重性難以想像。根據申請文件的交通影響評估報告(TIA)建議增加巴士及專線小巴(由「中轉房」至大埔)，由於交通顧問預測乘客數量偏低，我們深信這些緩解措施仍然不足夠，現時居民經常投訴巴士及小巴班次追不上船灣區的人口增長，爭搭巴士、小巴返工返學及放工放學是常態，若城規會批准此項目申請，爭搭巴士小巴返工返學及放工放學的情況會更加惡化，真係悲哀!!!

由黃魚灘村口轉出汀角路在過去幾年發生多次交通意外，該段汀角路車速比較快，出車比較困難，該路口有需要改善。

2. **排水**—項目涉及的土地大部分都是棄耕農地，有一定的儲水能力，若要建屋必須填平農地及加高，對鄰近一群村屋造成嚴重水浸影響。現時黃魚灘村每逢大雨都容易水浸，渠務署網頁明確表示黃魚灘是水浸黑點，有關發展必然會加劇水浸問題。這低窪農地原是黃魚灘村唯一雨水蓄水庫，每當大雨來臨，此蓄水庫便會擔當重要功能，將暴增的雨水臨時儲存，逐漸地排放至大海。根據申請文件的雨水排放評估報告(DIA)，60%的地盤面積被石屎覆蓋，部

(D)

分低窪農地會進行挖土和填土工程，評估報告沒有評估剩餘土地的吸水能力和儲水庫功能有沒有變差，對黃魚灘將來雨季水浸情況會否惡化。這評估是不容忽視。

3. **排污**—現時黃魚灘村及蝦下村一帶，都缺乏排污設施，未能接駁到政府污水渠。根據申請文件的污水排放評估報告(SIA)，過渡性房屋項目將自設污水處理設施位置在汀角路旁離民居只有3米。處理後的污水，排入政府雨水渠，居民擔心污水處理廠發出的臭味造成空氣污染及有損居民健康。
4. **選址**—建議的選址位處被一群村屋所包圍的「綠化」地及「鄉村式發展」地帶，若11棟四層高的過渡性組合房屋建成後，該群村屋(超過100戶)的景觀由現時遠觀綠油油一片沼澤地變成近在咫尺的組合屋。坐落於市區(例如深水埗中轉房)的組合屋對環境影響相對比較細，坐落於鄉村式發展地帶的高密度組合屋(1,236個單位)對環境影響(包括景觀、交通、噪音)帶來破壞性的滋擾非常之大，這個選址非常之有問題。
5. **社會融合及治安**—新增人口大部份並非慣常在鄉郊生活，未必能融入鄉村寧靜生活的模式；目前黃魚灘村全村只有約二百多居民，新增人口卻多達三千多人，竟是黃魚灘村原有的10倍以上！勢必完全摧毀現有的寧靜鄉村的面貌和居民和諧共處的風氣。村民亦會擔心新增的人口，在缺乏社區設施的情況下，必定對社區造成壓力，引發治安問題。
6. **景觀**—現時黃魚灘村及詹屋江庫是寧靜的鄉郊，同一時間在農田興建11棟大型房屋必然大幅改變現有的景觀，增加大量人口亦會改變現時寧靜環境。一經被填平的濕地、綠化地是不可以逆轉並回復原貌，村民將永遠失去現時的自然生態環境。
7. **環境影響**—過渡性房屋項目採用組合屋形式興建，正如前面所述，有關土地是荒廢農地，大部份更是濕地，下面是淤泥，若要建屋需大量填土。施工期間必然對環境造成重大影響，包括噪音、污水、灰塵等，而工地貼近現有村屋，亦會對村民造成不便和影響村民健康。雖然項目刻意避開自然保育區(CA)，但對附近生態環境的影響亦不容忽視，尤其是水文改變、施工期間的污染、噪音等都會影響鄰近濕地，對保育區的生態造成破壞。

基於上述種種問題，汀角路民生關注組強烈反對在黃魚灘興建過渡性房屋項目。

劉志成



汀角路民生關注組主席—劉志成博士

回郵地址:

日期: 01/03/2021

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

Date: 1 March 2021

I am LAU CHEE SING, a resident of Shuen Wan Chim Uk, Tai Po, and I learned from the Town Planning Board that an NGO has submitted its Temporary Transitional Housing Development Proposal at Wong Yue Tan, Tai Po to Town Planning Board for approval (Application Number A/NE-TK/702).

I have grave concern about the impact on traffic flow by the proposed development and write to express my comments and **objection to the proposal**. I have gone through the TIA submitted by the traffic consultant, Aecom. Please see below my Findings / Comments for the TIA dated January 2021.

**1. The Traffic Surveys – clause 3.2.3 – Not Appropriate Adoption of In-house Data and may lead to traffic jam due to the increase of 3,585 residents from this temporary transitional housing development**

---

The TIA stated that due to the effect of Novel Coronavirus, there was no traffic count performed. In light of this, I guess Aecom adopted ‘in house’ survey carried out on a typical weekday and weekend in May 2019 for another project, i.e. Tung Tsz development (Application Number Y/TP/31)

According to the Tung Tze Development TIA (dated August 2020), the traffic counts in May 2019 is not appropriate and representative in respect of date and time because

- I. Only one Station 5006 (TIA in August 2020) was considered and the rest, such as
  - A. Station 5266 Ting Tai Road from Tai Wo Road to Ting Kok Road
  - B. Station 6211 Ting Kok Road from Dai Kwai Road to Tai Mei Tukhave not been studied and analyzed.
- II. Week end (Saturday) Peak hours should be 16:14 to 17:45 (TIA identified in 2017 by another traffic consultant) instead of ending at 15:00 (TIA in August 2020 by Aecom). The peak hour has been estimated to end 2 hour and 45 minutes earlier. The traffic data obtained in the traffic counts were not representative and not reliable.

**2. Existing Traffic Condition – clause 3.3.2 table 3.2 – Over Estimate of Junction Capacity Reserve and may lead to traffic jam due to the increase of 3,585 residents from this transitional housing development**

Existing Junction Performance (TIA in August 2020)

The traffic consultant Aecom tabled the Junction Capacity Reserve as follows:

<u>Junction</u>	<u>Weekday</u>		<u>Weekend</u>
	Am	Pm	Pm
J5 Ting Kok Road / Dai Fat	29%	57%	81%
J6 Ting Kok Road / Dai Kwai	36%	25%	46%
J7 Ting Kok Road / Lo Fai	42%	80%	76%

Compared to the TIA in 2017 by other traffic consultant,

<u>Junction</u>	<u>Weekday</u>		<u>Weekend</u>
	Am	Pm	Pm
J5 Ting Kok Road / Dai Fat	21%	50%	50%
J4 Ting Kok Road / Dai Kwai	32%	29%	27%
J3 Ting Kok Road / Lo Fai	32%	30%	28%

The above Junction Capacity Reserve (CR) for weekday in 2017 TIA was even less than the one in 2020, which was unreasonable as the traffic volume increased year by year and hence the CR should reduce year by year.

Similarly for weekend, the Junction CR in 2017 was less than 2020 and was unreasonable, the reason behind may be due to the traffic counts finished at 15:00 before the peak hours 16:45 to 17:45 as identified by the TIA in 2017 (by another traffic consultant).

### **3. Future Public Transport Demand - clause 4.1.1 – Under Estimate of Demand and lead to long queue time and lengthy waiting period for public transport.**

The TIA pointed out that Average Daily Mechanized Trips per person was 1.83. However, it has not included the regional variance of trip movement growth of 8% (within NT) as identified in Table 3.4 of Travel Characteristics Survey (TCS) 2011 Final Report.

The regional variance can easily be understood and also illustrated:

In this TIA clause 3.2.3 AM peak hours is 07:45 to 08:45, however in TCS clause 3.3.7 AM peak hours is 08:00 to 09:00

From the TCS report, there was a growth of 8% from year 2002 to year 2011, therefore the Average Daily Mechanized Trip per person at 2011 should be  $1.83 \times 1.08 = 1.98$  and assume there is a linear growth from 2012 to 2021 (now), there will be another 8% increase.

i.e.  $1.98 \times 1.08 = 2.13$



The TIA said the transport demand in AM peak hour is 709 ( $3,585 \times 1.83 \times 0.12 \times 0.9$ ) pax/hr. As there is a growth increase from 1.83 to 2.13, **therefore the demand shall be increased to 824** ( $3,585 \times 2.13 \times 0.12 \times 0.9$ ) pax/hr.

**4. Future Public Transport Proposal – clause 4.2 – under estimate and lead to long queue time and lengthy waiting period for public transport.**

From the above findings, the 709 pax/hr is increased by 16.2% from 709 to 824, the proposed recommendation **will NOT be sufficient and cause long queue and excessive waiting time for public transport.**

**5. Trip Generation of the Proposed Transitional Housing Development – clause 5.2.1 – Under Estimate of Trip Rate and may lead to traffic jam due to the increase of 3,585 residents from this transitional housing development**

This TIA referenced to the existing transitional housing “Trackside Villas 策誠軒” and made “observation” to the residents of travel mode, hence to adopt a trip rate of 15 pcu/hr for both AM and PM peak hours.

---

On one hand, the traffic consultant had not elaborated on the method of “Observation”. We do not know how they “observed” the travel mode, i.e. by assumption, by feeling, by counting or by interview. On the other hand, I questioned the trip rate of 15 pcu/hr based on the following facts

- a. Trackside Villas consists of 185 transitional housing units only and how can it be compared / simulated to an almost 7 times bigger scale development of 1,236 units.
- b. The first batch of tenants in-take was in Q3 2020. Due to the outbreak of Novel coronavirus, the observed and adopted trip rate of 15 pcu/hr was on the down side. **The downside estimation may lead to traffic jam due to the increase of 3,585 residents from this transitional housing development**

**6. Other Planned Development in the Vicinity – clause 5.3.1 and Table 5.10 – Had Not considered other Potential Long Term Development and may lead to traffic jam due to the increase of 3,585 residents from this transitional housing development**

This Traffic Consultant has only considered 4+3 Key Future Developments in the Vicinity, however, according to the TIA 2017 presented by other consultant there were 2 more developments namely

S2 - Small House Development Residential 270 units

S5 – HKSGI Columbarium 6,000 niches.

**7. Traffic Forecast - clause 5.4.2 Table 5.4 – Under Estimate of Traffic Growth and may lead to traffic jam due to the increase of 3,585 residents from this transitional housing development**

This traffic consultant has omitted the annual traffic growth rate reference to historical traffic data of the Annual Traffic Census (ATC) reports published annually by Transport Department.

In 2017 TIA, other traffic consultant has included these data of 5 census stations,

In 2019 TIA, this consultant Aecom, presented one census station 5006 and stated that the annual growth rate =+2.2% (from 2007 to 2017),

In 2020 TIA, Aecom omitted this data and presented none.

In 2021 TIA, Aecom continued to omit this data and presented none.

According to Annual Traffic Census 2018 published by the Transport Department

<u>Stn No.</u>	<u>Rd Name</u>	<u>From</u>	<u>To</u>	<u>AADT</u>	<u>Change from 2017</u>
5006	Ting Kok Rd	Nam Wan	Dai Kwai	30900	+0.7%
5243	Ting Kok Rd	Nam Wan	Tai Wo Rd	16450	-2.7%
5266	Ting Tai Rd	Tai Wo Rd	Ting Kok Rd	21440	+9.8%
6057	Yuen Shing Rd	Tolo Hway	Ting Kok Rd	38630	+2.3%
6211	Ting Kok Rd	Dai Kwai	Tai Mei Tuk	29580	+9.1%

The exclusion of these data ( especially station 5266 & 6211 with growth rate of more than 9% increase per year) will mis-interpret and not focus on the annual traffic growth realistically. Hence, the growth projection adopted by Aecom will be on low growth rate side and may lead to traffic jam due to the increase of 3,585 residents from this transitional housing development.

**8. Annual growth rate of population – clause 5.4.- Under Estimate of Population Growth and may lead to traffic jam due to the increase of 3,585 residents from this transitional housing development.**

Aecom has used Planning Data of 2016 based on TPEDM (Territorial Population and Employment Data Matrix). However, Aecom

1. omitted to use the Population Data generated by Employment
2. excluded the population in Tai Po area 9 - Chung Nga Road public rental housing population.

By restoration of the 2 omitted items, the following data should be adopted in calculating the population growth

2016		2026		<u>Annual Growth</u>
<u>Population</u>	<u>Employment</u>	<u>Population</u>	<u>Employment</u>	<u>Rate</u>
248,850	79,450	284,300	86,000	+1.28% p.a.

The population growth rate per year was trimmed from 1.28% to 0.7% (about 50%) and Aecom had adopted 0.7% per annum for projecting the peak hour traffic flow from year 2019 to 2025.

However, compared to the findings of the above item 7 and 8, i.e. the increase of traffic rate =9.1% and the increase of population rate = 1.2%, we suggest to adopt whichever is the greater figure. **Therefore the growth rate will not less than 9.1% p.a. The adopting of slow growth rate may lead to traffic jam due to the increase of 3,585 residents from this transitional housing development**

**9. Junction Capacity Assessment, Possible Traffic Improvement Recommendation – clause 4.7**

Based on the above findings, the **Traffic Improvement Recommendation will NOT be adequate.** This TIA dated January 2021 is in-adequate to support that existing critical junctions are operating within their predicted capacity and lead to traffic jam at these junctions.

**My above comments highlighted many problems in this TIA report. Most of the traffic parameters had been under estimated and lead to in-adequate provisions. Improvement to road junctions are needed to solve the traffic congestion problem due to the increase of 3,585 residents.**

**Therefore, I object to the Proposed Development.**

Name of Person making these comments

Name: LAU CHEE SING Signature: 

Address: 



# 大埔鄉事委員會 TAI PO RURAL COMMITTEE

Appendix II-10 of RNTPC  
Paper No. A/NE-TK/702

本會檔號：22-115

香港北角渣華道 333 號北角政府合署 15 樓

敬啟者：



## 強烈反對大埔黃魚灘村興建過渡性房屋計劃申請 (申請編號：A/NE-TK/702)

茲接獲本會轄下大埔船灣聯村村公所來函，就上述申請提出反對，並要求本會協助，代為向 貴會反映。

就有關上述計劃申請，得知申請團體擬在大埔黃魚灘興建過渡性房屋共有十一棟三至四層高的組合房屋，提供 1,236 個單位，約不少於 3,600 人居住。本會對上述申請予以強烈反對，理由如下：

- (一) **交通問題**：當區祇有汀角路一條主要幹道，近年該區發展迅速，私人屋苑及各村丁屋林立，人口激增，一直以來汀角路不勝負荷，經常遇上交通擠塞，加上慈山寺開放及龍尾泳灘相繼落成啟用，交通問題更趨嚴重，若申請項目將為船灣帶來三千多新人口，必然會加重該區的交通擠塞，其嚴重性難以想像。船灣聯村村公所及其他組織曾多次向政府有關部門反映，務求改善交通問題，至今未有進一步消息，該區居民深表遺憾。
- (二) **影響排水，水浸問題加劇**：擬建過渡性房屋位於黃魚灘和詹屋江庫屋苑，位處低窪地帶，每逢雨季來臨船灣一帶成為水浸黑點。其項目涉及填土和挖土工程，大量砍伐樹木，勢必減少土壤吸收雨水功能，加劇鄰近水浸問題，污染河溪及附近沼澤濕地。
- (三) **環境污染及噪音問題**：申請地點的東南面緊貼現有很多村屋，施工期間產生的污水、噪音及塵土等不但影響環境，亦會對附近村民帶來深遠影響，故附近村民反對聲音不絕，其憂慮可以理解。

綜合以上原因，本會極表支持村民所採取的行動，祈請 貴會尊重當區持份者的意見，在未有全面解決以上問題前應否決有關申請。

專此奉達，祈為察亮。

此致  
城市規劃委員會秘書處

大埔鄉事委員會主 席：林奕權  
副主席：陳笑權  
張國棟



二〇二一年二月廿六日

tpbpd@pland.gov.hk

---

寄件者: Roy Ng <roy@cahk.org.hk>  
寄件日期: 2021年03月02日星期二 12:40  
收件者: 'tpbpd'  
主旨: CA Comments on the Section 16 Application No. A/NE-TK/702  
附件: TPB20210302(TK702).pdf

Dear Sir/Madam,

Please refer to the attachment for the captioned.

Yours faithfully,

Ng Hei Man (Mr.)

Campaign Manager

The Conservancy Association

T: 2728 6781

D: 2272 0303

F: 2728 5538

Registered Name 註冊名稱 : The Conservancy Association 長春社

(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)

This email is for the sole use of the intended recipient(s) and may contain confidential information. Unauthorised use, disclosure or distribution of this email or its content is prohibited. If you have received this email in error, please delete it and notify the sender.





長春社

Since 1968

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期  
13 樓 1305-6 室

Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port  
Road, Kwai Chung, New Territories, H.K.

網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

2<sup>nd</sup> March 2021

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

By e-mail: tpbpd@pland.gov.hk

Dear Sir/Madam,

RE: Comments on the Section 16 Application No. A/NE-TK/702

The Conservancy Association (CA) OBJECTS to the captioned application.

**1. Not in line with the planning intention of Green Belt (GB) zone**

According to Ting Kok Outline Zoning Plan No. S/NE-TK/19, the planning intention of GB zone is *“primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone”*. Although part of the development site falls within Village Type Development zone, the site is indeed largely within GB zone. It still serves an important buffer between the existing village area and the marsh. The proposed development is not in line with the planning intention.

**2. Water pollution**

The Sewerage Impact Assessment (SIA) and Drainage Impact Assessment (DIA) have mentioned the following:

*“it is currently technically infeasible to discharge wastewater generated from the proposed development to public sewerage system upon its operation”*  
(Section 6.5.3 of SIA)



長春社 Since 1968

## The Conservancy Association

會址：香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期  
13 樓 1305-6 室

Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port  
Road, Kwai Chung, New Territories, H.K.

網址 Website: www.cahk.org.hk

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

*“Onsite drainage system will be designed so that there will be no increased surface runoff (including treated effluent from onsite sewage treatment plant) to the public drainage system along Ting Kok Road. Most of the surface runoff would be discharged to the marshland” (Section 7.6.1 of DIA)*

*“After development, only treated effluent from the proposed STP and one patch of area (Catchment SP2) near to Treasure Garden would have surface runoff collected and discharged to the public drainage system by connecting to the existing manhole (SMH1009338 tentatively) at Ting Kok Road in order to limit the discharge to not exceeding existing situation. The exact route of connection to existing drainage system is still subject to detailed design and site investigation to ensure that there is no conflict with existing utilities and the drainage system can be practically constructed. The surface runoff from the remaining portion of the Subject Site would be generally collected and discharged to the retained marshland at the Subject Site first and eventually to adjacent marshland. There will be increase of catchment area with surface runoff discharged to the marshland” (Section 7.6.2 of DIA)*

For the “treated” effluent under STP, currently no assessment results are available to reflect the quality of “treated” effluent. The performance of STP is still in doubt and is susceptible to operation and maintenance problems. We worry that potential adverse environmental impact caused by effluent discharge remains unsolved in full.

### 3. Adverse ecological impact on adjacent marsh habitat

The proposed development site is very close to adjacent freshwater marsh habitat. According to the EcoIA, its ecological value is ranked “moderate” and has some potential for further ecological enhancement. Indirect impact during construction and operation phase can be anticipated.

Even though the application is claimed to be temporary in nature, Section 1.1.1 of the planning statement disclosed that *“While the application seeks approval for initial temporary basis of 5 years, the Applicant intends to operate the proposed transitional housing for 8 years”*. We opine that adverse ecological impact can be permanent and even irreversible.



長春社 Since 1968

## The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期  
13 樓 1305-6 室

Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port  
Road, Kwai Chung, New Territories, H.K.

網址 Website: [www.cahk.org.hk](http://www.cahk.org.hk)

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: [cahk@cahk.org.hk](mailto:cahk@cahk.org.hk)

We also note that according to Section 2.1.3 of EcoIA, “a series of rapid ecological surveys focusing on the immediate environs of the Application Site were carried out in from July to October, 2000...”. In this way, the surveys completely miss the dry season. We worry that the EcoIA still might not comprehensively reflect the ecological baseline.

#### 4. Undesirable precedent of “destroy first, apply later”

Land filling and formation works could be spotted in the application site and the entire Shuen Wan area since 1990s (Figure 1). There were also records of unauthorized development (Case No. E/NE-TK/011, E/NE-TK/026, E/NE-TK/076, E/NE-TK/082). Enforcement Notices were issued by Planning Department. It is suspected that this is a case of “destroy first, build later”.

Planning Department and members of Town Planning Board (TPB) should alert that TPB has announced approaches to deter “destroy first, build later” activities in 2011. It stated that “the Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned”. Therefore, this application should not be given any sympathetic consideration or it will set an undesirable precedent for similar cases in future.

Yours faithfully,

Ng Hei Man

Campaign Manager

The Conservancy Association





長春社

Since 1988

The Conservancy Association

會址: 香港新界葵涌貨櫃碼頭路 77-81 號 Magnet Place 一期

13樓 1305-6室

電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

電子郵件 E-mail: cahk@cahk.org.hk

Add.: Units 1305-6, 13/F, Tower 1, Magnet Place, 77-81 Container Port

Road, Kwai Chung, New Territories, H.K.

網址 Website: www.cahk.org.hk

Figure 1 Vegetation clearance and land excavation could be spotted in the application site and the entire Shuan Wan area since 1990s  
(Source: S12(A) Rezoning for a Sustainable Nature Conservation and Development at Shuan Wan, Tai Po)

Figure 2.3 History of the Destruction of the Site



tpbpd@pland.gov.hk

---

寄件者: Tobi Lau (Local Biodiversity) <tlau@wwf.org.hk>  
寄件日期: 2021年03月02日星期二 11:51  
收件者: tpbpd@pland.gov.hk  
主旨: s16 Wong Yue Tang A\_NE-TK\_702 WWF  
附件: A\_NE-TK\_702\_2021 03(Mar) WWF.pdf

Dear Sir/Madam,

Please find WWF-Hong Kong's submission on the captioned town planning application. See attached file:

A\_NE-TK\_702\_2021 03(Mar) WWF

Thank you for your attention.

Yours faithfully,  
Tobi LAU  
Manager, Conservation Policy  
World Wide Fund For Nature Hong Kong

Registered Name 註冊名稱: World Wide Fund For Nature Hong Kong 世界自然(香港)基金會  
(Incorporated in Hong Kong with limited liability by guarantee 於香港註冊成立的擔保有限公司)





世界自然基金會  
香港分會

WWF-Hong Kong

香港新界葵涌葵昌路 8 號  
萬泰中心 15 樓  
15/F, Manhattan Centre  
8 Kwai Cheong Road  
Kwai Chung, N.T., Hong Kong

電話 Tel: +852 2526 1011  
傳真 Fax: +852 2845 2764  
wwf@wwf.org.hk  
wwf.org.hk

2 Mar 2021

Chairman and members  
Town Planning Board  
15/F North Point Government Offices,  
333 Java Road, North Point,  
Hong Kong  
(E-mail: [tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk))

By E-mail ONLY

Dear Sir/Madam,

**RE: Proposed Temporary Residential Institution (Transitional Housing) with Filling and Excavation of Land for a Period of 5 Years in "Agriculture" and "Green Belt" zones in Wong Yue Tang in Tai Po (A/NE-TK/702)**

We would like to lodge objection to the captioned.

**Not in line with the planning intention of the "Green Belt"**

Since over 95% of the proposed site boundary is situated in the "Green Belt" ("GB"), the proposed residential institution is not in line with the planning intention of the "GB" zoning for the area which aims to define the limits of urban development areas by natural physical features so as to contain urban sprawl and to provide passive recreational outlets. The proposed site is indeed performing a buffer between the village type developments along the Ting Kok Road and the "Conservation Area" that adjoining the project site (Fig 1).

**"Destroy first, apply later" may have adopted**

By comparison with the Google Earth's image in 2012 and 2019, vegetation removal and site formation works had occurred at the project site while no town planning permission shown from the Town Planning Board's portal (Fig 2). We suspect that those site works were unlawful. We consider that the proposed land filling and excavation of land activities is trying to legalise such suspected unlawful activities. We would like to ask the Town Planning Board to proactively deter such "Destroy first, build later" planning application so as to be consistent with the Government press release on 4 July 2011 which stated that *"the Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned"*<sup>1</sup>.

together possible™

<sup>1</sup> <http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>.

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

Sincerely yours,

*Tobi Lau*

Tobi Lau (Mr.)

Manager, Conservation Policy

**Fig 1 The “Green Belt” that the project site situated in is an buffer to mitigate the potential disturbances caused by house development and road traffic in its vicinity**





**Fig 2 Aerial views of the application site in 2012 and 2019 with land excavation and site formation observed within the site**



Image source: Google Earth. Access on 1 Mar 2021.

tpbpd@pland.gov.hk

---

寄件者: Samuel Wong <samuel@designinghongkong.com>  
寄件日期: 2021年03月02日星期二 18:38  
收件者: tpbpd@pland.gov.hk  
主旨: DHK's comment on A/NE-TK/702  
附件: 20210302 A\_NE-TK\_702 Wong Yue Tan Temp Transitional Housing and Land Excavation in GB&V.pdf

Dear Sir/Madam,

Our comment on the following application is attached:

1. A/NE-TK/702

Thank you for your attention.

Yours faithfully,

For and on behalf of Designing Hong Kong Limited

Samuel Wong | Project Officer

T: +852 3104 2767 | E: samuel@designinghongkong.com



02 March 2021

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](mailto:tpbpd@pland.gov.hk)

**Proposed Temporary Residential Institution (Transitional Housing) with Filling and  
Excavation of Land for a Period of 5 Years  
(Application No. A/NE-TK/702)**

Dear Chairman and Members,

Designing Hong Kong Limited **objects** the captioned for the following reasons:

- Majority of the area is zoned as "**Green Belt (GB)**". The planning intention of this zone is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.
- From the Google Earth's aerial image, the proposed site has been destroyed and cleared in the last few years without any previous planning approval. We concern the Town Planning Board may be rewarding an "**Destroy First, Development Later**" practice and **unauthorized development** here through the approval of captioned application.



April 2014



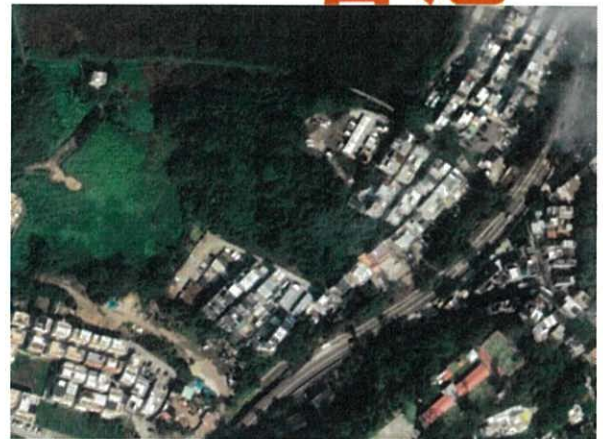
February 2017



# 創建 Designing Hong Kong 香港 .com



November 2019



November 2020

- It is noted that three **enforcement notices** (Case No. E/NE-TK/011, Case No. E/NE-TK/076, Case No. E/NE-TK/082) have been issued for site formation and land filling since 1996. The approval of the application will further legitimize unauthorized use of land set an undesirable precedent to regularize unlawful activities through planning application.
- The area is a popular destination for local tourism and public transportation in this area is overload during the weekend or public holiday. We concern the approval of this application may bring adverse traffic impact to the resident in the area and worsen the road situation and add burden to the existing public transportation system.
- The proposed site is adjacent to an area assessed as “moderate” or “moderate to high” ecological value. We concern the proposed development will bring negative impacts to the natural environment and habitat in the area. All developments nearby should be considered the possible damages to the existing natural environment.
- The approval of the application would set an undesirable precedent for other applications within the "Green Belt (GB)" zone, and lead to a general degradation of the rural environment of the area.

Here we submit our concerns for your consideration.

Yours,  
**Designing Hong Kong Limited**

tpbpd@pland.gov.hk

---

寄件者: EAP KFBG <eap@kfbg.org>  
寄件日期: 2021年03月02日星期二 21:02  
收件者: tpbpd@pland.gov.hk  
主旨: KFBG's comments on one planning application  
附件: 210302 s16 TK 702.pdf

Dear Sir/ Madam,

Attached please see our comments regarding one application. There is one pdf file attached to this email. If you cannot see/ download this file, please notify us through email.

Best Regards,

Ecological Advisory Programme  
Kadoorie Farm and Botanic Garden

The Secretary,  
Town Planning Board,  
15/F, North Point Government Offices,  
333, Java Road, North Point,  
Hong Kong.  
(Email: tpbpd@pland.gov.hk)

2nd March, 2021.

By email only

Dear Sir/ Madam,

**Proposed Temporary Residential Institution (Transitional Housing) with Filling and  
Excavation of Land for a Period of 5 Years  
(A/NE-TK/702)**

1. We refer to the captioned.
2. Most citizens of Hong Kong are aware of the limited land space that holds a large and densely packed population. As a member of the community, Kadoorie Farm and Botanic Garden (KFBG) fully understands this issue and would also like to see an improved living standard and environment for Hong Kong people. We, however, do not agree that this goal should be achieved by sacrificing our natural resources.
3. The site of the captioned application is almost entirely within Green Belt (GB) zone, which is intended *'for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone'*. Obviously, the proposed use is unlikely to be in line with this planning intention.
4. This site is also adjacent to Conservation Area (CA) zone; this CA zone and the remaining part of the GB zone to the west of the application site are largely covered with freshwater marsh (**Figure 1**). Thus the existing GB zone where the site is located is somehow functioning as a buffer to separate this freshwater marsh from the Village Type Development zone/ village areas (those to the east and to the south of the site) (**Figure 1**); this is exactly what the GB zone is intended for – defining the limits of urban and sub-urban development



areas and to contain urban sprawl.

5. According to the habitat map in the ecological assessment report for this application and our on-site observation, the northern portion and the western edge of the application site is largely vegetated (classified as ‘plantation’ in the habitat map) (see **Figure 2**), and the marsh to the immediate west of the application site is largely separated from those existing large-scale village clusters along Ting Kok Road and to the south of the application site by the ‘plantation’ habitat (**Figure 2**). Indeed, this marsh is currently largely surrounding by vegetated areas (i.e., the plantation aforementioned, the remaining marsh and woodland in Wong Yu Tan and the wetland in Ha Tei Ha) (**Figure 3**). Only two houses (i.e., Wong Yue Tan No. 65 & 66) are located immediately next to this marsh, at present; another house (i.e., Wong Yue Tan No. 39) which is also very close to the marsh is somehow screened off by some thick bush (**Figure 3**). A row of houses is located to the east of the site (and the marsh) (i.e., Shuen Wan Chim Uk No. 361 – 367); however, the blocks of these houses are set back from the marsh by at least 25 m (or more), and they are also screened off from the marsh to a certain extent by the ‘plantation’ (**Figures 2 and 3**). Turning the GB area of concern into a housing site would thus mean the buffering function currently offering by it would be largely impaired – residential areas would further approach the eastern and southern boundaries of the freshwater marsh in the CA zone; the landscape of the area would be drastically changed (see the comparison in **Figure 4**).

6. The marsh adjacent to the application site is connected with other wetlands/ marshes in the region, and it is also part of the continuous CA zone which largely covers the Shuen Wan marsh area. Under the Explanatory Statement of the Approved Ting Kok Outline Zoning Plan No. S/NE-TK/19, the followings are mentioned: ‘*The marsh area to the west of Ting Kok Road at Shuen Wan is of ecological significance and importance in providing a diversified habitat for various flora and fauna, particularly as a feeding ground for birds. Developments in these areas are generally not permitted while developments in the surrounding areas are restricted to ensure that the special characters of these areas are preserved*’<sup>1</sup>.

7. According to the information collected from the Planning Department, the application site has been involved in some enforcement cases (mainly consisting of filling of land or site formation; partially covering the site). The area around the site has also been involved in some enforcement cases of similar nature (e.g., unauthorised filling of land). As shown in

---

<sup>1</sup> [https://www2.ozp.tpb.gov.hk/plan/ozp\\_plan\\_notes/en/S\\_NE-TK\\_19\\_e.pdf#nameddest=CA](https://www2.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_NE-TK_19_e.pdf#nameddest=CA)

some aerial photos (**Figure 5**), landscape of the site and/ or its surroundings has been changing continuously in recent decades. In a Government press release issued in 2011, a spokesman for the Town Planning Board mentioned: *‘The Board is determined to conserve the rural and natural environment and will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned’*<sup>2</sup>.

8. In addition to the above, we would like the Board to consider whether it is worth to use a piece of GB area for building a ‘temporary residential institution (transitional housing)’, which implies that it may only exist ‘temporarily’; concurrently, we urge the Board to consider whether this proposed temporary use would cause permanent and irreversible impacts on the GB site of concern.

9. There is an ecological assessment report, which contains an ecological impact assessment, submitted for the present application. We urge the Board to liaise with relevant authorities as to whether this report can provide adequate and enough ecological information on the application site and its surroundings. During our half-day site visit conducted on 1st March, 2021, we could easily hear the breeding calls of two very common amphibians, Asian Common Toad and Gunther’s Frog, from the marsh adjacent to the application site. However, these two species were not recorded during the rapid surveys conducted for the assessment. According to Section 2 of the report, the rapid surveys were only conducted from July to October 2020, and this period obviously does not overlap with the breeding seasons of some lowland amphibian species (see <sup>3</sup>). Furthermore, no bat species was recorded during the aforementioned rapid surveys; however, wetlands are important foraging grounds for insectivorous bats as they support many species of emergent insects and often high numbers of aquatic emergent insects will swarm over wetlands; this swarming behaviour provides an attractive food resource for aerial feeders such as the local insectivorous bats (Dr. Gary Ades (a leading bat expert in Hong Kong) Pers. Comm.). Tong (2016)<sup>4</sup> has even indicated a positive relationship between the abundance of insectivorous bats and the area with water. Simply speaking, we hope the Board can realise that the wetlands in the locality seem to be very suitable to provide such feeding habitats, and we would be very surprised if no bats

<sup>2</sup> <https://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>

<sup>3</sup> <https://www.biosch.hku.hk/ecology/hkamphibians/index.htm>

<sup>4</sup> Tong, C.-p. 2016. *Distribution and preference of landscape features and foraging sites of insectivorous bats in Hong Kong urban parks*. Unpublished M.Sc. Thesis, The University of Hong Kong.



utilise the wetland area adjacent to the site (and other marshes in the locality) as foraging grounds. We urge the Board to liaise with the applicant and/ or relevant authorities as to whether night survey has been conducted (useful for surveying bats and breeding amphibians) and whether a bat detector has been used for surveying bats for the ecological assessment. We would like the Board to consider: how can an ecological impact assessment adequately identify and evaluate the potential ecological impacts caused by a development proposal if the ecological information collected to support the assessment is not adequate and sufficient?

10. Finally, we would like to emphasise that we strongly object to the captioned application as we consider GB zone is not intended for housing development, no matter it is temporary or permanent, and we are also highly concerned about the potential ecological impacts (e.g., light pollution, human disturbance) that would be caused by the proposal on the nearby wetland in the CA zone. We are also concerned about the quality of the submitted ecological assessment report. We also urge the Board to seriously consider the potential cumulative impacts of approving this application on the GB zone and the environment in the locality.

11. We consider proposals of 'transitional housing' should avoid conservation zonings (including GB<sup>5</sup>) or environmentally sensitive areas. Indeed, recently, there is another application involving 'temporary transitional housing' (i.e., A/YL-PH/876), and we do not object to this application.

12. We urge the Board to reject the captioned application (i.e., A/NE-TK/702).

13. Thank you for your attention.

Ecological Advisory Programme  
Kadoorie Farm and Botanic Garden

cc. The Conservancy Association  
Hong Kong Bird Watching Society  
WWF-HK  
Designing Hong Kong

---

<sup>5</sup> [https://www.pland.gov.hk/pland\\_en/tech\\_doc/hkpsg/sum/pdf/sum\\_ch10\\_en.pdf](https://www.pland.gov.hk/pland_en/tech_doc/hkpsg/sum/pdf/sum_ch10_en.pdf)

**Figure 1.** Zonings in the locality and the application site (boundary marked by the red line).

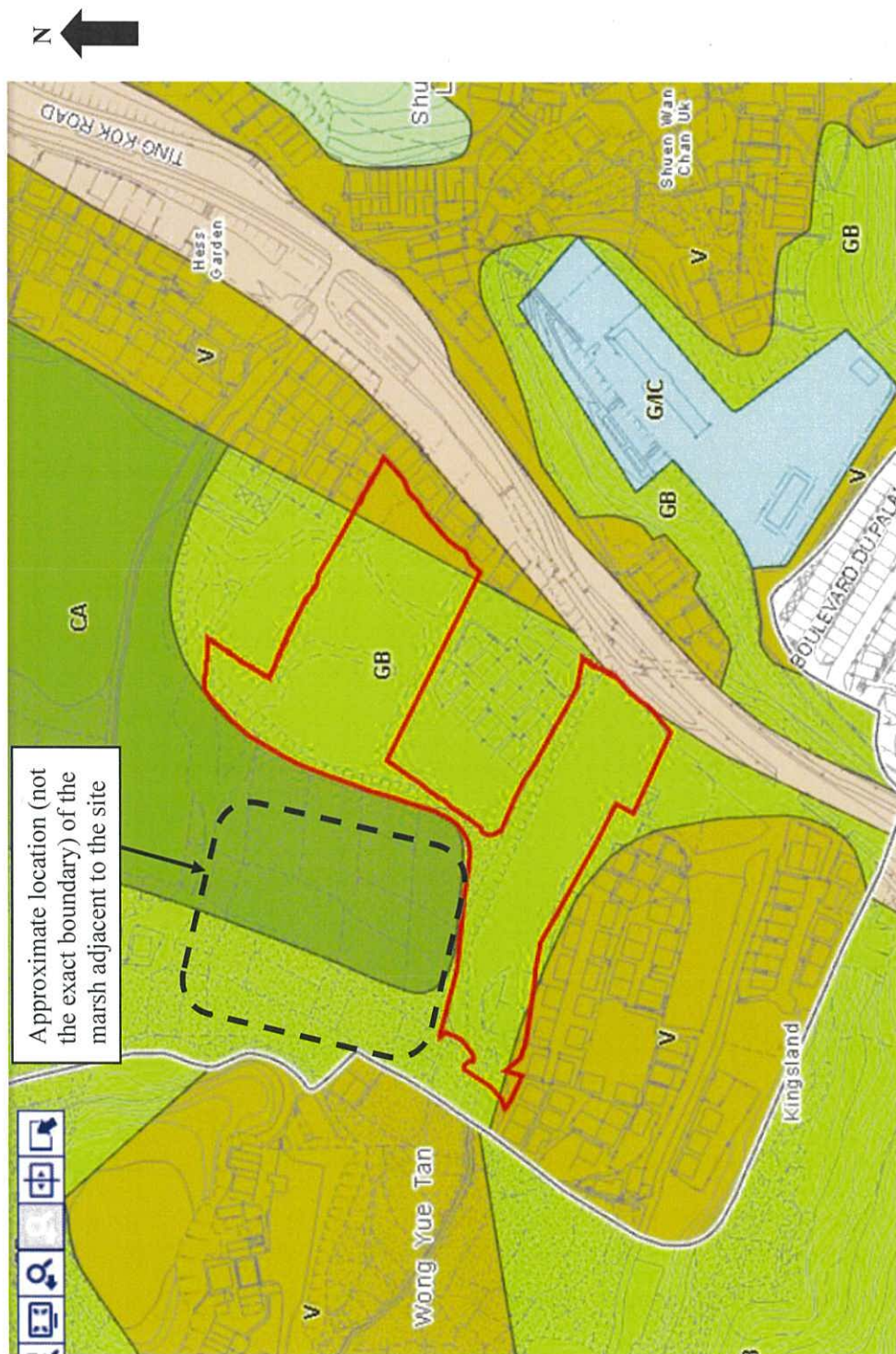
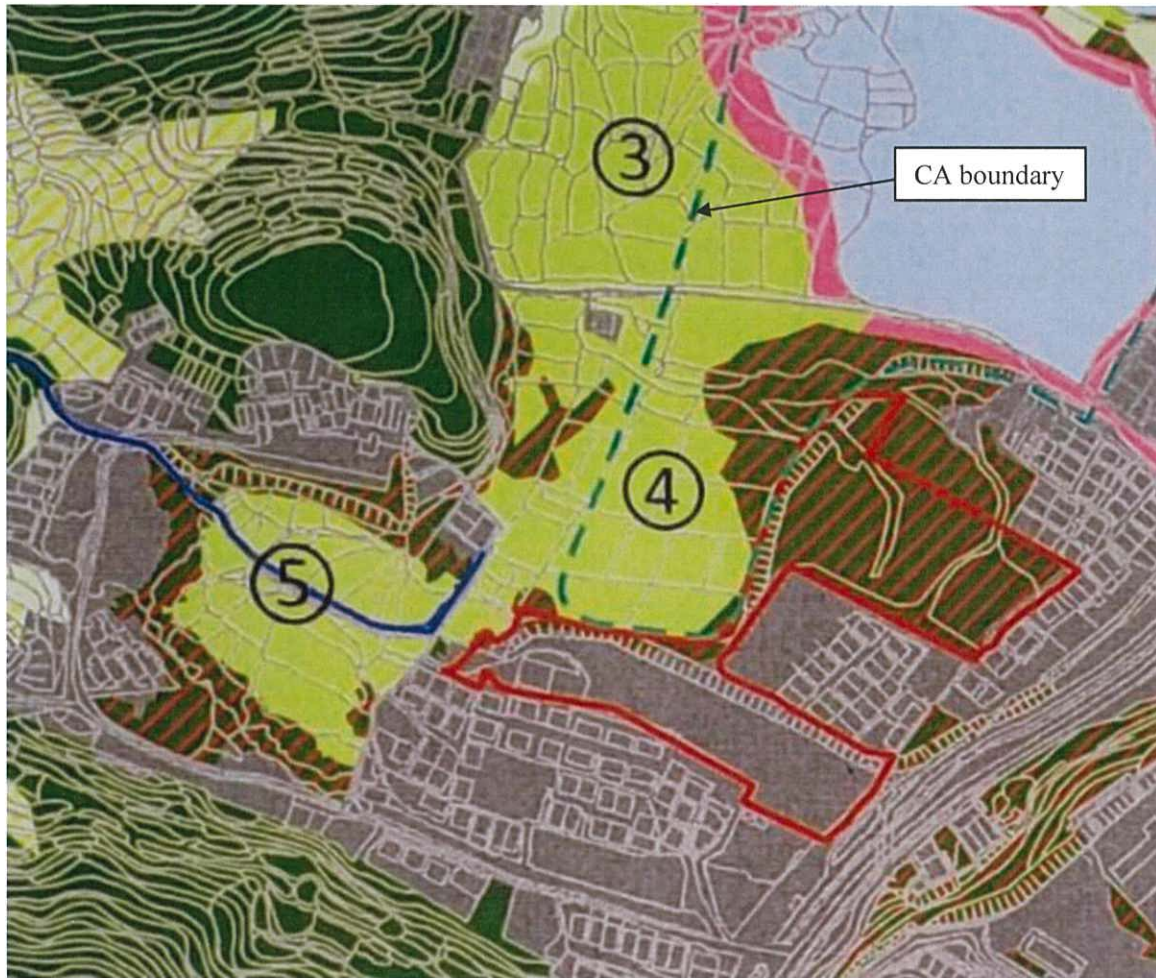




Figure 2. Habitat map extracted from the ecological assessment report.





**Figure 3.** On-site photos taken in March 2021 (dashed circle indicates the approximate location of the application site and/ or the plantation).

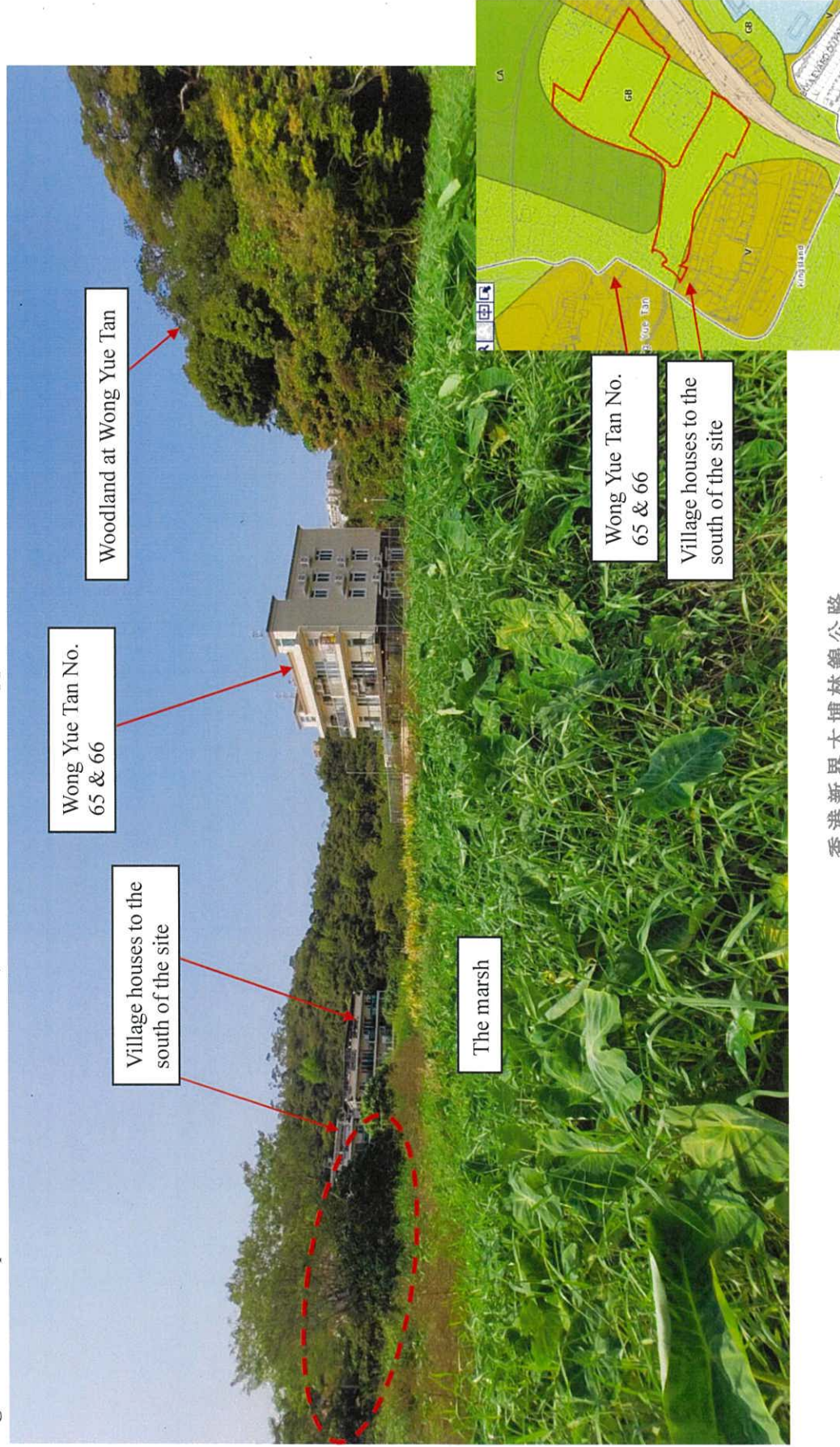




Figure 3. Cont'd.

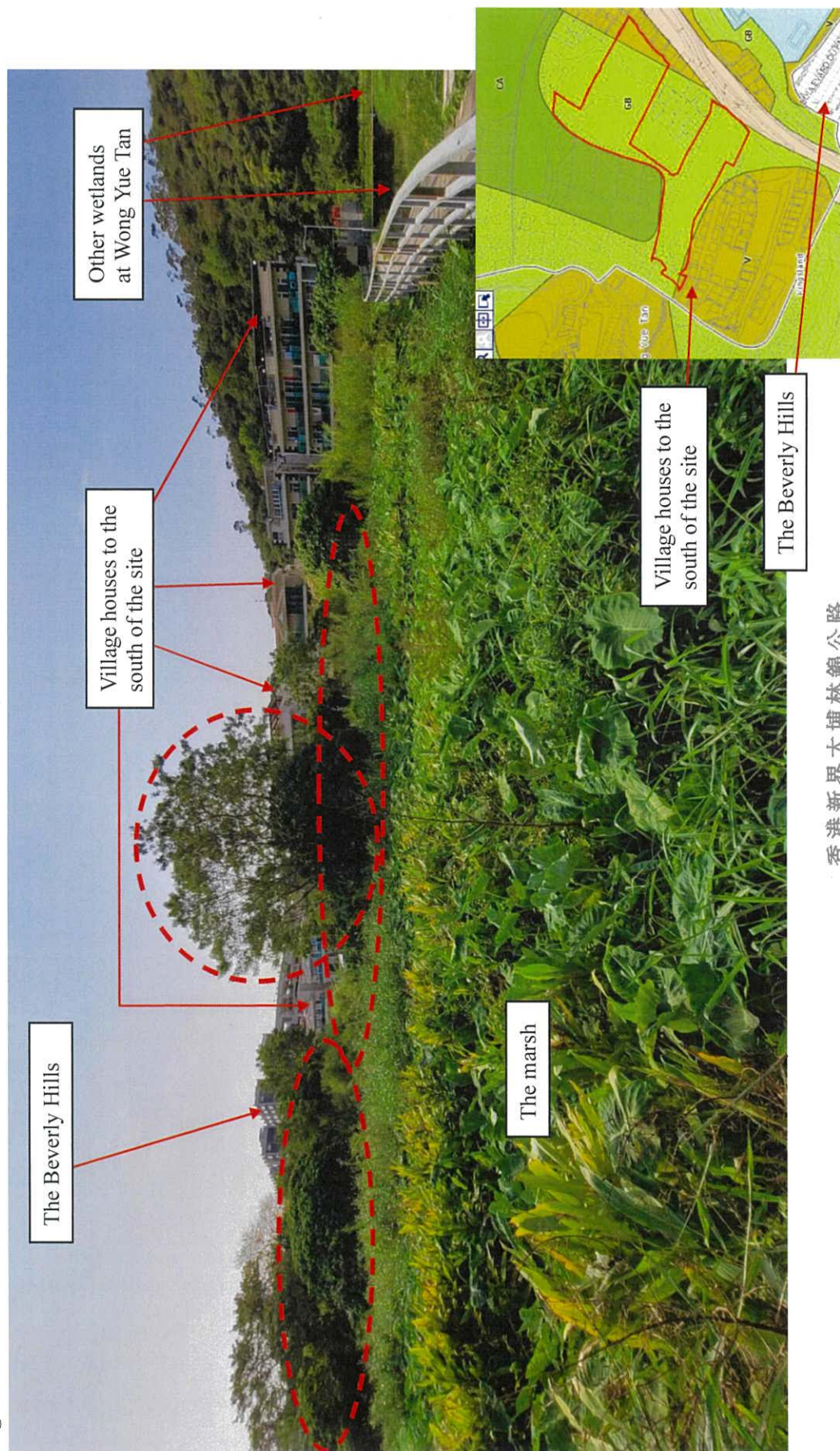




Figure 3. Cont'd.

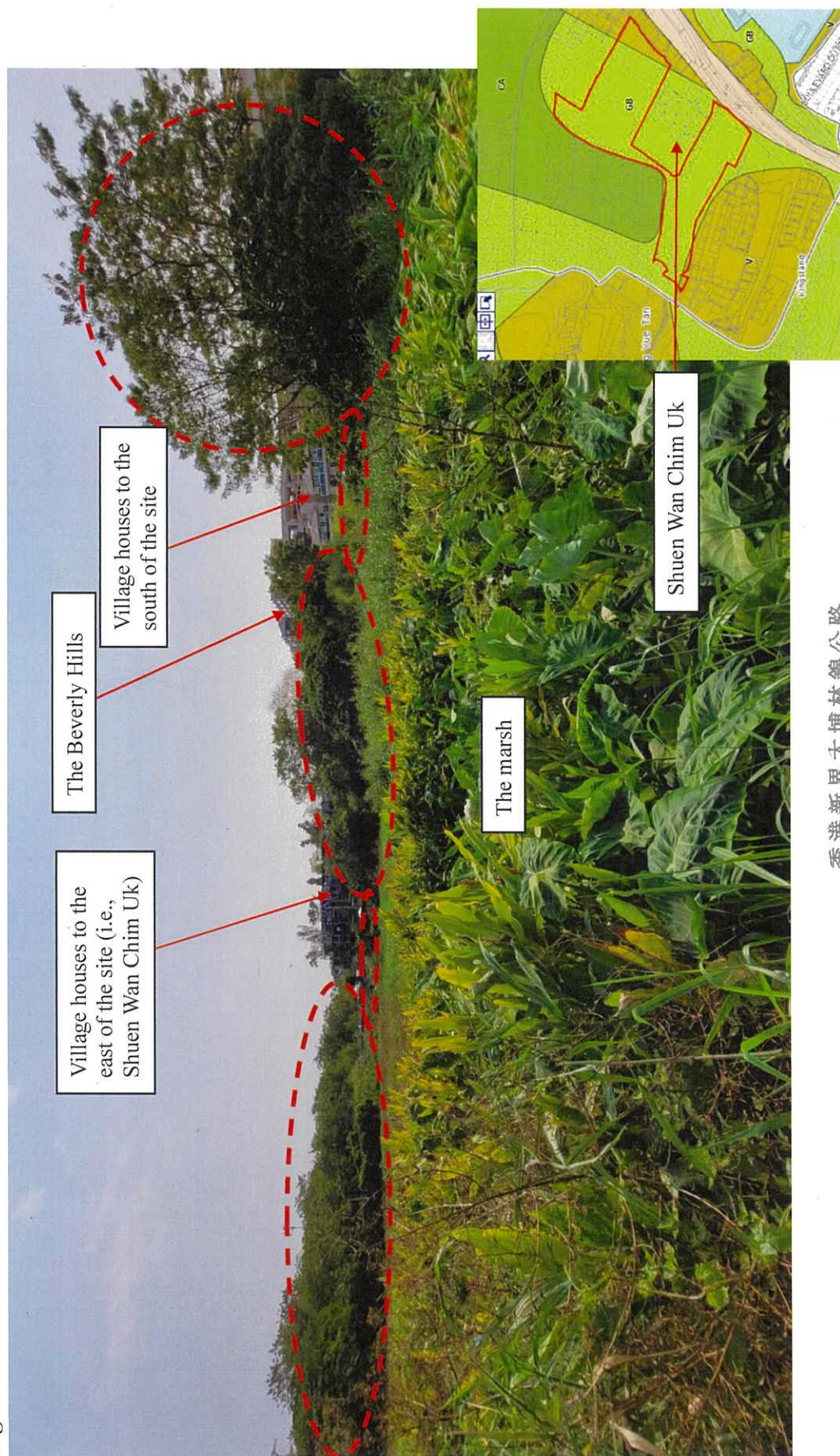




Figure 3. Cont'd.





Figure 3. Cont'd.

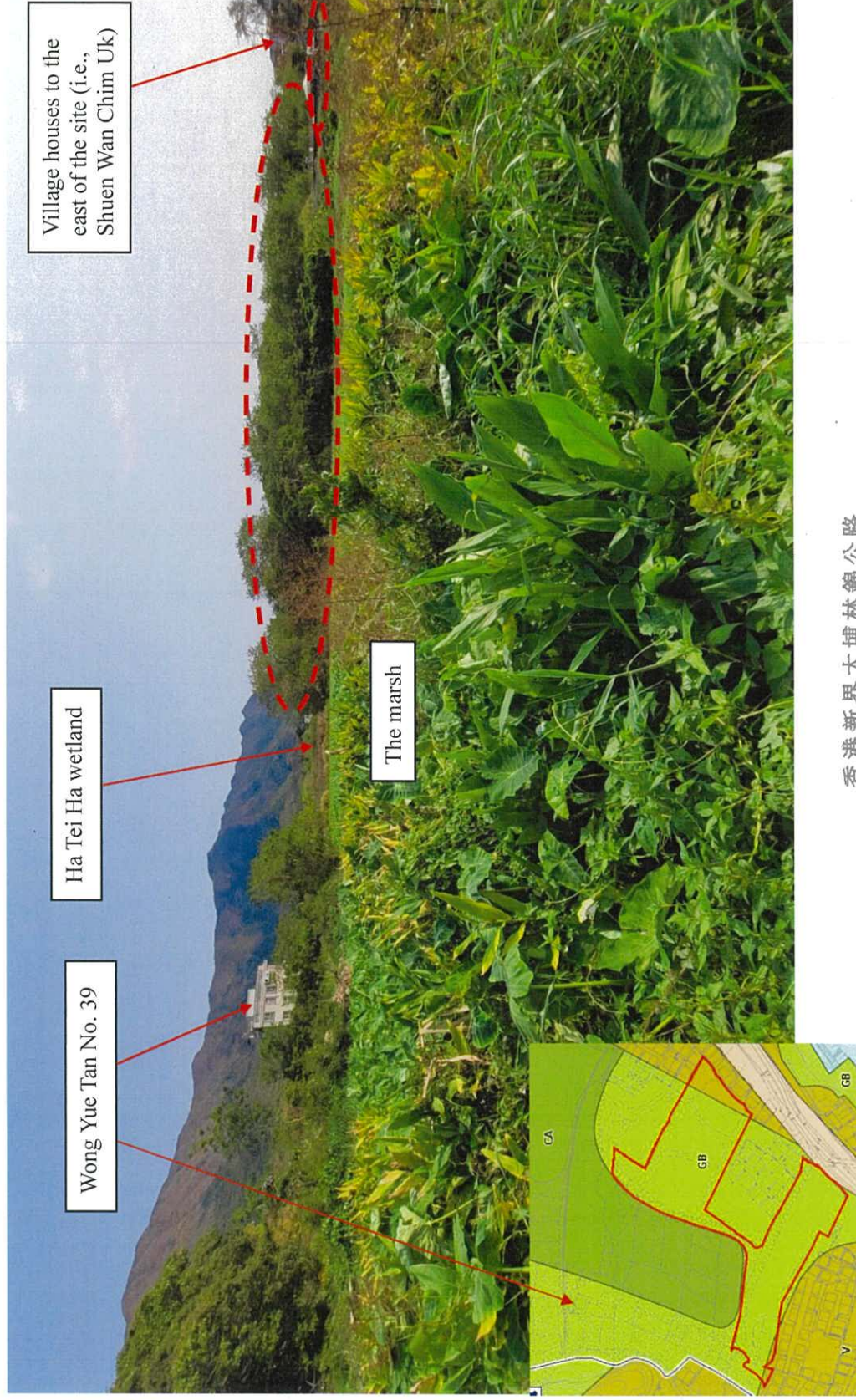
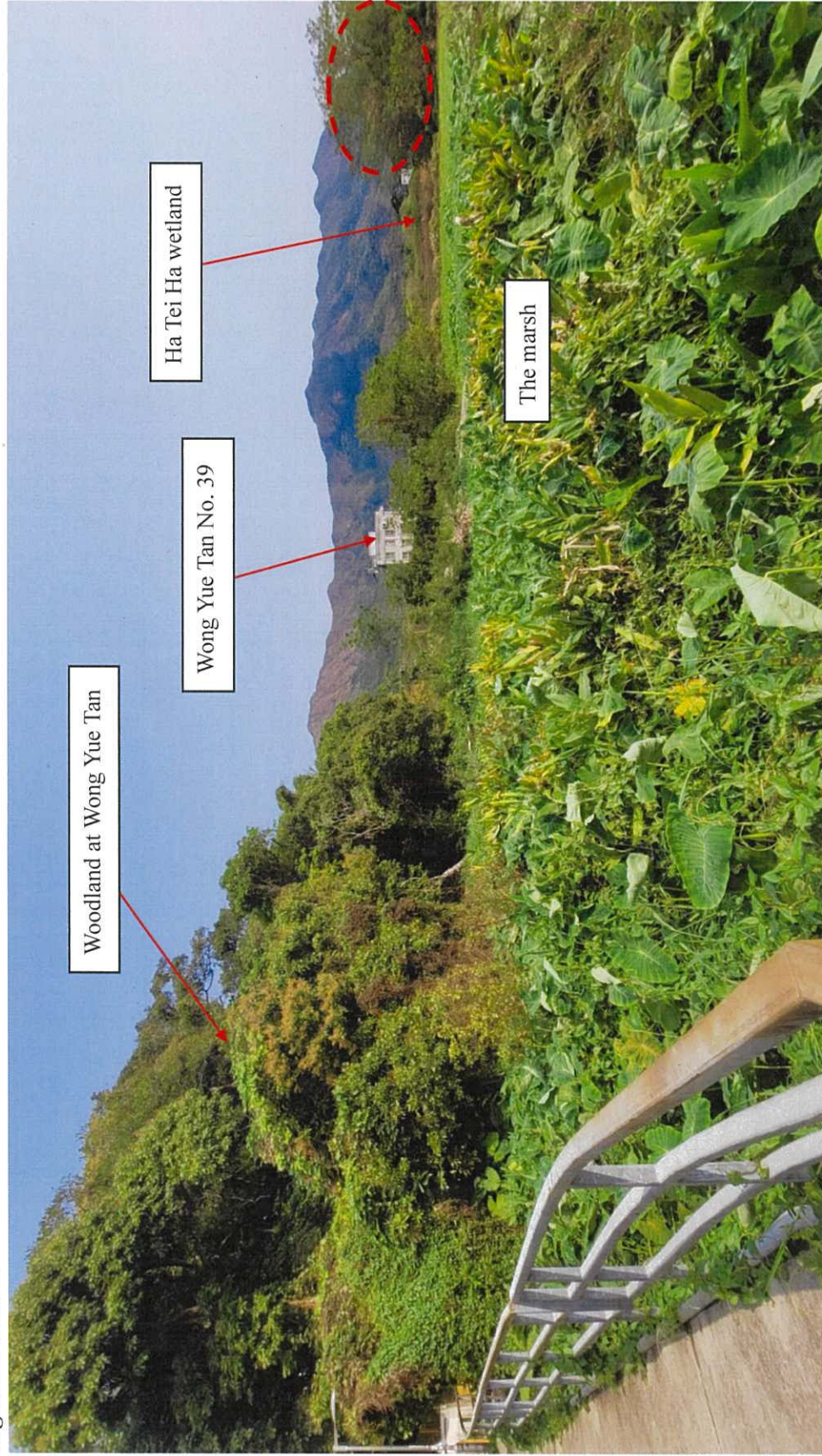




Figure 3. Cont'd.





**Figure 4.** Existing condition (above) and photomontage extracted from the gist (below).





Figure 4. Cont'd.



Figure 5. Aerial photos taken in various years.

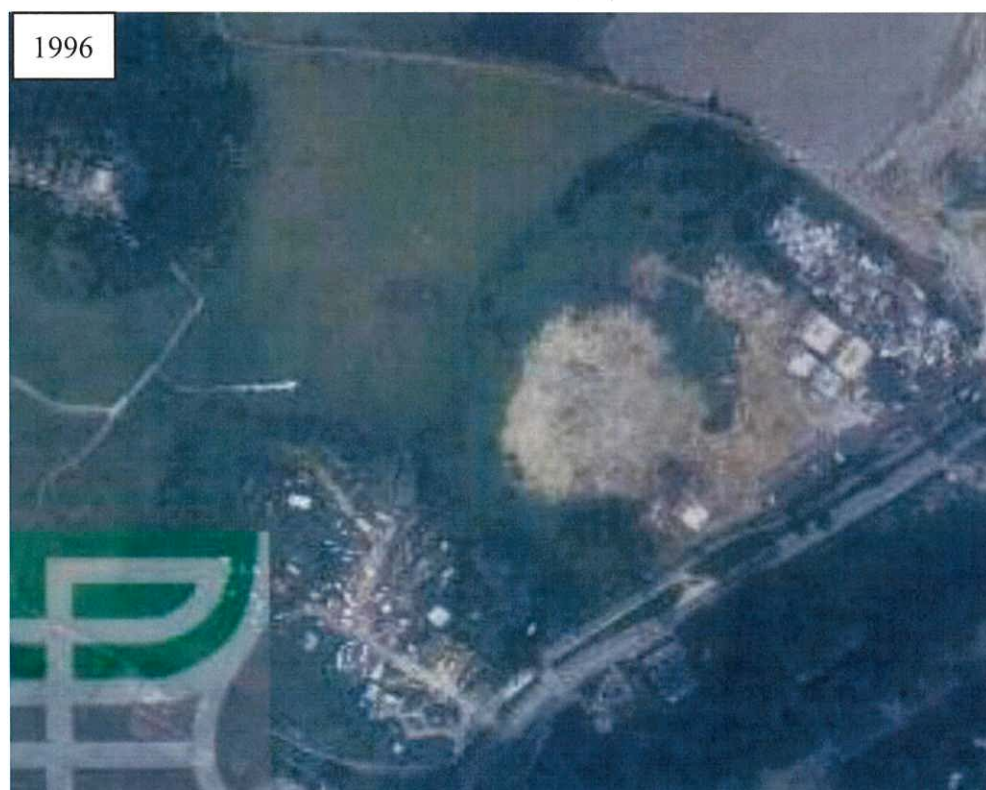




Figure 5. Cont'd.

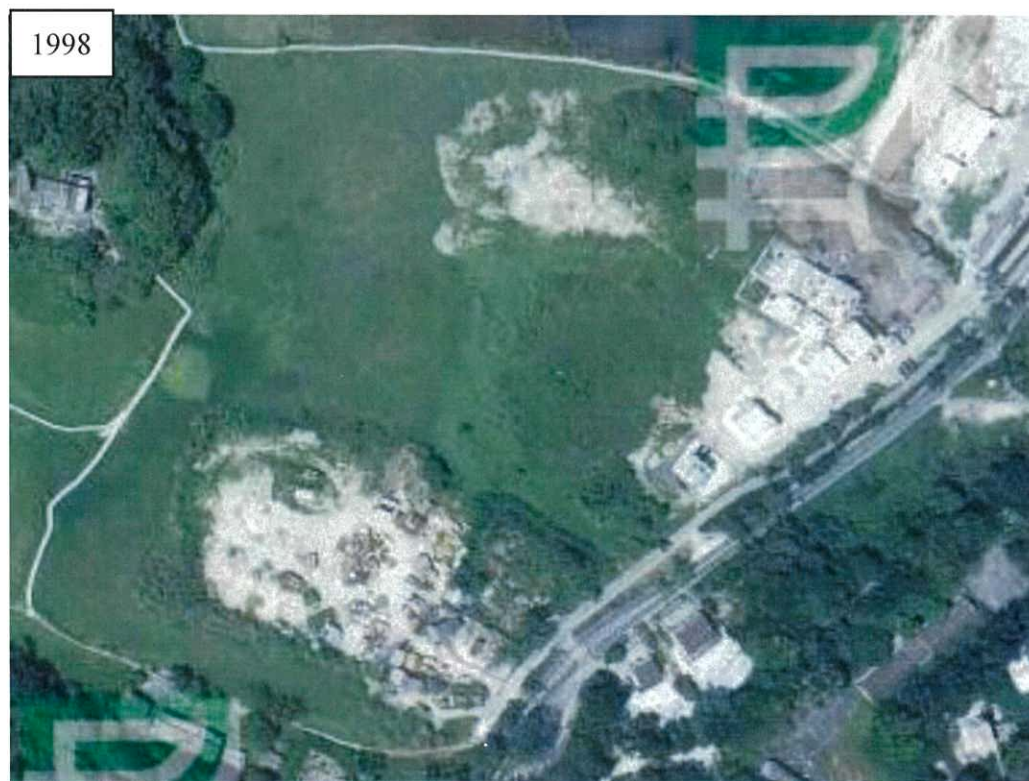
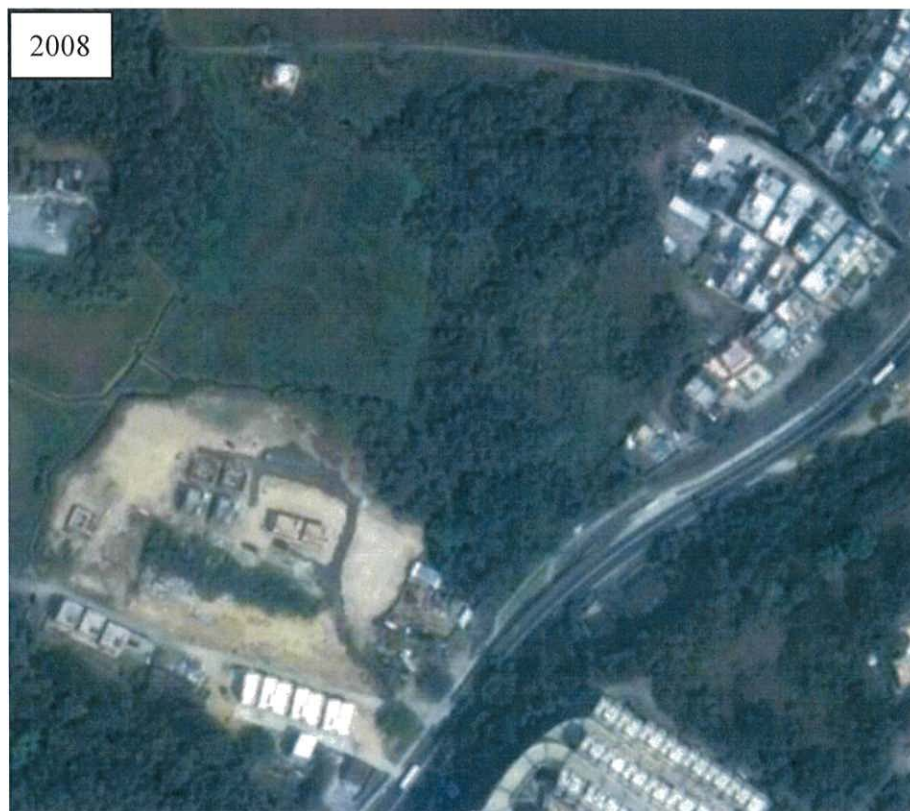




Figure 5. Cont'd.



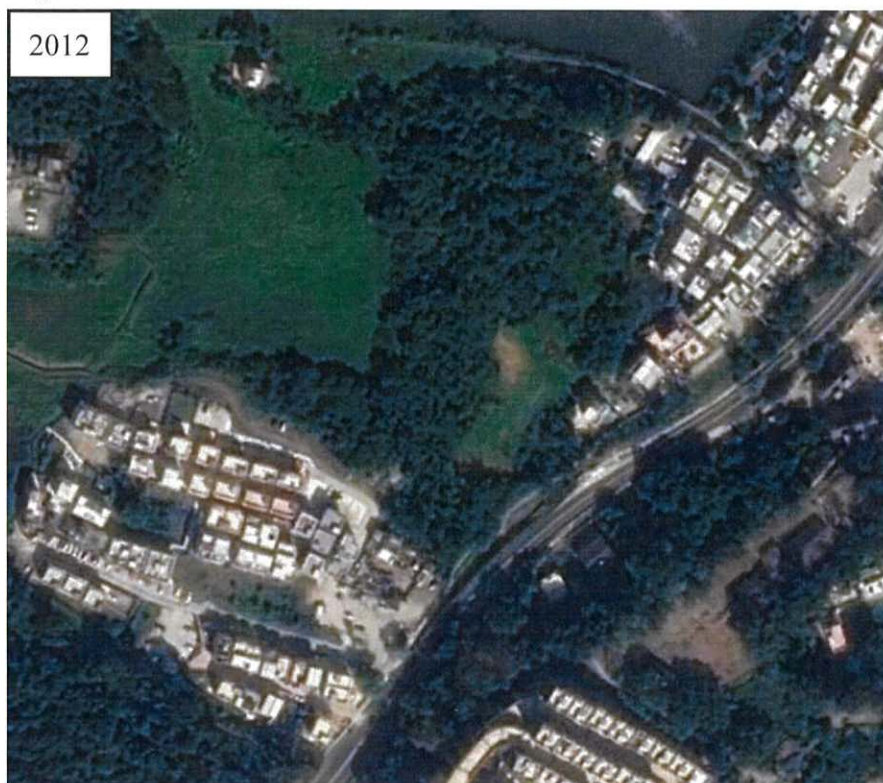
Figure 5. Cont'd.



香港新界大埔林錦公路  
 Lam Kam Road, Tai Po, New Territories, Hong Kong  
 Email: eap@kfbg.org



Figure 5. Cont'd.



香港新界大埔林錦公路  
 Lam Kam Road, Tai Po, New Territories, Hong Kong  
 Email: eap@kfbg.org



Figure 5. Cont'd.

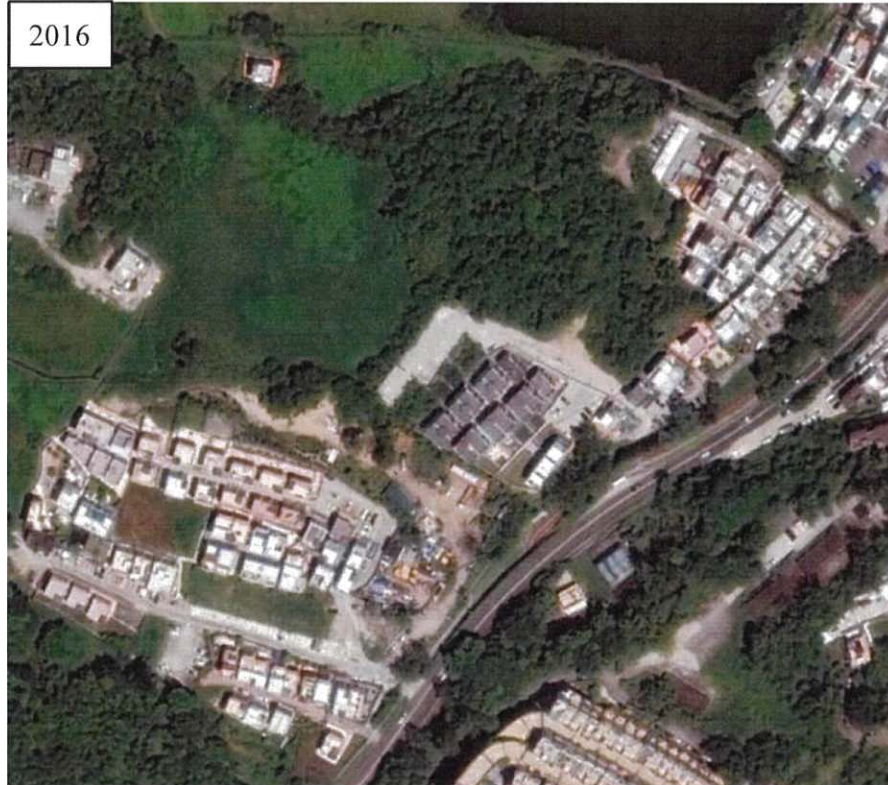




Figure 5. Cont'd.





Figure 5. Cont'd.



tpbpd@pland.gov.hk

寄件者: WONG, Suet Mei <wsuetmei@hkbws.org.hk>  
寄件日期: 2021年03月02日星期二 17:23  
收件者: tpbpd  
副本: HKBWS HKBWS  
主旨: HKBWS's comments on the planning application for the proposed Temporary Residential Institution (Transitional Housing) with Filling and Excavation of Land for a Period of 5 Years at Wong Yue Tan, Tai Po (A/NE-TK/702)  
附件: 20210302\_WongYueTan\_TransitionalHousing\_A\_NE\_TK\_702\_HKBWS.pdf

Dear Sir/Madam,

The Hong Kong Bird Watching Society's comments on the planning application for the proposed Temporary Residential Institution (Transitional Housing) with Filling and Excavation of Land for a Period of 5 Years at Wong Yue Tan, Tai Po (A/NE-TK/702) is attached.

Thank you.

Best Regards,

**Wong Suet Mei | 黃雪嫻**

Conservation Officer | 保育主任

**Hong Kong Bird Watching Society | 香港觀鳥會**

A: 7C, V Ga Building, 532 Castle Peak Road, Kowloon, Hong Kong  
香港九龍荔枝角青山道 532 號偉基大廈 7 樓 C 室

T: +852 2377 4387 | F: +852 2314 3687





Secretary, Town Planning Board  
15/F, North Point Government Offices  
333 Java Road, North Point, Hong Kong  
(E-mail: [tpbpd@pland.gov.hk](mailto:tpbpd@pland.gov.hk))

By email only

2 March 2021

Dear Sir/Madam,

**Comments on the planning application of the Proposed Temporary Residential Institution (Transitional Housing) with Filling and Excavation of Land for a Period of 5 Years at Wong Yue Tan, Tai Po (A/NE-TK/702)**

The Hong Kong Bird Watching Society (HKBWS) objects to the planning application based on the following reasons.

**1 Not in line with the planning intention of the Statutory Outline Zoning Plan and "Green Belt" (GB) zoning**

- 1.1 According to the approved Ting Kok Outline Zoning Plan S/NE-TK/19 (the Plan), the general planning intention of the Plan "*should be oriented towards conservation and landscape protection*" and "*to conserve its natural environment and to protect it from intensive urban developments*"<sup>1</sup>. Moreover, the application site falls within GB zone, where "*the planning intention of this zone is primarily for defining the limits of urban and sub-urban development areas by natural features such as foothills, lower hill slopes, spurs, isolated knolls, woodland and vegetated land and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within this zone.*"
- 1.2 From the Google Earth aerial photograph in 2020, most of the application site is well-vegetated and is serving the function of buffering the adjoining marsh and pond within Conservation Area (CA) zone from the village

<sup>1</sup> [https://www1.ozp.tpb.gov.hk/plan/ozp\\_plan\\_notes/en/S\\_NE-TK\\_19\\_e.pdf](https://www1.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_NE-TK_19_e.pdf)

settlements (Figure 1).

- 1.3 Referring to the Ecological Impact Assessment and Tree Preservation Proposal submitted by the applicant, two habitat types were identified within the site, including "Plantation" and "Developed Area", while native trees such as *Ficus hispida* and *Macaranga Tanarius* were recorded at the plantation.
- 1.4 Moreover, during our site investigation in February 2021, an individual of Besra (*Accipiter virgatus*) was spotted within the site and it was found flying out from the tree within the site to the inland area (Figure 2). This species of raptor is commonly found in forest habitats which include "*moist deciduous and evergreen montane forest, secondary forest, plantations, mangroves and pine forest*"<sup>2</sup>. We consider the natural features including both plantation stand and shrubs within the site have its ecological value, and are performing the ecological function as well as the buffering function.
- 1.5 However, the proposed Transitional Housing Development would involve tree felling of a total of 165 number of trees including all 147 number of trees within the application site. Extensive land filling and site formation would be resulted, leading to a direct loss in 0.8 hectares of plantation habitat that was recorded with several species of native trees. This is clearly a direct and permanent loss in habitats and natural features, even the development was said to be temporary for 5 years. We consider this is not in line with the above planning intention of the Plan to conserve the natural environment in Ting Kok area, and the planning intention of GB zone to retain the natural features to contain urban sprawl. We therefore urge the Town Planning Board (Board) to reject this application.

---

<sup>2</sup> Clark, W.S. and J. S. Marks (2020). Besra (*Accipiter virgatus*), version 1.0. In Birds of the World (J. del Hoyo, A. Elliott, J. Sargatal, D. A. Christie, and E. de Juana, Editors). Cornell Lab of Ornithology, Ithaca, NY, USA. <https://doi.org/10.2173/bow.besra1.01>

## **2 Adverse impacts of the development and the conservation importance of the surrounding ecologically sensitive habitats**

- 2.1 According to the Ecological Impact Assessment, the habitats around the application site including pond, watercourse, marsh, mangrove and secondary woodland were assessed as of “moderate” or “moderate to high” ecological value. Hence, they are of conservation concern.
- 2.2 As the ecological surveys for the current application were conducted from July to October 2020 only (only 32 bird species were recorded in the Study Area), we consider that the list of birds provided by the applicant does not fully represent the bird community in the area and does not take the seasonal variation of birds (particularly the migrants and winter visitors) into account. We are concerned the ecological value of the habitats and the adverse impacts of the development on the surroundings would be underestimated.
- 2.3 According to the HKBWS bird records, about 155 species of birds were recorded in the marshes and habitats around the application site. Some globally threatened species were recorded, including Yellow-breasted Bunting (Critically Endangered), Collared Crow (Vulnerable), Northern Lapwing (Near Threatened), and Red-necked Stint (Near Threatened).
- 2.4 We are concerned the proposed transitional housing development would cause adverse impacts on the surrounding ecologically sensitive environment. Moreover, the introduction of a population of about 1,962 people in this area would also increase the human disturbance to these sensitive habitats. As explained in the previous section, we consider that the application site should be maintained as buffer with natural features between the current village development and the Conservation Area, and that the proposed development should be rejected.

## **3 The Town Planning Board should not encourage “destroy first, build later”**

- 3.1 The application site is associated with unauthorized development. Four Enforcement Notices (Case no. E/NE-TK/011, E/NE-TK/026, E/NE-TK/076, E/NE-TK/082) for the unauthorized development of land filling and site formation were issued at the application site from 1996 to 2015.

- 3.2 From the Google Earth aerial photograph, landscape changes including vegetation clearance, land filling and storage uses are spotted in southwestern part of the application site between 2013 and 2021, while vegetation clearance and land filling were occurred in the northeastern part of the site in 2019.
- 3.3 We consider that this is “destroy first, build later”. We are concerned the approval of the current application would further legitimize the current misuse of the GB zone, leading to the promotion of “destroy first, develop later” attitudes among landowners in the locality. As the Board has suggested that *“the Board will not tolerate any deliberate action to destroy the rural and natural environment in the hope that the Board would give sympathetic consideration to subsequent development on the site concerned.”*<sup>3</sup> We urge the Board to reject this application.

#### **4 Set undesirable precedent in Ting Kok area**

- 4.1 We would like to reiterate that the proposed transitional housing is not in line with the Statutory Outline Zoning Plan to conserve the natural environment in Ting Kok area and the planning intention of GB zone to retain natural features.
- 4.2 Moreover, the landowner of the application site is Wheellock Properties (Hong Kong) Limited, which loaned the lots at a nominal rent of \$1 to the applicant, and has previously submitted a low-density residential development in the same area back in 2009<sup>4</sup>. There are also “destroy first, build later” cases and unauthorized developments within the application site and also the nearby GB zoning (Figure 3).
- 4.3 We are concerned the approval of this application, even in a temporary basis, would set an undesirable precedent to the future applications of housing development associated with “destroy first, build later” within GB zoning and Ting Kok area, and thus nullifying the statutory planning control

---

<sup>3</sup> TPB Press Release. Available at:  
<http://www.info.gov.hk/gia/general/201107/04/P201107040255.htm>

<sup>4</sup> 【頻聞追 Click】會德豐借出生態沼澤建過渡房 環團：填平後易改用途起樓  
<https://hk.appledaily.com/local/20200110/TBSVQS2KUA5N5CRDQTIGPUUYOI/>



mechanism.

## **5 Justifications for the decision and comments made by Government departments and the Board**

According to the Hong Kong Planning Standards and Guidelines (HKPSG), Chapter 10, Section 2.1 (ii), the Board has the responsibility to, “restrict uses within conservation zones to those which sustain particular landscapes, ecological and geological attributes and heritage features” and (iii), the Board has the responsibility to “*control adjoining uses to minimise adverse impacts on conservation zones and optimise their conservation value*”. We note that all other Government bureaux/departments are also bound to the HKPSG, the Agriculture, Fisheries and Conservation Department (AFCD) and the Planning Department (PlanD) has the responsibility to advise the Board on the ecological and planning aspects in particular<sup>5</sup>. Given AFCD’s mission to conserve natural environment and safeguard the ecological integrity<sup>6</sup> and the proposed development is not in line with the planning intention of the statutory plan, HKBWS would also expect AFCD and PlanD to object this application. Should AFCD, PlanD or the Board feels otherwise, we urge that the appropriate justifications are provided.

The HKBWS respectfully requests the Board to take our comments into consideration and **reject** the current application. Thank you for your kind attention.

Yours faithfully,



Wong Suet Mei  
Conservation Officer  
The Hong Kong Bird Watching Society

---

<sup>5</sup> AFCD Role of Department. Available at:  
[http://www.afcd.gov.hk/english/aboutus/abt\\_role/abt\\_role.html](http://www.afcd.gov.hk/english/aboutus/abt_role/abt_role.html)

<sup>6</sup> AFCD Vision and Mission. Available at:  
[http://www.afcd.gov.hk/english/aboutus/vision\\_mission/abt\\_vision\\_mission.html](http://www.afcd.gov.hk/english/aboutus/vision_mission/abt_vision_mission.html)

cc.

The Conservancy Association

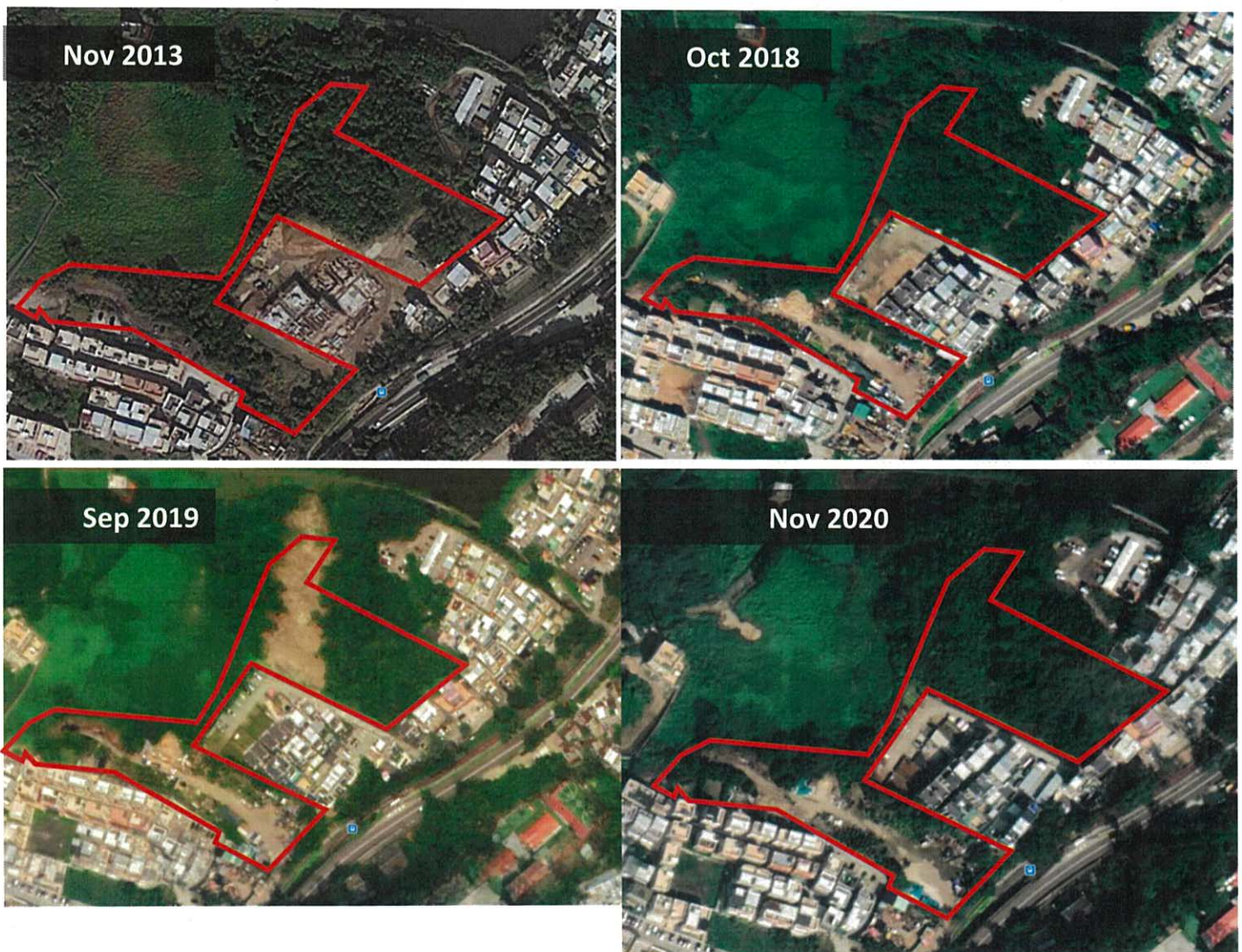
Designing Hong Kong

Kadoorie Farm and Botanic Garden

WWF – Hong Kong

TrailWatch

**Figure 1.** According to the Google Earth aerial photograph in November 2020, most of the application site (marked with red line) is well-vegetated and is serving the function to buffer the adjoining marsh and pond within Conservation Area (CA) zone from the village settlements. However, landscape changes including vegetation clearance, land filling and storage uses were spotted in southwestern part of the application site between 2013 and 2021, while vegetation clearance and land filling were occurred in the northeastern part of the site in September 2019.



**Figure 2.** During our site investigation in February 2021, an individual of Besra (*Accipiter virgatus*) was spotted within the site and it was found flying out from the tree within the site to the inland area. We consider the natural features including both plantation stand and shrubs within the site have its ecological value, and are performing the ecological function as well as the buffering function.



Besra (*Accipiter virgatus*) was spotted within the site



**Figure 3.** The photo was taken in February 2021, showing an unauthorized landfilling of marsh within GB zone occurred near the application site. As there are already “destroy first, build later” cases and unauthorized developments within the nearby GB zoning, we are concerned the approval of this application, even in a temporary basis, would set an undesirable precedent to the future similar applications of housing development associated with “destroy first, build later” within GB zoning and Ting Kok area, and thus nullifying the statutory planning control mechanism.



tpbpd@pland.gov.hk

---

寄件者: [REDACTED]  
寄件日期: 2021年03月01日星期一 21:24  
收件者: tpbpd@pland.gov.hk  
主旨: 轉寄: Application No. A/NE-TK/702 - Comments on the Application  
附件: Letter to TPB (2021.02.28) Final.pdf

Dear Sir/Madam,

Further to my email below, please note that copy of my letter is also sent to you by registered mail today.

Regards  
K.W. Cheung

傳送自 Android 上的 Yahoo Mail

----- 轉寄的郵件 -----

寄件人: [REDACTED]  
收件人: "tpbpd@pland.gov.hk" <tpbpd@pland.gov.hk>  
寄件備份: 2021 年 2 月 月 28 日 週日, 時間: 22:38  
主旨: Application No. A/NE-TK/702 - Comments on the Application  
Secretary, Town Planning Board

Dear Sir/Madam,

Proposed Temporary Residential Institution (Transitional Housing)  
with Filling and Excavation of Land for a Period of 5 Years  
in Wong Yue Tan, Tai Po

Please find attaches my comments on the captioned planning application. Grateful if you could convey my comments to the Town Planning Board in considering the Application.

Regards  
K.W. Cheung

28 February 2021

Secretary, Town Planning Board,  
15/F, North Point Government Offices,  
333 Java Road,  
North Point, Hong Kong  
(e-mail: tpbpd@pland.gov.hk)

Dear Sir/Madam,

**Proposed Temporary Residential Institution (Transitional Housing)  
with Filling and Excavation of Land for a Period of 5 Years  
in Various Lots in D.D. 26 and Adjoining Government Land,  
Wong Yue Tan, Tai Po  
Application No. A/NE-TK/702**

I am an indigenous villager of Wong Yue Tan and would like to raise my serious objection to the captioned application. The application, in particular its Supporting Planning Statement (SPS), has provided incomplete, inaccurate, or misleading information about the proposed development. The proposal is a large-scale residential development at a remote countryside lacking basic infrastructures. The proposed development is incompatible with the existing rural settings. The proposed large intake of population will lead to insurmountable adverse impacts to the local villages as well as the rural environment. Please find below elaborations of my comments on the application:

**Wrong Location**

2. There was no proper site search exercise conducted by the Government for the proposed project. The application site is selected just because the landowner Wheelock is willing to loan the site to the Applicant Lok Sin Tong. The site was part of former unsuccessful residential development applications (e.g. Y/TP/10) proposed by Wheelock at Shuen Wan. Like other farmlands acquired by major developers, the site is idle just because the developer is waiting for development opportunities. It does not mean the site is suitable for the current proposal or other uses.

3. Shuen Wan area is predominately rural in nature and comprises 11 small indigenous villages with low populations. Basic infrastructures and community facilities (e.g. schools, markets, leisure places) are generally lacking. The area is only served by a single two lanes public road, Ting Kok Road. Traffic problem has always been bothering local residents and poses serious constraints for new developments. Hence, the application site is not an appropriate place for large scale residential development like the current application. If the criteria of Government's former "site trawling" exercise for Green Belt were applied (excluding land status), this site will certainly be ruled out at the first instance.

## The Proposed Development is Excessive

4. The application proposed to build 11 massive residential blocks. Detailed dimensions of these building blocks were not available in the SPS. However, based on the limited layout plans provided, a typical building block measured 30480 x 12192 x 13500 mm (L x W x H). Obviously, the typical footprint of these building blocks (**372 m<sup>2</sup>** or 4,000 sq. ft.) is much larger than that of a New Territories Small House (not exceeding 65.03m<sup>2</sup> or 700 sq. ft.) It is **61.5 times bigger**. The number of storeys (4) and building height (**13.5m**) are also much higher than that of a Small House (3 storeys, not exceeding 8.23m). It is **1.6 times higher**. These massive building blocks are thus incompatible with the rural village settings in the area. The two photomontages provided in the SPS (Figure 5.1) showing that these massive building blocks looked like adjacent village houses, are therefore misleading.

5. The application sought to provide 1,236 units, which are much more than that of some recent Home Ownership Scheme developments (e.g. Kai Cheung Court 940 units, Choi Wo Court 806 units). In fact, the proposal is comparable to large scale private low rise residential developments. The proposed plot ratio of 1.493 is quite high in the rural settings (higher than 1.19 of Beverly Hills, 0.8 of Tycoon Place and Casa Marina in the surrounding areas). It is therefore more like a "Residential (Group C)" development.

6. The estimated population of the proposed development is 1,962 persons. However, according to the flat mix provided in the supplementary information, the **maximum population of the proposal should be 2,553** (2 persons unit x 1,182 + 3 persons unit x 27 + 4 persons unit x 27). It is **1.3 times higher**. The accuracy of design and technical assessments based on the estimated population of 1,962 would be subject to queries. In any case, some 2,000 additional population is a very high figure for the Shuen Wan area. For instance, the population of adjacent Wong Yue Tan Village or Treasure Spot Garden should be around some 200. Hence, the new population is **more than 10 times** of the existing ones. There will be severe adverse implications on local infrastructures and facilities.

7. Moreover, the proposed layout is very congested. According to the Master Layout Plan and Master Landscape Plan, the residential blocks are extremely close to the site boundary (not even wide enough for the proposed single row of trees) and remarkably close to each other. Large part of the remaining space will be used for the emergency vehicle access (EVA) and other facilities. The residual area left is mainly circulation space between building blocks and EVA. There is little room left for other purposes, such as the alleged "open space". The proposed development is thus excessive and congested. It is completely incompatible to the existing rural environment.

## Not in line with the General Planning Intention of the Area

8. The application site falls within the Approved Ting Kok Outline Zoning Plan No. S/NE-TK/19 ("the OZP"). It is clearly stipulated in the Explanatory Statement of the



OZP that the planning intention of the Area should be oriented towards conservation and developments are restricted. Relevant sections are quoted below:

*"The primary planning intention for the Area is to **conserve the natural environment**."* (Section 7.1.1)

*"The marsh area to the west of Ting Kok Road at Shuen Wan [adjacent to the application site] is of ecological significance and importance in providing a diversified habitat for various flora and fauna, particularly as a feeding ground for birds. Developments in these areas are generally not permitted while **developments in the surrounding areas are restricted** to ensure that the special characters of these areas are preserved."* (Section 7.2.2 (b))

*"the rural hinterland of the NENT [including the subject site], the general planning intention should be **oriented towards conservation and landscape protection**"* (Section 8.1)

*"In view of the high scenic and ecological value and the rural nature of the Area, the general planning intention for the Area is **to conserve its natural environment... and to protect it from intensive urban developments**."* (Section 8.2)

9. It is obvious that the proposed development of constructing 11 massive building blocks housing a population of some 2,000 people is too intensive and incompatible with the rural characters of the Area. **The proposed development is not in line with the general planning intention of the Area.**

### **Not in line with the Planning Intentions of the Land Use Zonings**

10. The application site largely falls within Green Belt ("GB") zone of the Ting Kok OZP while a small portion falls within Village Type Development ("V") zone. According to the Schedule of Uses of the OZP, the planning intention of GB is:

*"The planning intention of this zone is primarily for **defining the limits of urban and sub-urban development areas** by natural features and **to contain urban sprawl** as well as to provide passive recreational outlets. There is a **general presumption against development within this zone**."*

11. The Explanatory Statement of the OZP further elaborated that

*"The planning intention of this zone [GB] is primarily for **defining the limits of urban and sub-urban development areas** by natural features such as foothills, lower hill slopes, spurs, isolated knolls, woodland and vegetated land and **to contain urban sprawl** as well as to provide passive recreational outlets. There is a **general presumption against development within this zone**".* (Section 9.1.1)

12. It is obvious that the proposed **development is not in line with the planning intention of GB zone**, which is primarily for defining the limits of urban and sub-urban development areas by natural features and to contain urban sprawl as well as to provide passive recreational outlets. There is a general presumption against development within GB zone. There is no strong planning justification in the submission to justify a departure from the planning intention

13. For V zone, the Schedule of Uses of the OZP stated that:

*"The planning intention of this zone is to designate both existing recognized villages and areas of land considered suitable for village expansion. Land within this zone is primarily intended for development of Small Houses by indigenous villagers."*

*"No new development... shall result in a total development and/or redevelopment in excess of a maximum building height of 3 storeys (8.23m)"*

14. The proposed 11 building blocks are much bigger and higher than New Territories Small Houses. As mentioned in paragraph 4 above, the typical footprint of these building blocks (**372 m<sup>2</sup>**) is **61.5 times** larger than that of a Small House (65.03m<sup>2</sup>). They are 1 storey higher as well. The building height (**13.5m**) is **1.6 times higher** than that of a Small House (8.23m). Hence, the proposed development is also **not in line with the planning intention of V zone**.

### **Not Comply with the Town Planning Board Guidelines No. 10**

15. Furthermore, the Town Planning Board Guidelines No. 10 for 'Application for Development within "GB" zone under section 16 of the Town Planning Ordinance' clearly stipulated that:

*"...The scale and intensity of the proposed development including the **plot ratio, site coverage and building height should be compatible with the character of surrounding areas**. With the exception of New Territories Exempted Houses, a **plot ratio up to 0.4 for residential development may be permitted**."*  
(Paragraph 2b)

*"The design and layout of any proposed development should be compatible with the surrounding area. The development **should not involve extensive clearance of existing natural vegetation, affect the existing natural landscape, or cause any adverse visual impact on the surrounding environment**."*  
(Paragraph 2g)

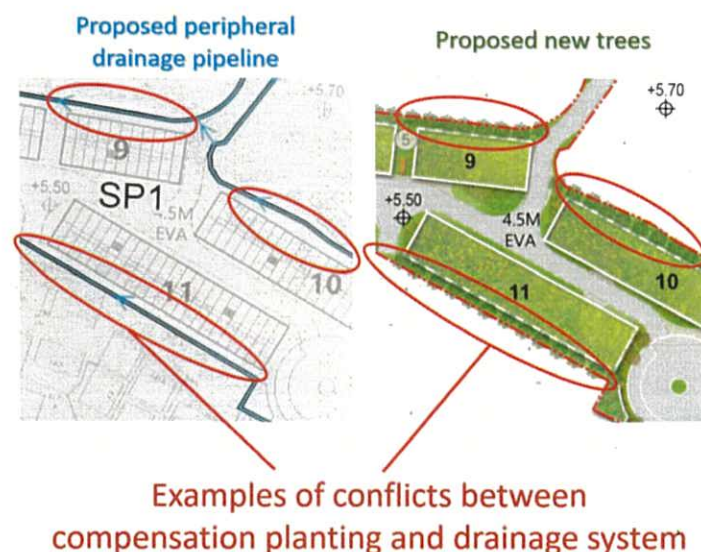
*"The proposed development **should not overstrain the capacity of existing and planned infrastructure such as sewerage, roads and water supply. It should not adversely affect drainage or aggravate flooding in the area**."*  
(Paragraph 2i)

16. As described in paragraph 4 above, the footprint of proposed building blocks is some 60 times bigger than the existing small houses in the surrounding areas. The building blocks are also 1.6 times higher. The photomontages enclosed in the application (Figure 5.1) showing that the proposed building blocks have similar height with the existing village houses are quite misleading and inaccurate! Obviously, the proposed development is **not compatible with the character of surrounding areas**.

17. According to the development parameters provided in the application, the proposed development has a **total plot ratio of 1.493** (domestic plot ratio 1.485), which is much higher than 0.4 stipulated in the TPB Guidelines No. 10. **It is 3.7 times higher.**

18. The application site comprises two land parcels interconnected by a narrow strip of land. The northern land parcel is now completely overgrown by trees. Reference could be made to the historic aerial photos of the site contained in Appendix 5 of the Environment Assessment (EA) report in the SPS. According to the Tree Preservation Proposal in Appendix C of SPS, all 147 trees within site boundary and 18 trees outside are proposed to be felled (total 165 trees). Hence, **all trees at the site will be removed** and certainly will generate adverse landscape impacts.

19. It is proposed that 165 no. of trees will be planted as compensation, but no details has been provided. The Landscape Master Plan only show a row of trees along the site boundary. Presumably, the compensation planting will be carried out there, but it is doubtful if such narrow strip could accommodate 165 trees. As revealed from the Tree Survey and Recommendation Plans, the building blocks are already awfully close to the boundary (may be as narrow as 1 to 2m). There should not be enough room left for the proposed compensation planting. Moreover, there will be a proposed Peripheral Drainage Pipeline at the site boundary as shown in the Schematic Onsite Drainage Plan (Figure 12). Serious conflict between drainage works and tree planting is anticipated as illustrated in the figure below.





20. Furthermore, parts of the boundary are loose earth slopes but geotechnical assessment is lacking. It is uncertain whether there will be any slope improvement works required at the site boundary. Therefore, **the proposed compensation planting will seem impracticable.** The landscape impacts could not be properly mitigated.

21. As indicated in the Master Layout Plan, some of the building blocks (Nos. 4, 6, 7, 10 and 11) are remarkably close to the existing village houses of Wong Yue Tan and Treasure Spot Garden. In Table 1 of the Air Quality Assessment (Chapter 2 of EA), the **distance of the proposed building blocks to the existing village houses could be as close as 3m to 5m.** Given the much larger footprint and higher height of the building blocks, the adjacent village houses will be almost completely overshadowed. Their views will be blocked by the building blocks and their natural lighting will be seriously affected. However, there is no visual impact assessment conducted to address such **severe visual impacts.** Only two inaccurate photomontages have been provided (Figure 5.1). Photomontages of views from affected village houses as well as other sensitive receivers (e.g. Beverly Hills) were not provided.

22. The SPS of the application asserted that the proposed development will not bring about adverse impacts to traffic, environment, drainage, sewerage, etc. Brief reports of different technical assessments were also provided. However, it is found that many details are not available and some assumptions of the technical assessments may not be accurate. **The proposed development may lead to adverse impacts to traffic, drainage and ecology of the surrounding areas.** Detailed comments on these aspects will be provided later.

23. As discussed above, **the proposed development does not comply with the Town Planning Board Guidelines No. 10** in that the proposed development is incompatible with the character of surrounding areas; has plot ratio much higher than 0.4; cause adverse visual impacts to surrounding village houses; has involved extensive clearance of vegetation and generated adverse landscape impacts to the area; and may overstrain the capacity of existing infrastructures.

### **Undesirable Precedent Case**

24. There were applications for Small Houses at GB in the vicinity of the application site but were rejected by the Town Planning Board (TPB) (e.g. A/TP/613 , A/NE-TK/215 , A/NE-TK/352). Applications for residential development were also rejected (e.g. A/TP/273). The major reasons were (a) the proposed development was **not in line with the planning intention of the GB zone**; (b) the proposed development was **not in line with the Town Planning Board Guidelines No. 10**; and (c) the approval of the application would **set an undesirable precedent** for similar developments within the "GB" zone. The cumulative effect of approving such applications would **result in adverse landscape/traffic impact** and a general degradation of the natural environment in the area.

25. If building a small house at GB will set an undesirable precedent, what kind of precedent will be set by the current application with such huge development intensity.

If the proposal is approved, it will only **set an undesirable precedent** that large scale residential development could be allowed at GB zone. It may also facilitate Wheellock to apply for development at the site after completion of the project (or termination by the developer). This will lead to allegation about collusion between government and developer (官商勾結). **The TPB should not apply double standards.** Otherwise, it would be unfair to other applicants, especially local villagers with little resources.

26. The SPS of the application has also referred to the OZP. However, it only highlighted those parts saying that applications at GB could be considered by the Town Planning Board under special circumstances. There have not been elaborations on how the planning intentions could be met. The major arguments are that the proposal is only temporary; the applied land use “Residential Institution” is a Column 2 use of GB and V zones; and there are planning merits. However, all these arguments are unsound or misleading and are refuted in the following paragraphs.

### **Unlikely be a Temporary Land Use**

27. The application seeks for an approval of the proposed use for 5 years. If approved, the Applicant will immediately apply for an extension of 3 years. Then why not apply for an approval for 8 years in one go? Maybe this is a packaging technique to make the application looks more “temporary”. It should be noted many so called “temporary” facilities such as the Tai Po Temporary Market could last for decades.

28. It is not uncommon that many “temporary uses” approved by the TPB have applied for renewal or extension of time many times. For example, in a recent application for temporary use as barbeque site at Ting Kok (No. A/NE-TK/698), the barbeque site got its first approval in 2007. Hence, if the 5 + 3 years of the current application is approved, the Applicant could continue to apply for renewal or extension of time every 2 to 3 years. Eventually, the project could last for decades. The adverse impacts of the development, say visual and landscape impacts, then will not be temporary.

29. As discussed above a number of times, the proposal is a large scale residential project for some 2,000 population. It is not those temporary land uses usually handled by the TPB such as carpark, barbeque site or open storage, which could be terminated or decommissioned without much difficulties. Terminating the project will involve terminating the leases of some 1,000 families or some 2,000 tenants. It will be very difficult, if not impossible, to evacuate such large number of tenants. How could the TPB reject applications for renewal or extension when there are so many grass root families being affected?

30. The proposal is very expensive. According to the Legislative Council paper submitted by the Transport and Housing Bureau (THB) in December 2020 (No. CB(1)299/20-21), the cost of a transitional housing unit is \$0.55m. Hence, the cost of the current proposal will be **\$679.8m** (\$0.55m x 1,236). The actual cost should be much higher since the site lacks basic infrastructures. For instance, the project needs to construct a secondary level sewage treatment plant, which should add a few ten

thousand million dollars to the overall cost. Annual maintenance costs of the plant will not be low either. All these have to be paid by public money. It would be **highly not cost effective** if the project only lasts for a few years. Or has the Government in mind that the project will last for much longer time?

31. The Applicant seemed too optimistic on the delivery of the project by the end of 2022. Take "The Boxes" (temporary cross-boundary shopping centre) at San Tin as example. The development used containers as the building blocks for shops. The site was formerly used as container carparks. Originally, the project proponent thought the development could be completed in a few months, due to "simplicity" of the proposal and obtaining "consents" from various Government departments. The proposal obtained TPB's first approval in 2015 (A/YL-ST/476), but the development could only commence operation in 2018. There were a number of applications for extension of time and amendments of the proposal (e.g. A/YL-ST/477, A/YL-ST-529). It is because the proponent had to sort out various technical issues to meet the actual requirements of various departments, which took a long time.

32. The current application may face similar situation as The Boxes. Unlike other transitional housing projects in the urban areas, the application site lacks general infrastructures. For instance, constructing a secondary level sewerage treatment plant will be required. The proposal has yet to fulfil various technical requirements such as discharge licence for sewage, fire safety, building plans, drainage, geotechnical assessments, etc. Application for extension of time may be necessary. Eventually, it may take 3 years or even more to sort out all these tedious issues. Will it be cost effective to pursue such "temporary" use? Or will the proposed use not be temporary?

### **Unlikely be a "Residential Institution"**

33. According to the TPB's Definition of Terms, Residential Institution means

*"any institution established within a building... which provides residential accommodation for persons... It includes hostel, dormitory, and elderly housing... but excludes hotel and guesthouse..."*

The quoted examples (hostel or dormitory) normally only provide basic accommodation services which are short term in nature. Usually, catering or cooking facilities are not provided. As informed in the consultation meeting, the housing units of the development will be rented to residents under a 2-year lease. This is the same as renting flats in the market. The development will be managed by the Applicant like an ordinary housing estate. Hence, it is different from a hostel or dormitory.

34. As discussed in various paragraphs above, the proposed development resembles more a private low rise residential development. In terms of development intensity and scale, it is more appropriate to group the proposal under "Residential Group (C)".



35. Column 2 land uses require permission from the TPB. This means that such uses may or may not be suitable for a specific site and need to be considered by the TPB. Even if the proposed development could be classified as Residential Institution, it does not imply that the proposed land use is appropriate for the current site. Site constraints will render the site unsuitable for the proposed use. Hence, the applied use is a Column 2 use does not justify deviation from the development control or planning intention of GB zone.

### **Asserted Planning Merits Not Justified**

36. A number of planning merits have been listed in the SPS to justify the proposed development at GB zone (Chapter 5). However, some of them are inaccurate and some are misleading. For instance, echoing government's policy and providing supply of affordable housing are listed as the top merits. These are good objectives but they should not be mixed up with the planning merits or justifications of the application. If such argument is followed, then any piece of GB zone could be turned into a public housing site. In fact, the TPB has rejected several requests for rezoning GB sites for residential development by the Government, including GB sites in the vicinity of the application site at Tai Po.

37. Alleged merits like enhancing quality of life of residents and fostering an environmental friendly and resource-efficient neighbourhood, are rather vain and not supported by strong evidence. For example, the development is congested and crowded. Community facilities are lacking, but the SPS listed a bunch of facilities: "multi-purpose community area, multi-purpose exercise area with exercise equipment, pocket garden, leisure-sitting-out areas, shops and communal space" (Section 5.6.1). It is hard to envisage how to juggle so many features into the limited and confined space at the site. There was not any figure or drawing showing the layout of such facilities. There might not be enough space to put a sitting bench there. It is also difficult to comprehend why providing a small shop and small communal space for some 2,000 residents could enhance their quality of life. Also, building an expensive sewage treatment plant and decommission it afterwards cannot be said to be resource efficient.

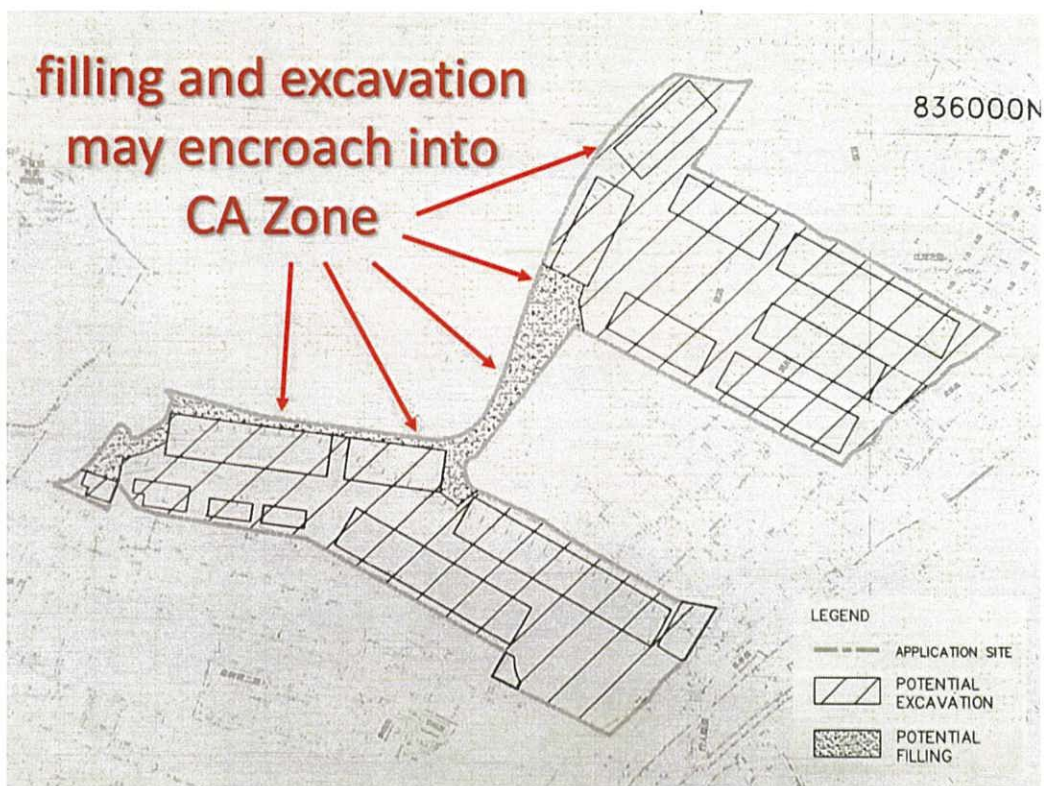
38. For the other alleged merits like temporary nature of project; compatibility with surrounding village setting; no adverse impacts to the surrounding; and set a desirable precedent, etc., my comments above and below have shown the opposite. All in all, there are no actual planning merits of the application to justify deviation from the strict development control of GB zone.

### **Lacking Important Details**

39. The SPS only provided some basic technical assessments and many important details were not provided. For instance, information on geotechnical aspects were not available (Section 4.7.1 of SPS). The application site comprises filled farmland, but the properties of fill materials could not be certain. The boundary of the site facing the marshes in the Conservation Area (CA) zone consists of loose earth slopes. Given

the close proximity of the massive building blocks to the site boundary, there may be slope safety problems. The practicability of the proposal in its simple form as presented is thus doubtful.

40. Eventually, some sort of slope improvement works such as constructing retaining wall may be required. This may seriously affect village houses in the vicinity. More importantly, these slope works may encroach into the marshes in the CA zone and cause ecological impacts. The Applicant has admitted that there will be potential excavation and filling (Attachment 1 of Application Form). However, details were not available. Such work may also affect the CA zone, in particular at the narrow strip of land connecting the two land parcels. There is only a narrow strip between the CA zone and the development and encroachment may be unavoidable. (Please see figure below.) If the CA zone is encroached, the proposed development will become a **Designated Project under the Environmental Impact Assessment (EIA) Ordinance**. A more detailed **statutory EIA study will be required** to obtain an Environmental Permit (EP) from the Environmental Protection Department.

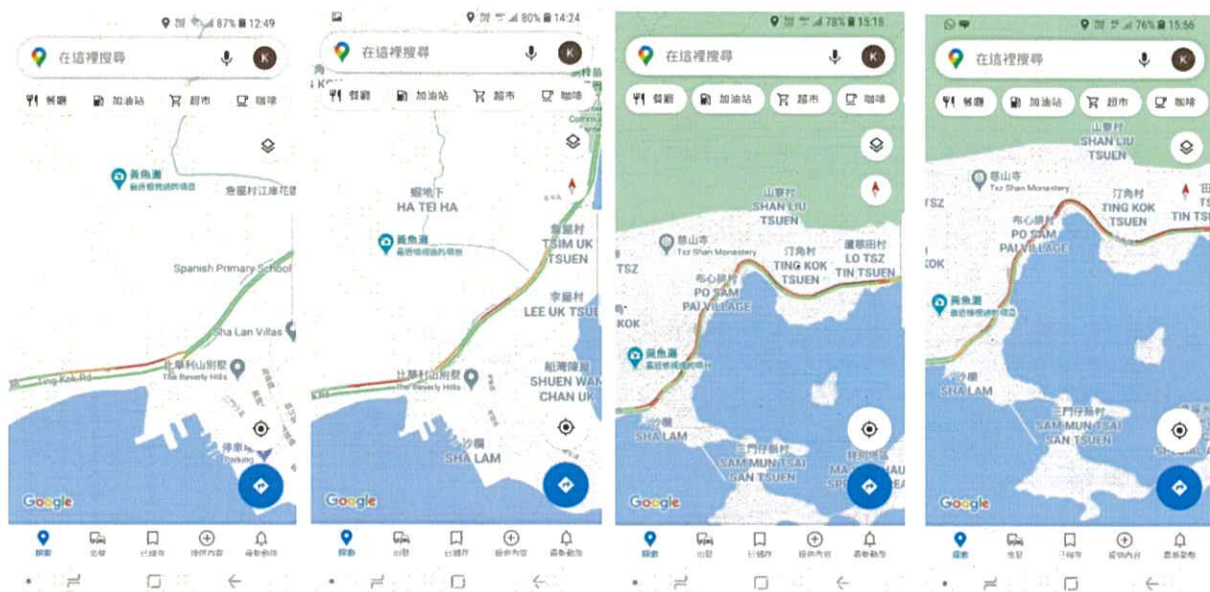


41. Other important details like onsite drainage system and compensatory tree planting plan are also not available. It is thus uncertain if the proposed drainage system will be effective as alleged and will not aggravate flooding in the area. As discussed in paragraphs 19 and 20 above, the proposed compensatory planting seems impractical. The Applicant failed to provide a detailed landscape plan to support the proposed development.



## Adverse Traffic Impacts

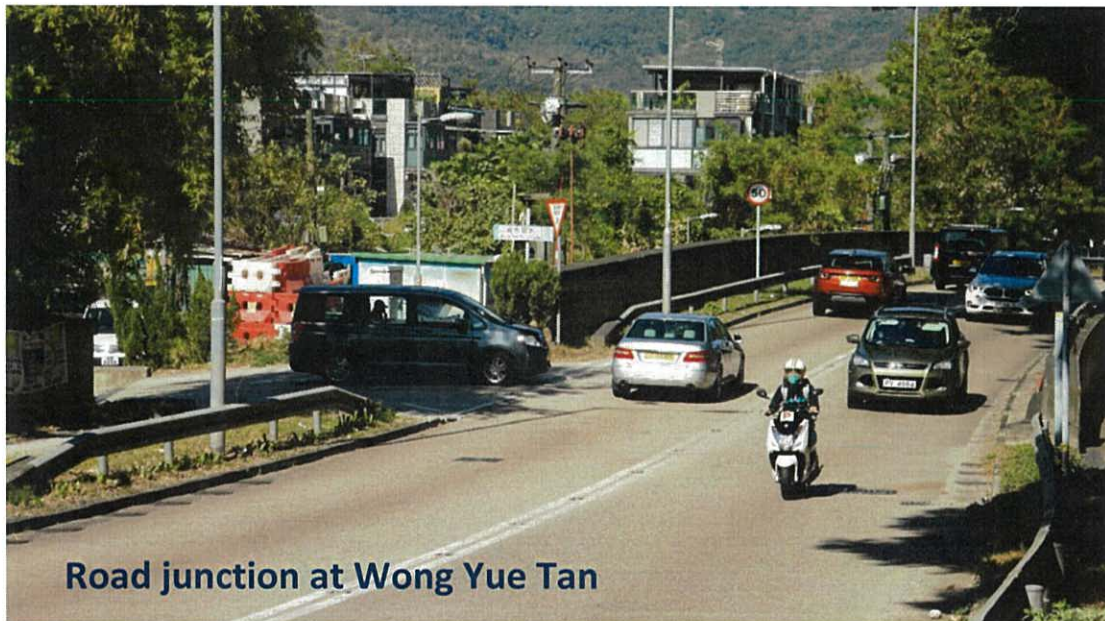
42. Ting Kok Road is the only public road serving the areas from Fortune Garden near Tai Po Industrial Estate to Tai Mei Tuk. It is the only transport corridor between Tai Po and Tai Mei Tuk. Ting Kok Road narrows from 4 lanes to 2 lanes at Wong Yue Tan and eastward to Tai Mei Tuk. This forms a bottle neck at Wong Yue Tan and often results in traffic congestion. The proposed development is just located at this bottle neck area. During peak hours, the traffic there is terribly busy and often vehicle queues are building up starting from the road junction at Sam Mun Tsai Road. The situation aggravates during Festive Days and public holidays. Queues could extend from Wong Yue Tan to Tai Mei Tuk. For example, on 15 February 2021 (the Fourth Day of Lunar New Year, a public holiday), vehicles started queuing up around noon near Wong Yue Tan. The queue continued to build up and gradually extend eastward to Tai Mei Tuk. The traffic only returned normal in the evening. Please find below screenshots of google map on that day to illustrate the situation.



43. The proposal will lead to an influx of some 2,000 additional population. While no increase in private cars will be anticipated, there will be a strong demand for public transport. To cope with the demand, there will inevitably be increase in buses and public minibuses. Aggravation of the traffic conditions will be envisaged. However, the Applicant did not provide any mitigation measures to ease the situation. Only slight improvements to some road junctions further west of Ting Kok Road were suggested (Figure 5.5). These could not solve the root of problem, i.e., the bottle neck at Wong Yue Tan. More severe traffic congestion during peak hours will seem unavoidable. This is not acceptable.

44. The Traffic Impact Assessment (TIA) of the application also suggested providing a new Green Minibus (GMB) route from the application site to Tai Po Market (Section 4.2.3). The terminal of the new route is at the cue-de-sac near the site entrance and the minibuses thus have to use the existing village track of Wong Yue Tan to access

Ting Kok Road. The section of Ting Kok Road at this road junction is quite busy as it has only two lanes. It is now sometimes quite difficult for vehicles at the village track to get into Ting Kok Road. (Please refer to the photo below.) Adding additional public minibuses will just exacerbate the situation. The TIA also suggested existing GMB services could be extended by making use of the minibus layby at the site. This will only further worsen situation. When a GMB going westward waiting at the road junction to get into the Wong Yue Tan village track, traffic queue will be built up.



45. It is noted that traffic count surveys were not conducted by the TIA due to the pandemic (Section 3.3.2). In house data of the Consultant in May 2019 was used for the assessment (Section 3.2.3). It is uncertain if the data will be able to reflect the current situation. It appears the estimated traffic load is on the lower side.

### **Inaccurate Prediction of Public Transport Demand**

46. The TIA predicted that the additional public transport demand in outbound direction in AM peak hours is about 709 pax/hr ( $1,236 \times 2.9 \times 1.83 \times 0.12 \times 0.9$ ) (Section 4.1.1). It was based on some assumptions on household size (2.9), daily trip rate (1.83), morning trip ratio (0.12) and outbound trip ratio (0.9). These assumptions used average figures of Tai Po District or the Territory. The specific characters of the Shuen Wan area and the additional population have not been considered. Hence, the predicted demand was surprisingly low.

47. As discussed in paragraph 6, the maximum population of the proposed development should be 2,253. The new residents should all be grass root people and need to go out to work. There are no job opportunities along Ting Kok Road. Moreover, community facilities (e.g. schools, markets, leisure places) are lacking. Therefore, no matter the residents go to work, attend school, buy food and groceries, meet friends, seek entertainments, etc., they must go to Tai Po first. Most of these



activities will take place during peak hours in the morning. Hence, a more accurate estimation of the transport demand will be  $2,253 \text{ (max. population)} \times 2 \text{ (daily trip)} \times 0.5 \text{ (morning trip ratio)} \times 0.98 \text{ (outbound trip ratio)} = 2,208 \text{ pax/hr}$ . The transport demand should be about 3 times more than that predicted by the TIA.

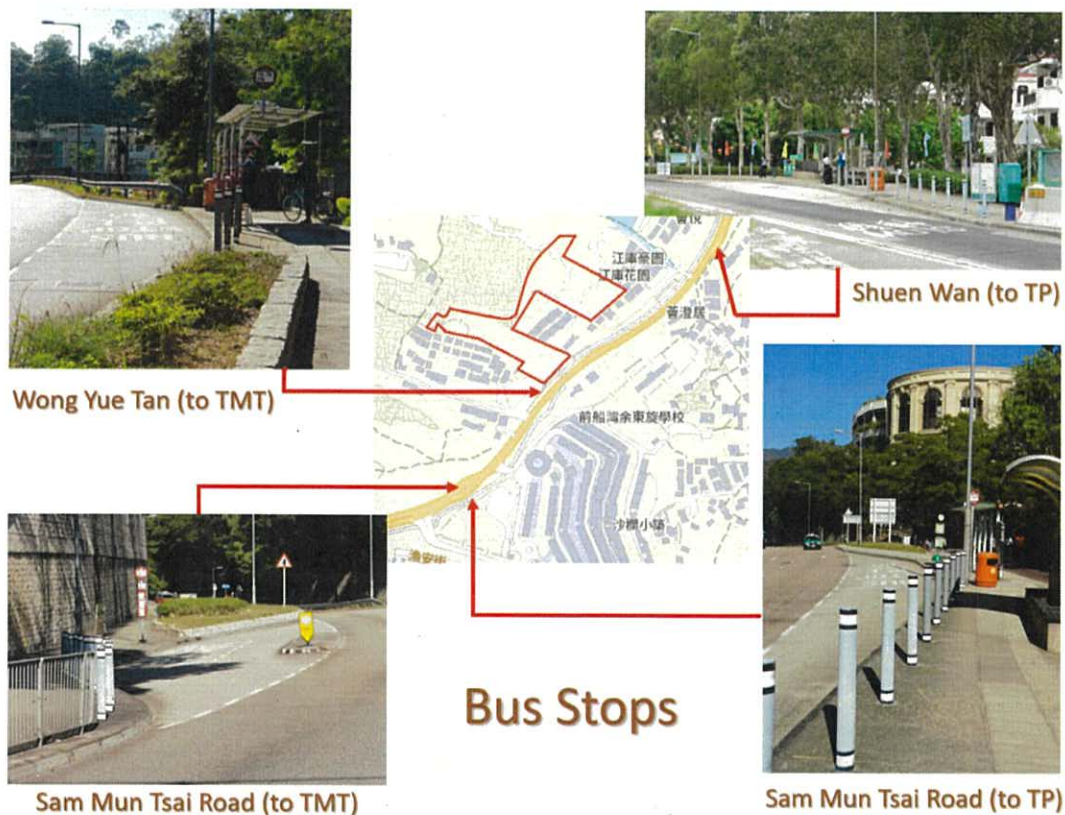
48. The proposed enhancement of existing public transport services by the TIA should be unable to address the new transport demand, even using the estimated 709 pax/hr. It is suggested providing one additional trip each for the special bus routes 73P to Tsuen Wan and 74E to Kwun Tong (Section 4.2.1). These two additional trips were alleged to meet 20% (10% each) of the new demand (Table 4.1). These are special routes with limited morning services (Table 3.3) and only serve limited passengers with destinations at Tsuen Wan and Kwun Tong. They are not popular routes due to scarce frequencies (a single trip to 3 trips). No justifications are given in the TIA why future residents have demand for such routes.

49. The Applicant mentioned in the consultation meetings with Village Representatives that target residents may mainly be those currently living in Tai Po. On the other hand, those currently living or working at places far from Tai Po should have little incentives to move to the proposed development, owing to much longer travel time and higher transport costs. Hence, the key destination for future residents should be Tai Po. Additional trips of 73P and 74E, fares of which (\$14.8) are more expensive than 75K (\$5.8), will not be effective in meeting the new transport demand.

50. The other suggestion of adding one additional trip for bus routes 72C, 75K and 75P to Tai Po Market Station in the morning may help but far from adequate. Please note that the public transport services now are already unable to cope with the existing demand. Passengers at the Shuen Wan and Sam Mun Tsai Road bus stops have great difficulties in boarding buses or GMB in the morning. Nearly all GMB are full and 75K buses are crowded, if not full. With the additional populations, the situation will only be worsened. The proposed 3 additional trips will be far from adequate.

51. The TIA recommended increasing the headway of Bus Route 75K to Tai Po Market in AM peak hour from existing 8 minutes (7 trips/hr) into 7.5 minutes (8 trips/hr). However, the existing frequencies of 75K shown in KMB's website should be 8-15 minutes (05:30 to 07:55) and 15-20 minutes (07:55-23:10). Hence, there may even not be 7 trips/hr under the current services. In any case, there is no guarantee that KMB will be willing to provide all those suggested additional bus services for a single development.

52. The TIA suggested extending the existing layby of Sam Mun Tsai Road bus stop to accommodate 2 bus bays for facilitating the additional public transport demand (Section 4.2.2). Again, this is far from adequate. As shown in the figure below, there are 4 bus stops near the application site (2 for each direction). The large increase in passengers will overload these bus stops which also serve GMB. There could be over a hundred passengers waiting for bus during peak hours and create safety problems. However, the section of Ting Kok Road adjacent to the application site is very narrow and there is little room available for improvements.



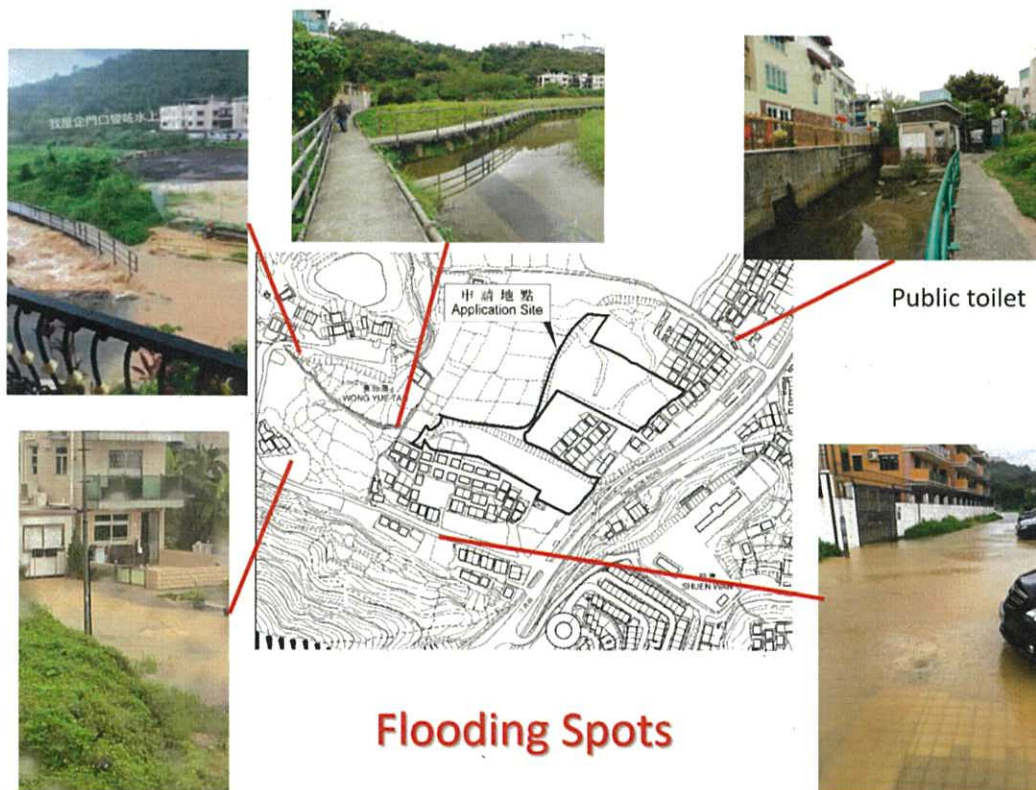
53. To cope with the increase in some 2,000 population, more buses and GMB services will be required. However, this will lead to more vehicles using Ting Kok Road. The congestion problem of Ting Kok Road will then be aggravated.

### Aggravating Flooding

54. “Ting Kok Road -Shuen Wan Chim Uk to Wong Yue Tan” is identified as Medium Flooding Blackspot by the Drainage Services Department (DSD). Flooding occurs at a “public toilet” and there is possibility of flooding at “a segment of pedestrian way + cycle path along Ting Kok Road” according to DSD (Section 7.3.2). Apart from these sites which are elevated lower than the surrounding, flooding did occur in the other parts of the areas. Please refer to the figure below for past flooding spots.

55. The Drainage Impact Assessment (DIA) of the application admitted that the development will lead to increase in paving area and therefore runoff discharge will increase generally (Section 7.6.1). It also mentioned that “Onsite drainage design will be designed so that there will be no increased surface runoff (including treated effluent from onsite sewage treatment plant) to the public drainage system along Ting Kok Road. **Most of the surface runoff would be discharged to the Marshland.**” However, as shown in the figure below, flooding in the village areas might be due to backflow from the marshland, or when the amount of flood water exceeded the storage capacity of the marshland. Obviously, the development will increase surface runoff to the marshland (Section 7.6.6) and hence will increase flooding risks in the area.





56. Detailed design of the onsite drainage system was not available and there is no way to assess how effective such system in controlling discharge of surface runoff. It appears that the major measure to reduce surface runoff of the development would be the suggested use of “green roof” (Section 7.7). However, the effectiveness of green roof in the proposed development may not be easily assessed.

57. The DIA has adopted a runoff coefficient of 0.48 based on a study by Anna Palla *et al*<sup>1</sup> (Section 7.2.4). The figure was derived from a laboratory green roof system (test-bed) examined at the University of Genova (Italy). Due to different climate and environmental conditions, the figure may not be readily applicable locally. In fact, different regions achieved different result of storm water retention percentage due to climate and green roof configuration differences, ranging from 23~78%.<sup>2</sup>

58. The dynamic stormwater response of a green roof to rainfall events is highly variable and related to climate conditions and green roof design. The magnitude of stormwater retention depends on various factors like structure of the green roof, climatic conditions and rainfall patterns. The characteristics of substrates (thickness of the soil layers and materials, vegetation typology and density) are important factors for volume retention.

<sup>1</sup> Palla A, Gnecco I, Lanza LG (2010) Hydrologic restoration in the urban environment using green roofs. *Water* 2(2):140–154

<sup>2</sup> WAI Wing Hong, Onyx (2012) Study of Green Roofs: Green Roof Guidelines, Water Quality and Peak Runoff. Presentation at Drainage Services Department Research & Development Forum 2012

59. The moisture content of the substrates immediately before a rain event significantly influences water retention and detention. Study by Kolasa-Więcek and Suszanowicz<sup>3</sup> reported that in the case of heavy rain (more than 10 mm/day), the runoff reduction decreased by 30%. In the case of a minimum of 3 consecutive days of rainfall, the reduction in rainwater runoff decreased by 20%. Consecutive days of heavy rainfall are not uncommon in Hong Kong. The substrate of green roof may easily become saturated and ineffective in retention of runoff. Hence, it would seem risky to rely on green roof as the key measure to reduce surface runoff. The proposed development will aggravate flooding problem in the area.

### **Implications under the EIA Ordinance**

60. The Environmental Assessment (EA) report of the SPS alleged that the project does not fall within the definition of Designated Project (DP) under the EIA Ordinance (Section 1.4). However, many details of the proposed development are not available, such as geotechnical assessment, need for slope improvement works, design of drainage system, etc. As such, it is premature to draw conclusion that the development is not a DP, in particular the development is adjoining to the CA zone. Any encroachment into the CA zone may render the proposal becoming a DP under Category Q1. If dredging operation is required, then the project may be a DP under Cat. C12(a)(viii). (Dredging is not restricted to activities at the sea or river as interpreted by EPD in the past.)

### **Ecological Assessment Inadequate**

61. The Ecological Assessment (EcoA) report (Appendix D) of EA in SPS is not adequate to provide accurate assessment of the potential ecological impacts of the proposed development. The application site is adjacent to the Shuen Wan marsh. As described in the Explanatory Notes of the OZP:

*"The marsh area to the west of Ting Kok Road at Shuen Wan is of ecological significance and importance in providing a diversified habitat for various flora and fauna, particularly as a feeding ground for birds. Shuen Wan marsh is known to have conservation interests."*

The marsh is zoned "CA" on the OZP in order to conserve its ecological value.

62. The proposed development is in close proximity to the CA zone (Marsh 4 as shown in Habitat Map). It is also close to Marsh 3 (zoned GB). Marshes 3, 4 and 5, are located at the upstream of the reed beds, mangroves and pond habitats at the northern side of the site. These wetland habitats are interconnected and form a wetland ecosystem. Any changes in hydrological or ecological characters at the upstream will also impact the downstream habitats.

---

<sup>3</sup> Kolasa-Więcek, A., Suszanowicz, D. The green roofs for reduction in the load on rainwater drainage in highly urbanised areas. *Environ Sci Pollut Res* (2021). <https://doi.org/10.1007/s11356-021-12616-3>



63. Since the application site is close to the marshes and elevated higher, any construction activities like filling or excavation will easily affected the marshes. Silty runoff or other pollutants discharged from the construction site will seriously affect the wetland habitats. However, only some very general mitigation measures were proposed and may not adequately address the potential ecological impacts.

64. For instance, the SPS mentioned that a **2.5m buffer** has been reserved between the proposed transitional housing blocks and the boundary of CA zone (Section 5.5.3). It further mentioned that planting along the boundary adjacent to CA will provide physical and visual separation from the CA zone and screen off potential human disturbance to the ecological sensitive areas. Interestingly, such measure was not recommended or elaborated in the EcoA.

65. The 2.5m buffer is too narrow and far from adequate. It is even not enough for the proposed tree planting. From ecological perspective, buffer to streams, wetlands and coastal habitats should be **at least 15m**. Such approach has been adopted by the TPB in many cases of determining zonings in OZP (e.g. SSSI zoning of Sha Lo Tung Stream in Sha Lo Tung OZP, GB zoning along Lin Ma Hang Stream in Lin Ma Hang OZP, GB zoning along Heung Yuen Wai Stream in Ta Kwu Ling North OZP, CPA zonings of coasts in Hoi Ha OZP and Tai O OZP) and vetting development applications.

66. There are a number of inadequacies in the EcoA which may lead to underestimation of ecological value of the habitats or inaccurate assessment of the ecological impacts. The following paragraphs highlight some of the major inadequacies.

67. The EcoA only reviewed the 2009 Ecological Baseline Report for a S.12A application (Section 2.1.2). Presumably, this was the rezoning request of Wheelock. As the Report was not in the public domain, the public would be unable to assess the relevance or accuracy of the data. On the other hand, some published information about the site were omitted. This includes the approved EIA Report for Drainage Improvement in Sha Tin and Tai Po (EIAO Register No.: AEIAR-110/2007), the study area of which covered the application site. Ecological monitoring of the project was carried out at Shuen Wan from March 2011 to January 2016, by Ramboll, Consultant of the EA of this application. It is therefore surprising such relevant information was not reviewed in the EcoA.

68. The Conservancy Association was invited by Wheelock in proposing a Wetland Rehabilitation Project in Shuen Wan. To have a better understanding on the ecological situation of Shuen Wan wetland, the Association completed a series of ecological baseline surveys on habitat types, birds, dragonflies, amphibians and reptiles in 2012. The surveys recorded 68 species of birds, 34 species of dragonflies, 18 species of amphibians and reptiles.<sup>4</sup> The EcoA should try to acquire further information in this aspect from the Association or Wheelock.

---

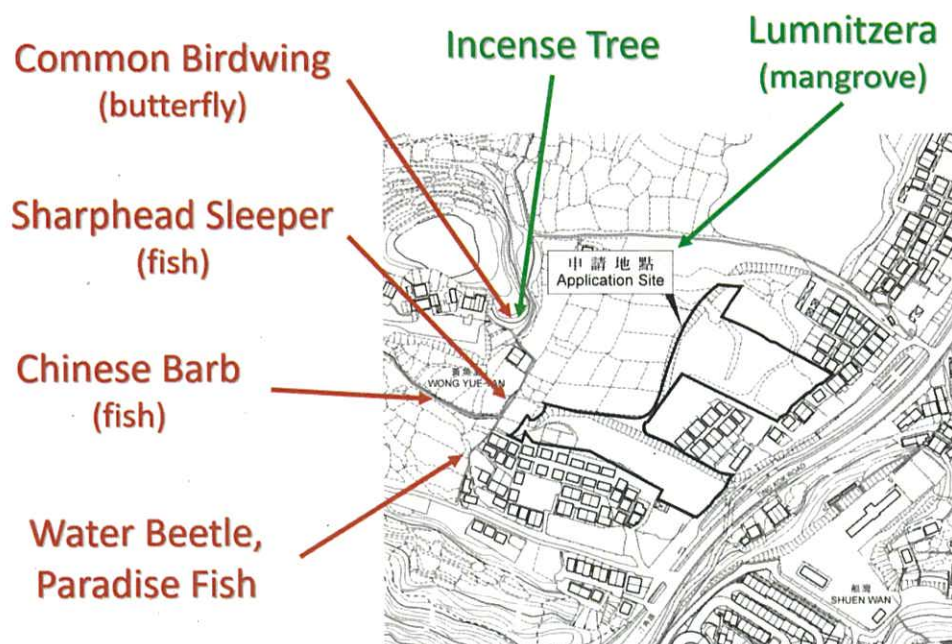
<sup>4</sup> Please refer to the website of Conservancy Association:  
[https://www.cahk.org.hk/show\\_works.php?type=content&u=54&lang=en](https://www.cahk.org.hk/show_works.php?type=content&u=54&lang=en)

69. The EcoA only carried out rapid ecological surveys from July to October 2020 (Section 2.1.3), i.e., with a duration of 4 months covering the dry season only. As recognized by the OZP, Shuen Wan wetland habitats are considered of conservation interests. There may be seasonal changes in wildlife uses, especially water birds. According to the EIAO Guidance Note No. 7/2010 "Ecological Baseline Survey for Ecological Assessment", there should be an ecological baseline survey of 6 months or 9 months covering both wet and dry seasons. The survey efforts of the EcoA might not be adequate to draw up an accurate ecological profile of the study area.

70. In addition, only the dates of the ecological surveys were provided. Other details, such as survey routes, sampling points, survey methodologies, timing, etc., were not provided. It is hard to assess the appropriateness of the surveys.

71. Only plants species of Marshes 3 and 4 were provided in Appendix 1. Records of plants occurring in other habitats, in particular those with ecological interests like secondary woodland/fung shui wood and mangroves, were not provided. For examples, a group of uncommon mangrove *Lumnitzera racemosa* is found along the footpath near the north side of the application site and an Incense Tree (*Aquilaria sinensis*) sapling is found at the fung shui wood to the west of the site. Locations and photos of these plants as well as some past personal records of native fauna observed/collected are shown in the figures below. There were also past sightings of fireflies at Marshes 4 and 5.

### Records of Native Flora and Fauna





**Incense Tree**  
**(*Aquilaria sinensis*)**  
**土沉香**



**Lumnitzera**  
**(*Lumnitzera racemosa*)**  
**欖李**

72. Although species lists of major fauna groups were provided in Appendix 2, the EcoA report only roughly divided the records into two categories: "in Application Site" and "in Study Area". Detailed locations or habitats where they were recorded were not provided. It might be hard to determine the likeness of these fauna being impacted by the project.

73. The major ecological concern for this project should be indirect impacts to the adjacent habitats of ecological interests, including marshes, streams and wetland habitats further downstream. The EcoA did identify a number of potential impacts of low to moderate significance (Sections 5.3.8 to 5.3.12 and Table 12). However, only some general mitigation measures were recommended. It heavily relied on the belief that the development will be confined within site boundary and there will be minimal site formation work (Sections 6.1 & 6.2). As pointed out in paragraphs 39 to 41 above, filling and excavation works may be required. Slope improvement works may also be necessary and encroachment of CA zone may result. The narrow strip of vegetation between the development and CA zone will not provide sufficient screening and minimise the disturbance impacts to the CA zone as predicted in Section 6.2.6.

74. The EcoA suggested that fence off the application site by hoarding or with sandbags stockpiled along the site boundary would be sufficient to control water quality impacts (Section 6.3.1). As discussed earlier, the building blocks are very close to the boundary and only very narrow space is left. However, such narrow space have to be used for constructing peripheral drainage pipelines as well as compensatory tree planting. Maybe use as "sitting out" areas later as well. Erecting hoardings and construction of pipelines will already bring about construction impacts to the CA zone. Sandbags may not be effective in preventing silty runoff particularly during heavy rain. The suggested mitigation measures would seem inadequate or ineffective.

75. The proposal will lead to influx of some 2,000 population. These new residents obviously will not stay at home all time. Given that leisure facilities are lacking in the area, it is highly likely that they will wander into neighbouring areas. Trespassing through landscaped areas to gain access to public road or scenic spots is now a rather common phenomenon. Apart from potential conflicts with existing villagers, they will also put pressure on the local natural environment. Human disturbance and nuisance will affect wildlife there, particularly birds at the Shuen Wan marshes. However, such impacts were not discussed in the EcoA.

76. The SPS mentioned that proper management will be in place to deter any unwanted activities at the CA zone and the surrounding area (Section 5.8.2). Like the proposed 2.5m buffer, such issue was not discussed in the EcoA. Moreover, it is uncertain what kind of management will be implemented. The proposed development is not a detention camp, not much could be done to control the behaviour of residents.

### **Potential Conflicts with Existing Residents**

77. The proposed development will bring an additional population of some 2,000 people. It is some 10 times more than the existing populations of villages there. Given that the building blocks are so close to the village houses (the closest just 3m), there may not be any effective separation or screening between the new development and existing villages. Trespassing and competitions for the scarce community resources (e.g. public transport) may create conflicts between new and existing residents. This is highly undesirable. The empty statements in the SPS for providing a pleasant co-living environment will not be materialized.

### **Concluding Remarks**

78. No one will object to the provision of appropriate accommodation to people in need. I am also grateful for all the good work of Lok Sin Tong in serving the community. However, any good work must be carried out at the right time and right place. The location of the current application is just not suitable for such purposes. It will bring adverse impacts to the local community and the environment. The application is also not in line with the planning intention of the area and land use zonings. I sincerely hope that the TPB could seriously consider my lengthy presentation above and reject the application. If necessary, I would be pleased to present my comments to the TPB.

Yours faithfully,



Cheung Kwok Wai

Address:

Email:



tpbpd@pland.gov.hk

---

寄件者: [REDACTED]  
寄件日期: 2021年03月01日星期一 13:02  
收件者: tpbpd@pland.gov.hk  
主旨: 強烈反對在大埔黃魚灘村興建過渡性房屋及填土和挖土工程 (申請編號: A/NE-TK/702)  
附件: L2021-001 過渡組合社會房屋項目(城規會).pdf

致 城市規劃委員會秘書:

有關大埔黃魚灘村興建過渡性房屋及填土和挖土工程(申請編號: A/NE-TK/702), 本苑業主委員會對此項目表示反對, 現附上有關信件。如有任何查詢, 可致電 2144 2018 與本人聯絡。

Best Regards.

**Jimmy Cheng**

The Beverly Hills

Well Born Real Estate Management Limited

Tel : 2144 2018 / [REDACTED]

Fax : 2144 2000

---

Going Green. Please consider the environment - do you really need to print this email?

---

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you are not the intended recipient you are notified that disclosing, copying, distributing or taking any action in reliance on the contents of this information is strictly prohibited. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your mailbox.



檔案編號：TBH-OC/L2021-001

敬啟者：

強烈反對在大埔黃魚灘村興建過渡性房屋及填土和挖土工程

申請編號：A/NE-TK/702

比華利山別墅業主委員會得知樂善堂向城規會申請在大埔黃魚灘興建過渡性房屋。有關項目涉及興建 11 棟三至四層高的建築物，總共提供 1,236 個單位，供不少於 3,000 人入住。本會強烈反對上述申請，理由如下：

1.選址—建議的選址位處被一群村屋所包圍的「綠化」地及「鄉村式發展」地帶，若 11 棟四層高的過渡性組合房屋建成後，該群村屋(超過 100 戶)的景觀由現時遠觀綠油油一片沼澤地變成近在咫尺的貨櫃屋。坐落於市區(例如深水埗中轉房)的組合屋對環境影響相對比較細，坐落於寧靜鄉郊的組合屋(1,236 個單位)對環境影響(包括景觀、交通、噪音)帶來破壞性的滋擾非常之大，這個選址非常之有問題。

2.路面交通—沿汀角路已有 20,000 多人居住，在黃魚灘村對出的一段汀角路由來回四線收窄為兩線是交通問題所在，多次向運輸署反映爭取擴闊路面和路口都無回應。黃魚灘過渡性房屋(1,236 戶)連同沿汀角路的另一個改劃申請(位於鳳園 Y/TP/30—1,462 戶 200 車位)，合共提供 2,698 個單位(人口增加約 10,000 人)。汀角路/露輝路及汀角路/鳳園路兩個往大埔方向的樽頸路口位置至今還未有改善方案。龍尾泳灘開放前的農曆新年多天假期，汀角路交通非常擠塞，車龍由雅景花園塞至龍尾泳灘(長達 4 公里)，平日 5 分鐘的車程居民要花 45 分鐘在車龍中才能回到家中，兩個發展疊加效應對汀角路帶來的交通擠塞影響評估報告未有提交。

3.公共交通—第 2 項提及沿汀角路兩個住宅改劃申請，合共提供 2,698 個單位，將會令現在沿汀角路的 20,000 多人口增加至 30,000 多人，對每天的公共交通需求百上加斤。過去有透過議員提出要求增加公共巴士及小巴班次，都未見有加密班次服務的改善。

4.排水—項目涉及的土地大部分都是棄耕農地，有一定的儲水能力，若要建屋必須填平農地及加高，對鄰近一群村屋造成嚴重水浸影響。現時黃魚灘村每逢大雨都容易水浸，渠務署網頁明確表示黃魚灘是水浸黑點，有關發展必然會加劇水浸問題。這低窪農地原是黃魚灘村唯一雨水蓄水庫，每當大雨來臨，此蓄水庫便會擔當重要功能，將暴增的雨水臨時儲存，逐漸地排放至大海。若然蓄水庫被填平建過渡性房屋，蓄水庫功能盡失，黃魚灘村發生的水浸情況加劇百倍。

## 比華利山別墅業主委員會

The Beverly Hills Owners' Committee

5. 排污—現時黃魚灘村及蝦地下村一帶，都缺乏排污設施，未能接駁到政府污水渠。過渡性房屋項目將自設污水處理設施，處理後的污水，亦未知如何排放，既不會改善本區現有排污設施不足的問題，亦不清楚會否影響周遭環境。

6. 社會融合及治安—新增人口大部份並非慣常在鄉郊生活，未必能融入鄉村寧靜生活的模式；目前黃魚灘村全村只有約二百多居民，新增人口卻多達三千多人，竟是黃魚灘村原有的 10 倍以上！勢必完全摧毀現有的寧靜鄉村的面貌和居民和諧共處的風氣。村民亦會擔心新增的人口，在缺乏社區設施的情況下，必定對社區造成壓力，引發治安問題。

7. 景觀—現時黃魚灘村及詹屋江庫是寧靜的鄉郊，同一時間在農田興建 11 棟大型房屋必然大幅改變現有的景觀，增加大量人口亦會改變現時寧靜環境。一經被填平的濕地、綠化地是不可以逆轉並回復原貌，村民將永遠失去現時的自然生態環境。

8. 環境影響—過渡性房屋項目採用組合屋形式興建，正如前面所述，有關土地是荒廢農地，大部份更是濕地，下面是淤泥，若要建屋需大量填土。施工期間必然對環境造成重大影響，包括噪音、污水、灰塵等，而工地貼近現有村屋，亦會對村民造成不便和影響村民健康。雖然項目刻意避開自然保育區(CA)，但對附近生態環境的影響亦不容忽視，尤其是水文改變、施工期間的污染、噪音等都會影響鄰近濕地，對保育區的生態造成破壞。

基於上述種種問題，本會是反對在黃魚灘興建過渡性房屋項目。如對上述事宜有任何查詢，可致電 2144 2018 與比華利山別墅物業服務處高級物業經理鄭鍵基先生聯絡。

此致  
城市規劃委員會秘書



何啟文

比華利山別墅業主委員會主席

2021 年 2 月 25 日

tpbpd@pland.gov.hk

---

寄件者: [REDACTED]  
寄件日期: 2021年03月02日星期二 21:00  
收件者: tpbpd@pland.gov.hk  
主旨: Comments on application number: [A/NE-TK/702]  
附件: 申請規劃許可的意見 (申請編號: A\_NE-TK\_702).pdf

Dear Sir,

Attached please find my comments to the captioned application for permissions to the Town Planning Board under section 16(2F) of the Town Planning Ordinance.

Best regards,  
Cheung Kwok Keung



2/3/2021

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：

**強烈反對於大埔船灣興建過渡性房屋及  
填土和挖土工程 [申請編號：A/NE-TK/702]**

我強烈反對上述申請，理由如下：

是項申請是在鄉村內，緊貼 CA 地的綠化地帶上，興建史無前例的大型「鄉村式過渡性房屋」項目，為未來發展立下先例。是項申請明顯要求城規會作出違反整體規劃意向和細規的決定，當中涉及不是簡單的房屋項目，是有意明顯挑戰鄉郊未來發展方向和長遠規劃政策。

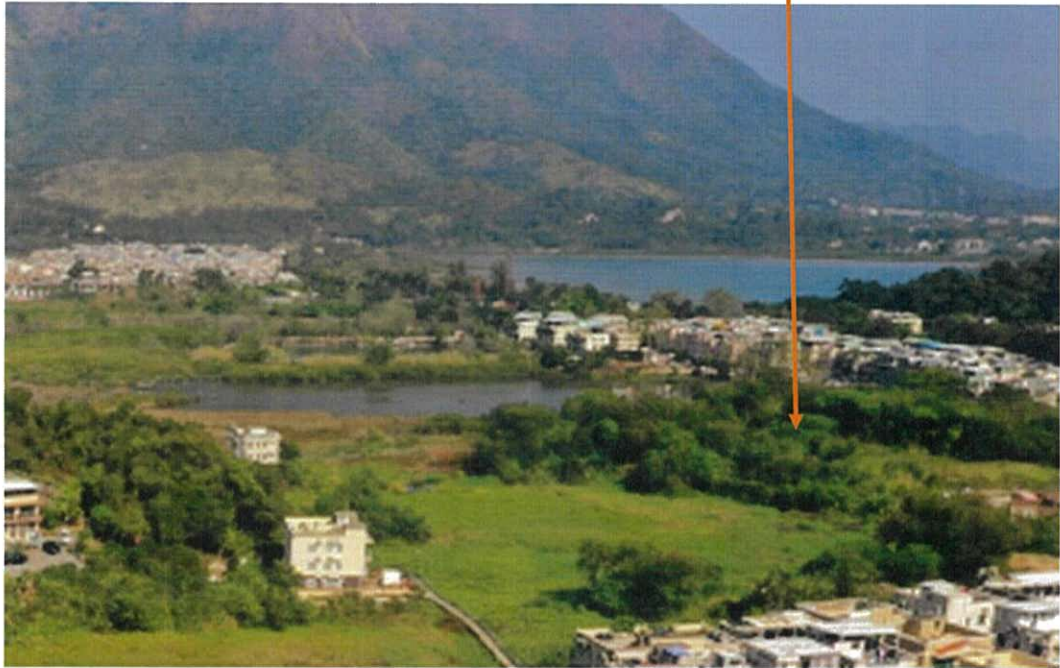
**1. 大埔鄉郊地區的規劃目標**

大埔一直是香港可以引以為傲的新市鎮，在不斷發展之餘，對大自然的滋擾仍可以減至最低。這完全有賴於城規會的努力和公眾對規劃標準與準則的認同及支持。亦由於此，大埔的整體規劃在過去並無作出重大修改，規劃署網址關於大埔規劃 2002 年的小冊子仍然適用，當中的規劃概念指出鄉郊地區，主要目標是保持自然及鄉村環境的寧靜氣氛，並保育重要的自然風景區。這一點將會繼續是大埔區日後的主要規劃目標。

**2. 是項申請違反整體規劃意向和細規**

- 2.1 擬議房屋項目與汀角分區計劃大綱圖(S/NE-TK/19)的「綠化」地帶的規劃意圖不一致，及嚴重違反公眾對大埔特色鄉村保育的期望；
- 2.2 申請地點並非一塊已大部分平整的土地，必須填土和挖土，並大量伐去天然植物，摧毀與具特殊科學價值地點之間已成功設置的緩衝區，為緊貼CA地之「綠化」地帶制造不能逆轉的破壞；(HKSPG 第十一章 P.48 表2)

「綠化」地帶天然屏障保護 CA 地



- 2.3 擬議選址並非閒置土地，而是規劃意向中不宜進行發展的「綠化」地帶；
- 2.4 擬議發展的發展密度與周圍的低密度發展地區並不相容，申請清楚表明是 1,236單位的「大型」房屋項目，前所未有，嚴重違反在鄉郊範圍「盡量避免發展龐大的建築群」並「避免在原居民鄉村的核心地帶引入與鄉村建築風格不相協調的建築物」的指引；(HKSPG 第十一章 P.48-49 表2)
- 2.5 此項申請的臨時性質不可信。由於長遠房屋問題根本不能在三五十年內得到解決，過渡房將會是香港長期需要的緩衝。所謂「過渡」並非指項目本身，而是對有住房需要的人仕而言。項目申請為期5年，但已明確說明意向是8年，未說的是越長越好。由於此大型「鄉村式過渡性房屋」項目史無前例，必然嚴重影響全港所有鄉郊的長期規劃意圖；
- 2.6 此項申請所進行對環境、生態、交通、排水及排污方面的初步技術評估，均未能提供有效的科學數據以證明擬議發展不會對周圍環境造成不利影響。而當中建議興建使用昂貴的排污系統，從成本效益角度出發根本不是一個臨時項目應該採用的設施；
- 2.7 放棄利用「綠化」地帶的天然地理環境作屏障保護CA地，而接受2.5米的人工植坡，便可保護大型房屋唯一行人通路旁的「船灣濕地紅樹林」，不會受到近二千居民的滋擾，實在欠缺科學根據，令人難以接受。

## 2.8 此項申請發展地積比率過高

為求合理化申請的地積比率，刻意錯誤引用位於大埔新市鎮範圍的屋苑地積比率作參考比對，而事實上在汀角分區計劃大綱圖上，選址四周的船灣鄉村地區，只有百多棟3層高的「丁屋」。

(HKSPG 第二章 P.19 表3) 最高住用地積比率 — 鄉郊地區

發展密度分區	最高地盤發展比率	一般層數	地點方面的準則
鄉郊住宅發展密度第4區	0.4倍	3 層， 包括開敞式停車間在內	地點與鄉郊住宅發展密度第3區相同，但發展密度受基礎設施或景觀方面的限制所規限。
鄉郊住宅發展密度第5區	0.2倍	開敞式停車間上加兩層	取代地區內的臨時構築物。以便改善地區內的環境。
此項大型「鄉村式過渡性房屋」項目	1.485倍	11座 4層	為大型鄉村式過渡性房屋項目開拓一個先例

## 2.9 此項申請發展單位和人口密度過高

(HKSPG 第二章 表10 P.27) 住宅用途分區的新發展地區的人口總數及單位密度釋例每公頃可容人數：

發展密度指引 地盤發展面積	鄉郊住宅發展密度 第4 區	鄉郊住宅發展密度 第5 區
每公頃可容人數：	100人	50人
2.16公頃人數：	216人	108人
此項大型「鄉村式過渡性房屋」項目(2.16公頃)	申請人數：約 1,962 人	

地盤發展面積每公頃可建單位數目：

發展密度指引	鄉郊住宅發展密度 第4 區	鄉郊住宅發展密度 第5 區
每公頃可建單位數目：	30	20
2.16公頃單位數目：	65	43
此項大型「鄉村式過渡性房屋」項目(2.16公頃)	申請興建單位數目： 1,236	



### 3. 申請毫無誠意及誠信

在2021年1月20日的諮詢會上，項目團隊深知黃魚灘水浸問題嚴重，一而再再而三向船灣各村代表清楚表明項目不需進行挖土填土工程。唯當有村民及後發現選址內有人偷步進行挖土填泥而想跟進時，一切偷步行為便馬上停止。而城規會是次申請便硬著頭皮加上了挖土填土要求。

### 4. 欺負弱勢村民,以政府之力,玩弄程式

充份利用疫情限聚期間，當區議會所有諮詢暫停時，仍然透過民政事務處向大埔鄉事委員會要求進行諮詢，利用疫情牽制鄉民表達意見。雖然諮詢會得到的共識是項目發展太急,太倉卒，必須向大眾清楚交待各項專家評估報告內容，才向城規會提出申請，但LST卻急急於農曆年前一天向城規會入紙申請，親各鄉村忙於新年各項活動，期望瞞天過海，減低城規會收到反對聲音。

### 5. 立法會會議文件的單位數目

在2020年初收到會德豐提供用地後，LST在運房屋的協助下，便馬上作出研究。同時亦因供地面積大，大大增加政府信心，令特首馬上將過渡房目標由1萬提升至1萬5千。選址初步估計可興建1800戶三至四人單位，唯在2020年9月24日初步接觸村民後，才得知困難重重,在團隊顧問專家的研究下，發現選址的確有大量不能解決的技術難題，故只好馬上修改方案，將原本建議興建26棟4層高大樓以容納5000多人，修改為數棟大樓只含850單位。並將最新的方案更新在立法會2020年12月6日申請增加過渡房撥款的背景資料中。<https://www.legco.gov.hk/yr20-21/english/panels/hg/papers/hgcb1-299-e.pdf> 是次立法會會議通過了33億撥款，是以過渡房專責小組按每單位平均需要54.7萬元費用來計算。在是次立法會會議中，雖然成功覓地單位數目只有13,237，與15,000目標尚欠一段距離，但船灣過渡房項目單位數目仍然顯示為850。事實上在2020年的施政報告中，特首亦只是以13,200個單位交待已覓得可在未來三年內提供的單位數目，而船灣過渡房項目亦只佔當中850個單位。

### 6. 申請的真正目的 - 為求達標，孤注一擲

6.1 如上文所指2019年施政報告目標，是在2023年前提供15,000個過渡房單位，距離目標承諾只差12% (2,800)，而時間明顯有限，申請文件亦表明有困難再找大型項目。在施政報告目標以單位計算的前題下，有理由相信，項目團隊選擇以提高單人單位數目比例以提升達標能力，為船灣目項提供多386 (=1236 - 850)個單位交數。提升單位數目不單可令專責小組盡快在所餘不多的時間下達標，亦有可能是為增加項目撥款。但可憐的是,究竟項目團隊是否有深入探討在偏遠的鄉郊地區，大量移居單身戶，究竟在工作安排，日常生活上是否可行，這應該是一個不簡單的社會學問題。



6.2 達標對項目團隊有多重要，只要看申請文件三番四次地提及項目可提供8%政府的目標單位便可知一二。(4.1.1； 4.2.2； 5.2.2； 5.10.1段)

6.3 若各委員有時間，可嘗試比較一下是次城規會會議的兩項過渡房申請 [申請編號：A/NE-TK/702 及 申請編號：A/YL-PH/876]。八鄉項目的 typical block layout，明顯比大埔船灣的項目詳細，而更有趣的是船灣項目的標準平面圖所示同一層21個單位當中竟然19個是單人單位。

6.4 用21個方格草草交待每層的單位安排，不單表明是團隊急忙修改的後遺症，亦反應項目團隊對此項目的期望。一方面不想浪費已用的時間和各項顧問報告所花的金錢，另一方面亦深知船灣項目可行性極低，不想再花功夫於這項目，最後將申請文件草草修改一下，加大單位數目，便交城規會審議，像賭徒般搏一搏，好彩便多收1,236單位，若然城規會否決申請亦只是止蝕，而且責任只會落在城規會身上。

## **7. 申請文件粗疏，為求盡快提交，使用不及時數據**

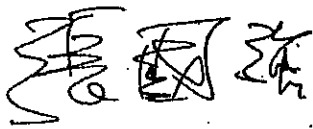
申請文件於2021年2月提交，但在3.3.4段仍然引用立法會2020年5月26日會議的舊資料(<https://www.legco.gov.hk/yr19-20/english/panels/hg/papers/hg20200526cb1-652-1-e.pdf>)，而不去更新為上文所提及立法會2020年12月6日會議的最新資料。當然表示文件粗疏毫無誠意，但亦有不少可能是怕各委員發現官方文件中，大埔船灣項目只應是 850 個單位。

## **8. 市區還有不少空間尚待發掘**

我支持過渡房的政策，為有住房需要的人仕盡快提供支援，但大部這類人仕更需要工作以支援生活，而市區的就業機會和身邊朋友支援明顯較高，故 2014 年 2 月發表的《長遠房屋策略》公眾諮詢報告第 6.17 段便有此建議：「在尚未有額外公屋供應的過渡期間，若**市區**有合適的臨時空置土地，政府可進一步研究在相關土地興建**過渡性房屋**予有需要人士。」為過渡房清楚定立在「市區」研究發展的方向。事實上過渡房在過去一兩年間取得很大進展，不少市區項目推行時大受歡迎，的確為有需要的人雪中送炭。2020 年尾在工業大廈改建過渡房中已取得成功例子，而 2021 年 2 月於九龍城區的 B 酒店成功簽署過渡房合作備忘錄，亦成功盡用市區土地資源去為基層家庭提供過渡房協助。鑒於市區尚有不少發展過渡房的潛力，實在不應破壞偏遠鄉郊以求達至過渡房 15,000 的短期目標。

9. 請不要低估船灣各鄉村的小市民為保護鄉村家園的決心和勇氣

請三思他們所提出的多項原則性和技術性的問題,並非毫無根據。花重金找幾個顧問用兩三個月所研究得出「項目並無不能解決問題」的結論,實在並無任何科學根據。請在事件演變成政策問題以至政治問題之前做應該做的事,否決這項申請,堅守城市規劃的大方向和原則。請勿將長遠房屋問題轉化到鄉郊,破壞大埔長期建立好的城鄉共容局面,撕裂大埔,自毀長城。



張國強

2021 年 3 月 2 日

地址:

Email:



# 蘇達良區議員辦事處

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

1st March 2021

Dear Sir,

**Re: Proposed Temporary Residential Institution (Transitional Housing) at Wong Yue Tan, Tai Po (A/NE-TK/702)**

First of all, as a member of Tai Po District Council, it's regret that we were not being consulted, while at the same time it was done with the Tai Po Rural Committee. During this time, we are waiting for the meeting and information from the concerned parties. However, I was finally informed before the Chinese New Year that we are bypassed and the project went directly to your board with the time of public consultation of about 1 month time.

We therefore collected the public opinion from the area with results as follows (attached with this letter in separated):

	Total collected	Agreed	Not agreed
On line	356	2	354
On Street	83	3	80
TOTAL	439	5	434

It's clear that the overwhelming majority is not agreed with the proposed project.

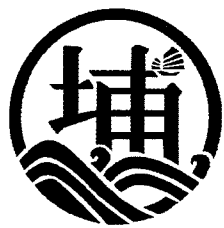
Within the one month time (including the Chinese New Year), our office worked hard to understand the proposal in your Shatin office which comprises professional knowledge of different aspects, including environment protection, traffic, sewage and etc. Being a layman of different professional aspects, and without the explanation by relevant authorised people, we tried to understand and picked up information that we could understand and response as below.

*Paragraph 4.2.1 ....it is proposed to increase the headway of Bus Route 75K...from existing*

電話 :

電郵 :

地址 : 大埔汀角路395號翠濤苑G座地下



# 蘇達良區議員辦事處

*8 minute to 7.5 minutes and to provide one additional trip for Bus Route 72C and 75P....*

The 75K has never been 8 minutes headway. It's 10 minutes during the morning peak hour (before 9 am) in the morning and becomes 15 and 20 minutes for the rest of the day. Regarding the GMB service, it's hard to have one GMB picking up passenger in the Shuen Wan Station (Jim Uk) in the daytime. It is very easily to be observed if the applicant has visited the bus stop at the normal day time especially before 9 am or consulted with concerned parties. You would also see taxis waiting to pick up customers around the bus stop.

We have been talking with the GMB for providing more service but they couldn't at the moment due to the limit of resources, although they agreed it's profitable for them. It means the demand for the service is already greater than what it could be provided even at this time being.

---

Beside the inaccurate fact from the applicant, I wonder what is the status of "*it is proposed to increase...*" and what action has been made in addition to the statement made in the proposal.

*Paragraph 5.9.2 "...Those improvement works could be implemented by the government or Tung Tsz Residential Development..."*

We can't see any kinds of improvement works have been planned or mentioned, and in fact, the planning Tung Tsz Residential Development will also worsen the traffic condition of Ting Kok Road, where, this project as an organic part of it, will further deteriorate the condition.

Last but not the least regarding traffic and public transportation, the Lung Mei Beach which will be officially opened by this summer was already proved to worsen the traffic condition during the last Chinese New Year as shown in the attached photo (traffic congestion upto Sham Mun Tsai Road and further).

We welcome any plan to improve the overall housing condition especially for the need. However, this temporary Transitional Housing will be built and pulled down after 5 to 8 years time(?). It will be a double harassment for the neighbourhood, and I can foresee the third harassment once the land is returned to the developer.

We also know that other opinions have been organised and mailed to different concerned government departments before your notice of consultation. I hope that those opinions will

電話：[REDACTED]

電郵：[REDACTED]

地址：大埔汀角路395號翠濤苑G座地下





# 蘇達良區議員辦事處

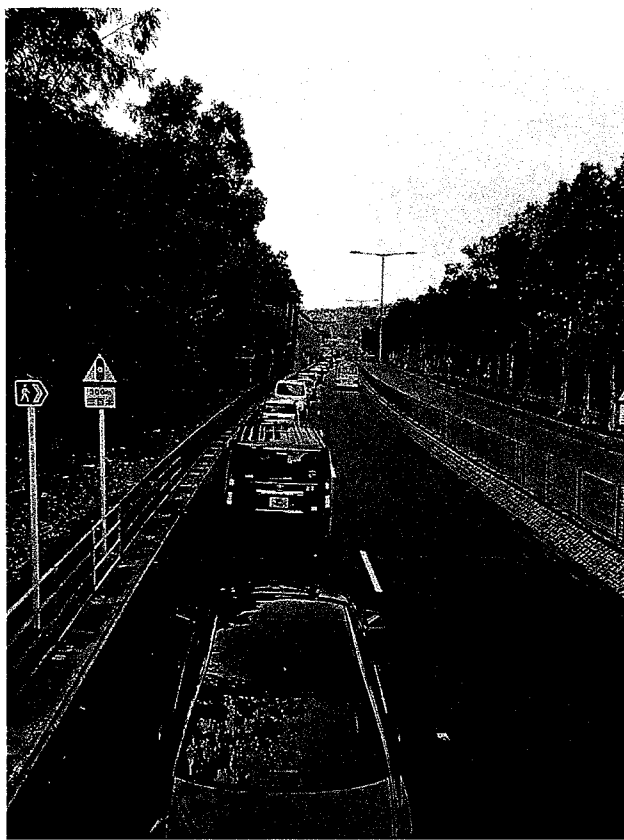
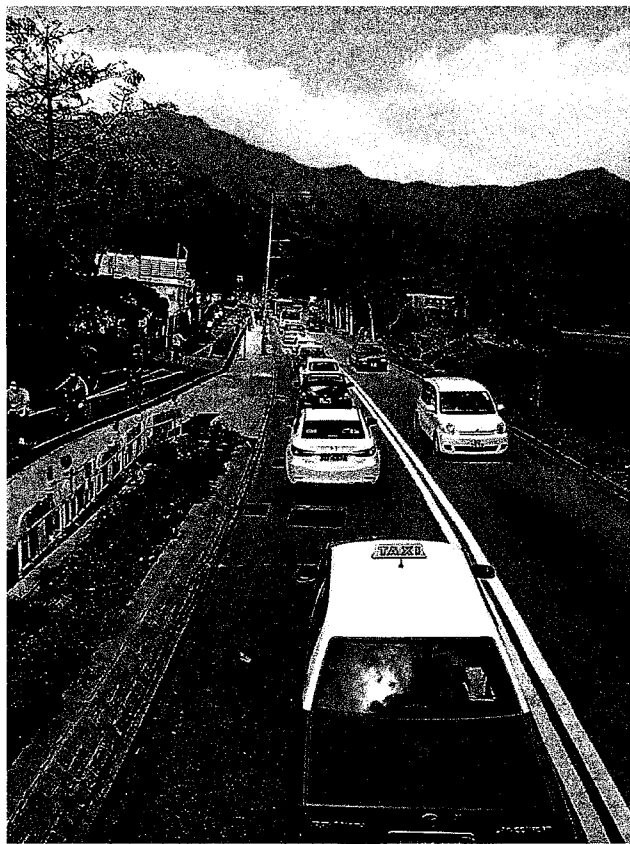
also be considered.

A 1238 units housing project for almost 3000 people concentrated in the area will definitely create lots of influence to the neighbourhood. I hope that your board will safeguard with your professional knowledge as we have no adequate knowledge and chance to be consulted.

Regards,

So Tat Leung

Member of Tai Po District Council (Shuen Wan)



電話：[REDACTED]

電郵：[REDACTED]

地址：大埔汀角路395號翠濤苑G座地下



## 蘇達良區議員辦事處

001565

有關 A/NE-TK/702 發展問卷調查

該計劃會在黃漁灘興建 11 座, 提供 1238 個單位 ( 見現場圖表 )

你支持此項計劃嗎?

☐ 支持

☒ 反對

支持原因	反對原因
<input type="checkbox"/> 增加住屋數目	<input checked="" type="checkbox"/> 增加公共交通壓力
<input type="checkbox"/> 其他: _____	<input checked="" type="checkbox"/> 引致交通擠塞
_____	<input checked="" type="checkbox"/> 破壞附近環境
_____	<input checked="" type="checkbox"/> 增加違泊風險
_____	<input checked="" type="checkbox"/> 增加治安問題
_____	<input type="checkbox"/> 其他: _____

姓名: 余小芳

電話/電郵: [REDACTED] ( 必須填寫 )



**Recommended Advisory Clauses**

- (a) to note the comments of the District Lands Officer/Tai Po, Lands Department (DLO/TP, LandsD) that:
  - (i) the Site comprises mainly private lots held under Block Government Lease and government land. No structures should be erected on the Site without approval under lease; and
  - (ii) the lot owners should submit and obtain a short term waiver under lease before using the Site for the proposed use and a short term tenancy from LandsD before occupying/using the government land for the proposed use. If the above applications are approved by LandsD in the capacity as landlord at its absolute discretion, they will be subject to such terms and conditions, including but not limited to payment of fees as may be imposed. However, there is no guarantee that approval to such applications will be given;
- (b) to note the comments of the Commissioner for Transport (C for T) that the management party of the access road and the roundabout should ensure the smooth traffic of the access road and the roundabout (including exercising control over illegal parking) and allow 24-hour access by and overnight parking of GMB to facilitate the efficient operation of the GMB service;
- (c) to note the comments of the Chief Town Planner/Urban Design and Landscape, Planning Department (CTP/UD&L, PlanD) that approval of the application does not imply approval of tree works such as pruning, transplanting and felling under lease. The applicant should seek approval for any proposed tree works from relevant departments prior to commencement of the tree works;
- (d) to note the comments of the Chief Architect/CMD(2), Architectural Services Department (CA/CMD(2), ArchSD) that:
  - (i) some of the building façade area of Block 1 are facing west. Solar control devices should be considered to reduce solar heat gain and avoid glare affecting other buildings as far as practical; and
  - (ii) barrier free access shall be provided to comply with “Design Manual: Barrier Free Access 2008”;
- (e) to note the comments of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD) that :
  - (i) means of escape of the proposed building should comply with regulation 41 of Building (Planning) Regulations (B(P)R). If single staircase buildings are proposed, the requirements on building height, usable floor area, access to required staircase and travel distance, etc. under Clause B6.1 and Clause B11.2 of the Code of Practice for Fire Safety in Buildings 2011 should be complied with;

- (ii) the Site should be provided with means of obtaining access thereto from a street under B(P)R 5 and emergency vehicular access (EVA) should be provided under B(P)R 41D;
  - (iii) if the Site is not abutting on a specified street having a width not less than 4.5m, the development intensity should be determined by the Building Authority under B(P)R 19(3) at building plan submission stage;
  - (iv) the proposed building should be provided with adequate access and facilities for use by person with a disability in accordance with B(P)R. Also the provision of open space and the provision of prescribed windows for natural lighting and ventilation should comply with relevant regulations of the B(P)R;
  - (v) the sustainable building design requirements and pre-requisites under PNAP APP-151 & 152 would be applicable to the proposed development if GFA concessions for non-mandatory/ non-essential plant rooms and services are claimed;
  - (vi) if MiC is proposed for constructing the proposed development, the applicant is advised to note PNAP ADV-36 and APP-161; and
  - (vii) formal submission under the Buildings Ordinance (BO) is required for any proposed new works, including any site formation works. Detailed comments under the BO will be provided at the building plan submission stage;
- (f) to note the comments of the Director of Fire Services (D of FS) that :
- (i) detailed fire safety requirements will be formulated upon receipt of formal submission of general building plans; and
  - (ii) EVA provision at the Site shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011 under B(P)R 41D which is administered by BD;
- (g) to note the comments of the Director of Food and Environmental Hygiene (DFEH) that :
- (i) if any Food and Environmental Hygiene Department (FEHD)'s facility is affected by the proposed development, prior consent from FEHD must be obtained. Reprovisioning of the affected facilities by the applicant up to his satisfaction may be required;
  - (ii) no environmental nuisance should be generated to the surroundings. For any waste generated from the works and operation of the proposed development, the applicant should arrange the disposal of waste properly at his own expenses;
  - (iii) during the planning approval period, the proposed development should not hinder the flow of departmental refuse collection vehicle(s) (RCVs) to the refuse collection point (RCP) and the normal operation of RCP should not be affected; and



- (iv) if domestic waste collection service of FEHD is required, prior comments from FEHD on the waste collection plan, including the accessibility and manoeuvrability of RCVs to RCP, should be sought.