

2023年 4月 21日
此文件在 收到 城市規劃委員會
只會在收到所有必需的資料及文件後才正式確認收到
申請的日期。

This document is received on 21 APR 2023.
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-III
表格第 S16-III 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 Proposal Only Involving Temporary Use/Development of
Land and/or Building Not Exceeding 3 Years in Rural Areas or Renewal
of Permission for such Temporary Use or Development***

**適用於祇涉及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/發展或該等臨時用途/發展的許可續期的建議***

**Form No. S16-I should be used for other Temporary Use/Development of Land and/or Building (e.g. temporary use/developments in the Urban Area) and Renewal of Permission for such Temporary Use or Development.*

**其他土地上及/或建築物內的臨時用途/發展 (例如位於市區內的臨時用途或發展) 及有關該等臨時用途/發展的許可續期，應使用表格第 S16-I 號。*

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

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

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

2301033

Form No. S16-III 表格第 S16-III 號

For Official Use Only 請勿填寫此欄	Application No. 申請編號	A/7L-MP/34
	Date Received 收到日期	21 APR 2023

- 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。

1. Name of Applicant 申請人姓名/名稱

(☐ Mr. 先生 / ☐ Mrs. 夫人 / ☐ Miss 小姐 / ☐ Ms. 女士 / ☐ Company 公司 ☒ Organisation 機構)

Architectural Services Department

2. Name of Authorised Agent (if applicable) 獲授權代理人姓名/名稱 (如適用)

(☐ Mr. 先生 / ☐ Mrs. 夫人 / ☐ Miss 小姐 / ☐ Ms. 女士 ☒ Company 公司 / ☐ Organisation 機構)

Townland Consultants Limited

3. Application Site 申請地點

(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. 3054 S.A. ss1, 3156 S.A., 3200 RP(Part), 3200 S.A. RP, 3201 RP (Part), 3202 (Part), 3203 RP, 3204 RP, 3205 RP, 3215, 3216, 3217, 3211RP, 3212RP, 3213RP, 3214 S.A., 3214 S.B., 3218, RP, 3250 S.B. ss23 RP, 3250 S.B. ss33 RP in D.D. 104 and adjoining government land, Yau Pok Road, Yuen Long
(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 89,774 sq.m 平方米 <input checked="" type="checkbox"/> About 約 <input checked="" type="checkbox"/> Gross floor area 總樓面面積 55,510 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)	8,029 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 Mai Po and Fairview Park Outline Zoning Plan No. S/YL-MP/6
(e) Land use zone(s) involved 涉及的土地用途地帶	"Recreation", "Residential (Group C)"
(f) Current use(s) 現時用途	mostly vacant, small portion for storage of equipment for Site maintenance (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"[#] (please proceed to Part 6 and attach documentary proof of ownership).
是唯一的「現行土地擁有人」[#] (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"[#] (please attach documentary proof of ownership).
是其中一名「現行土地擁有人」[#] (請夾附業權證明文件)。
- ☒ is not a "current land owner"[#].
並不是「現行土地擁有人」[#]。

- ☐ 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 29.3.2023 (DD/MM/YYYY), this application involves a total of 1 "current land owner(s)"[#].
根據土地註冊處截至 29.3.2023 年 3 月 29 日的記錄，這宗申請共牽涉 1 名「現行土地擁有人」[#]。

(b) The applicant 申請人 -

- ☒ has obtained consent(s) of 1 "current land owner(s)"[#].
已取得 1 名「現行土地擁有人」[#] 的同意。

Details of consent of "current land owner(s)" [#] obtained 取得「現行土地擁有人」 [#] 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. 3054 S.A. ss1, 3156 S.A., 3200 RP(Part), 3200 S.A. RP, 3201 RP (Part), 3202 (Part), 3203 RP, 3204 RP, 3205 RP, 3215, 3216, 3217, 3211RP, 3212RP, 3213RP, 3214 S.A. 3214 S.B., 3218 RP, 3250 S.B. ss23 RP, 3250 S.B. ss33 RP in D.D. 104	14.4.2023

(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)"[#]
已通知 名「現行土地擁有人」[#]。

Details of the "current land owner(s)" [#] notified 已獲通知「現行土地擁有人」 [#] 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. 如上述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)^{#&}
於 (日/月/年)向每一名「現行土地擁有人」[#]郵遞要求同意書[&]

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)[&]
於 (日/月/年)在指定報章就申請刊登一次通知[&]
- ☐ posted notice in a prominent position on or near application site/premises on (DD/MM/YYYY)[&]
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[&]
- ☐ sent notice to relevant owners' corporation(s)/owners' committee(s)/mutual aid committee(s)/management office(s) or rural committee on (DD/MM/YYYY)[&]
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[&]

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

(A) Temporary Use/Development of Land and/or Building Not Exceeding 3 Years in Rural Areas
 位於鄉郊地區的土地及/或建築物內進行為期不超過三年的臨時用途/發展
 (For Renewal of Permission for Temporary Use or Development in Rural Areas, please proceed to Part (B))
 (如屬位於鄉郊地區臨時用途/發展的規劃許可續期，請填寫(B)部分)

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

Proposed Light Public Housing Development and
 Associated Filling / Excavation of Land on a 3 Years Temporary Basis

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

(b) Effective period of permission applied for
 申請的許可有效期

☒ year(s) 年 3
☐ month(s) 個月

(c) Development Schedule 發展細節表

Proposed uncovered land area 擬議露天土地面積	67,330.5 (approx. 75% of Site Area)sq.m <input type="checkbox"/> About 約
Proposed covered land area 擬議有上蓋土地面積	22,443.5 (approx. 25% of Site Area)sq.m <input checked="" type="checkbox"/> About 約
Proposed number of buildings/structures 擬議建築物/構築物數目	17 Residential Blocks, 2 Amenity Blocks, 2 Guardhouses, 1 Sewage Pumping Station, and 8 Building Services Blocks (including 2/M and 2 Refuse Collection Points)
Proposed domestic floor area 擬議住用樓面面積	54,435sq.m <input checked="" type="checkbox"/> About 約
Proposed non-domestic floor area 擬議非住用樓面面積	1,075sq.m <input checked="" type="checkbox"/> About 約
Proposed gross floor area 擬議總樓面面積	55,510sq.m <input checked="" type="checkbox"/> About 約

Proposed height and use(s) of different floors of buildings/structures (if applicable) 建築物/構築物的擬議高度及不同樓層的擬議用途 (如適用) (Please use separate sheets if the space below is insufficient) (如以下空間不足，請另頁說明)
 Please refer to Supplementary Planning Statement

Proposed number of car parking spaces by types 不同種類停車位的擬議數目

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)

Proposed number of loading/unloading spaces 上落客貨車位的擬議數目

Taxi Spaces 的士車位	2 taxi lay-by
Coach Spaces 旅遊巴車位
Light Goods Vehicle Spaces 輕型貨車車位	6
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 Green Minibus Bays 2 Bus Bays

Proposed operating hours 擬議營運時間 All hours			
(d) Any vehicular access to the site/subject building? 是否有車路通往地盤/ 有關建築物?	Yes 是	<input checked="" 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)) Yau Pok Road, Fairview Park Boulevard	
	No 否	<input 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)	
(e) 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. 如需要的話, 請另頁註明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。)			
(i) 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	<input type="checkbox"/> Please provide details 請提供詳情 	
	No 否	<input checked="" type="checkbox"/>	
(ii) Does the development proposal involve the operation on the right? 擬議發展是否涉及右列的工程?	Yes 是	<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) (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 15,700 sq.m 平方米 <input checked="" type="checkbox"/> About 約 Depth of filling 填土厚度 1.5 m 米 <input checked="" type="checkbox"/> About 約 <input checked="" type="checkbox"/> Excavation of land 挖土 Area of excavation 挖土面積 7,600 sq.m 平方米 <input checked="" type="checkbox"/> About 約 Depth of excavation 挖土深度 2.2 m 米 <input checked="" type="checkbox"/> About 約 NB: Indicative only. Area and Depth of Filling/Excavation of Land subject change during detailed design	
	No 否	<input type="checkbox"/>	
(iii) 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 checked="" type="checkbox"/> No 不會 <input 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"/>

	<p>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)</p> <p>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)</p> <p>Please refer to the Supplementary Planning Statement.</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p> <p>.....</p>
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(B) Renewal of Permission for Temporary Use or Development in Rural Areas 位於鄉郊地區臨時用途/發展的許可續期	
(a) Application number to which the permission relates 與許可有關的申請編號	A/ _____ / _____
(b) Date of approval 獲批給許可的日期 (DD 日/MM 月/YYYY 年)
(c) Date of expiry 許可屆滿日期 (DD 日/MM 月/YYYY 年)
(d) Approved use/development 已批給許可的用途/發展	
(e) Approval conditions 附帶條件	<p><input type="checkbox"/> The permission does not have any approval condition 許可並沒有任何附帶條件</p> <p><input type="checkbox"/> Applicant has complied with all the approval conditions 申請人已履行全部附帶條件</p> <p><input type="checkbox"/> Applicant has not yet complied with the following approval condition(s): 申請人仍未履行下列附帶條件：</p> <p>.....</p> <p>.....</p> <p>Reason(s) for non-compliance: 仍未履行的原因：</p> <p>.....</p> <p>.....</p> <p>(Please use separate sheets if the space above is insufficient) (如以上空間不足，請另頁說明)</p>
(f) Renewal period sought 要求的續期期間	<p><input type="checkbox"/> year(s) 年</p> <p><input type="checkbox"/> month(s) 個月</p>

7. 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 Supplementary Planning Statement.

8. 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 this application 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


.....
Lau, Vincent Chi King

.....

Name in Block Letters
姓名（請以正楷填寫）

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

Associate Director

Position (if applicable)
職位（如適用）

Professional Qualification(s) ☒ Member 會員 / ☐ Fellow of 資深會員

專業資格

- ☒ 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
☐ RPP 註冊專業規劃師
Others 其他

on behalf of
代表

Townland Consultants Limited



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

Date 日期

17.4.2023

..... (DD/MM/YYYY 日/月/年)

Remark 備註

The materials submitted in this application 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

- 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。
- 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。
- 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。

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 available 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於規劃署規劃資料查詢處供一般參閱。)

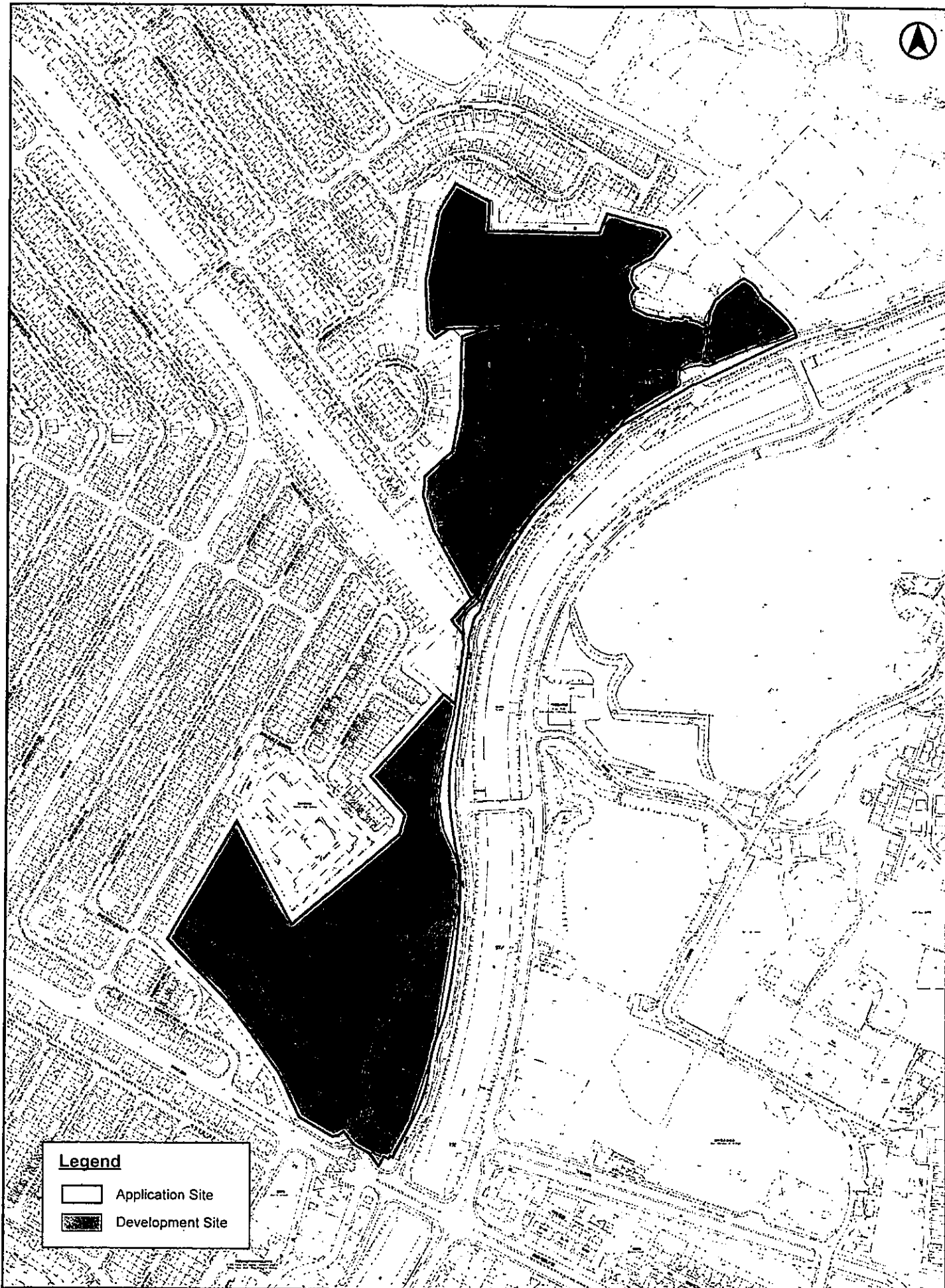
Application No. 申請編號	(For Official Use Only) (請勿填寫此欄)
Location/address 位置/地址	Lot Nos. 3054 S.A. ss1, 3156 S.A., 3200 RP(Part), 3200 S.A. RP, 3201 RP (Part), 3202 (Part), 3203 RP, 3204 RP, 3205 RP, 3215, 3216, 3217, 3211RP, 3212RP, 3213RP, 3214 S.A. 3214 S.B., 3218 RP, 3250 S.B. ss23 RP, 3250 S.B. ss33 RP in D.D. 104 and adjoining government land, Yau Pok Road, Yuen Long
Site area 地盤面積	89,774 sq. m 平方米 <input checked="" type="checkbox"/> About 約 (includes Government land of 包括政府土地 8,029 sq. m 平方米 <input checked="" type="checkbox"/> About 約)
Plan 圖則	Approved Mai Po and Fairview Park Outline Zoning Plan No. S/YL-MP/6 米埔及錦繡花園分區計劃大綱核准圖編號S/YL-MP/6
Zoning 地帶	"Recreation", "Residential (Group C)" "康樂", "住宅(丙類)"
Type of Application 申請類別	<input checked="" type="checkbox"/> Temporary Use/Development in Rural Areas for a Period of 位於鄉郊地區的臨時用途/發展為期 <input checked="" type="checkbox"/> Year(s) 年 <u>3</u> <input type="checkbox"/> Month(s) 月 _____ <input type="checkbox"/> Renewal of Planning Approval for Temporary Use/Development in Rural Areas for a Period of 位於鄉郊地區臨時用途/發展的規劃許可續期為期 <input type="checkbox"/> Year(s) 年 _____ <input type="checkbox"/> Month(s) 月 _____
Applied use/ development 申請用途/發展	Proposed Light Public Housing Development and Associated Filling / Excavation of Land on a 3 Years Temporary Basis 擬議臨時簡約公屋發展及相關填土/挖土工程 (為期 3 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	54,435 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	<input type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
Non-domestic 非住用	1,075 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	<input type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	
(ii) No. of block 幢數	Domestic 住用	17	
	Non-domestic 非住用	14 (2 Amenity Blocks, 2 Guard Houses, 1 Sewage Pumping Station, and 9 Building Services Blocks (including E&M and 2 Refuse Collection Points))	
(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	Approx. 10.65 (Main roof) m 米 <input type="checkbox"/> (Not more than 不多於)	
		3 <input checked="" type="checkbox"/> Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於)	
	Non-domestic 非住用	Approx. 5.5 (Main roof) m 米 <input type="checkbox"/> (Not more than 不多於)	
		1 <input checked="" type="checkbox"/> Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於)	
(iv) Site coverage 上蓋面積	25 % <input checked="" type="checkbox"/> About 約		
(v) 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) _____ _____		
	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) Green Minibus Bay Bus Bay		12 2 6 2 2

Submitted Plans, Drawings and Documents 提交的圖則、繪圖及文件		
	Chinese 中文	English 英文
Plans and Drawings 圖則及繪圖		
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 type="checkbox"/>
<hr/>		
Reports 報告書		
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 checked="" 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sewerage impact assessment 排污影響評估	<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"/>
Ecological Impact Assessment	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>		
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。



ASD/FPYL

SITE LOCATION PLAN
SCALE 1 : 4,000

SECTION 16 PLANNING APPLICATION TOWN PLANNING ORDINANCE (CAP. 131)

**PROPOSED LIGHT PUBLIC HOUSING DEVELOPMENT AND ASSOCIATED FILLING /
EXCAVATION OF LAND ON A 3 YEARS TEMPORARY BASIS
AT VARIOUS LOTS IN D.D. 104 AND ADJOINING GOVERNMENT LAND,
YAU POK ROAD, YUEN LONG**

- Supplementary Planning Statement -

TOWNLAND CONSULTANTS LIMITED



TOWNLAND CONSULTANTS LTD.

URBAN AND REGIONAL PLANNING, DEVELOPMENT CONSULTANCY, MASTER PLANNING, URBAN DESIGN, ARCHITECTURE,
LANDSCAPE ARCHITECTURE, PROJECT MANAGEMENT AND SOCIAL DEVELOPMENT

Our Ref ASD/FPYL/ERIC/03
Date 18 May 2023

By HAND and EMAIL

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

Dear Sirs

**SECTION 16 PLANNING APPLICATION
THE TOWN PLANNING ORDINANCE (CHAPTER 131)**

PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3 YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND "RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: A/YL-MP/341)

Reference is made to the Captioned Planning Application submitted on 17 April 2023.

Further to comments received from Agriculture, Fisheries and Conservation Department ("AFCD"), Urban Design & Landscape ("UD&L") Section of Planning Department ("PlanD"), Environmental Protection Department ("EPD"), and Drainage Services Department ("DSD"), please find our responses provided in the enclosed Responses to Comments ("R-to-C") table (Attachment 1 refers).

Per AFCD's Comment, please omit Appendix A from the Ecological Impact Assessment ("EcolA") (Appendix 7 of the Supplementary Planning Statement submitted on 17 April 2023) as the relevant information already incorporated into the main text of the EcolA.

Please note that all responses are clarifications only and there are no changes to the Proposed Development or the findings of the Technical Assessments which conclude no adverse impacts to the surrounding environment.

Should there be any queries, please do not hesitate to contact the undersigned or Mr. Eric Chan.

Yours faithfully
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED


Vincent Lau
Associate Director

VINERIC

MAIN HONG KONG OFFICE

CHINA OFFICE

INDIA OFFICE

INDONESIA OFFICE

ASSOCIATED COMPANIES

TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)

TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)

TOWNLAND CONSULTANTS PVT. LIMITED (India)

PT TOWNLAND INTERNATIONAL (Indonesia)

HOWARD & SEDDON PARTNERSHIP (United Kingdom)



ISO 9001:2015
Certificate No.: CC644



TOWNLAND CONSULTANTS LTD.

URBAN AND REGIONAL PLANNING, DEVELOPMENT CONSULTANCY, MASTER PLANNING, URBAN DESIGN, ARCHITECTURE,
LANDSCAPE ARCHITECTURE, PROJECT MANAGEMENT AND SOCIAL DEVELOPMENT

Our Ref ASD/FPYL/ERIC/04
Date 25 May 2023

By FAX and EMAIL

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

Dear Sirs

**SECTION 16 PLANNING APPLICATION
THE TOWN PLANNING ORDINANCE (CHAPTER 131)**

**PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3
YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND
"RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING
GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: A/YL-MP/341)**

Reference is made to the Captioned Planning Application submitted on 17 April 2023.

Further to comments received from Environmental Protection Department ("EPD"), Transport Department ("TD") and Highways Department ("HyD"), please find our responses provided in the enclosed Responses to Comments ("R-to-C") table (Attachment 1 refers). The R-to-C Table also summarises comments from the Public and responds accordingly.

Please note that all responses are clarifications only and there are no changes to the Proposed Development or the findings of the Technical Assessments which conclude no adverse impacts to the surrounding environment.

Should there be any queries, please do not hesitate to contact the undersigned or Mr. Eric Chan.

Yours faithfully
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED

Vincent Lau
Associate Director

VINERIC

Enc Attachment 1 - R-to-C Table
Attachment 2 - Replacement Pages of Environmental Assessment
Attachment 3 - Replacement Pages of Traffic Impact Assessment

cc Client / Team

城 MAIN HONG KONG OFFICE

市 CHINA OFFICE

規 INDIA OFFICE

劃 INDONESIA OFFICE

顧問

問

ASSOCIATED COMPANIES

TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)

TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)

TOWNLAND CONSULTANTS PVT. LIMITED (India)

PT TOWNLAND INTERNATIONAL (Indonesia)

HOWARD & SEDDON PARTNERSHIP (United Kingdom)



ISO 9001:2015
Certificate No.: CC844

Attachment 1

	R-TO-C TABLE
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ATTACHMENT 1

PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3 YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND "RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: A/YL-MP/341)

Comments/ Suggestions		Applicant's Responses
A. Comments received from the Environmental Protection Department on 19.5.2023 (Contact Person: Ms. CHAN Lai Mei, Jollita: Tel.: 2835 1112):		
	<u>Water Quality</u>	
1.	The construction works are in close proximity to the watercourse, relevant mitigation measure from the ETWB TC (Works) No. 5/2005 shall be incorporated.	Noted and Section 6.2.4 has been revised (Attachment 2 refers)
2.	Best Management Practices (BMPs) for stormwater discharge to minimize stormwater pollution arising from the Project shall be incorporated.	Noted and Section 6.2.2 has been revised (Attachment 2 refers)
3.	Please supplement the recommendation and conclusion of SIA.	Noted and Sections 6.3.1 and 6.3.2 have been revised (Attachment 2 refers)
4.	Section 6.2.2: The construction workforce on site will generate sewage, please elaborate the mitigation measures will be taken for the sewage management.	Noted and Section 6.2.5 has been revised (Attachment 2 refers)
5.	Section 6.3.2 a) Please explain how to come up with the effective volume of 18.51m ³ . b) Please clarify if equalization tank will be provided and also the number of equalization tank and the volume.	The effective volume of the FRP sewage tank (i.e. the wet well) is calculated based on the retention volume from the minimum submergence level to the invert level of the overflow bypass. It should be noted the volume will subject to further review upon the finalised design of the FRP sewage tank at the detailed design stage. Equalization tank was not proposed as with all the other proposed mitigation measures, the overflow risk is expected to be low.
B. Comments received from the Transport Department on 19.5.2023 (Contact Person: Mr TSE Ming Yip: Tel.: 2399 2718):		
(a)	Please be reminded to seek comment from FSD on the EVA arrangement;	Noted and FSD's comment will be sought in detailed design stage.
(b)	Please indicate the width of the vehicular access and locations of pedestrian access points;	Noted and please refer to the revised Appendix A (Attachment 3 refers) for the width of the vehicular access and locations of pedestrian access points are indicated in the drawing.
(c)	Please clarify the total time required for MiC units delivery for both northern and southern sites for estimated nos. of delivery activities of 20 units/site/day;	Please note that the construction period is approx. 1 year, the actual time required for MiC units should be subject to the actual site arrangement proposed by the contractor in the next stage.
(d)	In addition to the swept path analysis, please arrange site trial to confirm bus manoeuvring arrangement at the junctions;	Noted. Site trials will be conducted to verified the proposed junction design and adjustments will be made in the detailed design stage if found necessary.

ATTACHMENT 1

PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3 YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND "RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: A/YL-MP/341)

Comments/ Suggestions	Applicant's Responses
(e) Section 5.4.2: "Table 5.3" should read as "Table 5.2";	Noted and Section 5.4.2 has been revised (Attachment 3 refers).
(f) Section 6.2.2: Please advise the MiC units delivery route from Lok Ma Chau control point to Kam Pok Road;	Noted and Appendix C is supplemented with the preliminary route for MiC units delivery route from Lok Ma Chau Control Point (Attachment 3 refers).
(g) No vehicle is allowed to queue back to or reverse onto/from the subject site at any time during the planning approval period;	Noted.
(h) Section 5.6.3: The peak hour quoted in TCS2011 is based on the overall mechanised trips of the whole territories. The morning peak hour in Yuen Long would be earlier due to longer journey time required as compared with urban district;	Noted and Section 5.6.3 has been revised (Attachment 3 refers).
(i) Table 5.5: The table only provides information regarding the capacity to be provided in the peak hour without considering the passenger's travel pattern. Detailed assessment on the public transport demand and provision should be conducted and critical information, such as the passenger's destination, bus/ PLB routing should be considered. Please advise how the passenger demand is estimated and split into Bus/ PLB and the total demand, i.e. 791+189 = 980, does not tally with the passenger generated, i.e. 992 in table 5.4;	Noted and please refer to Tables 5.5 – 5.7 (Attachment 3 refers).
(j) Section 5.6.3 – 5.6.6: Please assess and advise the bus and GMB routes details, such as the destination, routing, etc.;	Noted and please refer to Tables 5.5 – 5.9 (Attachment 3 refers). Please note that the assessment and recommendations in this report are preliminary at this stage. The actual public transportation services shall be reviewed holistically at the detailed design stage to suit local demand.
(k) Table 5.5 and Table 5.6: The no. of trip per hour in Table 5.5 does not tally with the peak hour headway in Table 5.6 and Section 5.6.7, please clarify;	Noted and please refer to Tables 5.5 – 5.9 and Section 5.6.7 (Attachment 3 refers).
(l) Table 5.6 – The illustration "Bus/GMB" in the table is not clear. Please specify if bus or GMB will be provided. The consultant needs to assign the bus and GMB trips required to the proposed PT services to illustrate the additional trips required for each proposed public transport service;	Please note that the assessment and recommendations in this report are preliminary at this stage. The actual public transportation services shall be reviewed holistically at the detailed design stage to suit local demand.
(m) Section 5.7.2 and 5.7.3: Please specify the length of bus and GMB bays;	Noted and Sections 5.7.2 and 5.7.3 have been revised (Attachment 3 refers).
(n) Please review the layout and recommend measures to enhance the pedestrian safety in both PTTs, in particular the pedestrian crossing facilities therein;	Pedestrian crossing facilities have been proposed at both PTTs as shown in Appendix A and Appendix D of the Traffic Impact Assessment. Detailed layout and measures will be proposed by the designer in detailed design stage.

ATTACHMENT 1

PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3 YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND "RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: AYL-MP/341)

Comments/ Suggestions	Applicant's Responses
(o) In the southern PTT: Please review the bay arrangement to provide three parallel bays. Bus and GMB bays are designated for the use of bus and GMB respectively and not for passage of other vehicles. Please review if additional stacking space for bus could be available without significant change of the layout;	Please note that the arrangement will be reviewed at the detailed design stage and for TD's consideration and acceptance.
(p) Shelters should be provided in all waiting platforms; and	Please note that simple shelters will be provided in all waiting platforms of the public transport termini.
(q) Please indicate the area reserved for placement of bus and GMB operators' kiosks and mobile toilets.	There are toilets inside the adjacent amenity blocks which could serve the bus and GMB operators as well. The need for additional mobile toilets and kiosks for the operators will be reviewed with TD and the operators at detailed design stage.
C. <u>Comments received from the Highways Department on 25.5.2023:</u>	
(e) Drawing No. AB2/880/SK007c: Please be advised that this Office's maintenance boundary of Yau Pok Road is to the edge of cycle track/footpath of and the registered slopes as indicated as "HyD" and "HyD/Slope" on the attached Drawing No: YL201501/R/CYT/0103 Stage R Rev A EXCEPT the area for the provisions of ingress/ egress of between the cycle track/footpath and the application site. Besides, this Office will not take up the maintenance responsibility of the staircases and ramps shown on the abovementioned drawing.	Noted.
D. <u>Public Comments:</u>	
1. 22 public comments were received in total during the formal publication period of the S16 Planning Application. The summary of the comments is listed below:	
2. <u>Comments Expressing Views and Concerns:</u> <u>Site Suitability</u> <ul style="list-style-type: none"> The Application Site is not suitable for the Proposed LPH Development as it is not conveniently connected to any public transportation and there is a lack of public and livelihood facilities in the area to serve the residents. The additional population will affect the existing bus services provide to the residents of Fairview Park and increase the pressure to the neighbourhood facilities. 	To enhance the connectivity and accessibility of the Site, two public transport termini is proposed within the Proposed LPH Development to serve the future residents. Amenity blocks are also proposed to provide social welfare and livelihood facilities to meet the basic needs of the residents.

ATTACHMENT 1

PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3 YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND "RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: AYL-MP/341)

Comments/ Suggestions	Applicant's Responses
<ul style="list-style-type: none"> The Proposed LPH Development is not in line with the planning intention of the "Recreation" ("REC") zone on the Approved Mai Po and Fairview Park Outline Zoning Plan No. SYL-MP/6. <p><i>Environmental and Traffic Impacts</i></p> <ul style="list-style-type: none"> The Proposed LPH Development will aggravate the traffic congestion in the area. The proximity of the Proposed LPH Development to the existing cycling track will also incur more traffic accidents. The additional populations will aggravate the sewerage and waste issues at the nullah surrounding the Fairview Park. The public transport terminus in the south portion of the Application Site is too close to the schools and nearby residential developments and induce adverse air quality and noise impacts. During the construction period, the construction noise and dust will adversely affect the residents of Fairview Park. <p><i>Ecological Impact</i></p> <ul style="list-style-type: none"> The Application is not in line with the planning intention of Wetland Buffer Area under the Town Planning Board Guidelines for Application of Developments within Deep Bay Area under Section 16 of the Town Planning Ordinance (TPB PG-No. 12C). 	<p>Despite the current "REC" zoning of the Site, the Site is subject to an approved Rezoning Request to rezone the Site to "Residential (Group C)" zone for low-to-medium rise residential development, which also demonstrated the suitability of the Site for residential development. In any event, the Proposed LPH Development is temporary in nature, and shall not jeopardise the long-term planning intention of the Site.</p> <p>A Transport Impact Assessment has been conducted which concluded the nearby junctions and road links will operate with acceptable capacities and performance. Moreover, the residents will mainly rely on public transport through the public transport terminus within the Site as no private car parking spaces will be provided. The traffic arrangement of the Proposed LPH Development will meet the relevant road safety requirements.</p> <p>On-site Sewerage Pumping Station and Refuse Collection Points are proposed, no sewerage or waste will be discharged/ disposed to the nullah. Sewerage Impact Assessment and Environmental Assessment have been conducted to demonstrate that, with appropriate implementation of all proposed mitigation measures, the Proposed LPH Development will not lead to adverse sewerage, air quality and noise impacts.</p> <p>The public transport terminus located at Southern Portion of the Project Site is small in scale. Hence, with proper implementation of all proposed mitigation measures, the Proposed LPH development would not induce unacceptable adverse air quality and noise impacts.</p> <p>As only shallow foundation will be required for the Proposed LPH Development, no piling works will be involved. Suitable mitigation measures including provision of screening/ barriers along the Site Boundary will be provided to minimise the disturbance to the surrounding. Moreover, due to the use of MiC method, the construction time will also be shortened, hence, the duration of the construction impact will be reduced.</p> <p>As demonstrated in Section 4.7 of the Supplementary Planning Statement and Ecological Impact Assessment, there shall be no decline in wetland or ecological functions of the Ramsar Site wetland due to the Proposed Temporary LPH Development. Therefore, TPB PG-No. 12 is complied.</p>

ATTACHMENT 1

PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3 YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND "RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: A/YL-MP/341)

Comments/ Suggestions	Applicant's Responses
<ul style="list-style-type: none"> The ecological survey is not adequate to conclude the existing ecological condition. It is considered that the ecological value of the Application Site and its surrounding is high. The Proposed LPH Development will lead to adverse ecological impact, particularly to the flight paths of the birds. 	<p>The Ecological Impact Assessment reviewed and adopted baseline data from several previous EIA reports and planning applications as the main body and basis for its ecological evaluation and impact assessment. These reviewed data included the 18-month survey data from March 2019 to October 2020 conducted for Planning Application Nos. Y/YL-MP7 and Y/YL-MP8. As the existing baseline data are for the same site location and recent enough, a reconnaissance survey was carried out in December 2022 (incl. daytime and night-time) to verify the up-to-date ecological conditions (in particular habitat types and distribution) against the ecological baseline established from the literature review. It has been concluded that habitats within the Application Site are considered to be of Very Low to Low to Moderate value and wildlife usage is of low level, and that the Application Site does not lie on a major flightline for waterbirds; therefore, with the proper implementation of the proposed ecological mitigation measures, the Proposed LPH Development would not have unacceptable adverse ecological impact, including impact on bird flight line.</p>
<ul style="list-style-type: none"> When compared to the Approved EIA Report (AEIAR-182/2014) which the proposed residential development proposed to maintain the northern portion of the Application Site as landscaped area to avoid significant ecological impact. The Proposed LPH Development which will develop the northern portion of the Site will lead to additional ecological impact. The construction noise due to the site formation and piling works will adversely affect surrounding habitat. <p>Others</p> <ul style="list-style-type: none"> The Proposed LPH Development should consider providing additional emergency gateway(s) that link to Fairview Park to enhance the safety of the residents. 	<p>While the residential houses in the development assessed in the approved EIA Report (EIAO Register No. AEIAR-182/2014) were limited in the Southern Portion, site clearance, foundation and site formation works were required for both the Southern and Northern Portions. On the other hand, the Proposed LPH Development only requires shallow foundation and has a shorter construction time. Suitable mitigation measures including provision of screening/ barriers along the Site Boundary will be provided to minimise the disturbance to the surrounding.</p> <p>The design and provision of ingress/ egress and emergency vehicular access for the LPH project will be in compliance with relevant statutory requirements to warrant the safety of the development and the residents.</p>

Date: 25 May 2023
File Ref: ASD/FPYL

Attachment 2

REPLACEMENT PAGES OF
ENVIRONMENTAL ASSESSMENT



6. Water Quality Impact

6.1. Criteria and Guidelines for Water Quality

- 6.1.1. The assessment on water quality impact shall comply with the Water Quality Objective (WQO) as stipulated in the Water Pollution Control Ordinance (Cap. 358) (WPCO), and other relevant guidelines and regulations, including the Practice Note for Professional Persons on Construction Site Drainage (ProPECC PN 1/94) and the ProPECC PN 5/93 on Drainage Plans.

6.2. Water Quality Impact During Construction Stage

- 6.2.1. The major water quality concerns shall be the on-site runoff from dust suppression activities and rainfall, sewage effluent from construction workforce and chemical spillage during the construction stage. The key pollutants would be suspended solids from surface runoff and other pollutants would include fuel and lubricant oil from the construction vehicles and Powered Mechanical Equipment (PME) on-site.

- 6.2.2. Best Management Practices (BMPs) should be implemented at the construction site, including proper handling, sorting and storage of construction solid waste, debris and refuse generated on-site prior to disposal. General refuse and recyclable materials should be collected separately and stored in appropriately labelled bins and removed regularly to minimise the risk of windblown waste/ debris discharging into the harbour.

- 6.2.3. To mitigate the water quality impacts, construction practices outlined in the ProPECC PN1/94, where applicable, would be implemented. Typical relevant waste water control measures include:

- All open stockpiles of construction materials (for example, aggregates, sand and fill material) should be covered with tarpaulin or similar fabric during rainstorms;
- Manholes (including newly constructed ones) should always be adequately covered and temporarily sealed so as to prevent silt, construction materials or debris being washed into the drainage system, and storm runoff being directed into foul sewers;
- Wastewater generated from the washing down of mixer trucks and drum mixers and similar equipment should wherever practicable be recycled. The discharge of wastewater should be kept to a minimum and sited away from natural water courses after treatment to WPCO requirement; and
- The construction solid waste, debris and rubbish on-site should be collected, handled and disposed of properly to avoid causing any water quality impacts.

- 6.2.4. The practices outlined in ETWB TC (Works) No. 5/2005 "Protection of natural streams/ rivers from adverse impacts arising from construction works" should be adopted where applicable. Relevant mitigation measures are listed below:

- Impermeable sheet piles and cofferdams should be used as required to divert water flow from the construction works area so that all the construction works would be undertaken within a dry zone and physically separated from the watercourses;
- The proposed works should preferably be carried out within the dry season where the



flow in the stormwater culvert/ water channel/ stream is low;

- The use of less or smaller construction plants may be specified in works areas close to the inland water bodies;
- Temporary storage of materials (e.g. equipment, filling materials, chemicals and fuel) and temporary stockpile of construction materials should be located well away from any watercourses during carrying out of the construction works;
- Stockpiling of construction materials and dusty materials should be covered and located away from any watercourses;
- Construction debris and spoil should be covered up and/or disposed of as soon as possible to avoid being washed into the nearby water receivers;
- Construction activities, which generate large amount of wastewater, should be carried out in a distance away from the watercourses, where practicable;
- Mitigation measures to control site run-off from entering the nearby water environment should be implemented to minimise water quality impacts. Surface channels should be provided along the edge of the waterfront within the work sites to intercept the run-off;
- Construction effluent, site run-off and sewage should be properly collected and/ or treated;
- Any temporary works site inside the stormwater watercourses should be temporarily isolated, such as by placing of sandbags or silt curtains with lead edge at bottom and properly supported props to prevent adverse impact on the stormwater quality.

6.2.5. The construction workforce on site will generate sewage effluents, which are characterised by high levels of BOD, ammonia and E.coli counts. Potential water quality impact on the local drainage and freshwater system may arise from these sewage effluents, if uncontrolled. The Contractor should provide temporary sanitary facilities such as portable chemical toilet within the construction site to handle sewage from the workforce. The Contractor has the responsibility to ensure that chemical toilets are used and properly maintained, and that licensed constructors are employed to collect and dispose of the waste off-site at approved locations.

6.2.6. By adopting the above mitigation measures with best management practices, the impacts arisen during the construction stage would be reduced to an acceptable level and adverse water quality impacts would not be anticipated.

6.3. Water Quality Impact During Operational Stage

6.3.1. During operation phase, storm water runoff from paved surfaces with the Application Site will be directed to a managed stormwater drainage system. Runoff from the buildings and road surfaces within the Application Site may carry suspended solids and other pollutants such as fuel, oils and heavy metals that could enter nearby surface water bodies or storm drains if uncontrolled. Within implementation of stormwater best management practices including provision of trapped gullies and catch-pits, adverse impacts to water quality are not anticipated.



- 6.3.2. Regarding sewerage and sewage treatment implications, an on-site SPS will be provided to collect the sewage from the future LPH during operation and conveyed to the public sewerage system. A control system will be incorporated into the design of the on-site SPS to control the discharge flowrate as appropriate to suit the design capacity of downstream treatment. Therefore, no adverse sewerage impact due to the LPH development is anticipated (Sewerage Impact Assessment at Appendix 8 of Supplementary Planning Statement refers).
- 6.3.3. The proposed on-site SPS is designed to collect sewage to be generated from the proposed LPH development. Under emergency situation (e.g. pump failure, electricity cut off, pipe bursting, etc) where overflow of the proposed on-site SPS occur, the following mitigation measures/ design would be applied to minimize the chances of emergency discharge as far as practicable.
- A standby pump will be provided to cater for breakdown and maintenance of the duty pump;
 - Backup power supply in the form of dual/ ring circuit power supply by CLP will be provided to secure electrical power supply;
 - Regular maintenance and checking of plant equipment to prevent equipment failure;
 - A wet well with effective volume of approximately 18.51m³^[1]; and
 - Sewage will be tanked away to minimise the change of emergency overflow.
- 6.3.4. With standard provisions for SPS including dual power supply, standby pumps, wet well and provision of tanker away arrangement, the proposed on-site SPS is considered to be equipped with high reliability and risk of minimizing the risk of emergency discharges is considered low.
- 6.3.5. The SPS design has adopted the latest standard design and management practice adopted by DSD. Any incident of emergency overflows from the proposed SPS will strictly follow EPD's "A Guide on Reporting Sewage Bypass Incidents in Sewage Pumping Stations and Sewers" and DSD's "Contingency Plan for Incidents Possibly Encountered in Sewage Treatment Facilities having a Potential of Generating an Environmental Nuisance" (Contingency Plan). It is laid out in the Contingency Plan that before taking the need of sewage overflows, all steps, as outlined in the Standard Checklist for Considering Various Options to Mitigate/Avoid Sewage Discharge Prior to Bypass for the Purpose of Maintenance or Minor Modifications in Existing Sewage Treatment Facilities (Appendix II(h) of Contingency Plan), should be carefully considered. All emergency sewage overflows to sensitive waters nearby should also be reported to EPD except during the case of sewage bypass/overflow due to prolonged and very heavy rainfall (e.g. during black rainstorm warning). The Contingency Plan details the procedures to promptly notify relevant Government Departments such as WSD, AFCD, Environmental Protection Department (EPD), Leisure and Cultural Services Department (LCSD) and Home Affairs Department (HAD) in the event of emergency overflow that may pollute water sensitive receivers close to the proposed SPS or cause other environmental nuisance as soon as possible within 24 hours of the incident and to conduct joint investigation with EPD to assess the impacts as well as to work out mitigation measures to reduce impact to the environment and public health and to interact with the community if necessary.

[1] The effective volume of the FRP sewage tank (i.e. the wet well) is calculated based on the retention volume from the minimum submergence level to the invert level of the overflow bypass. It should be noted that the volume is subject to further review upon the finalised design of the FRP sewage tank at the detailed design stage.

Attachment 3

REPLACEMENT PAGES OF TRAFFIC IMPACT
ASSESSMENT

Table 5.2 Road Link Performance in Year 2022 Observed, 2030 Reference, and 2030 Design Scenarios

Link	Road/Link	Dir	Link Capacity (pcu/hr)	2022 Observed			2030 Reference Scenario			2030 Design Scenario		
				AM Peak Flow (pcu/hr)	V/C Ratio	PM Peak Flow (pcu/hr)	AM Peak Flow (pcu/hr)	V/C Ratio	PM Peak Flow (pcu/hr)	AM Peak Flow (pcu/hr)	V/C Ratio	PM Peak Flow (pcu/hr)
L1	Castle Peak Road - Tam Mi	2-way	2500 (1)	795	0.32	750	1,060	0.42	1,010	1,170	0.47	1,150
L2	San Tin Highway	NB	5700 (2)	4,160	0.73	3,460	4,790	0.84	4,020	4,815	0.84	4,060
		SB	5700 (2)	3,865	0.68	4,080	4,055	0.71	4,235	4,080	0.72	4,260
L3	Fairview Park Boulevard	EB	2800 (3)	930	0.33	610	1,040	0.37	700	1,040	0.37	700
		WB	2800 (3)	670	0.24	705	750	0.27	785	750	0.27	785

Remarks: (1) Road capacity for Single 2-Rural Road
(2) Road capacity for Dual 3-Trunk Road
(3) Road capacity for Dual 2-Rural Road

5.4.2. As shown in Table 5.2, all accessed road links would operate with acceptable operation performance with V/C ratio less than 1.0 under all assessment scenarios.

5.5. Pedestrian Assessment

- 5.5.1. Based on the site observation, most of the people are driving along the carriageway and riding a bicycle on the cycle track along Yau Pok Road; nominal pedestrian flows (e.g. less than 20 ppl per hour) are observed using the footpath adjacent to the site (e.g. Yau Pok Road, Kam Pok Road).
- 5.5.2. Given the site's distance from the nearest MTR station (e.g. Yuen Long MTR Station) and the provision of public terminus with bus and minibus service within both the northern and southern sites, it is expected that only a nominal number of people will choose the public footpath to and from the nearby destinations.
- 5.5.3. Therefore, it is anticipated that all footpaths adjacent to the site would still operate with a desirable Level-Of-Service (LOS "A") even with the proposed development.

5.6. Public Transport Assessment

- 5.6.1. It is anticipated that residents of the Proposed Development are mainly low-income families who take public transport service as their main mode of transport. However, there are only limited number of existing public transport facilities within a walkable distance. Therefore, a public transport assessment has been carried out to analyse the public transport demand of the Proposed Development.

Estimated Public Transport Passenger Demand

- 5.6.2. The provision of public transport facilities of the Proposed Development were determined making reference to population characteristics of Fairview Park (M35) and San Tin District (M36) District Council Constituency Area, presented in the 2021 Population Census results, the breakdown of Workers, Student and Non-student in the area is summarized in **Table 5.3**.

Table 5.3 Breakdown of Workers, Student and Non-student in the Areas

District	Population	Resident Worker	Non-student ⁽¹⁾	Student
Fairview Park & San Tin (M35 & M36)	38,027	18,507	14,199	5,321
		48.7%	37.3%	14.0%
Proposed Development	5,500	2,677	2,054	770

Remark: (1) Home-makers, Retired or Others.

- 5.6.3. With reference to TCS2011, the overall peak hours for mechanised trips on a weekday were found to be accounting for about 12% of the daily trips made. The mechanized trip rate 1.83 is adopted for assessment purpose. The passenger generation by Transport Mode are summarized in **Table 5.4**.

Table 5.4 Passenger Generation by Transport Mode

Population Type	Pedestrian Trip (ped/hr) (1)	Development Pedestrian Trip by Transport Mode (ped/hr) ⁽²⁾							Total (4)
		MTR	MTR (Light Rail)	Bus	PLB	On foot	School Bus	Others (3)	
2021 Modal Split of Yuen Long									
Worker	-	39%	9%	25%	3%	7%	-	17%	100%

Student	-	24%	15%	13%	3%	26%	7%	11%	100%
Non-student	-	27%	3%	27%	13%	-	-	30%	100%
Adopted Modal Split of The Proposed Development									
Worker	-	39%	9%	25%	3%	7%	-	17%	100%
Student	-	24%	15%	13%	3%	26%	7%	11%	100%
Non-student	-	27%	3%	27%	13%	-	-	30%	100%
The Proposed Development									
Worker	588	227	51	149	20	42	0	99	588
Student	169	42	26	22	5	44	12	18	169
Non-student	235	64	7	63	31	0	0	70	235
Total	333	84	234	56	86	12	187	992	

Remark: (1) Peak hour factor 12% and mechanized trip rate 1.83 are adopted for workers and students; Peak hour factor 6% and mechanized trip rate 1.83 are adopted for non-student, making reference to TCS2011.

(2) Refer to the overall mode split of Yuen Long in the 2021 Population Census results for workers and students; refer to TCS2011 Table 3.6 for non-student.

(3) "Others" includes private cars, taxi, and shuttle bus.

(4) The figures are rounded to nearest integer. The figures may not add up to the totals due to rounding.

Note: According to TCS2011, home-based others (HBO) trips are distributed quite uniformly throughout 7:00 a.m. to 11:00 p.m. in a day. Therefore, peak hour factor 6% is adopted for non-student, who generates HBO trips only.

5.6.4. With reference to the 2021 Population Census, the distribution of passenger generation by transport mode is summarised in Table 5.5 to Table 5.7.

Table 5.5 Destinations by 2021 Population Census

Population Type	Destinations for Population in Yuen Long			
	Same District ⁽³⁾	Hong Kong Island and Kowloon	Other Areas in the New Territories ⁽⁵⁾	Total
Worker / Non-student ⁽¹⁾	62,636 27%	111,293 47%	60,547 26%	234,476 100%
Student ⁽²⁾	53,380 53%	26,235 26%	20,338 20%	99,953 100%

Remark: (1) Distribution factor for worker and non-student is making reference to 2021 Population Census "Working Population with Fixed Place of Work in Hong Kong by District Council District, Place of Work, Year and Main Mode of Transport to Place of Work" and "Population in Domestic Households by Area of Residence, Year and Type of Housing".

(2) Distribution factor for student is making reference to 2021 Population Census "Persons Attending Full-time Courses in Educational Institutions in Hong Kong by District Council District, Place of Study, Year and Educational Attainment (Highest Level Attended)" and "Population in Domestic Households by Area of Residence, Year and Type of Housing".

(3) Same District includes Yuen Long, and new towns (Tuen Mun, Tin Shui Wai, Hung Shui Kiu/ Ha Tsuen)

(4) Hong Kong Island and Kowloon includes Hong Kong Island, Kowloon and new towns (Tsuen Wan, Tung Chung)

(5) Other Areas in the New Territories includes new towns (Fanling/ Sheung Shui/ Kwu Tung, Tai Po, Sha Tin, Tseung Kwan O)

Table 5.6 Passenger Demand by Destination of the Proposed Development

Population Type	Pedestrian Trips (ped/hr) ⁽¹⁾	Destinations ⁽²⁾			Total
		Yuen Long	Tai Lam Interchange	Sheung Shui	
Worker	588	27%	47%	26%	100%
		157	279	152	588
Student	169	53%	26%	20%	100%
		90	44	34	168
Non-student	235	27%	47%	28%	100%
		63	112	61	236

Remark: (1) Refer to Table 5.4

(2) Refer to Table 5.5

Table 5.7 Distribution of Passenger Generation by Transport Mode

Destination	Population Type	Estimated Passenger Demand
Yuen Long	Worker ⁽¹⁾	157
	Student ⁽²⁾	90
	Non-student ⁽¹⁾	63
	Total	310
Sheung Shui	Worker ⁽¹⁾	152
	Student ⁽²⁾	34
	Non-student ⁽¹⁾	61
	Total	247
Tai Lam Interchange	Worker ⁽¹⁾	279
	Student ⁽²⁾	44
	Non-student ⁽¹⁾	112
	Total	435

Remark: (1) Refer to Table 5.6

Public Transport Demand of the Proposed Development

- 5.6.5. From **Table 5.7**, the required public transport provision during morning peak hour is assessed and summarized in **Table 5.8**.

Table 5.8 Required Public Transport Provision during Morning Peak Hour

Public Transport Type	Capacity (passenger/service)	Estimated Passenger Demand	Required no. of Services (service/hr)
GMB – Yuen Long ⁽¹⁾	19	310	17
Bus – Sheung Shui ⁽¹⁾	120 x 75% = 90	247	3
Bus – Tai Lam Interchange ⁽¹⁾	120 x 75% = 90	435	5

Remark: (1) Demand of MTR passenger, pedestrian on foot, and pedestrian taking other transport modes are redistributed to transport modes of Bus and PLB.

- 5.6.6. As shown in Table 5.8, 17 trips of PLB during the AM peak hour would be required to cater for the additional public transport demand from the Proposed Development to Yuen Long. 3 trips of buses would be required to cater for the additional public transport demand from the Proposed Development to Sheung Shui, and 5 trips of buses would be required to cater for the additional public transport demand from the Proposed Development to urban areas through the Tai Lam Tunnel Bus Interchange.

Proposal of Public Transport Route

- 5.6.7. According to Table 3.1 in Chapter 3.2, the most common destinations of existing public transport service are Yuen Long and Sheung Shui. Therefore, it is anticipated that majority of passengers generated from the proposed development would take public transport towards the two locations. It is also expected that a portion of passengers would take public transport towards Tai Lam Tunnel Bus Interchange for bus services towards Kowloon or Hong Kong Island Area. An indicative Public Transport Service Proposal is shown in Table 5.9:

Table 5.9 Indicative Public Transport Service Proposal

Public Transport Type	Origin & Destination	Peak Hour Headway (mins)	Remarks
GMB	Proposed Public Transport Terminus ↔ Yuen Long	60 / 17 = 3	Daily
Bus	Proposed Public Transport Terminus ↔ Sheung Shui	60 / 3 = 20	Daily
Bus	Proposed Public Transport Terminus ↔ Tai Lam Tunnel Bus Interchange	60 / 5 = 12	Peak only

Mode of Operation

- 5.6.8. For Yuen Long, it is recommended that the proposed PLB be a daily service, 17 trips of service would be required during peak hour, and the headway would presumably be 3 mins, which is feasible for GMB operation. As there is a GMB 36 operating in the vicinity to/ from Yuen Long, a supplementary service route of GMB 36 could be considered to serve the development.
- 5.6.9. For Sheung Shui, it is recommended that the proposed bus be a daily service, 3 trips of service would be required during peak hour, and the headway would be presumably 20 mins. An amendment to the mode of operation of existing bus route 76K could be considered to provide special trips during peak hours.
- 5.6.10. Given that the proposed all-day GMB service to Yuen Long could let passengers transit to the Tuen Ma MTR line and the proposed all-day bus service to Sheung Shui could let passengers transit to the East Rail MTR line, to further enhance the convenience of public transport during peak hour, it is recommended that the proposed bus be a peak hour service, 5 trips of service would be required during peak hour, and the headway would be presumably 12 mins. The bus could stopover at Tai Lam Tunnel Bus Interchange, and the final destination could be an urban area (e.g. Tsuen Wan), which is similar to the mode of operation of existing bus route 268M.

5.7. Public Transport and Internal Transport Provision

- 5.7.1. Two public transportation terminals, one on the northern site and one on the southern site, are proposed to meet the proposed development's transportation needs.

- 5.7.2. The Northern public transport terminus has a 18m long general lay-by, 1 green mini-buses (GMB) bay with length of 24m accommodating 3 nos. of GMBs, and 1 bus bay with length of 52m accommodating 2 nos. of buses.
- 5.7.3. The Southern public transport terminus has a 18m long general lay-by, 1 green mini-buses (GMB) bay with length of 24m accommodating 3 nos. of GMBs, and 1 bus bay with length of 52m accommodating 2 nos. of buses.
- 5.7.4. It is anticipated that the demand for private car parking spaces for the proposed development for low-income families is negligible. Therefore, no parking provision is proposed at the Site. However, a few general lay-bys for taxis and private cars and LGV would still be provided adjacent to the building blocks.

Passenger Queuing Area

- 5.7.5. The Level-of-Service (LOS) for passenger queuing area at both public transport terminus during peak hour has been assessed and summarised in **Table 5.10**.

Table 5.10 LOS for Passenger Queuing Areas at Public Transport Terminus during Peak Hour

Public Transport Type	Estimated Passenger Demand (person)	Passenger during Peak Service (person/service)	Waiting Area (m ²)	Waiting Space (m ² /person)	LOS (1)
Bus (Northern PTD)	$682 \times 55\% = 375$	$400 / 4 = 94$	>63	>0.67	C
Bus (Southern PTD)	$682 \times 45\% = 307$	$328 / 4 = 77$	>43	>0.56	C
PLB (Northern PTD)	$310 \times 55\% = 171$	$145 / 9 = 19$	>48	>2.53	A
PLB (Southern PTD)	$310 \times 45\% = 140$	$119 / 8 = 18$	>48	>2.67	A

Remark: (1) Level-of-Service (LOS) criteria for pedestrian queuing areas from Highway Capacity Manual 2000 is adopted.

- 5.7.6. As shown in **Table 5.10**, all assessed passenger queuing area would operate with acceptable Level-of-Service (LOS "C") or above.

5.8. Proposed Mitigation Measures at Kam Pok Road

- 5.8.1. In view of the observed parking condition at Kam Pok Road, it is found that Kam Pok Road is often occupied by goods vehicle. There are many goods vehicles parking taking place at Kam Pok Road, which causes only single lane being available most of the time.
- 5.8.2. To allow accessibility for long vehicles (e.g., franchised buses, refuse collection vehicles) to both site portions via Kam Pok Road, it is recommended to take mitigation measures for ensure Kam Pok Road would be operating with its full capacity.
- 5.8.3. It is proposed that regulatory markings, i.e., RM 1040 should be placed at Kam Pok Road (Between Castle Peak Road – Tam Mi and Bridge located Outside Southern Site). Stopping would be prohibited for 24 hours a day on all days. It is also advisable to provide signs at the start (T.S. 2137) and finish (T.S. 2139) of the restriction as a

reminder to drivers of the restriction in force. The proposed mitigation measures at Kam Pok Road are shown in **Figures 5.5**.

for the population and traffic generation from the development in long term, Junction J2, J3 along Yau Pok Road and J4, J5 along Kam Pok Road are proposed to be reconfigured as a signalised junction.

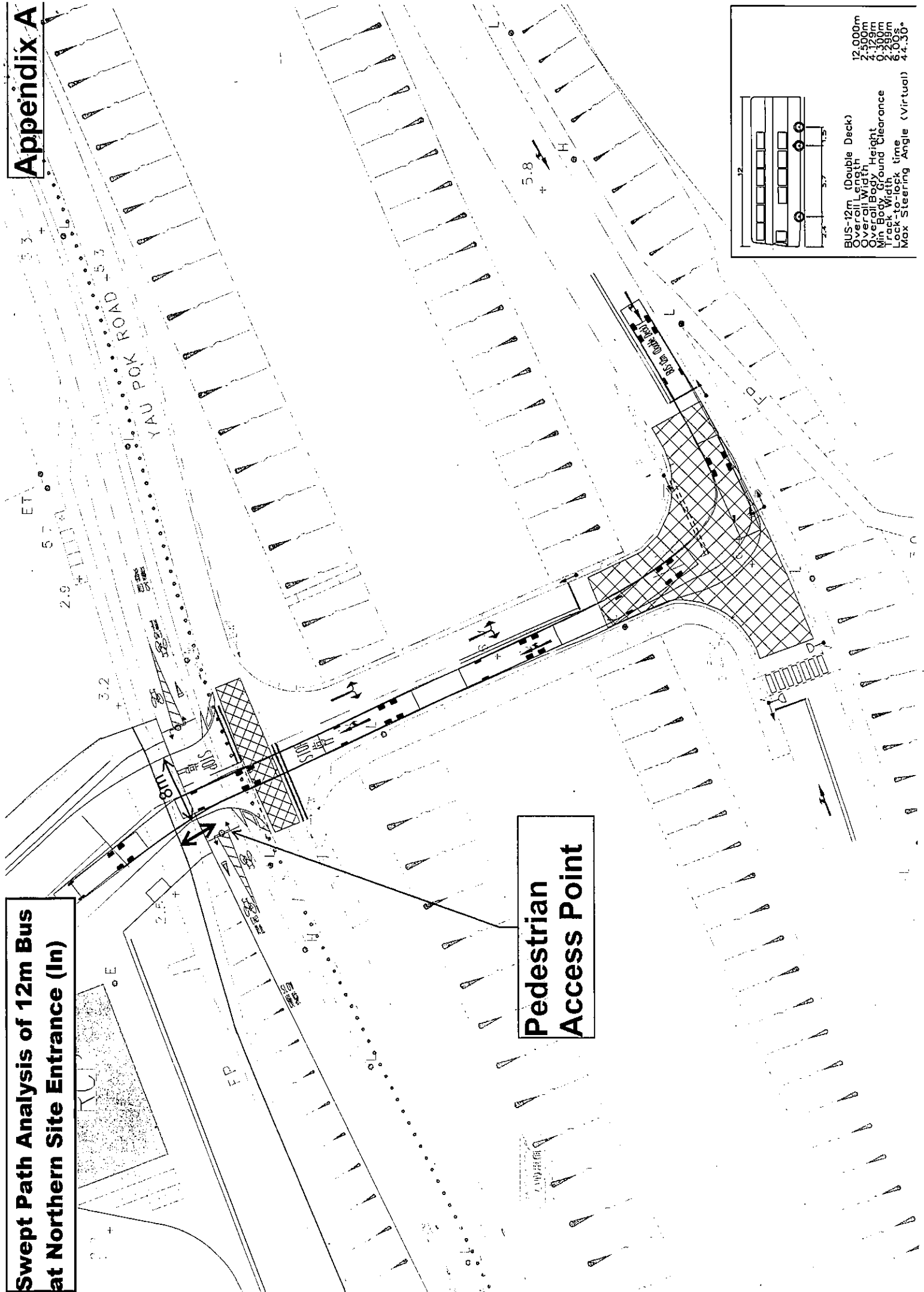
- 7.1.11. With the proposed junction improvement, junction J2, J3, J4, and J5 would all perform well above capacity with DFC of ≤ 0.85 or RC of $>100\%$, while no junction improvement schemes would be proposed for the remaining assessed junctions.
- 7.1.12. Road link assessment were also undertaken for some key road links with respect to the traffic generation of the Development, including Castle Peak Road – Tami Mi, San Tin Highway, and Fairview Park Boulevard. It is founded that all accessed road links would operate with acceptable operation performance with V/C ratio less than 1.0 under all assessment scenarios.
- 7.1.13. Public transport assessment was also undertaken to estimate the public transport demand of the proposed development. It is anticipated that about 992 pax/hr of passengers would be generated during the AM peak hour, which 4 trips of Bus service and 8 - 9 trips of Public Light Bus (PLB) would be proposed for each site portion.
- 7.1.14. To facilitate the additional public transport demand generated from the proposed development, three new public transport service routes are proposed and will be served as a major mode of transport for the residents.
- 7.1.15. The Level-of-Service (LOS) for passenger queuing area at both public transport terminus during peak hour were assessed. It is anticipated that all assessed passenger queuing area would operate with acceptable Level-of-Service (LOS "C") or above.
- 7.1.16. This proposed development involves the construction of a 3-story relocatable temporary residential development (transitional housing) by means of the MIC. The proposed MIC trailer trucks would transport from the Lok Ma Chau control point and standby at the parking location on Kam Pok Road. With estimation of construction traffic impact, it is anticipated that the trip generation of construction vehicle will be manageable comparing to the operation scenario. Delivery of MIC during nonpeak hours in daytime is allowed via this route with minimal disruption to the locals.
- 7.1.17. According to the site observation, there are only nominal pedestrian flows (e.g. less than 20 ppl per hour) observed using the footpath adjacent to the site (e.g. Yau Pok Road, Kam Pok Road). Also, majority of pedestrian generation will be absorbed by the provision of Northern and Southern site public transport terminus. Therefore, it is anticipated that all footpaths adjacent to the site would still operate with a desirable Level-Of-Service (LOS "A") even with the proposed development.

7.2. Conclusion

- 7.2.1. Based on the above discussion, it is concluded that the Development would not induce adverse traffic impact on the surrounding road network upon commissioning at years 2025 and 2030. Therefore, the Development is considered acceptable from traffic point of view.

Swept Path Analysis of 12m Bus at Northern Site Entrance (In)

Appendix A

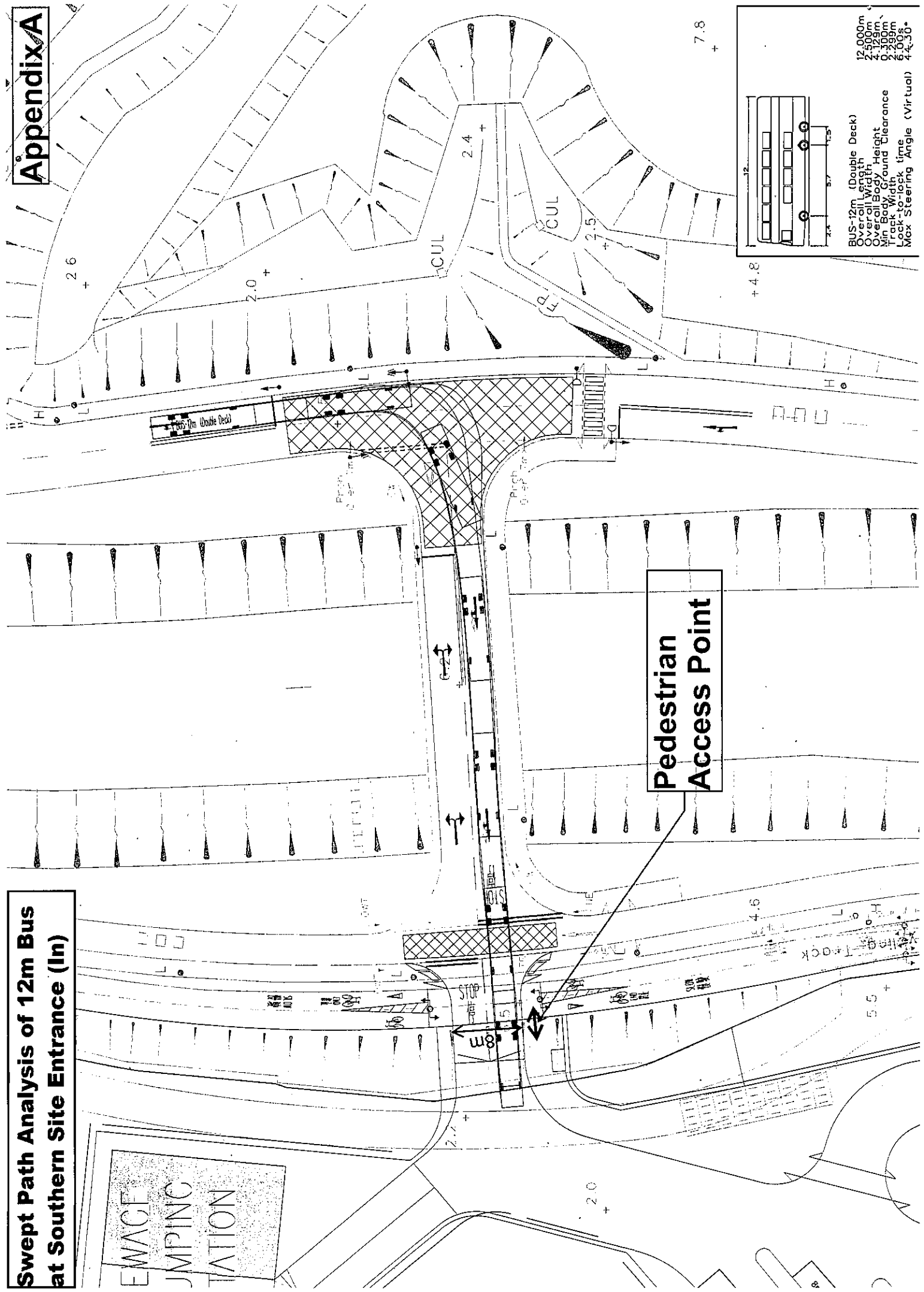


Pedestrian
Access Point

BUS-12m (Double Deck)	12,000mm
Overall Length	2,500mm
Overall Width	4,100mm
Overall Body Height	4,100mm
Wheelbase	2,280mm
Track Width	2,280mm
Lock-to-lock time	6.00s
Max Steering Angle (Virtual)	44.30°

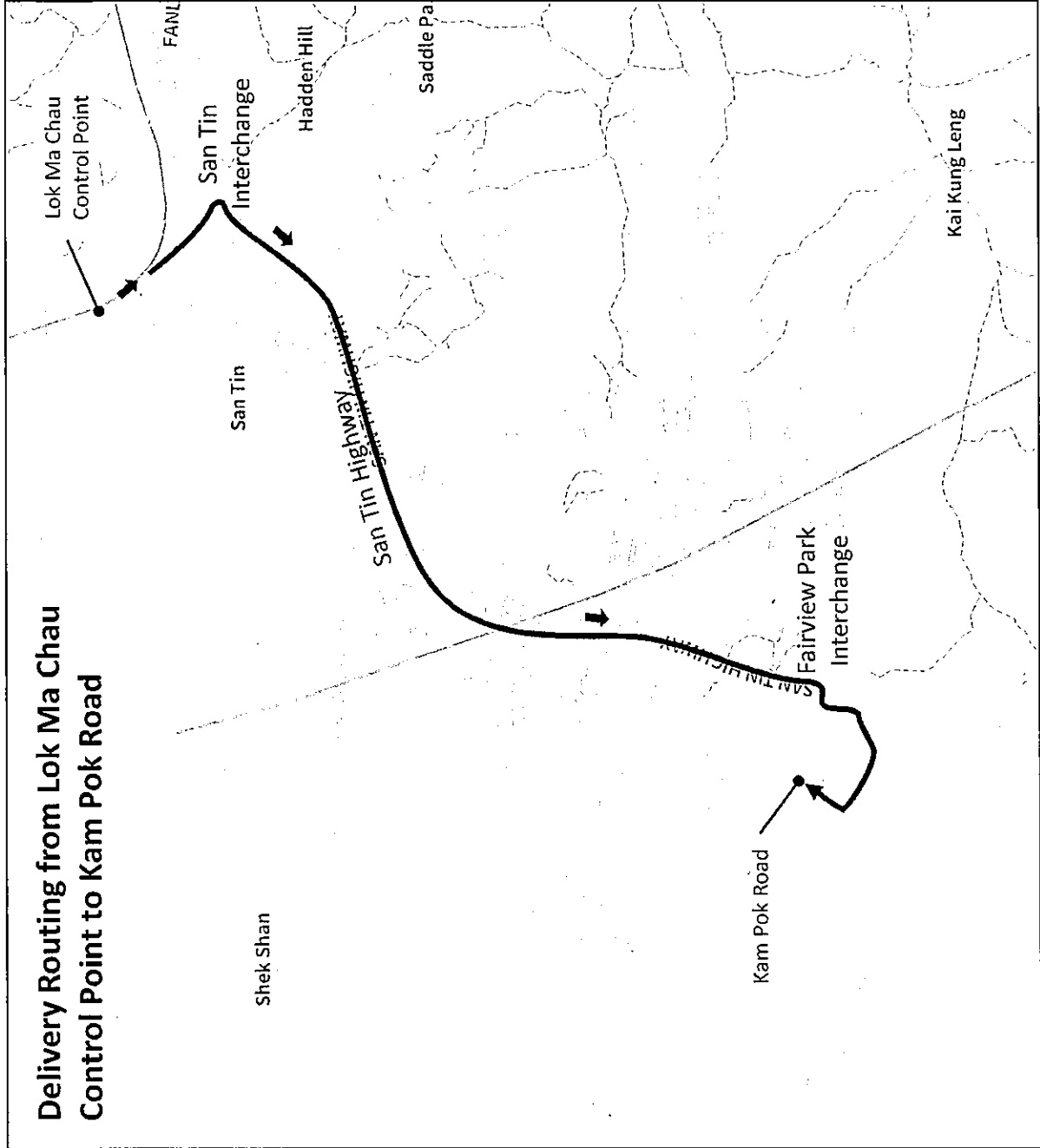
Appendix A

Swept Path Analysis of 12m Bus at Southern Site Entrance (In)



Pedestrian Access Point

EWAGE
JUMPING
TATION





TOWNLAND CONSULTANTS LTD.

URBAN AND REGIONAL PLANNING, DEVELOPMENT CONSULTANCY, MASTER PLANNING, URBAN DESIGN, ARCHITECTURE,
LANDSCAPE ARCHITECTURE, PROJECT MANAGEMENT AND SOCIAL DEVELOPMENT

Our Ref ASD/FPYL/ERIC/05
Date 2 June 2023

By FAX and EMAIL

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

Dear Sirs

**SECTION 16 PLANNING APPLICATION
THE TOWN PLANNING ORDINANCE (CHAPTER 131)**

**PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3
YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND
"RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING
GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: A/YL-MP/341)**

Reference is made to the Captioned Planning Application submitted on 17 April 2023.

Further to comments received from District Planning Office ("DPO") of Planning Department ("PlanD") and Drainage Services Department ("DSD"), please find our responses provided in the enclosed Responses to Comments ("R-to-C") table (Attachment 1 refers).

Please note that all responses are clarifications only and there are no changes to the Proposed Development or the findings of the Technical Assessments which conclude no adverse impacts to the surrounding environment.

Should there be any queries, please do not hesitate to contact the undersigned or Mr. Eric Chan.

Yours faithfully
FOR AND ON BEHALF OF
TOWNLAND CONSULTANTS LIMITED

Vincent Lau
Associate Director

VINERIC

Enc Attachment 1 - R-to-C Table
Attachment 2 - Replacement Pages of Sewerage Impact Assessment

cc Client / Team

城
市
規
劃
處
工
務
局

MAIN HONG KONG OFFICE

CHINA OFFICE

INDIA OFFICE

INDONESIA OFFICE

ASSOCIATED COMPANIES

TOWNLAND CONSULTANTS (INTERNATIONAL) LIMITED (International)

TOWNLAND CONSULTANTS (SHENZHEN) LIMITED (China)

TOWNLAND CONSULTANTS PVT. LIMITED (India)

PT TOWNLAND INTERNATIONAL (Indonesia)

HOWARD & SEDDON PARTNERSHIP (United Kingdom)



ISO 9001:2015
Certificate No.: CC844

Attachment 1

	R-TO-C TABLE
--	--------------

ATTACHMENT 1

PROPOSED TEMPORARY LIGHT PUBLIC HOUSING DEVELOPMENT FOR A PERIOD OF 3 YEARS AND ASSOCIATED FILLING AND EXCAVATION OF LAND IN "RECREATION" AND "RESIDENTIAL (GROUP C)" ZONES, VARIOUS LOTS IN D.D. 104 AND ADJOINING GOVERNMENT LAND, YAU POK ROAD, MAI PO, YUEN LONG (TPB REF: A/YL-MP/341)

Comments/ Suggestions		Applicant's Responses
A. <u>Comments received from the Drainage Services Department on 25.5.2023 (Contact Person: Mr. TANG Kin Ming; Tel.: 2300 1257):</u>		
1.	<u>Sewerage Impact Assessment</u> Please find the attached markup comment for reference.	Noted and Para. 5.1.1 has been revised accordingly (Attachment 2 refers).
2.	Para. 5.1.1: For the highlighted first 4 sentences, please verify with ArchSD whether this statement is correct. To our understanding, there will not be screening facilities in ArchSD's pumping facilities.	Please be confirmed that there will be screening facilities in the proposed pumping facilities.
3.	Para. 5.1.1: The content of the revised para. is unclear. Please review and revise.	Noted and Para. 5.1.1 has been revised (Attachment 2 refers).
B. <u>Comments received from the Fanling, Sheung Shui & Yuen Long East District Planning Office of Planning Department on 30.5.2023 (Contact Person: Mr LAM Long Yin, Davy; Tel.: 3168 4045):</u>		
(a)	Please further clarify the arrangement of off-site tree compensation	As mentioned under para.6.2 of Appendix 3 of the submission, due to the temporary nature of the Proposed LPH Development, off-site trees compensation to permanent government-managed locations will be arranged. Possible compensation locations being considered include government lands in the vicinity of the proposed development or sites of new government projects such as district open spaces under implementation and construction.

Date: 2 June 2023
File Ref: ASD/FPYL

Attachment 2

REPLACEMENT PAGES OF SEWERAGE
IMPACT ASSESSMENT

- 3.1.4. The construction works will tentatively commence in late 2023 and the Proposed Development is anticipated to begin operation in Year 2025. The LPH is planned to operate for five years.

4. Relevant Government Standards

- 4.1.1. Water quality in Hong Kong is legislated by the provisions of the *Water Pollution Control Ordinance (Cap 358), 1980 (WPCO)*. Territorial Water has been subdivided into ten Water Control Zones (WCZ) and four supplementary water control zones. A Technical Memorandum on Standards for Effluents discharged into Drainage and Sewerage Systems, Inland and Coastal Water (TMES) has been issued, which requires licensing of all discharges into all public sewers and drains. The water quality standards will have to be met during the operation stage.
- 4.1.2. With reference to ProPECC PN 5/93 Drainage Plans Subject to Comment by the Environmental Protection Department ("EPD"), foul water should be discharged to a foul sewer under the Building ("Standards of Sanitary Fitments, Plumbing, Drainage Works and Latrines) Regulations 40(1) and 41(1).

5. Assessment Methodology

- 5.1.1. The sewage generated associated with the Proposed Development will be collected by the holding tanks via underground drainage system by gravity. The sewage will be discharged to the holding tanks with screening which will be constructed in dry-pit arrangement. The sewage will then be discharged from the holding tank by dry-pit pump to the proposed SPS to be constructed by Drainage Services Department ("DSD") as shown in **Figure 3-1**. The total maximum flow rate from north and south side to the proposed SPS shall not exceed 37 L/s. Subsequently, the proposed SPS will pump the sewage through the proposed twin rising mains to be constructed by DSD to Nam Sang Wai Sewage Pumping Station ("NSWSPS"). The sewage discharged from the Proposed Development is conveyed to Yuen Long Sewage Treatment Works ("YLSTW") for further treatment and ultimate disposal. **Figure 3-1** illustrates the sewage impact assessment study area.

**Relevant Extracts of Town Planning Board Guidelines for
Application for Developments within Deep Bay Area
under Section 16 of the Town Planning Ordinance (TPB PG-No. 12C)**

According to TPB PG-No. 12C, the Site partly falls within the Wetland Buffer Area (WBA). Extracts of land use concept and development guidelines are summarised as follows:

- (a) the intention of the WBA is to protect the ecological integrity of the fish ponds and wetland within the Wetland Conservation Area (WCA) and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds; and
- (b) within the WBA, for development or redevelopment which requires planning permission, an ecological impact assessment (EcoIA) would need to be submitted. Some local and minor uses (including temporary uses) are however exempted from the requirement of EcoIA.

Previous s.16 Applications covering the Application Site

Approved Application

No.	Application No.	Proposed Use(s)/Development(s)	Date of Consideration (RNTPC/TPB)
1.	A/YL-MP/57	Golf Driving Range with Ancillary Facilities and Parking Area for a Period of 3 Years	10.9.1999 (<i>RNTPC</i>)

Rejected Application

No.	Application No.	Proposed Use(s)/Development(s)	Date of Consideration (RNTPC/TPB)	Rejection Reason(s)
1.	A/YL-MP/74	Golf Driving Range with Ancillary Office, Changing Room and Parking Area	1.6.2001 (<i>RNTPC</i>)	(1)
2.	A/YL-MP/107	Proposed Fishing Pond cum Field Study Centre and Residential Development	23.8.2002 (<i>RNTPC</i>)	(2), (3), (4) & (5)

Rejection Reason(s):

- (1) There was insufficient information in the submission to demonstrate that the development would not pose danger to the safety of the public in the surrounding areas, particularly the school located immediately to the north of the application site.
- (2) The proposed residential development is not in line with the planning intention of the "REC" zone in that the residential development is not ancillary to the recreational use.
- (3) Insufficient information has been provided to demonstrate that the proposed development would not cause negative environmental impact to Deep Bay.
- (4) Insufficient information has been provided to demonstrate that the proposed development would not lead to traffic and environmental nuisances to the local residents.
- (5) Approval of the application would set an undesirable precedent for similar applications leading to large-scale residential developments in the areas zoned "REC", the cumulative effects of which would lead to a loss of recreational space in this area.

Recommended Advisory Clauses

- (a) To note the comments of the District Lands Officer/Yuen Long, Lands Department (DLO/YL, LandsD) that
- the application site (the Site) comprises various private lots in D.D. 104, which are all old schedule agricultural lots, and adjoining Government Land (GL). As quoted by the applicant, the Site has an area of about 89,774m² (including about 8,029m² of GL), which should be subject to further verification and survey;
 - part of the Site encroaches onto Simplified Temporary Land Allocation No. GLA-TYL 2653 allocated to CEDD for construction of cycle track. The site boundary is subject to further liaison between Government departments upon the land application stage; and
 - should planning approval be given to the subject planning application, the applicant has to submit formal land application to implement the planning scheme. However, there is no guarantee at this stage that the land application would be approved. Such application, if submitted will be dealt with by the LandsD acting in the capacity of the landlord at its discretion and if it is approved, the approval would be subject to such terms and conditions as may be imposed by LandsD;
- (b) to note the comments of the Director of Environmental Protection (DEP) that
- the applicant should note that the design of the sewage tank shall follow the guidelines in Section 4 of the Sewage Manual Part 2 and subject to the agreement of the Drainage Services Department (DSD); and
 - the proposed residential development is a designated project (DP) under Item P.1, Schedule 2 of the EIAO (i.e. a residential development or recreational development, other than New Territories exempted houses within Deep Bay Buffer Zone 1 or 2) and an environmental permit under the EIAO is required before the construction and operation of the proposed residential development. Environmental Protection Department (EPD) received an application for permission to apply directly for environmental permit (DIR application) under 5(1)(b) (pursuant to Section 5(9)) of the EIA Ordinance for the LPH development from ArchSD on 28 April 2023. On 2.6.2023, DEP permitted the applicant to apply directly for environmental permit subject to conditions which will be included as enforceable conditions in the future environmental permit;
- (c) to note the comments of the Chief Engineer/Mainland North, Drainage Services Department (CE/MN, DSD) that
- the applicant should implement the drainage and sewerage provisions on site in accordance with the agreed Drainage Impact Assessment (DIA) and Sewerage Impact Assessment (SIA);
 - should there be any changes of design parameters in the course of the development which would materially affect the validity of the DIA or SIA report, the applicant should review/revise the DIA or SIA report and submit the revised DIA report to DSD and the revised SIA report to DSD and DEP for comment;

- the applicant is required to rectify the sewerage system if they are found to be inadequate or ineffective during operation. The applicant shall also be liable for and shall indemnify claims and demands arising out of damage or nuisance caused by a failure of the sewerage system;
 - the proposed development should neither obstruct overland flow nor adversely affected any existing natural streams, village drains, ditches and the adjacent areas; and
 - the applicant should consult DLO/YL and seek consent from relevant lot owners for any works to be carried out outside his lot boundary before commencement of the sewerage works;
- (d) to note the comments of the Chief Highway Engineer/New Territories West, Highways Department (CHE/NTW, HyD) that
- the access arrangement should be agreed by Transport Department (TD);
 - adequate drainage measures should be provided to prevent surface water flowing from the Site to nearby public roads and drains; and
 - the applicant should seek advice from TD on the junction layout and arrangement and the Traffic Impact Assessment report;
- (e) to note the comments of the Director of Fire Services (D of FS) that
- the applicant shall observe the requirements of emergency vehicular access (EVA) as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011, which is administered by Buildings Department (BD). Suitable parameters should be used for the swept path analysis of emergency vehicles;
 - the applicant is reminded that adequate protection and mitigation measures should be carried out before any structural works being done at the vicinity of the petrol filling station (PFS). Minimum separation distance between a PFS to its nearby development as stipulated in "Design, Construction, Modification, Maintenance and Decommissioning of Filling Station (4th edition)" published by APEA and Energy Institute should be observed. Shall the proposed work affect any licensed premises, such as petrol filling station, the applicant should make separate enquiry to this department; and
 - the applicant shall observe the Fire Services Department (FSD) Circular Letter No. 3/2019 on "Guidance Notes on Submission, Approval and Acceptance Inspection of FSI in Modular Integrated Construction Building Projects";
- (f) to note the comments of Chief Engineer/Construction, Water Supplies Department (CE/C, WSD) that
- for provision of water supply to the proposed development, the applicant may need to extend his/her inside services to the nearest suitable government water mains for connection. The applicant shall resolve any land matter (such as private lots) associated with the provision of water supply and shall be responsible for the

construction, operation and maintenance of the inside services within the private lots to WSD's standards; and

- (g) to note the comments of the Director of Food and Environmental Hygiene (DFEH) that
- no facilities of the Food and Environmental Hygiene Department (FEHD) should be affected. If any FEHD facility is affected by the proposed development, FEHD's prior consent must be obtained. Reprovisioning of the affected facilities by the project proponent up to the satisfaction of FEHD may be required. Besides, the project proponent may be required to provide sufficient amount of additional recurrent cost for management and maintenance of the reprovisioned facilities to FEHD;
 - proper licence/permit issued by FEHD is required if there is any food business/ catering service/activities regulated by the DFEH under the Public Health and Municipal Services Ordinance (Cap. 132) and other relevant legislation for the public;
 - under the Food Business Regulation (FBR), Cap. 132X, a food business licence is required for the operation of the relevant type of food business listed in the Regulation. For any premises intended to be used for food business (e.g. a restaurant, a food factory, a fresh provision shop), a food business licence from the FEHD in accordance with the Public Health and Municipal Services Ordinance (Cap. 132) shall be obtained. The application for licence, if acceptable by the FEHD, will be referred to relevant government departments such as BD, FSD and Planning Department for comment. If there is no objection from the departments concerned, a letter of requirements will be issued to the applicant for compliance and the licence will be issued upon compliance of all the requirements;
 - depending on the mode of operation, generally there are several types of food business licence/permits that the operator of a convenience store may apply for under FBR:
 - if food is sold to customers for consumption on the premises, a restaurant licence should be obtained;
 - if food is only prepared for sale for consumption off the premises, a food factory licence should be obtained;
 - if fresh, chilled or frozen beef, mutton, pork, reptiles (including live snake), fish (including live fish) and poultry is sold, a fresh provision shop licence should be obtained; and
 - if milk, frozen confections, non-bottled drinks, cut fruit etc. are to be sold, relevant restricted food permits should be obtained;
 - the operation of the eating place must not cause any environmental nuisance to the surrounding. The refuse generated by the proposed eating place are regarded as trade refuse. The management or owner of the Ste is responsible for its removal and disposal at their expenses. The operation

of any business should not cause any obstruction or environmental nuisance in the vicinity;

- proper licence issued by FEHD is required if related place of entertainment is involved. Any person who desires to keep or use any place of public entertainment for example a theatre and cinema or a place, building, erection or structure, whether temporary or permanent, on one occasion or more, capable of accommodating the public presenting or carrying on public entertainment within Places of Public entertainment (PPE) Ordinance (Cap. 172) and its subsidiary legislation, such as a concert, opera, ballet, stage performance or other musical, dramatic or theatrical entertainment, cinematograph or laser projection display or an amusement ride and mechanical device which is designed for amusement, a Place of Public Entertainment Licence (or Temporary Place of Public Entertainment Licence) should be obtained from FEHD whatever the general public is admitted with or without payment;
- there should be no encroachment on the public place and no environmental nuisance should be generated to the surroundings. Its state should not be a nuisance or injurious or dangerous to health and surrounding environment. Also, for any waste generated from such activities/ operation, the applicant should arrange disposal properly at their own expenses;
- if provision of cleansing service for new roads, streets, cycle tracks, footpaths, paved areas etc., is required, FEHD should be separately consulted. Prior consent from FEHD must be obtained and sufficient amount of recurrent cost may have to be provided to FEHD; and
- if domestic waste collection service of FEHD is required in future, prior comments from FEHD on the waste collection plan, including the accessibility and maneuverability of RCV to RCP, should be sought.

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

230512-174458-63721

提交限期

Deadline for submission:

19/05/2023

提交日期及時間

Date and time of submission:

12/05/2023 17:44:58

有關的規劃申請編號

The application no. to which the comment relates:

A/YL-MP/341

「提意見人」姓名/名稱

Name of person making this comment:

錦綉花園管理諮詢委員會(第十一屆)

意見詳情

Details of the Comment :

強烈關注在元朗攸壆路興建簡約公屋建議

致

環境保護署<ciaocomment@epd.gov.hk>

城規會<tpbpd@pland.gov.hk>

敬啟者

•我們理解這個「簡約公屋」項目只是五年的一个臨時發展項目。希望政府明確承諾，到2028年這個項目將會完成歷史任務，被移除及還原原有狀況。

•我們留意到項目沒有提供泊車位。明白可能簡約公屋居民並不多會擁有車輛，但希望政府（運輸署及警方）留意項目會否帶來附近違例泊車情況，因可能個別居民會是職業司機。亦應留意會否造成道路擠塞情況。

•項目有兩個「公共運輸總站」（相信是小巴士站）。南面的「公共運輸總站」需要取消或移位。因太接近學校及民居，會製造在營運期不可接受的噪音及空氣污染。

•文章4.2.29至4.2.34段有部份段落，我們不太同意。

特別是4.2.30「500米研究範圍內記錄的鳥類群落相對更加多樣化。然而，大多數品種是常見和廣泛分佈的，保育價值較低。」。我們住在這裏幾十年的居民，經常看見很多候鳥在附近飛過及在水道覓食，包括不少白鷺及黑臉琵鷺。4.2.31段的「沒有發現通過項目場地核心區域的鳥類飛行路線」更是不可接受。

•報告指出項目土地生態價值低。查實主要原因是業主長期刻意疏忽打理，任由其生態價值下降。這正正是一般業主囤積土地後刻意將高生態價值的土地放任荒廢，使其生態價值日漸下降。若政府是支持「可持續發展、高生態價值的藍綠城市發展」，必須立法規管這些行為。

•我們絕不接受「因附近已城市化」（4.2.21段 - 研究範圍的城市化生態環境面積較大），作為可作高密度（特別是高層）發展的理由。

•我們認同4.2.34點「在500米研究範圍內，鑒於越冬鳥類對牛潭尾排水道和攸美新村項目的臨時池塘的使用率相對較高，因此該兩處被認為具有中等的生態價值。」。但不同意結論說這裏「500米研究範圍內的其他生態環境被評估為生態價值低或非常低」。必需留意，規劃大綱圖這裏的原本規劃是「康樂用途」。希望政府早日落實這個發展項目。

•報告好像只是在2022年12月做過基綫調查，並無包括經常候鳥飛過的月份。似乎對雀鳥的評估會有缺陷。

•我們不同意5.4.8段「AEIAR-182/2014對鳥類飛行路線和鳥撞的影響的觀察……對鳥類飛行路線沒有重大影響。」。我們日常的觀察是這裏附近正正是雀鳥的主要飛行路徑，因此任何高層建築物（一般高過9、10米）便會對雀鳥飛行構成影響。

•在水質方面，我們奇怪報告說錦綉明渠水質有改善。我們發現明渠上游經常仍然有污染源。政府絕對有責任堵截該等污染源。

•報告絕不可引用規劃申請編號Y/YL - MP 6、7、8項目的評估報告（特別是生態及景觀）

。因該等評估有嚴重不足，刻意扭曲事實以支持其建議16至23層的高密度發展，不能作為參考。

敬祝

身體健康！工作順利！

第十一屆錦綉花園管理諮詢委員會

主席 黃楚銘 謹啟

[REDACTED]

2023年05月12日

副本抄送 (13副本)

何永賢房屋局局長<shoffice@hb.gov.hk>

規劃署<enquire@pland.gov.hk>

運輸署<tdenq@td.gov.hk>

民政總署<hadgen@had.gov.hk>

元朗民政事務處<doyl@had.gov.hk>

漁農自然護理署<mailbox@afcd.gov.hk>

環境保護署<enquiry@epd.gov.hk>

長春社<cahk@cahk.org.hk>

世界自然保護基金會<publicvisit@wwf.org.hk>

WWF文賢繼博士<xjwen@wwf.org.hk>

當區立法會議員

劉國勳議員 [REDACTED]

張欣宇議員

元朗區議會主席

沈豪傑區議會主席 [REDACTED]

☐ Urgent ☐ Return Receipt Requested ☐ Sign ☐ Encrypt ☐ Mark Subject Restricted ☐ Expand personal&publi



強烈關注在元朗攸壆路興建簡約公屋建議 20230512

12/05/2023 17:05

From:

To:

Cc:

環境保護署 <eiaocomment@epd.gov.hk>, 城規會 <tpbpd@pland.gov.hk>

何永賢房屋局局長 <shoffice@hb.gov.hk>, 規劃署 <enquire@pland.gov.hk>, 運輸署

<tdenq@td.gov.hk>, 民政總署 <hadgen@had.gov.hk>, 元朗民政事務處

<doyle@had.gov.hk>, 漁農自然護理署 <mailbox@afcd.gov.hk>, 環境保護署

File Ref:

1 attachment



20230512-致城規,環保署.pdf

敬啟者:

強烈關注在元朗攸壆路興建簡約公屋建議 20230512

請看附件

謝謝!

第十一屆錦綉花園管理諮詢委員會

主席 黃楚銘 謹啟

2023年05月12日

Fairview Park Management Advisory Committee

錦 綉 花 園 管 理 諮 詢 委 員 會

電話 Tel.

真 Fax: 2471 021

強烈關注在元朗攸壆路興建簡約公屋建議

致

環境保護署<eiaocomment@epd.gov.hk>

城規會<tpbpd@pland.gov.hk>

敬啟者

• 我們理解這個「簡約公屋」項目只是五年的一個臨時發展項目。希望政府明確承諾，到2028年這個項目將會完成歷史任務，被移除及還原原有狀況。

• 我們留意到項目沒有提供泊車位。明白可能簡約公屋居民並不多會擁有車輛但希望政府（運輸署及警方）留意項目會否帶來附近違例泊車情況，因可能個別居民會是職業司機。亦應留意會否造成道路擠塞情況。

• 項目有兩個「公共運輸總站」（相信是小巴站）。南面的「公共運輸總站」需要取消或移位。因太接近學校及民居，會製造在營運期不可接受的噪音及空氣污染。

• 文章4.2.29至4.2.34段有部份段落，我們不太同意。特別是4.2.30「500米研究範圍內記錄的鳥類群落相對更加多樣化。然而，大多數品種是常見和廣泛分佈的，保育價值較低。」。我們住在這裏幾十年的居民，經常看見很多候鳥在附近飛過及在水道覓食，包括不少白鷺及黑臉琵鷺。4.2.31段的「沒有發現通過項目場地核心區域的鳥類飛行路線」更是不可接受。

• 報告指出項目土地生態價值低。查實主要原因是業主長期刻意疏忽打理，任由其生態價值下降。這正正是一般業主囤積土地後刻意將高生態價值的土地放任荒廢，使其生態價值日漸下降。若政府是支持「可持續發展、高生態價值的藍綠城市發展」，必須立法規管這些行為。

• 我們絕不接受「因附近已城市化」（4.2.21段 - 研究範圍的城市化生態環境面積較大），作為可作高密度（特別是高層）發展的理由。

• 我們認同4.2.34點「在500米研究範圍內，鑒於越冬鳥類對牛潭尾排水道和攸美新村項目的臨時池塘的使用率相對較高，因此該兩處被認為具有中等的生態價值。」。但不同意結論說這裏「500米研究範圍內的其他生態環境被評估為生態價值低或非常低」。必需留意，規劃大綱圖這裏的原本規劃是「康樂用途」。希望政府早日落實這個發展項目。

• 報告好像只是在2022年12月做過基綫調查，並無包括經常候鳥飛過的月份。似乎對雀鳥的評估會有缺陷。

• 我們不同意5.4.8段「AEIAR-182/2014對鳥類飛行路線和鳥撞的影響的觀察……對鳥類飛行路線沒有重大影響。」。我們日常的觀察是這裏附近正正是雀

Fairview Park Management Advisory Committee 錦 綉 花 園 管 理 諮 詢 委 員 會

電話

鳥的主要飛行路徑，因此任何高層建築物（一般高過9、10米）便會對雀鳥飛行構成影響。

• 在水質方面，我們奇怪報告說錦綉明渠水質有改善。我們發現明渠上游經常仍然有污染源。政府絕對有責任堵截該等污染源。

• 報告絕不可引用規劃申請編號 Y/YL - MP 6、7、8 項目的評估報告（特別是生態及景觀）。因該等評估有嚴重不足，刻意扭曲事實以支持其建議16至23層的高密度發展，不能作為參考。

敬祝

身體健康！工作順利！



第十一屆錦綉花園管理諮詢委員會
主席 黃楚銘 謹啓

印: [Redacted]

2023年05月12日

副本抄送 (13 副本)

何永賢房屋局局長<shoffice@hb.gov.hk>

規劃署<enquire@pland.gov.hk>

運輸署<tdenq@td.gov.hk>

民政總署<hadgen@had.gov.hk>

元朗民政事務處<doyl@had.gov.hk>

漁農自然護理署<mailbox@afcd.gov.hk>

環境保護署<enquiry@epd.gov.hk>

長春社<cahk@cahk.org.hk>

世界自然保護基金會<publicvisit@wwf.org.hk>

WWF 文賢繼博士<xjwen@wwf.org.hk>

當區立法會議員

劉國勳議員 [Redacted]

張欣宇議員

元朗區議會主席

沈豪傑區議會主席 [Redacted]

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

230430-212017-62945

提交限期**Deadline for submission:**

19/05/2023

提交日期及時間**Date and time of submission:**

30/04/2023 21:20:17

有關的規劃申請編號**The application no. to which the comment relates:**

A/YL-MP/341

「提意見人」姓名/名稱**Name of person making this comment:**

先生 Mr. 黃

意見詳情**Details of the Comment :****強烈反對在錦綉花園旁邊興建簡約公屋，該處交通並不完善，請勿再增加居住人口**

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

230501-021616-88913

提交限期**Deadline for submission:**

19/05/2023

提交日期及時間**Date and time of submission:**

01/05/2023 02:16:16

有關的規劃申請編號**The application no. to which the comment relates:**

A/YL-MP/341

「提意見人」姓名/名稱**Name of person making this comment:**

先生 Mr. CHAN CALVIN

意見詳情**Details of the Comment :**

為興建三年毫無幸福感貨櫃屋
犧牲瀕危雀鳥出現地段 完全不值
除非政府欺騙市民 永續簡陋公屋

倒不如正正當當多起傳統公屋
或私人樓市再加辣 收租徵重稅 壓低樓市 令大量抄樓收租人士 見無利可圖 將大量非首置
單位重新流入市場

重申香港唔係唔夠樓 只你炒風令大部分市民不能承擔

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

230512-213809-64209

提交限期

Deadline for submission:

19/05/2023

提交日期及時間

Date and time of submission:

12/05/2023 21:38:09

有關的規劃申請編號

The application no. to which the comment relates:

A/YL-MP/341

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Thomas

意見詳情

Details of the Comment :

该位置交通不便，没有太多公共设施，远离市区，附近屋苑非封闭社区，没有承接能力。
。非常不适合作为简约公屋选址。

政府应当将已经作为隔离地带的位置开发为简易公屋

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 230513-135719-60697

提交限期
Deadline for submission: 19/05/2023

提交日期及時間
Date and time of submission: 13/05/2023 13:57:19

有關的規劃申請編號
The application no. to which the comment relates: A/YL-MP/341

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. 嚴志源

意見詳情
Details of the Comment :

該地段位置偏僻，公共交通配套嚴重不足，根本不適合發展住宅。如建成簡約公屋，勢必影響附近已經緊張交通狀況，佔用錦繡花園的巴士服務。該地鄰近濕地保護區，位置遠離市區和公共交通設施，根本吸引不到公屋住戶搬入，環境保育的社會價值遠大於發展簡約公屋的價值。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

230514-221047-49362

提交限期

Deadline for submission:

19/05/2023

提交日期及時間

Date and time of submission:

14/05/2023 22:10:47

有關的規劃申請編號

The application no. to which the comment relates:

A/YL-MP/341

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Wong Ngar Man

意見詳情

Details of the Comment :

本人反對上址興建房屋

該地段位置偏僻，公共交通配套嚴重不足，根本不適合發展住宅。如建成簡約公屋，勢必影響附近已經緊張交通狀況，佔用錦繡花園的巴士服務。

另外，該地鄰近濕地保護區，位置遠離市區和公共交通設施，根本吸引不到公屋住戶搬入，環境保育的社會價值遠大於發展簡約公屋的價值。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

230514-222122-37129

提交限期

Deadline for submission:

19/05/2023

提交日期及時間

Date and time of submission:

14/05/2023 22:21:22

有關的規劃申請編號

The application no. to which the comment relates:

A/YL-MP/341

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. 劉志輝

意見詳情

Details of the Comment :

不贊成改變上址用途。

該地段位置偏僻，生活及公共交通配套嚴重不足，根本不適合發展住宅。如建成簡約公屋，生活配套不足以應付計劃的兩千伙居民的生活所需，而交通配套不足也勢必令附近已經緊張交通狀況更多惡化，或者會佔用錦繡花園的巴士服務。

該地鄰近濕地保護區，每年有成千上萬的候鳥來此處過冬，另外位置遠離市區和公共交通設施，根本吸引不到公屋住戶搬入，環境保育的社會價值遠大於發展簡約公屋的價值。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

230515-093921-34631

提交限期

Deadline for submission:

19/05/2023

提交日期及時間

Date and time of submission:

15/05/2023 09:39:21

有關的規劃申請編號

The application no. to which the comment relates: A/YL-MP/341

「提意見人」姓名/名稱

Name of person making this comment:

先生 Mr. Terrie HOHO

意見詳情

Details of the Comment :

本人反對規劃申請. 本人反對規劃申請. 本人反對規劃申請.

現時錦繡花園迴旋處已經常塞車, 該路段能否支持簡約公屋發展所引起的交通需求?

現時當地的社區配套原全不能配合, 簡約公屋的發展.

超過2千1百個單位意味著有數千人會住入泥.

而道路, 泊車, 公共交通, 民生所需均明顯不足,

幾千人要的衣、食、行要如何解決? 出返元朗市? 出出入入又加重交通負擔.

本身元朗市已經塞到不得了, 再多幾千人會點?

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號
Reference Number: 230515-145410-15053

提交限期
Deadline for submission: 19/05/2023

提交日期及時間
Date and time of submission: 15/05/2023 14:54:10

有關的規劃申請編號
The application no. to which the comment relates: A/YL-MP/341

「提意見人」姓名/名稱
Name of person making this comment: 先生 Mr. 駱

意見詳情
Details of the Comment :

Planning statement 的摘要理據如下:

擬議簡約公屋完全符合政府當前的政策，在短期內提供簡約公屋可以紓緩居住環境惡劣和

長時間輪候公屋家庭的壓力；

- 擬議簡約公屋不會對現有社區設施增加壓力，相反能為當地改善社區支援網絡和服務；
- 擬議簡約公屋將採用「組裝合成」建築法，以提高建築效率和安全性、建築質量和可持續性；

- 擬議簡約公屋將會是以臨時形式提供，並不會對長遠規劃意向帶來影響或減少任何社區已

規劃的公共服務；

- 採用「組裝合成」建築法不單能迅速地提供住宅單位，更能容許將來在臨時性用途許可過

期後輕易地拆除和重置住宅單位，以減低對申請地點的影響；

- 已進行了不同的技術評估以證明擬議簡約公屋不會對視覺、景觀、交通、環境、生態或基

礎建設造成不良影響；和

- 由於擬議簡約公屋將於短期內增加臨時房屋供應及有助改善房屋短缺的迫切性問題，把申

請地點用作短暫性房屋發展將樹立適當和可取的先例。

以上沒有任何一點是提及考慮過錦綉花園，加州花園，圍村及鄰近居民對此發展的感受。為了解決及紓緩社會不同階層的居住環境而去破壞現有居民用金錢換來所享用的環境，不但增加社會階層的文化差異及排斥，亦會令當地居民生活造成不便，所以請問如何"能為當地改善社區支援網絡和服務"? 文化問題雖難以測量及評核，但絕對不能忽視!

再者，當地的供水設施老化經常出現問題，有關發展恐怕只會增加當地負擔!

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review

參考編號

Reference Number:

230515-201228-48913

提交限期

Deadline for submission:

19/05/2023

提交日期及時間

Date and time of submission:

15/05/2023 20:12:28

有關的規劃申請編號

The application no. to which the comment relates:

A/YL-MP/341

「提意見人」姓名/名稱

Name of person making this comment:

女士 Ms. Suen Ming Mi

意見詳情

Details of the Comment :

反對在攸壘路建簡約公屋，因為這裡的道路設施不能負荷，這裡是單車徑，候鳥地方，在這裡興建會影響環境！
單車徑是遊樂地方！太多人住在單車徑附近會引致意外。

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

230517-083223-19125

提交限期**Deadline for submission:**

19/05/2023

提交日期及時間**Date and time of submission:**

17/05/2023 08:32:23

有關的規劃申請編號**The application no. to which the comment relates:**

A/YL-MP/341

「提意見人」姓名/名稱**Name of person making this comment:**先生 Mr. CHU SHEK LU
N**意見詳情****Details of the Comment :**

I really do believe that it is quite impossible for low income person to live at the proposed temporary light public housing at Mai Po/Fairview Park.

I have been living (as a renter) in Fairview Park since 2012. As a Fairview resident, we have the luxury of having Fairview's coach service to Yuen Long. Because of the sheer size of Fairview Park, the frequency of bus service is acceptable. Waiting time of 5-10 minutes is quite common. If we look at the coach service for Palm Spring estate, their coach service is usually at a frequency of like 15-30 mins. Most people would find that to be quite a long wait. And most owners of Fairview and Palm Spring has their own vehicle, so not everyone uses the coach service all the time. The capacity has not maxed out yet. With the proposed housing, would there be adequate low cost transportation for its residents?

Cost of transportation would be another great concern. If the new resident does not have a job in the Yuen Long area, cost of daily transportation would easily amount to over HK\$1000. For myself, even with the government transport subsidy, I am paying way over \$1000 a month.

If the proposed housing would have a population similar to Palm Spring estate (~4000), I believe most of the resident will find transportation to be a major hurdle on cost and time.

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轉寄：元朗攸壘路簡約公屋工程項目提交「准許直接申請環境許可證 A/YL-MP/341」

14/05/2023 09:37

From: [REDACTED]
To: "tpbpd@pland.gov.hk" <tpbpd@pland.gov.hk>
File Ref:

Please respond to [REDACTED]

傳送自 Android 上的 Yahoo Mail

----- 轉寄的郵件 -----

寄件人：[REDACTED]

收件人：[REDACTED]

副本：

寄件備份：2023 年 5 月 月 14 日 週日，時間：9:24

主旨：元朗攸壘路簡約公屋工程項目提交「准許直接申請環境許可證 A/YL-MP/341」

致「城規會」領導

本人乃錦繡花園住戶，得悉(城規會)考慮批准元朗錦繡花園旁一幅土地申請興建簡約公屋工程項目，「准許直接申請環境許可證」城規會申請編號：

A/YL-MP/341. 本人非常反對，原因如下：

(1) 影響周邊濕地環境問題：錦繡花園周邊方原幾公里附近內都有濕地給予一些野生鳥類和野生小動物及昆蟲棲息及覓食之用，如果在附近興建簡約公屋會影響附近濕地生態環境，因為附近有很多濕地叢林，也有很多受保護的雀鳥在這裡棲息覓食，如果要興建簡約公屋，首先必須平整土地斬伐樹木，又要鑽探土地，打地樁，做地基開渠道等這些污染及嘈吵高分貝聲響，一定會嚇怕嚇走所有野生雀鳥和野生小動物及昆蟲等，牠們就沒有棲息的地方；也不會逗留此處，就會造成破壞生態平衡。

(2) 交通問題：錦繡花園迴旋交汇處一直以來都有著嚴重交通擠塞問題；特別在每天上班和下班的繁忙時間車輛流量非常多非常擠塞，流量非常巨大，每每塞車嚴重從錦繡花園開口埃索油站塞往交汇處，從元朗往返錦繡花園塞車至潭美路隔離中心門口甚至塞至park yohoo附近足足有2.5公里車龍。

如果日後真的決定在這地方增加多一個大型簡約公屋屋苑；但道路又沒有增加去改善交通擠塞的話，本人就不敢想像日後塞車會嚴重到什麼情況？？？

(3) 生活污水衛生問題：現在的排水河道修建後雖然比以前寬敞，但是淤泥從沒清理河藏已堆積很多淤泥垃圾；當每日水位漲退潮後都嗅氣徹天，淤泥厚厚積聚，如日後再增加興建大型簡約公屋屋苑；人口多了勢必加大污水及廢物排入河道，這樣就不堪切想了...

在此，

本人懇請下「城規會」多加考慮附近地理環境，自然生態保育，交通問題，污水處理等等情況下，是否適合在此地增建簡約公屋呢？

特此來函

錦繡花園住戶何世文

謝謝！

傳送自 Android 上的 Yahoo Mail

顯示較少

傳送自 Android 上的 Yahoo Mail

A/YL-MP/341

013



Friday, 12 May 2023

Tel Mobile

E-mail

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

Dear Members of the Town Planning Board,

Proposed Public Light Housing, Yau Pok Road, Yuen Long

One file jacket contains the correspondence which has been written under two dates, and the second contains relevant drawings and photographs.

Yours sincerely,

A handwritten signature in cursive script that reads "David Weaver".

David Weaver CPM

Copy to:-

Environmental Protection Department,
Your ref:- Dir-296/2023
Environmental Protection Department,
EIAO Register Office,
27/F, Southorn Centre,
130, Hennessy Road,
Wan Chai,
Hong Kong.

Madam Jenna YUEN,
LO(R6)1/YLDO,
Home Affairs Department,
Yuen Long District Office Building,
269, Castle Peak Road,
Yuen Long,
New Territories.

Monday, February 20, 2023

Various Government Departments.
Addressee list at the end.

Dear Sir or Madam,

Construction of "Light Public Housing" Adjacent to the Fairview Park Estate.

On the 10th January 2023 the Manager of the Fairview Park Estate sent out a circular to residents concerning the title above. A copy of this circular (Estate Management Notice No 1 (AD/2023) is attached for easy reference.

In particular the following paragraph caught the letter writer's attention:-

"We also took this opportunity to reiterate that though the Fairview Park Boulevard is a private road, it has actually been serving as a public road. Therefore, we once again requested the relevant authorities to take over the Fairview Park Boulevard and to build a public sewage well outside Fairview Park, to enable us to connect the sewage channel of out Estate to the public sewage well, so that the use of the sewage treatment plant in the estate is no longer necessary and such operating cost can be reduced".

Connecting the Fairview Park Estate sewage treatment plant to the on-line public sewage pipeline infrastructure not too far from the estate is likely to be a civil engineering matter which is not the subject of this letter.

Background.

The author of this letter and his family have lived [REDACTED] since mid-1997. As time has progressed the author has walked over every single road inside this estate, and he has also explored by bicycle rides all the public roads and tracks in the immediate vicinity of the estate.

The Fairview Park Estate is surrounded by a security perimeter fence line which consists of low height mounded earth embankments topped with fortress like chain link fencing and razor wire. In various parts of this perimeter fence there are pedestrian gates to allow maintenance of the fence alignment.

The point of this letter.

If the author's description in the preceding paragraph is correct – that there is no "emergency" vehicle and pedestrian ingress egress gateway with public road quality surfaces at any point in the security fence line, then the only way into, and out of, the Fairview Park Estate is via the main security entrance leading to the Fairview Park Boulevard and the public road system. Photograph and drawing attached.

In other words, the residents and daytime operations of the shopping centre are effectively trapped inside the Estate. There are 5,024 residential homes in the Estate so allowing for a population of 3 persons per residential home the mathematics provides $5,024 \times 3 = 15,072$, plus a ball park of 100 staff in the shopping centre and Management staff of 60,

makes $15,072 + 100 + 60 = 15,232$. Allowing for children and domestic helpers the real working total of people of all ages in the estate at any moment in time must be in the region of 20,000 or more.

The Fairview Park Estate is also surrounded by what can be described as a moat, or water filled ditch, which forms an integral part of the area natural drainage system leading the tidal Kam Tin River. The Fairview Park Estate and hinterland land is only a metre or two above principal datum.

In the course of everyday life this low level land mass could be considered to be a flooding risk, but after twenty five years of living in the Estate and experiencing all variations of inclement weather no hint of flooding risk has ever been observed.

However, there is one risk which is ever present and cannot be predicted in advance by modern technology and that is a tsunami. The Hong Kong Observatory has contingency warnings for the Hong Kong population about this event.

Having regard to the foregoing, readers can begin to see that the present day entrance – called the security entrance – is vital to escape from the Fairview Park Estate if a tsunami warning is ever given. No doubt there would be panic and the prospect of a traffic accident and/or jam up at the security entrance/exit would be a nightmare.

There could be other ways to completely stop ingress and egress at the security entrance in the form of:-

- a) The ESSO petrol/diesel station exploding in a giant fireball.
- b) A petrol tanker entering the estate to refuel the ESSO station collides with one of the concrete columns supporting the large weather cover at the security entrance causing it to collapse and then explode into a fireball incinerating anyone unlucky enough to be in the vicinity.
- c) A bottled gas cylinder vehicle delivering a large quantity of full cylinders to the bulk storage depot inside the estate replicating the event mentioned in (b) above.
- d) Prevention of vehicle entry and exit to/from the estate took place in 2007 when residents and outside villagers organized a sit-in and walk around protest with placards following the death of a young boy on a bicycle. He was run over by a goods vehicle whilst cycling along the Fairview Park Boulevard. This story can be found on the Internet.

Readers will of course think that the foregoing catastrophic examples will never happen and we all hope that such events will not interrupt our daily lives.

Comparison Residential Estates.

The nearby **Royal Palms Estate** also known as **Palm Springs** does have a well-made and maintained emergency ingress/egress road leading to the Castle Peak Road.

See below:- The emergency ingress egress gateway for vehicles and pedestrians.



The Hong Lok Yuen Estate.

It is more than twenty years since the author of this letter visited the Hong Lok Yuen Estate, but a rusty memory does have recall that there is an emergency ingress egress gateway leading to the public road system.

The Marina Cove Estate.

Whether or not an emergency road ingress or egress arrangement is provided to this estate is beyond the memory of the author.

Construction of "Light Public Housing" Adjacent to the Fairview Park Estate.

The author of this letter has **no objection** to the above project and over the past twenty and more years he has always thought that the proposed land development for the above project could provide the solution to multiple emergency ingress egress road connections to the Fairview Park Estate and the public road/highway system beyond – namely the Castle Peak Road and the San Tin Highway.

BUT, has the Government simply compounded an existing problem that may, or may not, exist for many other residential estates in Hong Kong?

Readers may now refer to the attached Architectural Services Department (ASD) land plan and it shows two road access points for the above project leading to and from Kam Pok Road. In other words, it's the same entrance **IN**, and the same Entrance **OUT** for each major part of the proposed project land mass. An exact replica of the way it is for the Fairview Park Estate.

Supposing these access ingress egress gateways were impassable for some reason – how would the residents of these two conjoined land portions escape in an emergency?

A solution.

Time is of the essence and it is probably not too late to solve the provision of multiple emergency ingress egress road links leading from the Fairview Park Estate and into the land now being allocated for Construction of "Light Public Housing" and thence the public road system. Architects, land surveyors, and others could easily plan such an arrangement.

BUT, supposing the situation was slightly different, and in reverse. If the residents of the "Light Public Housing" estate could not escape in the usual way (as shown by the solitary entrance for ingress and egress on the Architectural Services drawings) then they could escape **INTO** the Fairview Park Estate and thence the public road system if such 'emergency' road connections were in existence.

If there were locked security gates each party could hold keys for unlocking the gates.

This author of this letter is an 'owner' of a home in the Fairview Park Estate and therefore has a vested interest in this subject. However, it is not his job to solve a problem which more properly lies with a combination of Government Departments and the Management Company of the Fairview Park Estate.

Coordination and replies to this letter.

The original Management letter on this subject mentions a meeting between the Fairview Park Estate Manager and the Yuen Long Home Affairs Department in early December 2022.

It therefore seems to be a sensible and logical move to send all replies to the Officer in Charge of the Yuen Long Home Affairs Department. If this is not satisfactory addressees can rearrange a subject "leader" accordingly.

Any Department that wishes to send the letter writer a reply may do so if desired, but this is not obligatory.

Mai Po Fire Station and the Director of Fire Services.

This important public service facility is physically located within the Fairview Park Estate and consists of one High-Platform Fire Appliance^{**} and two Ambulances. (^{**} Reported to have a maximum safe reach height of 17 metres. Its capability for the proposed Light Public Housing (LPH) units is something for the Director of Fire Services to assess).

Essential public services like this always require a mention.

Security aspects.

The provision of multiple emergency ingress egress gateways for the Fairview Park Estate is unlikely to become a security problem. The development of CCTV technology and heat alarm sensors is so good these days that the vast majority of residents have already installed their own CCTV systems to protect their homes.

The author of this letter is a retired Hong Kong police officer and has spent many years studying and documenting the security of the Estate. Any person wishing to disagree with the author about estate security is welcome to attend a one-on-one confidential briefing if they have a contrary view point.

The Long Term.

We are told by the Government that this type of accommodation is:-

Light Public Housing (LPH) units will mainly cater to housing applicants who have been on the waiting list for traditional public rental housing for three years or more, with priority given to family applicants. It is estimated that the first batch of around 2,100 units can be completed in 2024-25 earliest.

The Fairview Park Estate Management circular included with this letter also mentions:-

"5. Construction-wise, assembly and synthesis will be used to avoid noise and dust nuisance caused by piling. At the same time, the location of the unit building will be situated as far away from the border of Fairview Park as possible, and housing estate fences will be set up to reinforce the security control".

Paragraph 6 mentions a sewage treatment plant, and

Paragraph 7 states that the service life of the entire "Light Public Housing" is about 5 years.

It therefore follows that the "Light Public Housing" to be built outside the Fairview Park Estate includes structures built on piles means that it will be with the community for much longer than the mentioned 5 years.

The mere mention of piling for building structures and the provision of a sewage treatment plant suggests an increase in cost and a life expectancy in excess of five years.

(This is not five years from the date of construction work, but five years from the date of first occupation. Allowing two years for construction and five years until Government can provide proper purpose built housing, then it means that this facility will be outside the Fairview Park Estate in the year 2030 and very likely much longer).

It seems rather odd that the houses in the Fairview Park Estate are built using the floating slab technique, whereas the note arising from the briefing by the staff of the Yuen Long Home Affairs Department states that the proposed accommodation will accommodate roughly 2,000 people and the floor height may not exceed 3 floors. This structural description is vague and does it mean:-

Ground floor.
First floor.
Second floor.
Third floor, and then the
Rooftop?

The sub-surface geology (estuarine mud) of the Yuen Long Plain is well known – especially to the Civil Engineering Department (CEDD) – so it is not surprising that piling will be needed to support these proposed structures.

Is the project at this particular land location viable?

Firstly let's look at the population.

The briefing note mentions 2,000 people. But what does this mean?

If it means 2,000 residents then it becomes possible to add on additional numbers follows:-

- | | | |
|----|---|-----------|
| a) | <u>Management.</u>
Administration.
Maintenance.
Security. | Say, 100. |
| b) | <u>Shopping centre.</u>
Sales staff.
Cleaners. | Say, 100. |
| c) | <u>Transient services.</u>
Post Office mail delivery.
Daily rubbish collection.
Other services. | Say, 50 |
| d) | <u>Visitors to residents and/or the shopping centre.</u> | Say, 200. |

The daily figure of persons residing in or having some connection with this estate may be in the region of $2,000 + 100 + 100 + 50 + 200 = 2,500$. For simplicity and argument purposes work on a high side figure say 3,000.

The need for a sewage treatment plant.

This is essential because the Director of Water Supplies cannot supply salt water for toilet flushing purposes. And neither can he supply salt water for the very same purpose to the Fairview Park Estate and probably all the estates in the area and villages around because there is no salt water supply infrastructure northwards from the Kam Tin River.

Nor is there any sign of such a supply being made in the near future. The Water Supplies Department has been supplying fresh water for toilet flushing purposes to the Fairview Park Estate since its inception circa 1975.

From time to time members of the Legislative Council tackle the Director of Water Supplies and enquire what is being done to conserve fresh potable water (drinking water).

And the same goes for the sewage disposal arrangements. There is recently built public sewage on-line infrastructure very close to the Fairview Park Estate, but the Palm Springs Estate, many other estates nearby, and thousands of village houses that do not have a share in a communal on-line sewage disposal system. Drawing attached. Hence the continuing use of fresh water for toilet flushing, septic tanks, and small scale sewage treatment plants.

In the attached Architectural Services Department drawing it shows two parcels of land with a narrow umbilical land link – the Light Public Housing project.

The estimated area values are 8.9 and 8.9 hectares totaling 17.8 hectares. What percentage will be eaten up to create a sewage treatment plant to serve between 2,000 and 3,000 people is unknown. As mentioned previously, potable water will be used for drinking and toilet flushing purposes so does this fly in the face of sensible questions raised by Legislative Councilors?

Is a project that is designed for useful life of five years with the above mentioned constraints really viable at this location that lacks essential infrastructure? The question is now academic because at the date of posting this letter there is site investigation taking place so the project will almost certainly go ahead as planned.

To Conclude.

What is the Government policy regarding the provision of a combined **pedestrian and vehicle ingress egress emergency gateway(s)** for self-contained residential estates in the whole of Hong Kong?

The Fairview Park Estate is so large that it deserves several vehicle and pedestrian emergency ingress egress locations. How can this be achieved?

For the avoidance of any doubt and absolute clarity, this series of notes are **not** intended to stand in the way of Government direction.

Thank you and good luck.

Yours sincerely,

David G. Weaver. CPM

Hinterland – meaning - the remote areas of a country away from the coast or the banks of major rivers.

tributary region, either rural or urban or both, that is closely linked economically with a nearby town or city.

Another name:- The 'sticks'.

Distribution.

Mr. TSE Cheong Wo, Edward, JP
Director of Architectural Services
36/F, High Block,
Queensway Government Offices,
66, Queensway,
Hong Kong.

Mrs. CHEUNG CHIU Hoi Yue, Alice, JP
Director of Home Affairs,
30th floor,
Southorn Centre,
130, Hennessy Road,
Wan Chai,
Hong Kong.

The Officer in Charge,
Home Affairs Department,
Yuen Long District Office Building,
269, Castle Peak Road,
Yuen Long,
New Territories.

Ms. CHIANG Chui Wan, Sophia
Acting Director of Lands Department,
20th floor,
North Point Government Offices,
333, Java Road,
North Point,
Hong Kong.

Miss WONG Tin Yu, Agnes, JP
Director of Housing,
Housing Authority Headquarters,
33, Fat Kwong Street,
Ho Man Tin,
Kowloon.

Mr. Tai Sheung Shing, Victor, JP.
Under Secretary for Housing,
19/F, West Wing,
Central Government Offices,
2, Tim Mei Avenue,
Tamar,
Hong Kong.

Mr. CHUNG Man Kit, Ivan, JP
Director of Planning,
Planning Department,
17/F, North Point Government Offices,
333, Java Road,
Hong Kong.

Mr. NG Wai Keung, JP.
Acting Director of Highways,
5th Floor,
Ho Man Tin Government Offices,
88 Chung Hau Street,
Ho Man Tin,
Kowloon.

Mr. Vincent Lin,
Manager,
Fairview Park Property Management Ltd,

2 copies

**Please continue reading on the
next page**

This following text was written on the 12th May 2023

Proposed Temporary Light Public Housing Development
Planning Application No: A/YL-MP.341

Scenario Number One

An Airbus 380 fully loaded with fuel and 525 passengers plus aircrew takes off from Check Lap Kok airport.

Minutes later, after developing technical failures, the aircraft crashes on the entrance/exit gateways at the Fairview Park Estate.

There is a catastrophic loss of life everywhere. All the crew and passengers are killed, and many people in Fairview Park Estate homes, surrounding village houses, restaurants, vehicles in the vicinity, are burnt to death by fuel from the aircraft.

The main potable and flushing water supplies into the Fairview Park Estate are lost because they lie under the road at the point of impact by the aircraft.

Residents inside the estate cannot leave because there is **no emergency vehicle and pedestrian means of ingress or egress anywhere in the fence surrounding the estate**. Residents outside the estate at the time of the crash cannot enter because the perimeter fence is so formidable and there is no means of alternative ingress or egress.

The crash site becomes a **Civil Aviation air crash investigation site and is fenced off by police and fire services personnel**.

- a) Residents in the Fairview Park Estate buy out all the food in the shopping centre;
- b) There is no immediate water supply;
- c) The Director of Fire Services cannot deploy his single fire appliance from the Mai Po Fire Station and two ambulances because they cannot exit the estate to meet an area service.

And so it does not take much to illustrate to readers of this document that the above sentences highlight a significant problem of biblical proportions.

Scenario Number Two.

An earthquake takes place in the South China Sea at 2 o' clock in the morning – 2 am.

The Hong Kong Observatory issues a tsunami warning that a 6 metre high wave will hit all of the low lying areas of Hong Kong in two hours time – circa 4 am.

The warning is given on the radio, television, Internet and also by the Hong Kong Government activating the emergency smart phone alarm system. This was tested once during the COVID era;-

"The Government today (26th November 2020) launched the emergency alert system (EAS). Government Departments may disseminate important real-time messages to mobile phone users through the EAS during emergency situations that may extensively endanger lives and properties.

In the Fairview Park Estate residents pile into the family car and try to exit through the one and only means escape which is the present day ingress/egress system. Panic traffic accidents occur in the estate, fighting takes place, and traffic is dead locked.

The same happens outside the estate with the San Tam Road, Castle Peak Road Tam Mei Section, and the San Tin Highway with traffic dead locked and completely jammed up.

People abandon their cars and walk and run speedily to reach hills in the surrounding area.

Some of the smart people in the estate grabbed bags, emptied all the food out of the refrigerator and from shelves, and made their way out of the estate on foot which was faster than those trying to escape in motor vehicles to somewhere and nowhere!

This scenario is actually far worse than scenario one.

The point being made, yet again, is that the Fairview Park Estate has never had provision made in the land grant for one or more roads to facilitate ingress and egress by vehicles and pedestrians as a means of escape in a dire emergency.

Why not?

Laws of Hong Kong.

The Building Ordinance CAP 123 has been perused and there is plenty of detail to allow the Director of Fire Services to enforce provisions that have been enacted from the result of fires that have occurred over many years.

The Buildings Ordinance changes from time to time, but it did once contain this very important provision:-

Cap. 123F Building (Planning) Regulations — Regulation 41 Means of escape.

Means of escape

(1)

Every building shall be provided with such means of escape in case of emergency as may be required by the intended use of the building.

(2)

Without prejudice to paragraph (1), every building which exceeds 6 storeys in height or in which the level of the floor of the uppermost storey is more than 17 m above the level of the ground at the point of discharge of the main staircase shall, in addition to the main staircase, be provided with a second staircase as means of escape in case of emergency.

(L.N. 294 of 1976)

(L.N. 33 of 1966)

Code of Practice for Means of access for Firefighting and Rescue

41D. Emergency vehicular access

- (1) Every building shall be provided with an emergency vehicular access which is so designed and constructed as—
 - (a) to allow safe and unobstructed access of a vehicle of the Fire Services Department to the building; and
 - (b) to provide for the safe operation of such a vehicle, in the event of a fire or other emergency.
- (2) The design and construction of an emergency vehicular access shall be in accordance with such requirements as may be specified by the Building Authority from time to time having regard to the intended use of the building.

In the above text nothing is mentioned about egress be it for vehicles or pedestrians.

- (3) The Building Authority may exempt a building from any or all of such requirements on design and construction if the Building Authority is satisfied that compliance with the requirement or requirements is—
 - (a) impracticable having regard to the topographical features of the area on which the building is situated; or
 - (b) unwarranted on the ground that the purpose for which the building is to be used constitutes a low fire risk.
- (4) A building in respect of which an exemption under paragraph (3) is in force shall comply with such other fire safety measures as may be specified by the Building Authority for the purpose of ensuring that the safety of the building would not be prejudiced by the exemption.

RESCUE is not the exclusive preserve of the Fire Services Department.

There is the common law presumption that every man, woman and child, should equally do what they can to save their own lives and that of others if the circumstances mean that conventional means such as fire appliances, ambulances, helicopters and so on are simply not accessible nor available.

Fairview Park Estate today – a concentration camp?

As it stands today the Fairview Park estate is nothing more than a concentration camp reminiscent of the wartime concentration camps. Just one gateway structure for ingress and egress.

Exactly the same applies to the proposed **Public Light Housing** proposed for construction just outside the estate.

Fairview Park Estate Perimeter Fence.

This is a seriously menacing obstacle. It has two uses:-

- a) The keep burglars, thieves, murderers, rapists, arsonists, scoundrels, and perverts, out of the estate, and
- b) To prevent law abiding residents, and others who have business to be in the estate, from escaping speedily from the estate in a dire emergency.

The photograph below shows the only gateway in the perimeter fence of the estate. It is mostly for maintenance work such as:-

- a) CCTV maintenance,
- b) Grass cutting.
- c) Fence maintenance.
- d) Tree, bushes and shrubs cutting.



The maintenance gateway is shown above.

Why has this situation been allowed to develop over the years?

What has the Town Planning Board done about it?

What action has been taken has been taken to hold the Director of Lands publicly accountable for this situation?

Proposed Public Light Housing Project

This voluminous text with drawings has **NOT been written as an objection** to the building of Public Light Housing outside the Fairview Park Estate nor anywhere else.

The author of this letter is quite happy to follow what the Government perceives to be an essential need in the short term.

The Town Planning Board needs to review this situation and provide a remedy for all existing estates and, of course, ask why the proposed Public Light Housing project outside the Fairview Park Estate has no provision for alternative emergency ingress/egress facilities for vehicles and persons on foot.

Since 1969 the only Police stations in the Yuen Long area are:-

- a) Yuen Long,
- b) Pat Heung,
- c) Lau Fau Shan, and
- d) Tsim Bei Tsui (Marine police).

Since 1969 the only Fire stations in the area are:-

- a) Yuen Long,
- b) Mai Po (Fairview Park Estate)
- c) Pat Heung Fire Station.

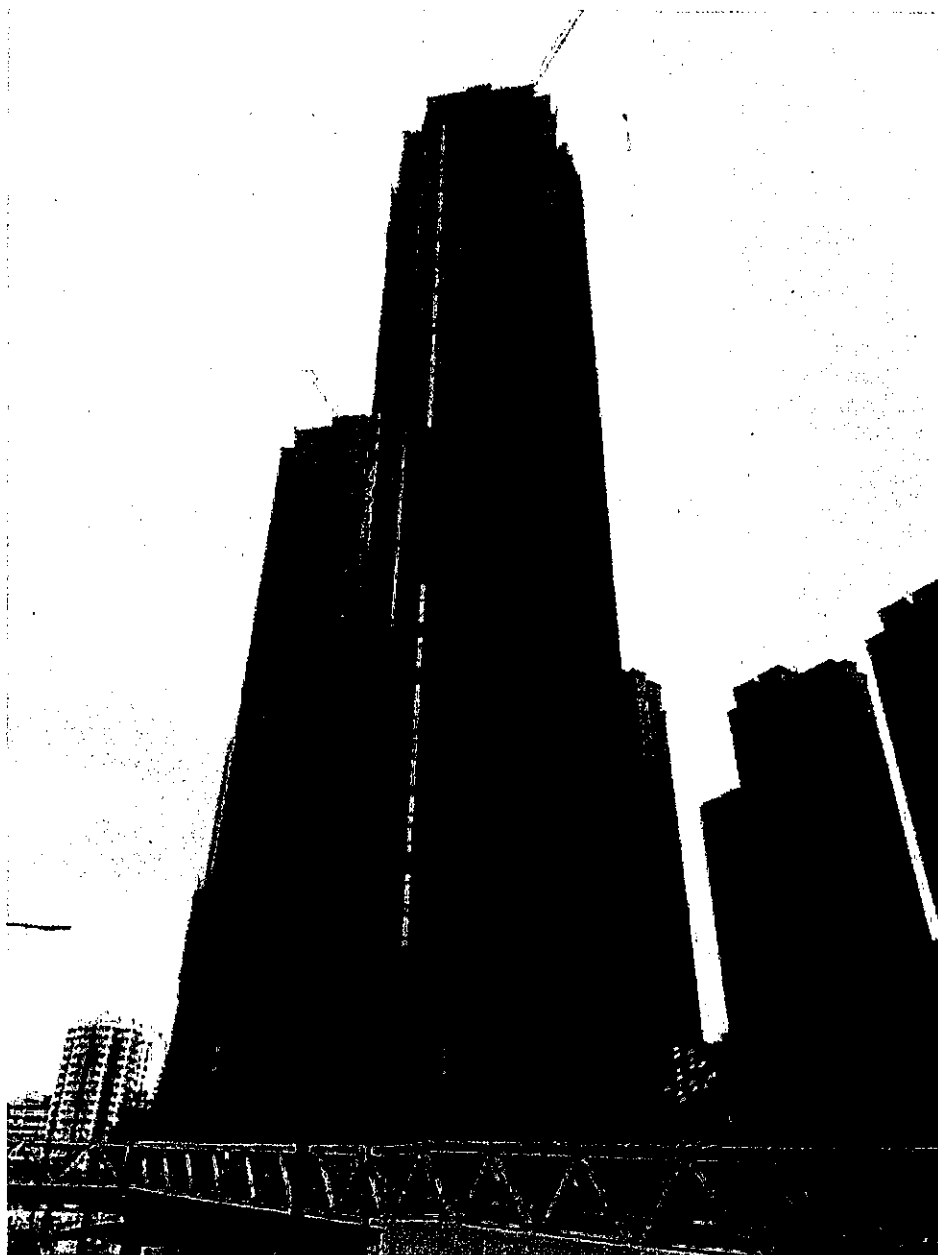
Since 1969 the only Post Offices in the area are:-

- a) Yuen Long,
- b) Fairview Park Estate shopping centre.
- c) Kam Tin.
- d) San Tin,
- e) Tin Yiu,
- f) Tin Yuet.

The point of the foregoing is that since 1969 scores of small to medium size estates have been created in the Yuen Long area. The Village House policy also comes into the equation.

Park YoHo has been built – this is a large very modern estate alongside the Kam Tin River.

Go to Yuen Long today and you will be able to see **YoHo MAX** and above it is a multi storey building with 55 residential floors. See below:-



Local estate agents do not yet know how many residential flats will be available on each floor level, but it could range from 6 to 10. Taking 10 as a worst case that allows some calculations to be made:-

Suppose 5 persons per flat.

5×10 (flats per floor) \times 55 floor levels = 2,750 residents (in the region of).

At the moment the Police Force is under strength by several thousands of vacant posts – recruiting is difficult.

The state of the Fire Services manpower is unknown.

The Post Office is short of staff so retiring staff are being re-engaged on three year contracts.

No new Police Stations have been built to cater for the massive residential developments that have taken place since 1969.

No new Fire Stations have been built – this definition includes ambulances.

No new Post Offices have been built.

The whole Town Planning process for the Yuen Long area is one gigantic mess.

And now the Government proposes Public Light Housing for 2,000 – 3,000 people just outside the Fairview Park Estate. Where is the supporting Government infrastructure?

Yuen Long and its surrounding area could be called “**the poor sister**” in terms of modern day Government Services. The nearest place to renew a vehicle licence (using the traditional method) is Shatin or Sham Shui Po both of which are long distances away.

The Yuen Long Government Offices, located opposite Yuen Long police station, are hopelessly inadequate and the whole site needs redeveloping into a modern day complex. The Government offices above the Tai Kiu Market are out-of-date and the best English language word to describe them is grim!

David Weaver CPM

CC

Environmental Protection Department,
Your ref:- Dir-296/2023
Environmental Protection Department,
EIAO Register Office,
27/F, Southorn Centre,
130, Hennessy Road,
Wan Chai,
Hong Kong.

Madam Jenna YUEN,
LO(R6)1/YLDO,
Home Affairs Department,
Yuen Long District Office Building,
269, Castle Peak Road,
Yuen Long,
New Territories.

**For those who are interested in the
letter writer's background and his
qualifications to write this
correspondence please read on.**

David Weaver CPM

Joined the Hong Kong Police on the 21st February 1969.



Above. Young and handsome, 20 years of age. Photograph taken at Kowloon City Police Station circa 1970 or 1971. The writer will soon be 75 years of age.

Police Headquarters, Arsenal Street, Hong Kong.

Planning and Development Branch,

David Weaver, Chief Inspector. Buildings I – Kowloon, Marine and Special Projects.

The Police Clubs Projects

The Police Officers' Club, and)
The Police Sports and Recreation Club) 2½ years exclusively. 1984 – 1986.

Building projects 1986 onwards:-

Converting the former Sai Wan Ho Ferry Piers to accommodate:-

Marine Police Headquarters, Sai Wan Ho.)
Marine Police Training School, Sai Wan Ho.) formerly HYF ferry piers.
Marine Police Harbour Division, Sai Wan Ho.)

Marine Police North Division Base, Ma Liu Shui, Shatin.

Marine Police South Division Base. Aberdeen.

Marine Police East Division Base, Tui Min Hoi, Sai Kung.

Marine Police West Division Base, Tai Lam Chung.

Marine Police Post, Yung Shui Wan, Lamma Island.

Marine Police Post, Tap Mun Island.

Marine Police Post, Kat O Island.

Others

Design and layout of Identity Parade rooms in new District police stations at Tseung Kwan O. and Ma On Shan.

Design and layout of Briefing Rooms in new District Police Stations. As above.

Conduit design, and project definition for cable runs and fibre optic cables between three hilltop observation posts on the Sino British Border (as it was then). This project was originally built by PCCW, but the legal documents allowed the company to share the conduit piping with the Hong Kong Government.

Refurbishment of the East Ping Chau (Mirs Bay) Marine Police Post emergency generator. The generator machine was air lifted by helicopter from the Marine Police North Division Base by the HK Auxiliary Air Force and it was the first time that the lifting strops had been used to carry a load under a helicopter.

Design of retro accommodation for District Commanders in the Marine South Division Base, and Regional Commander Kowloon East accommodation in Tseung Kwan O Police Station. I cannot remember why I was given this job but that was the way it was in those days – I seem to be landed with everything.

a) Project coordination with the Hong Kong Observatory to establish a wind shear radar mast on an outcrop of rock that formed part of the land area allocated to the Marine Police West Division Base at Tai Lam Chung. This was to support the new Chek Lap Kok airport.

b) Also the establishment of a Hong Kong Observatory facility to monitor background radiation associated with Daya Bay nuclear power station. The equipment is now located within the police post land allocation at Tap Mun Island.

Tung Chung Temporary Police Station. This lasted for a while after the completion of the Chek Lap Kok airport project.

It was temporarily used by a non Government organisation. It may have been demolished by now – February 2023.

Government Departments and professional staff routinely consulted.

Architectural Services Department – Chief Architect 4 Division.

Architects.

Building Services Engineers.

Structural Engineers.

Civil Engineering Department

Port Works Division Civil Engineers.

Hong Kong Observatory

Technical staff.

District Lands Office

Various staff in different office locations.

Hong Kong Auxiliary Air Force (as it was then)

Helicopter pilots for night time test landings on helipads in some Marine Police bases.

The Police Clubs.

Architectural Services Department.

Consultant Architects.

Interior Design Consultants.

Marine Department.

Various staff when required.

HOO No. 146/86 PART 2.



Commissioner's Commendation.

MR. D.G. WEAVER, CHIEF INSPECTOR OF POLICE

is hereby Commended for

LEADERSHIP, ADMINISTRATIVE ABILITY AND DEVOTION
TO DUTY OF AN EXCEPTIONALLY HIGH ORDER DISPLAYED
WHILST SERVING IN THE POST OF PROJECT OFFICER
(CLUBS AND RECREATION) FROM OCTOBER 1983 UNTIL
APRIL 1986.

獎狀

總督察

韋富華先生

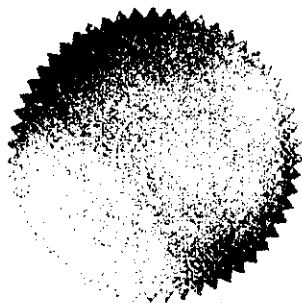
因

一九八三年十月至一九八六年
四月期間，擔任工程主任（俱
樂部及康樂）一職，表現極
高度的領導才幹，行政能
力與盡忠職守。
著有勞績現特頒發本獎狀
以示褒勉

警務處處長

顧理國

一九八六年九月四日



(R.H. ANNING)

Commissioner of Police,
Hong Kong

Dated: SEPTEMBER 1986

Estate Management Notice No. 1 (AD/2023)

10 January 2023

To all Owners / Residents,

Construction of "Light Public Housing" Adjacent to Fairview Park

Regarding the government's decision to build a "Light Public Housing" near Fairview Park , after learning the news from the newspaper, we called the Yuen Long Home Affairs Department in early December 2022 to understand the situation and express our serious concerns. Through various channels, we propose to make appointments with officials of relevant government departments in order to learn more details and reflect our opinions.

With the assistance of the "The Owners' Association of Fairview Park ", the representatives of both Fairview Park Property Management Ltd. and Owners' Association met with the Under Secretary for Housing, Mr. Tai Sheung Shing, Victor, JP, on 6 January 2023. During the meeting, we raised the likely impacts of nuisance, the impact of building height, security, and livelihood facilities, transportation facilities and future traffic conditions. In response, Under Secretary for Housing, Mr. Tai stated that the initial conception of the "Light Public Housing" adjacent to Fairview Park is as follows:

1. The number of units is about 2,000, and the floor height may not exceed 3 floors. The construction is based on units, mainly small units, ranging from 10 square meters to 31 square meters.
2. In terms of resident's livelihood supporting facilities, including retail stores, launderette, supermarkets, restaurants and other people's livelihood-related shops.
3. In terms of transportation facilities, there are a number of direct bus lines to the housing estate, and Kam Pok Road is used for entry and exit, avoiding the use of Fairview Park Boulevard, and there will be no private parking spaces in the housing estate.
4. There will be enough resting space and playground in the housing estate for residents to use.
5. Construction-wise, assembly and synthesis will be used to avoid noise and dust nuisance caused by piling. At the same time, the location of the unit building will be situated as far away from the border of Fairview Park as possible, and housing estate fences will be set up to reinforce the security control.
6. There will be a sewage treatment plant for the sewage disposal.
7. The construction period is around 2 years, and the service life of the entire "Light Public Housing" is about 5 years.

We also took this opportunity to reiterate that though the Fairview Park Boulevard is a private road, it has actually been serving as a public road. Therefore, we once again requested the relevant authorities to take over the Fairview Park Boulevard and to build a public sewage well outside Fairview Park, to enable us to connect the sewage channel of our Estate to the public sewage well, so that the use of the sewage treatment plant in the Estate is no longer necessary and such operating cost can be reduced.

Should there be any updated information, we will keep the resident abreast as soon as possible.

Fairview Park Property Management Limited





管理通告第 1 號 (AD/2023)

致錦綉花園全體業戶：

於鄰近錦綉花園興建「簡約公屋」

就政府決定在鄰近錦綉花園興建「簡約公屋」一事，我們從報章得悉有關消息後，已於 2022 年 12 月初致電元朗民政事務處了解情況及反映我們的憂慮，並透過多方渠道，希望約見有關政府部門的官員，以便進一步了解詳情和反映意見。

在「錦綉花園業主聯會」的協助下，業主聯會代表及管理處代表與房屋局副局長，戴尚誠太平紳士於 2023 年 1 月 6 日會面，我們於會議上提出對建築時引致的滋擾、樓層高度影響、保安、民生配套、交通設施及未來交通狀況方面的擔憂。戴副局長在回應時表示，初步構思鄰近錦綉花園「簡約公屋」規劃如下：

1. 單位數目約 2,000 戶，樓層高度不超過 3 層，以 10 平方米至 31 平方米單位建設，當中又以細單位為主。
2. 民生配套方面，包括：零售店、自助洗衣店、超級市場、食肆及其他民生相關商店。
3. 交通配套方面，包括多條直達屋苑內的專巴線，並以錦堡路作進出之用，避免使用錦綉大道，屋苑內亦不設私家車位。
4. 屋苑內設有足夠休憩空間，以供住戶使用。
5. 建築方面，將以組裝合成法處理，免除打樁引致的噪音及塵埃滋擾，同時單位建築位置，將盡量遠離錦綉花園邊界，及設置屋苑圍欄以加強保安。
6. 設有污水處理廠，處理單位污水問題。
7. 興建年期為 2 年，而整個「簡約公屋」使用年期約 5 年。

我們並藉此，重申表達錦綉大道雖屬私家路，但現今卻實際上已被用作公共道路，因此，我們再次要求有關當局收回錦綉大道，並在錦綉花園外建設公用污水井，以便我們可以把錦綉花園內的污水渠直接接駁至該污水井，從而不需再使用屋苑內的污水處理廠，減低屋苑的營運支出。

如有進一步消息，我們將會儘快向業戶發放。



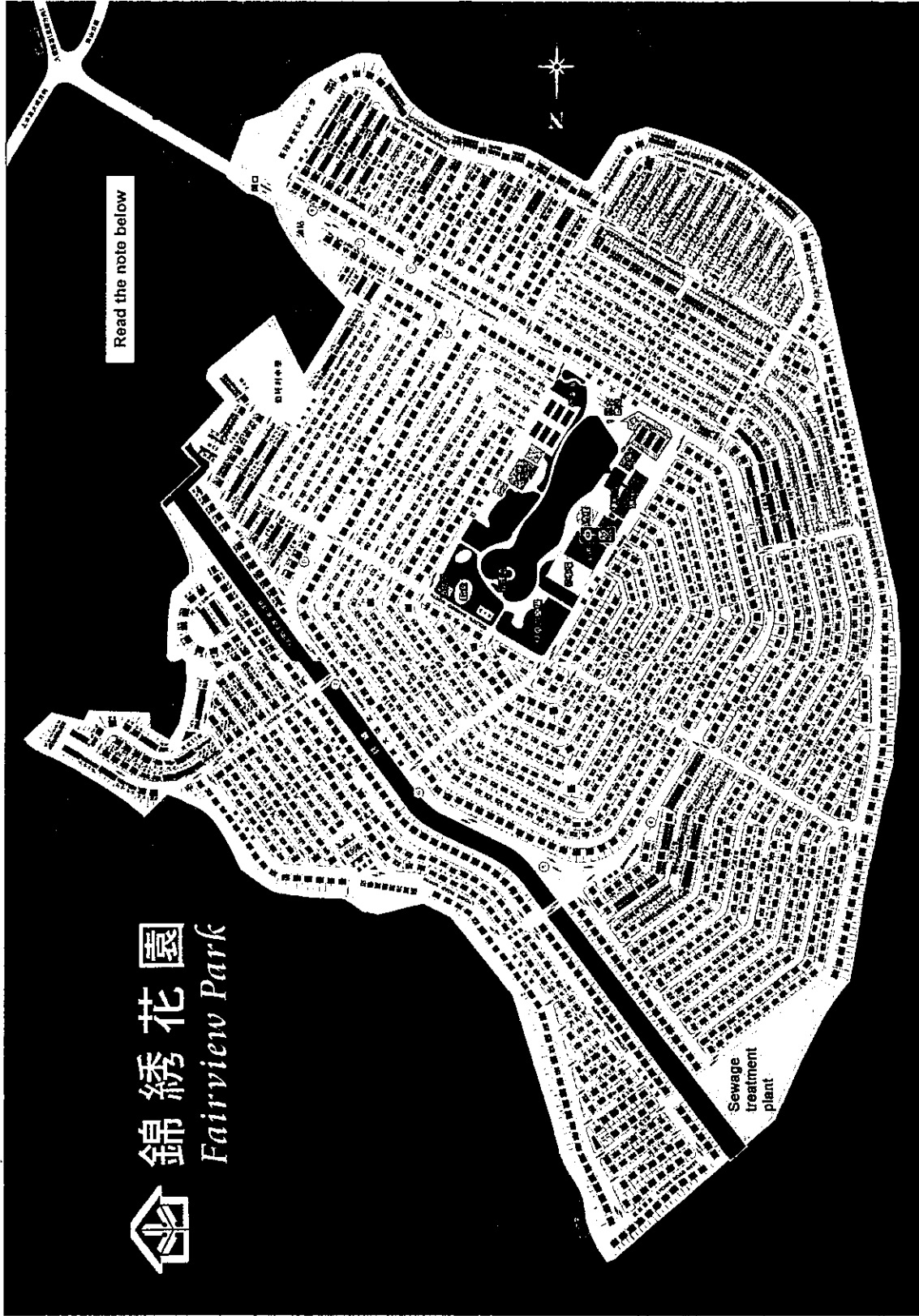
錦綉花園物業管理有限公司

2023 年 1 月 10 日



錦綉花園 Fairview Park

Read the note below



The red arrow points to the one-and-only gateway providing ingress and egress for all the residents (5,024 homes), shopping centre staff, visitors, one church, three schools, one ESSO fuel station, one Post Office, several medical surgeries, and a transient population of 20,000 men, women and children, depending on the day of the week and time of day.

In the event of a mass escape emergency this single gateway may even be impassable depending on the nature of the emergency.

Who, or which Government Department, is publicly accountable for this?

And please do not forget the very important Mai Po Fire Station which is home to one high-platform appliance and two ambulances.

Sewage pumping station

0.3 km

11:30

1530

5

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1

1

•

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100

1000

1

172

24

2

1

1

1

1

1



Fairview Park Estate.

The combined entrance and exit. Two vehicle lanes IN and two vehicle lanes OUT. And a pedestrian footpath on either side. This is the only way of escaping from the estate by vehicle or on foot. Notice the reinforced concrete umbrellas for wind, sun and rain protection. One earthquake, one tsunami, a petrol tanker for the ESSO petrol station exploding, or even a simple mass protest by resident's over some particular grievance or other can, or could, block this combined entrance exit.

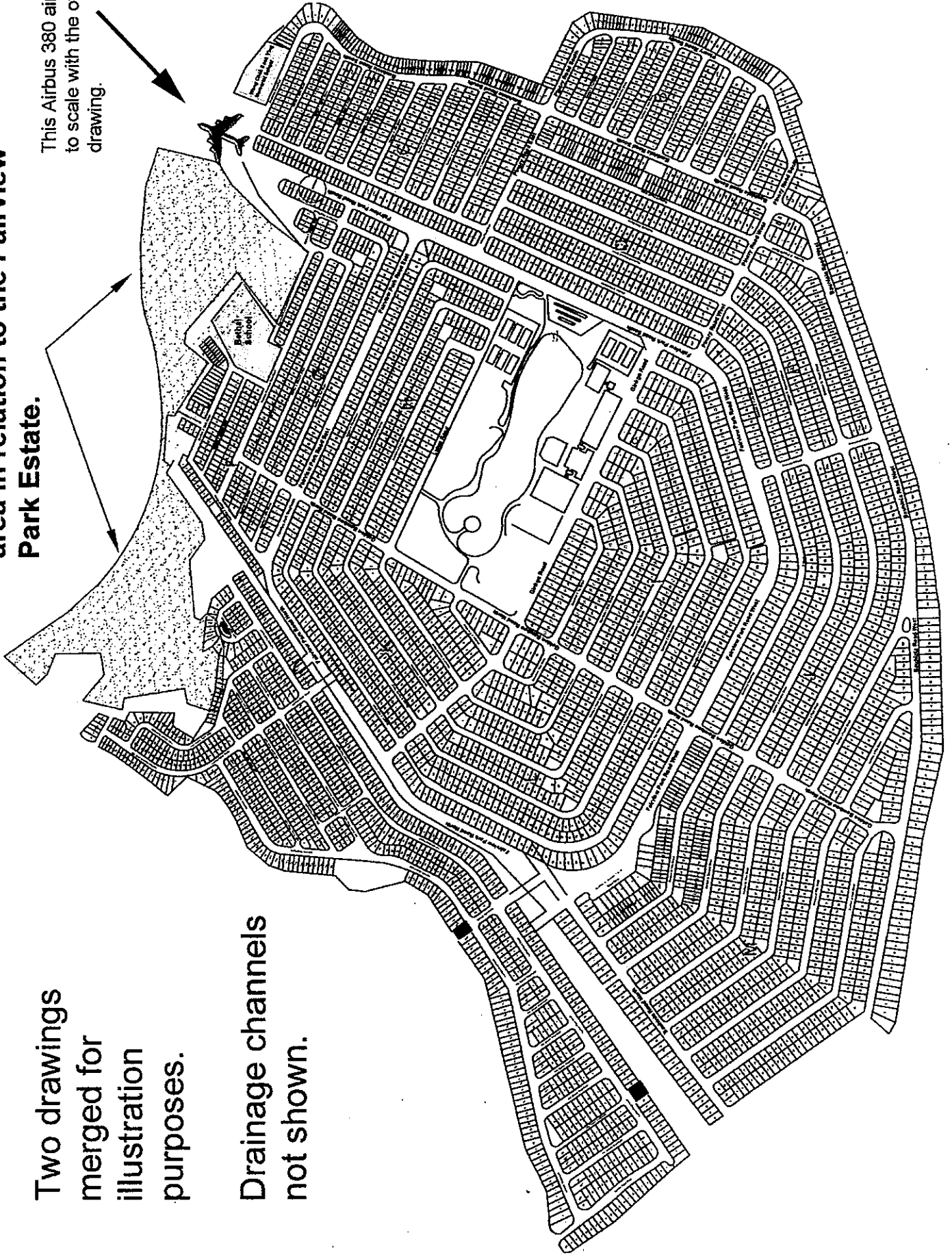
NOT TO SCALE.

Two drawings
merged for
illustration
purposes.

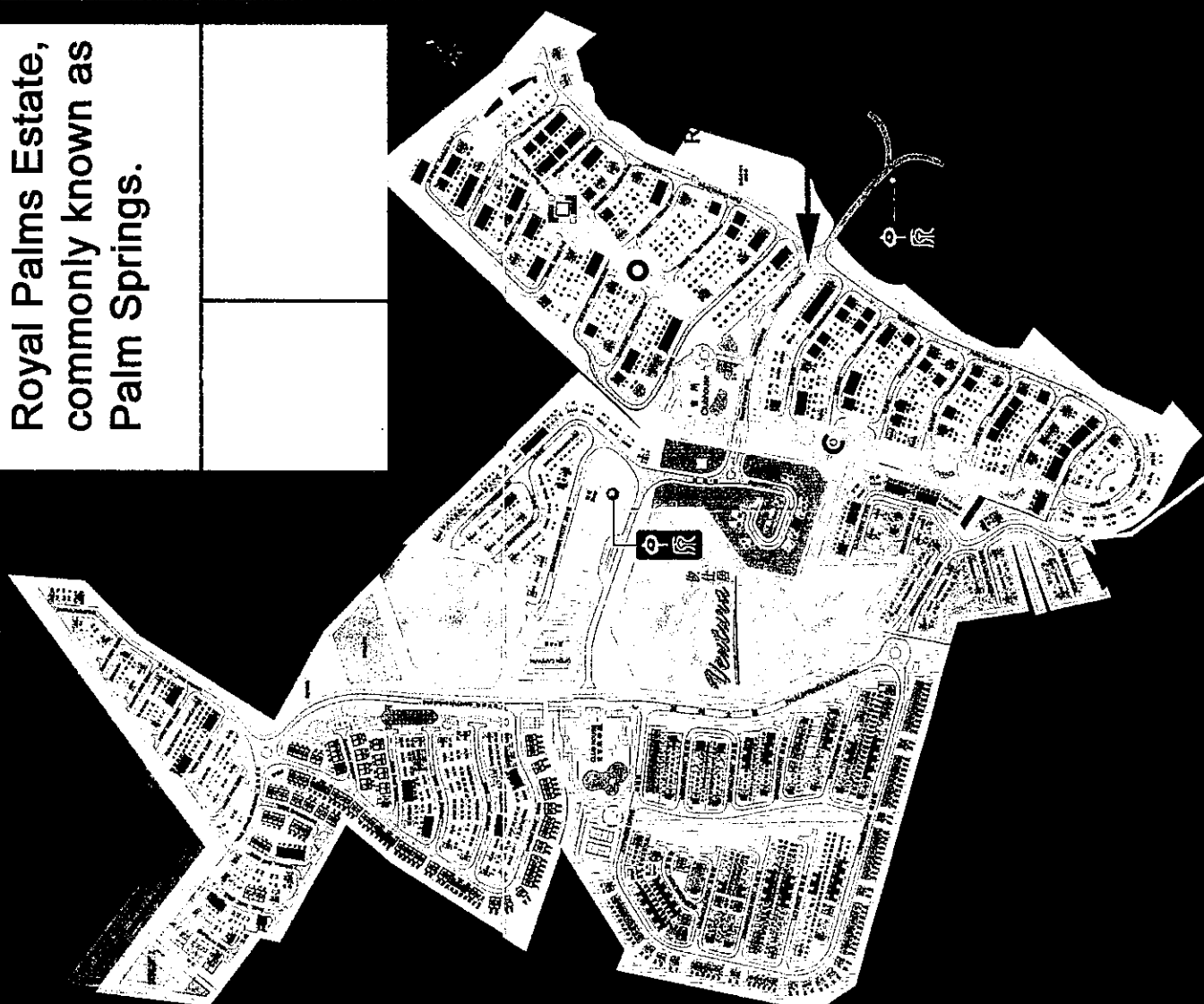
Drainage channels
not shown.

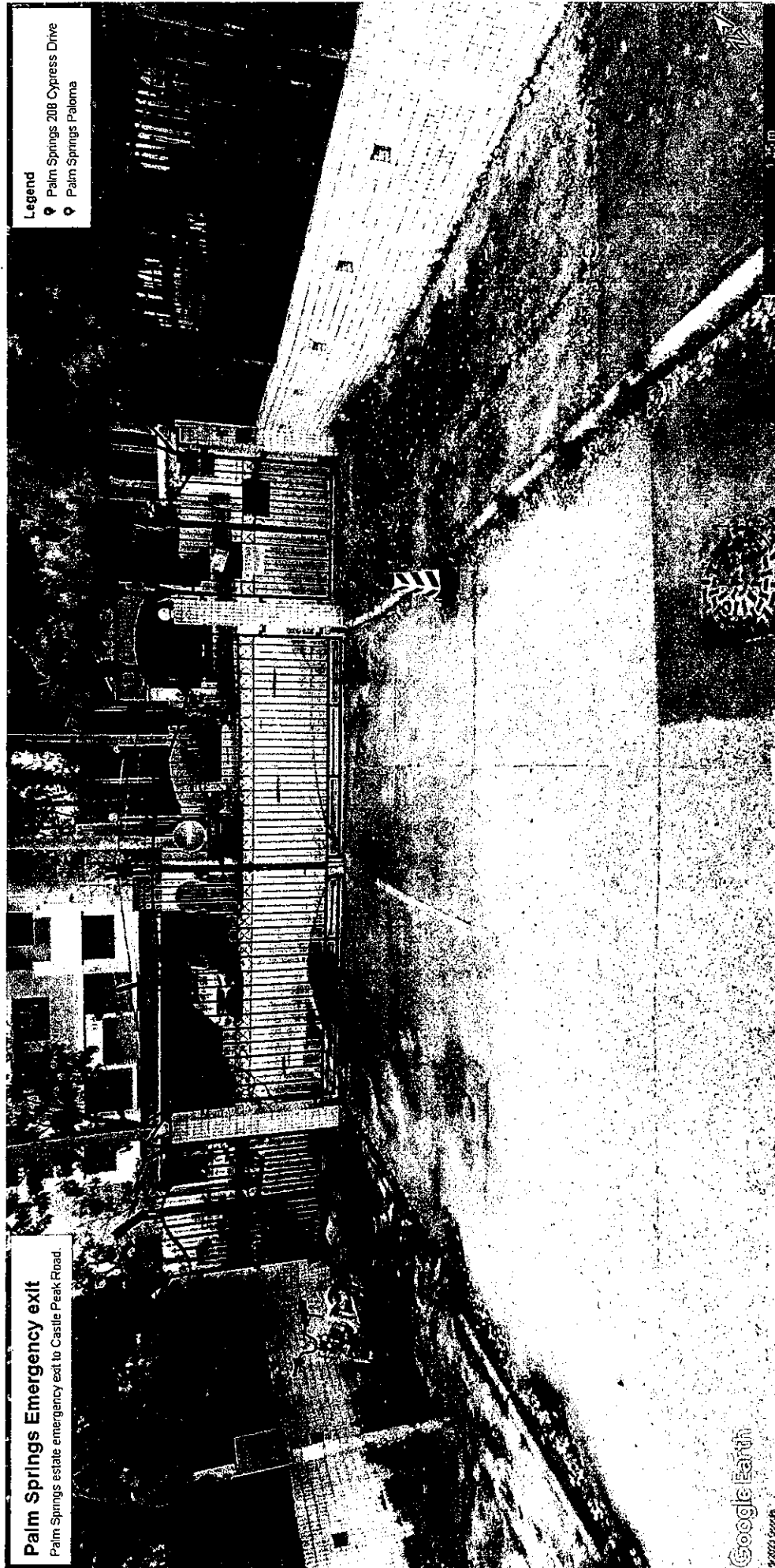
**Proposed Public Light Housing
area in relation to the Fairview
Park Estate.**

This Airbus 380 aircraft is
to scale with the overall
drawing.



Royal Palms Estate,
commonly known as
Palm Springs.

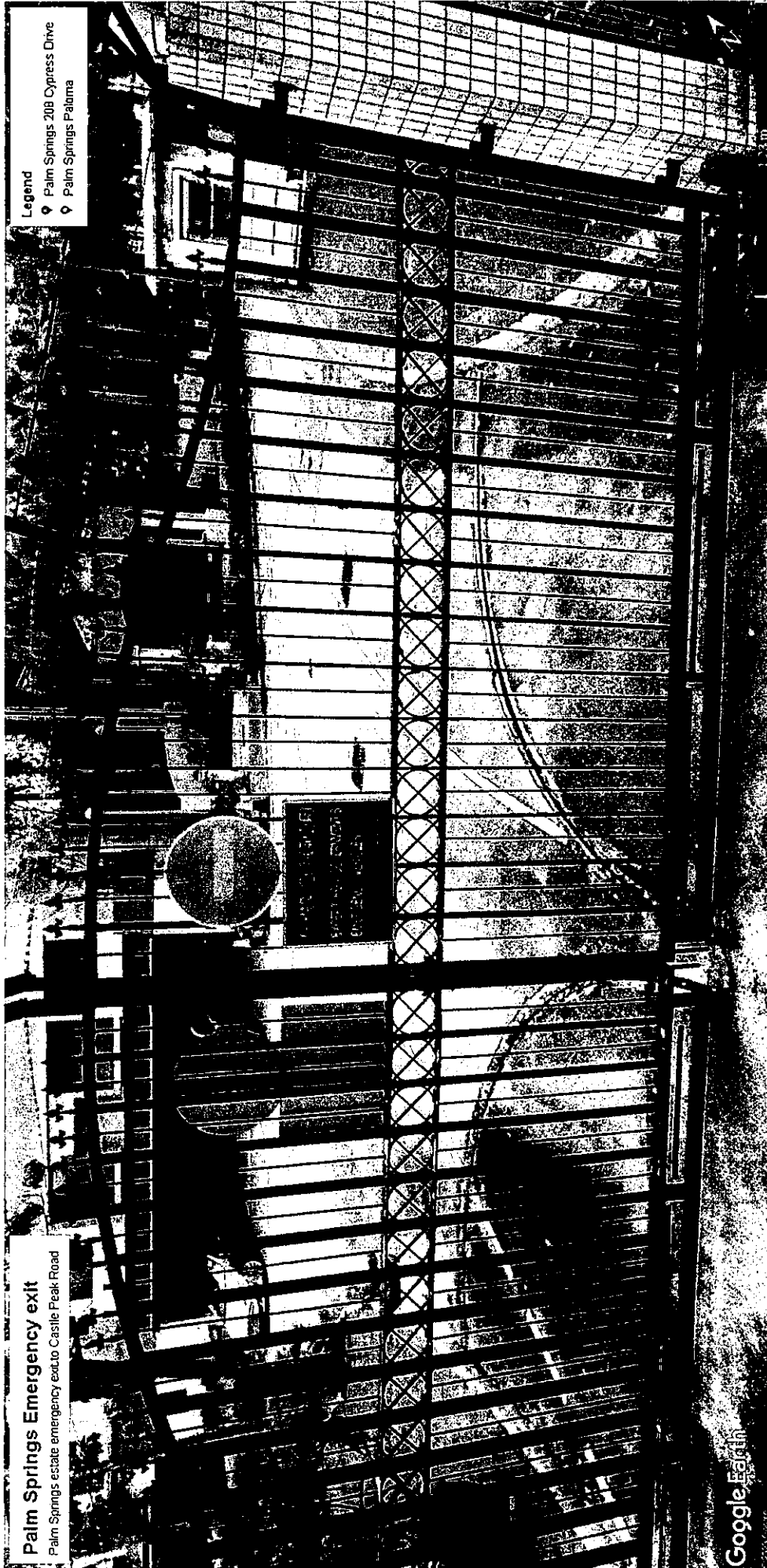




Above:-

The emergency ingress egress gateway for vehicles and pedestrians at the Royal Palms Estate (also known as Palm Springs), Yuen Long. This estate is almost a stone's throw away from the Fairview Park Estate.

The men and women who included this feature in the land allocation plan and estate design, deserve a bouquet of flowers for thoughtfulness, intelligence, and common sense.



Above:-

The emergency ingress egress gateway for vehicles and pedestrians at the Royal Palms Estate (also known as Palm Springs), Yuen Long. This estate is almost a stone's throw away from the Fairview Park Estate.

The men and women who included this feature in the land allocation plan and estate design, deserve a bouquet of flowers for thoughtfulness, intelligence, and common sense.

14

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

230517-160758-58453

提交限期**Deadline for submission:**

19/05/2023

提交日期及時間**Date and time of submission:**

17/05/2023 16:07:58

有關的規劃申請編號**The application no. to which the comment relates:**

A/YL-MP/341

「提意見人」姓名/名稱**Name of person making this comment:**

先生 Mr. Andy P

意見詳情**Details of the Comment :**

The application site falls in close proximity to ecological sensitive areas, including Wetland Buffer and Conservation Areas, Mai Po Ramsar Site and SSSI, as well as Mai Po Egrettries. Its importance is highly valued by the general public. It is understood that the Light Public Housing is to serve housing demand, careful design and monitoring for its ecological impact should not be undermined.

The applicant and his consultant largely rely on the Ecological Impact Assessment conducted for other planning application. However, since those applications have not been approved and the Assessment have not been undergone and endorsed by Environmental Impact Assessment Ordinance procedure, relevant Authority should not adopt such baseline information to determine the ecological condition of the application site.

It is noted that the applicant has conducted a reconnaissance survey in December 2022. Despite Ecological Impact Assessment is exempted for temporary uses under TPB-PG No. 12C, however, considering the development scale with population of about 5,500 in the Deep Bay area, a 12-month ecological survey must be required to be conducted to fully verify the ecological conditions.

AFCD please take lead to protect Mai Po.

15

就規劃申請/覆核提出意見 Making Comment on Planning Application / Review**參考編號****Reference Number:**

230518-204425-33593

提交限期**Deadline for submission:**

19/05/2023

提交日期及時間**Date and time of submission:**

18/05/2023 20:44:25

有關的規劃申請編號**The application no. to which the comment relates:** A/YL-MP/341**「提意見人」姓名/名稱****Name of person making this comment:**

女士 Ms. 林小燕

意見詳情**Details of the Comment :****反對**

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣甸道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

By hand or post : 15/F, North Point Government Offices, 333 Java Road, North Point, Hong Kong

By Fax : 2877 0245 or 2522 8426

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

有關的規劃申請編號 The application no. to which the comment relates

A/YL-MP/341

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

今次政府在錦綉花園近鄰發展簡約公屋項目，無可避免地將會增加該區的人口及交通的壓力！對區內現已不足的設施及附近有限環境所增加的壓力，真是不可承受的。

基於上述，本邨居民及本會的憂慮及擔心如下：

1. 交通方面：上述項目眾多個單位的人流車流，大部分均會使用錦綉花園大道迴旋處出入，該區現有交通將不勝負荷，尤以錦綉大道為甚！
 2. 環評方面：該區鄰近便是保育地域，每年有很多候鳥聚居，且有每年增多趨勢，該等項目我們看不到環評報告對區內自然生態、水質的評估影響，尤其是對候鳥的影響。
 3. 社區睦鄰方面：該項目將區內增加了數以千計的人口、每日數以百計的車流，但該簡約公屋區的基本社區設施非常缺乏，食肆、車位不足，無可避免地，這新區的住戶，便會使用鄰近，即錦綉花園的設施，這少不免會引起居民相互的磨擦及糾紛，對地區和諧不利。
- 敬希 政府能體恤本邨居民的憂慮，在交通、建設及規劃上可作適度合理的修建，如在錦聖路東出口加建迴旋處或接駁路口上新田公路，盡量減少使用錦綉迴旋處及錦綉大道，使能平復本邨居民及本會的疑慮。

「提意見人」姓名/名稱 Name of person/company making this comment

簽署 Signature

區東輝

日期 Date

19-5-2023



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致城市規劃委員會秘書：有關「擬議臨時簡約公屋發展（為期 3 年）和相關填土及挖土工程 A/YL-MP/341
19/05/2023 12:48

From: <fairviewpark.hk>
To: <tohpnd@pland.gov.hk>
Cc: <shoffice@hb.gov.hk>, <doyl@had.gov.hk>
File Ref:

1 attachment



20230519 - 簡約公屋 (向城市規劃委員會提出意見 No. AYL-MP341).pdf

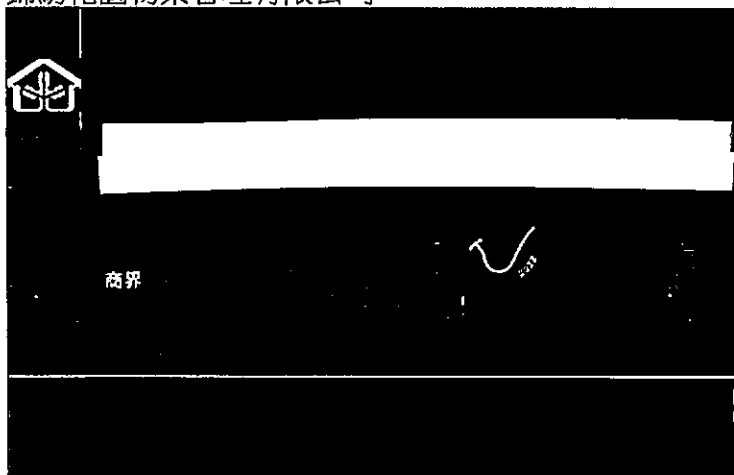
致：城市規劃委員會秘書

有關對「擬議臨時簡約公屋發展（為期 3 年）和相關填土及挖土工程」，申請編號為 A/YL-MP/341 的意見，請看附件，謝謝！

副本抄送：

立法會劉國勳議員
何永賢房屋局局長(shoffice@hb.gov.hk)
元朗民政事務處(doyl@had.gov.hk)
第十一屆錦綉花園管理諮詢委員會

錦綉花園物業管理有限公司





FAIRVIEW PARK PROPERTY MANAGEMENT LTD.
錦綉花園物業管理有限公司

本司檔案編號：FAIV/23/GM/L016

郵寄及電郵(tpbpd@pland.gov.hk)

敬啟者：

規劃申請編號 A/YL-MP/341

擬議臨時簡約公屋發展（為期 3 年）和相關填土及挖土工程

就上述編號 A/YL-MP/341 的規劃申請，本司，錦綉花園物業管理有限公司，現以錦綉花園（「本屋苑」）物業管理人身份及代表本屋苑發展商，俊業海外建設有限公司，提出反對並表達以下意見：

1. 眾所周知，錦綉花園的交匯處是全港最多出入口的迴旋處，現時交通長期處於超負荷狀態，而工程期間，大量工程車輛將無可避免地使用該迴旋處前往該地盤，從而令該迴旋處承受更大的壓力。更令人擔憂的是這些車輛穿梭於繁忙的迴旋處極容易造成混亂及發生交通意外，而有關事故，將會阻斷錦綉花園唯一的對外通道，對本屋苑居民造成極大困擾。
2. 此外，在工程期進行期間，不能排除該等工程車輛利用，由本司管理的私家路（「錦綉大道」）進出地盤，令路面加速耗損，而該道路的維修費用卻須由本屋苑居民承擔，做成極之不公情況。
3. 同時，工程進行期間，將造成嚴重噪音及塵埃滋擾，影響錦綉花園居民的日常生活。
4. 根據資料顯示，該項目落成後，會沿著本屋苑的明渠一帶種植樹木作環境綠化之用，可預見本屋苑的明渠將必成為「樹葉收集站」，造成渠道阻塞，嚴重影響環境衛生並滋生蚊蟲，對本屋苑居民身心健康造成困擾，而毫無疑問，該明渠的清潔及維修費用，又將再次由本屋苑居民支付。
5. 雖然，根據有關資料，該項目落成後將設有公共交通服務，但由於服務路線覆蓋範圍及班次所限，我們相信仍有不少簡約公屋居民，使用本屋苑的專巴服務，令本屋苑居民與該等公屋居民於繁忙時間，爭奪有限交通資源，使我們在管理上產生不必要的困難。

基於上述原因，我們要求有關政府部門向我們支付由此所產生的額外管理及維修費用。並藉此建議政府按新批地書（號碼：2265）內一般條款第 4 條收回該條原屬私家道路，但實際上卻用作公共道路的錦綉大道。事實上政府有責任為該簡約公屋項目，提供完善和充足的公共交通配套，與及規劃合適的行車路線，避免令交通流量已見飽和的錦綉大道，再進一步添加壓力。而不是把該等責任及問題，例如管理和維修道路支出，轉嫁於我們、道路擁有人及錦綉花園住戶承擔。

此致
城市規劃委員會秘書
香港北角渣華道 333
號北角政府合署 15 樓

錦綉花園物業管理有限公司
總經理 連子豐 謹啟
持牌物業管理人(第 1 級)
(牌照號碼 P1-573294)

副本抄送：立法會劉國勳議員
何永賢房屋局局長(shoffice@hb.gov.hk)
元朗民政事務處(doyl@had.gov.hk)
第十一屆錦綉花園管理諮詢委員會

2023 年 5 月 19 日

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A/YL-MP/341 DD 104 Yau Pok Road Light Housing
19/05/2023 03:32

From:

To:

File Ref:

tpbpd <tpbpd@pland.gov.hk>

A/YL-MP/341

Various Lots in D.D. 104 and Adjoining Government Land, Yau Pok Road, Mai Po

Site area: About 89,774sq.m Includes Government Land of about 8,029sq.m

Zoning: "Recreation" and "Res (Group C)"

Applied development : Light Public Housing / Filling and Excavation of Land / 17 Blocks – 2,150 Units / OS 5,500sq.m / 12 Vehicle Parking / 2 amenity blocks / 1 sewage pumping station / 2 guardhouses / 9 building services blocks

Dear TPB Members,

Strongest objections. This is a blatant conspiracy between the developer and the administration to convert what was intended to be recreational space for the community into a private residential development.

Not only is the immediate district lacking in many community facilities, there is also the issue of the growing number of residents in coming years as additional approved developments are completed.

There has not been a district OZP for almost two decades so the extent of non-compliance with basic HKPSG is difficult to assess. Of course this data has not been provided.

There have been a number of attempts to develop the two sites this over the past two decades but they were resisted

A/YL-MP/107 (Southern section)

Applied Use Proposed Fishing Pond cum Field Study Centre and Residential Development

RNTPC MEETING ON 23.8.2002

The Town Planning Board (the Board) decided not to approve the application and the reasons are :-

(a) The proposed residential development is not in line with the planning intention of the "Recreation" ("REC") zone in **that the residential development is not ancillary to the recreational use;**

(b) Insufficient information has been provided to demonstrate that the **proposed development would not cause negative environmental impact to Deep Bay;**

(c) Insufficient information has been provided to demonstrate that the **proposed development would not lead to traffic and environmental nuisances to the local residents;** and

(d) The **approval of the application would set an undesirable precedent for similar applications leading to large-scale residential developments in the areas zoned "REC", the cumulative effects of which would lead to a loss of recreational space in this area.**

Sun Hung Kai currently has two Sect 12 applications under consultation, Y/YL-MP/7 and 8. They were scheduled to be considered today but are not on the agenda. As there was a good chance they would not be approved, SHK has come up with this solution, allow the government to use the sites for a few years for the purpose of providing temporary homes. This will expedite stripping the lots of all vegetation and trees. In addition the tax payer will fund the installation of sewerage and other amenities, access roads, etc.

And a few years down the line the tenants will be given notice and approval will be guaranteed for the private residential developments. SHK gets to pocket billions, as does the administration with land premiums. The densely developed district loses the only piece of land where community recreational facilities could have been provided.

THIS IS A SHOCKING MANIPULATION OF THE UNDERPRIVELEGED TO ACHIEVE FINANCIAL REWARDS AT THE COST OF THE COMMUNITY IN GENERAL

In Sham Shui Po the transitional housing at Pei Ho Street, courtesy of Henderson, that was utilized for only two years has already been dismantled.

These transitional housing arrangements are temporary but cost as much as permanent public housing when all the charges are factored in. At a time when the economic outlook is not bright and our reserves are falling, throwing money around to achieve short term reductions in the number of people queuing for public housing is deplorable. And the people housed in these facilities will end up back in the slums and still in the PH queue so this is no more than a Band Aid solution to the housing issue.

On a site zoned "REC" there are expectations that there would be a considerable number of trees and natural surrounds but under this plan, more drastic than that of SHK, of the 339 trees – 245 to be removed. This will certainly impact the environment of the district that has no park area other than some pockets

surrounding an artificial pond at the centre of the sprawling residential development.

The planning intention of the "REC" zone is "primarily for recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism. **Uses in support of the recreational developments may be permitted subject to planning permission**".

In other words residential use is not permitted.

Of course anybody objecting to the scheme will be accused of stirring up trouble and failing to support the administration. But short term interests that squander public revenue and impact the long term quality of life of the community must be opposed.

Mary Mulvihill

From: [REDACTED]

To: tpbpd <tpbpd@pland.gov.hk>

Date: Thursday, 16 June 2022 2:34 AM CST

Subject: Y/YL-MP/7 and 8 DD 104 Yau Pok Road

Y/YL-MP/7

Lots 3211 RP, 3212 RP, 3213 RP, 3214 S.A, 3214 S.B, 3215, 3216, 3217, 3218 RP, 3250 S.B ss.23 RP and 3250 S.B ss.33 RP in D.D. 104 and Adjoining Government Land, Yau Pok Road, Mai Po

Site area : About 43,463sq.m Includes Government Land of about 4,342sq.m

Zoning : "Recreation" and "Res (Group C)"

Proposed Amendment : Rezone to "Res (Group C) 1" / 9 Blocks – 1,228 Units / PR 1.28 / 58mPD / OS 3,316sq.m / 336 Vehicle Parking / Clubhouse / Commercial

Y/YL-MP/8

Lots 3054 S.A ss.1, 3156 S.A, 3200 RP (Part), 3200 S.A RP, 3201 RP (Part), 3202 (Part), 3203 RP, 3204 RP and 3205 RP in D.D. 104 and Adjoining Government Land, Yau Pok Road, Mai Po

Site area : About 45,627sq.m Includes Government Land of about 2,385sq.m

Zoning : "Recreation"

Proposed Amendment : Rezone to "Res (Group C) 1" / 9 Blocks – 1,249 Units / PR 1.22 / 58mPD / OS 3,372sq.m / 344 Vehicle Parking / Clubhouse

Dear TPB Members,

Strong objections. House with private garden out because SHK can make more money cramming families into high rise concrete boxes of less than 400sq.ft.

The two applications are related and will be reviewed together. This is another striking example of how developers procrastinate and delay, delay in order to maximize profits. Unfortunately government policy has encouraged this as every year new measures are announced that promote increased density and developers know the longer they hold back the better returns.

Comparison:

Combo: 89,000sq.m / 18 Blocks / 2,477 Units / 710 Vehicle Parking / OS 6,688sq.m

Y/YL-MP/3 Approved 13 May 2016 SHK

106 Villas / 245 Vehicle Parking PR .2 / BH 2 storeys / / 2.67ha Private Open Space

The applicant proposed to rezone the site from "Recreation" ("REC") (about 98.3% of the site area) and "Residential (Group C)" ("R(C)") (about 1.7% of the site area) to one of the following options for a proposed residential cum commercial development with a plot ratio (PR) of 0.2 and building height of 2 storeys (6.6m) above one storey of basement car park and/or ancillary plant room:

The northern portion of the site, which fell within the Wetland Buffer Area (WBA), would reserve as a private local open space

Option 1: "R(C)1" zone; (ii)

Option 2: "R(C)1" zone (about 94.7% of the site area) and "Other Specified Uses" annotated "Bike Kiosk and Eating Place" ("OU(BK&EP)") zone;

Option 3: "Residential (Group D)" ("R(D)") zone;

Original Project Time Table **The construction work is expected to commence in 2012 and to complete for occupation in 2015/16 HA HA HA**

The Project Site is zoned "Recreation" ("REC") on the Approved Mai Po and Fairview Park Outline Zoning Plan (OZP) No. S/YL-MP/6 (Subject OZP). According to the Notes of the Subject OZP, the planning intention of the "REC" zone is, in brief, to encourage the development of active and/or passive recreation and tourism/eco-tourism. Uses in support of the recreational developments may be permitted subject to planning permission.

There is a very detailed EIA that is now out of date as it does not take into consideration the approvals for many additional estates in the district and nearby and their impact on both the environment and traffic.

<https://www.epd.gov.hk/eia/3d/pub/yuenlong/Hidden/Video/Test%20with%20Disclaimer.mp4>

Members can click onto link for 3D model that shows the pond

Decision Date

(DD/MM/YYYY 13/05/2016 Y/YL-MP/3

)

Decision Approved/Agreed

Authority Rural & NT Planning Committee

The Committee decided to agree to the application for rezoning the site for the proposed residential cum commercial development. **PlanD would work out an appropriate zoning with suitable development requirements for the site.**

Detailed Decision

The proposed amendments to the approved Mai Po and Fairview Park Outline Zoning Plan (OZP) No. S/YL-MP/6 would be submitted to the Committee for approval prior to gazetting under section 5 of the Town Planning Ordinance upon reference back of the OZP for amendment by the Chief Executive in Council.

The Committee also agreed to advise the applicant to **note Members' concern on enhancing the ecological linkage of the site to the Ngau Tam Mei Channel and the fishponds within WCA.**

But to date no new OZP has been put forward for public comment.

Issues raised during the meeting include:

9. A Member noted that the northern portion of the site was proposed for a landscaping area and asked whether that portion could be retained as "REC" zone. DPO said that three options, including an option to develop both the northern and southern portions for residential use, had been evaluated during the preparation of EIA report. **The findings indicated that residential development in the northern portion would create significant adverse ecological, environmental and visual impacts on the surrounding areas.** In addition, having considered neighbouring residents' views on preserving the natural environment and given the location of the northern portion within WBA, greenery and open

space uses were hence proposed in the northern portion.

The existing pond within the northern portion of the site, which was located within the WBA, would be retained and enlarged to enhance its ecological value. At the request of the Chairman DPO supplemented that the northern portion of the site, which fell within WBA, was in close proximity to fish ponds zoned "Conservation Area" and a site zoned "OU(CDWPA)" which both fell within Wetland Conservation Area (WCA). Locating residential development further away from the fish ponds and the "OU (CDWPA)", which were of ecological significance, could help minimize disturbance to those areas.

THE POND IS NOW GONE. DESTROY TO BUILD. WAS ANY ENFORCEMENT ACTION TAKEN?

A Member asked whether the EIA report had taken into account the cumulative impact of surrounding approved residential developments on the Ngau Tam Mei Channel. Mr Tim Osborne, with reference to the findings of an **ecological survey of water birds conducted from March 2015 to February 2016**, concluded that the cumulative increase in disturbance to those bird species would be insignificant.

BUT THAT WAS BEFORE OTHER DEVELOPMENTS LIKE ANOTHER SHK PROJECT ON THE OTHER SIDE OF THE DRAINAGE CHANNEL WERE PROPOSED.

SO ALL OF THIS HAS BEEN IGNORED AND DEVELOPER PLANS TO CONVERT BOTH SITES TO MEDIUM RISE RESIDENTIAL TOWERS

DPO supplemented that a total of 22 ha of land was zoned "REC" on the Mai Po and Fairview Park OZP **BUT THAT WAS A DECADE AGO AND MUCH OF THE RECREATION ZONE HAS BEEN USED FOR OTHER PURPOSES. WHAT IS THE CURRENT SITUATION? NO HKPSG FOR THE DISTRICT PROVIDED AS THERE HAS BEEN NO OZP. HOWEVER LARGE INCREASE IN POPULATION SO THERE IS CERTAINLY NEED FOR SITES TO PROVIDE COMMUNITY RECREATIONAL FACILITIES.**

6,727SQ.M IS GOVERNMENT LAND SHOULD BE RETAINED FOR THIS PURPOSE.

The only community facility included in the plan is a Kindergarten. But this is in a commercial building and these facilities are in fact commercial.

Visual Impact

Hazy images HOW COME PHOTOMONTAGE OF CYCLE TRACK IS ON BLUE SKY DAY BUT THE IMAGES PERTAINING TO RIDGELINES ARE ON CLOUDY DAY

Members should reject the two applications as they are not in the public interest. The growing community in that part of NT has urgent need of more sports fields and other recreational facilities. That the administration has been dragging its feet in providing the amenities does not mean that sites allocated for them should be eliminated.

Now with the renewed interest in sports and the pledges to support such activities, it is necessary to provide facilities not only for the traditional sports but also for the emerging pastimes that appeal to the younger demographics, like skateboarding, breakdancing, etc.

Covid and other virus that impact travel will be with us for years to come. There is urgent need to develop more amenities to ensure that citizens can recreate and let off steam.

Mary Mulvihill

19

☐ Urgent ☐ Return Receipt Requested ☐ Sign ☐ Encrypt ☐ Mark Subject Restricted ☐ Expand personal&publi



HKBWS' comments on the planning application for the proposed Temporary Light Public Housing Development for a Period of 3 Years and Associated Filling and Excavation of Land at Yau Pok Road, Mai Po (A/YL-MP/341)

19/05/2023 15:28

From: "WONG, Suet Mei" <wsuetmei@hkbws.org.hk>
To: tpbpd <tpbpd@pland.gov.hk>
Cc: Chuan Woo <wchuan@hkbws.org.hk>
File Ref:

Dear Sir/Madam,

The Hong Kong Bird Watching Society's comments on the planning application for the proposed Temporary Light Public Housing Development for a Period of 3 Years and Associated Filling and Excavation of Land at Yau Pok Road, Mai Po (A/YL-MP/341) is attached.

Thank you.

Best Regards,

Wong Suet Mei | 黃雪嫻

Conservation Officer | 保育主任

The 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



20230519_YauPokRoad_LightPublicHousing_A_YL_MP_341_HKBWS.pdf

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

By email only

19 May 2023

Dear Sir/Madam,

**Comments on the application for the proposed Temporary Light Public Housing
Development for a Period of 3 Years and Associated Filling and Excavation of Land
at Yau Pok Road, Mai Po (A/YL-MP/341)**

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

1 Not in line with the planning intention of Wetland Buffer Area (WBA) under the Town Planning Board Planning Guideline No. 12C and the existing zonings

- 1.1 The development site falls within WBA in Deep Bay area. According to the Town Planning Board Guideline No. TPB PG-NO. 12C, *'in considering development proposals in the Deep Bay Area, the Board adopts the Study's recommended principle of "no-net-loss in wetland"'*. Moreover, WBA is *"to protect the ecological integrity of the fish ponds and wetland within the WCA and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds."*¹ However, the footprint of the proposed LPH development would lead to a **direct and permeant loss in 7,300 m² of wetland and 7.22 ha of grassland/shrubland**, which is not in line with the principle of "no-net-loss in wetland" in Deep Bay. We consider the direct impact is significant, and compensation and mitigation measure are required for the direct wetland loss if the loss could not be avoided.

¹ Section 6.4 of the Town Planning Board Planning Guideline No. 12C. Available at: https://www.info.gov.hk/tpb/en/forms/Guidelines/pg12c_e.pdf

- 1.2 According to the approved Mai Po and Fairview Park Outline Zoning Plan (OZP) No. S/YL-MP/6², the general planning intention of the area is to *"conserve the ecological value of the fish ponds which form an integral part of the wetland ecosystem in the Deep Bay Area... The planning intention of the area further away from the fish ponds is to protect the ecological integrity of the wetland ecosystem, and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds."*
- 1.3 Most of the footprint of the residential development is zoned as Recreation (REC) zone which is intended *"primarily for recreational developments for the use of the general public", where "no residential development (except 'New Territories Exempted House') shall result in a total development in excess of a maximum plot ratio of 0.2 and a maximum building height of 2 storeys (6m)" under the OZP No. S/YL-MP/7.*
- 1.4 However, the proposed residential development consists of 17 blocks of 3-storey residential buildings in both northern and southern portions of the site, introducing a population of 5,500 people. We are concerned the disturbance to the surrounding ecological sensitive receivers (please refer to section 2 below), including noise, light pollution, and the increased human disturbance from the substantial increased population, leading to degradation of habitat quality of Deep Bay wetlands.
- 1.5 We consider the residential development is not in line with the above planning intention of WBA as it would bring negative off-site disturbance to the Wetland Conservation Area (WCA), and destroy the open rural landscape that is now with limited human disturbance. We urge the Town Planning Board (Board) to reject this application.

2 Underestimate the ecological value and sensitivity of the Yau Pok Road site

- 2.1 The Yau Pok Road site is currently composed of pond, seasonal wetlands, farmlands, and grassland. According to the previous survey in 2009/2010 under the Environmental Impact Assessment (EIA) Report (no. AEIAR-

² Approved San Tin Outline Zoning Plan No. S/YL-ST/8. Available at: https://www1.ozp.tpb.gov.hk/plan/ozp_plan_notes/en/S_YL-ST_8_e.pdf

182/2014), the survey in 2019/2020 under the Ecological Impact Assessment (EcoIA) Reports for the two recent rezoning applications (no. Y/YL-MP/7 & no. Y/YL-MP/8), and also the Reconnaissance Survey conducted in December 2022, a total of 46 species were recorded within the project site while 16 of them are of conservation concern.

- 2.2 However, the applicant stated that only 10 species of conservation concern were recorded within the site from the reviewed literature and the reconnaissance survey. We consider the applicant should review the current desktop review result.
- 2.3 The applicant also claimed that the “*potential direct ecological impact of the Project on fauna species of conservation importance is of Low significance.*” However, from the reviewed literature, the project site has been recorded with various **wetland-associated species of conservation interest**, such as the globally Vulnerable Collared Crow (*Corvus torquatus*), Eastern Cattle Egret (*Bubulcus coromandus*), Intermediate Egret (*Ardea intermedia*), Yellow Bittern (*Ixobrychus sinensis*), White-throated Kingfisher (*Halcyon smyrnensis*), Wood Sandpiper (*Tringa glareola*), Chinese Pond Heron (*Ardeola bacchus*), Red-billed Starling (*Spodiopsar sericeus*). Other **open country bird species** like Black-faced Bunting (*Emberiza spodocephala*) and Richard's Pipit (*Anthus richardi*) were also recorded. Most of the above species were recorded within the **Grassland/Shrubland**. The rare passage migrant and winter visitor Blunt-winged Warbler (*Acrocephalus concinens*) was recorded in the Reed. We consider the presence of these species indicates that the Yau Pok Road site is connected to the surrounding wetlands, and they all are forming a part of the Deep Bay wetland system and is of **significant ecological value, function, and sensitivity**.

3 Inadequate ecological impact assessment

- 3.1 From Table 5.1 of the current EcoIA report, the ecological value of Grassland/Shrubland deviates with the previous assessments under EIA Report (no. AEIAR-182/2014) and EcoIA Report (no. Y/YL-MP/7 & no. Y/YL-MP/8). Grassland/Shrubland was particularly **downgraded** from “Low to moderate” to “Low”. We consider such deviation needs to be made based

on a comprehensive 12-month baseline survey covering different taxa. However, there is no information explaining how such change was being made. It is unclear if it was downgraded due to any significant survey finding from the additional one-month survey. We consider the habitat evaluation of this EcolA report is not well evident and well explained.

3.2 In Section 4.5.1, it is highlighted that *"no bird species of conservation importance were recorded regularly within the Application Site"*. In Section 6.2.5, it is stated that *"the Application Site is an irregular loafing site for only a small number of wetland-dependent birds"*, and that the overall impacts on these species of concern is considered to be of Low Significance. However, the survey efforts under previous reports varies and were generally insufficient to capture the bird usage of the site during migratory season, while the surveys were not conducted on a regular basis, we consider it is inadequate to make a conclusion that no birds of interest were recorded regularly based on the existing surveys. In addition, when we refer to the surveys in 2009/2010 and 2019/2020, various water birds of conservation importance, such as Wood Sandpiper, Little Ringed Plover and Chinese Pond Heron were recorded in both surveys. This indicates the site was actually regularly used by several wetland-associated bird species of ecological concern.

3.3 Moreover, the EcolA report stated that *"none of the bird species of conservation importance were recorded in significant numbers in comparison to their Deep Bay populations"*. We would like to point out that birds in Deep Bay would exploit different resources across habitats at different times and seasons, such that the ecology of the wetlands should be viewed across the Deep Bay as a whole. In the Study on the Ecological Value of Fishponds in the Deep Bay, it is stated *'it is inappropriate to consider that some ponds are of intrinsically higher value to birds, and that removal of "low value" ponds will not be affect birds'*. We, therefore, are concerned the above conclusion drawn in the EcolA report is misleading and has underestimated the potential adverse impacts of the development on the integrity of the Deep Bay wetland ecosystem and the bird populations that such ecosystem supports.

4 The severe disturbance to the surrounding sites and species of ecological importance

4.1 The “Inner Deep Bay and Shenzhen River catchment” Important Bird and Biodiversity Area (IBA), Mai Po Inner Deep Bay Ramsar Site, WCA, WBA, Mai Po Village SSSI (Mai Po Village egretty) and Mai Po Lung Village egretty are all the areas of conservation importance located less than 2km away from the application site and are important sites and habitats for both breeding and migratory birds.

4.2 The application site is just adjacent to the Ngau Tam Mei Main Drainage Channel (NTMDC), where is under tidal influence and is ecologically connected with Deep Bay wetland ecosystem. Bird species of Regional Concern like Common Redshank (*Tringa tetanus*) and Spotted Redshank (*Tringa erythropus*) were recorded in April 2023. The Greater Painted-snipe (*Rostratula benghalensis*) of Local Concern³ and the globally “Endangered” Black-faced Spoonbill (*Platalea minor*)⁴ have been recorded in NTMDC⁵. Groups of 10 to 15 Black-faced Spoonbill individuals, and up to a maximum of 33 individuals, were observed in NTMDC during Jan 2014 to March 2015⁶. This channel is also regarded as “moderate” ecological value, having “*some functional linkages with the Deep Bay area*” and “*high abundance of certain bird species of interest*” as stated in the Ecological Impact Assessment (EcolA) report submitted by the applicant. The bird abundance in NTMDC is described as “*relatively higher and supported high numbers of ardeids occasionally during favorable tide conditions*” in the Environmental Impact Assessment (EIA) Report (no. AEIAR-182/2014). In this study, 101 Little Egrets, 80 Grey Herons and 65 Great Egrets, and up to 6 Black-faced Spoonbills were recorded in this channel.

4.3 Given the existing low pedestrian flow locally, the NTMDC provides a suitable foraging ground for different waterbirds especially during low tide. However, from our observation, the waterbirds that forage in this channel

³ Fellowes *et al.* (2002)

⁴ IUCN Red List

⁵ HKBWS unpublished data.

⁶ HKBWS internal data.

are very susceptible to human disturbance, owing to the close distance from the pedestrian and the relatively narrow width of NTMDC. We consider the low level of disturbance, the low population and low-density landscape, and the ecological corridor provided by the existing natural features of the site should be maintained for both migratory birds and breeding ardeids.

- 4.4 However, during operational phase, *"the proposed residential development will accommodate a residential population of about 5,500 after full occupation"*, which is almost 20 times more than the proposal under the previously approved EIA Report (no. AEIAR-182/2014). We are highly concerned the proposed development with substantial increase in population due to the LPH development would bring severe disturbance to the surrounding ecological sensitive receivers, including direct human disturbance, noise, light pollution, etc, leading to degradation of habitat quality for waterbirds in the vicinity and the Deep Bay wetlands. We consider the indirect impacts of the proposed development to the surroundings are significant and have not been properly assessed.

5 Contradict with the previous approved environmental impact assessment and rezoning applications

- 5.1 The current site was associated with private developments proposed by the property estate developer and previously approved under the Environmental Impact Assessment (EIA) Ordinance and Town Planning Ordinance. Based on the approved EIA application (no. EIA-220/2014) in 2014 and the approved rezoning application no. Y/YL-MP/3 in 2016, the northern portion of the site was proposed to be a landscaping area with pond and passive recreational uses, to maintain the rural landscape within WBA and the surroundings. Meanwhile, the 2-storey residential development was concentrated at the southern portion of the site.
- 5.2 Referring to the Minutes of 556th Meeting of the Rural and New Town Planning Committee held at 2:30 p.m. on 13.5.2016⁷, a Town Planning Board member asked whether the portion proposed for a landscaping area could

⁷ https://www.info.gov.hk/tpb/en/meetings/RNTPC/Minutes/m556rnt_e.pdf

be retained as "REC" zone, the representative from that application Ms Margaret Chan replied that *"three options, including an option to develop both the northern and southern portions for residential use, had been evaluated during the preparation of EIA report. The findings indicated that residential development in the northern portion would create significant adverse ecological, environmental and visual impacts on the surrounding areas. In addition, having considered neighbouring residents' views on preserving the natural environment and given the location of the northern portion within WBA, greenery and open space uses were hence proposed in the northern portion."*

- 5.3 In addition, the District Planning Officer Ms. Maggie M.Y. Chin also supplemented that *"the northern portion of the site, which fell within WBA, was in close proximity to fishponds zoned "Conservation Area" and a site zoned "OU(CDWPA)" which both fell within Wetland Conservation Area (WCA). Locating residential development further away from the fishponds and the "OU(CDWPA)", which were of ecological significance, could help minimize disturbance to those areas."* The applicant was also advised to note *"Members' concern on enhancing the ecological linkage of the site to the Ngau Tam Mei Channel and the fishponds within WCA".*
- 5.4 However, the northern portion of the site is now included in this LPH development. We consider the wetland filling and site formation during construction, and also the mass population during operation, are obviously contradicting with the above ecological and planning consideration (i.e. to minimize disturbance to the nearby wetlands and to enhance the ecological connectivity) and the previous impact assessment.
- 6 **Cumulative ecological impacts and undesirable precedent set on Deep Bay area**
 - 6.1 Cumulative ecological impacts to the fishponds of Deep Bay area need to be carefully assessed given that a number of other residential developments have already been proposed and approved in close proximity of the application site. We are concerned all the potential residential and commercial developments would all cumulatively cause significant impacts on the Ramsar Site, Wetland Conservation Area, migratory birds, and also

breeding ardeids.

- 6.2 Moreover, the approval of this application will set an undesirable precedent to the future similar applications within WBA in the Deep Bay area, and thus nullifying the statutory planning control mechanism. We urge the Board to reject this application in order to protect Deep Bay wetlands from any development threats.

7 Unjustified site selection at Yau Pok Road and deepen public distrust

- 7.1 One of the purposes of the scheme is *"to improve the living conditions of people living in inadequate housing"*. However, due to the remote geographical location and the inherent planning constraints of Yau Pok Road site, there are clearly insufficient infrastructures, amenities, public facilities, and public transport, to support such an additional population, and more importantly to maintain an affordable cost of living of the target residents (i.e. public rental housing applicants). We are concerned the current site selection of Yau Pok Road site would not be able to achieve the original good intention of improving living conditions but would in turn creating more social problems in the community in the long run.
- 7.2 Given the geographical limitations, it will not only increase the cost of living of the residents, the construction time and cost of the Light Public Housing at this site is also expected to be high, in order to comply with EIA and planning requirement, to conduct extensive site formation and to meet the basic needs of the residents. We consider that it is not well justified to choose Yau Pok Road site as one of the Light Public Housing sites. Besides, the government would be responsible to pay for the heavy financial and environmental costs derived from the filling of wetland, site formation, establishment of infrastructure (i.e. transport, sewage and drainage facilities) and the applications for permission under different land development procedures.
- 7.3 According to the paper submitted to Legislative Council, it is stated that the private sites would also be considered if *"the relevant private developers are willing to provide some of their land with no confirmed development plan for the Government to develop LPH"*. However, the Yau Pok Road site is



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

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KFBG's comments on four planning applications

19/05/2023 13:19

From: EAP KFBG <eap@kfbg.org>
 To: "tpbpd@pland.gov.hk" <tpbpd@pland.gov.hk>
 File Ref:

4 attachments



230519 s16 MP 341c.pdf 230519 s16 HT 20.pdf 230519 s17 ST 626.pdf 230519 s12a ST 49c.pdf

Dear Sir/ Madam,

Attached please see our comments regarding four applications. There are four pdf files attached to this email. If you cannot see/ download/ open these files, please notify us through email.

Thank You and Best Regards,

Ecological Advisory Programme
 Kadoorie Farm and Botanic Garden

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嘉道理農場暨植物園公司
Kadoorie Farm & Botanic Garden Corporation

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

19th May, 2023.

By email only

Dear Sir/ Madam,

**Proposed Temporary Light Public Housing Development for a Period of 3 Years and
Associated Filling and Excavation of Land
(A/YL-MP/341)**

1. We refer to the captioned.
2. Please make reference to our recent submission (**Appendix 1**) for the Project Profile of the same Light Public Housing proposal (DIR-296/2023) for our views on this application.
3. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden



Dr. CHUI Ho Kwong, Samuel, JP
Director of Environmental Protection
16/F, East Wing, Central Government Offices,
2 Tim Mei Avenue, Tamar, Hong Kong
(Email: eiaocomment@epd.gov.hk)

12th May, 2023.

By email only

Dear Dr. Chui,

Light Public Housing at Yau Pok Road, Yuen Long
(DIR-296/2023)

1. We refer to the captioned.
2. Although on a 'temporary' basis, the proposal would still introduce a relatively large population (as compared to existing condition) into the locality, which is ecologically sensitive (e.g., partially within Wetland Buffer Area¹). We have already been in many of our submissions for planning applications in this area expressed our concerns regarding the potential human disturbance impacts associated with the introduction of considerable human population into the locality.
3. We urge the authorities and relevant parties such as The Advisory Council on the Environment (ACE) to realise that existing human activities in the area are at a very low level (see **Figure 1**) and thus most of the time it is not subject to heavy human disturbance, and this would be the reasons why the Ngau Tam Mei Drainage Channel (NTMDC) can support a considerable amount of waterbirds during the wintering season (**Figure 2**). Some of these bird species are of conservation significance, such as the Globally Endangered² Black-faced Spoonbill, which would inhabit the NTMDC section right next to the proposed Light Public Housing (LPH) site (**Figure 2**).

¹ https://www.info.gov.hk/tpb/en/forms/Guidelines/pg12c_e.pdf

² <https://www.iucnredlist.org/fr/species/22697568/119347801>

4. We hope the authorities and relevant parties to consider the following:

- Would the future residents of the LPH utilise the nearby cycle track and pedestrian walkway, such as for jogging, cycling and exercise?
- Would the vehicle roads alongside the NTMDC such as Yau Pok Road and Kam Pok Road be more intensively utilised after the LPH is in operation (please look at the present situation as shown in **Figure 1**)?
- Could the proposed measures such as densely planting vegetation and shrubs along the boundary as mentioned in Section 6.5.4 of the captioned project profile be able to screen off the potential visual and noise disturbance impacts (on the adjoining NTMDC) associated with the potential increase in utilisation (by future residents) of those nearby cycle track and pedestrian walkways?
- Would the human disturbance on NTMDC be significantly increased eventually? Please note that we are not talking about the disturbance from the LPH site. We are talking about the impacts caused by the potential future users (e.g., the LPH residents) of the nearby cycle track, pedestrian walkways and vehicle roads on the NTMDC.

5. Section 5.4.14 of the project profile mentions the following:

'... ..The cycle track and Yau Pok Road are 1-2 meters higher than the PS in terms of existing ground level and already disturbed by frequent passenger and vehicle uses including heavy vehicles commuting between Yau Pok Road and the open storage areas close to Fairview Park... ...'

'... ..Currently, there are trees growing densely on both banks of the channel, which function as an effect screen for the birds in channel... ..'

6. We urge relevant authorities and the ACE to consider after looking at **Figure 1** whether the above first statement is valid. Then, we urge relevant authorities and the ACE to look at **Figure 3**. As shown, there are gaps among the trees growing alongside the banks; they are not always forming a complete screen. Birds in the channel can easily detect the human activities along the NTMDC (such as those from the cycle track/ pedestrian walkway). For instance, as shown in the photos at **Figure 4** some birds were highly alerted of the standing photographer who took the photos and some even flew/ swan away when the photographer moved closer – obviously they could see and detect the photographer and thus react accordingly. In addition, most of the trees growing on the banks are the invasive *Leucaena leucocephala* (銀合歡)

(Figure 5). We are concerned that one day they would be removed by the weeding exercise regularly carried out by the relevant authority and thus the so-called ‘effect screen’ would even disappear – indeed, the effectiveness of this ‘effect screen’ is also questionable as reflected by the behavior of the birds as aforementioned and shown in Figure 4.

7. We simply urge relevant authorities and the ACE to think about how the waterbirds in the NTMDC would behave when there would be more users in the nearby cycle track, pedestrian walkways and vehicle roads. Would there still be so many birds (density and species) utilising the NTMDC? Please note that many waterbirds including those inhabiting the NTMDC are highly sensitive to human disturbance^{3,4}. For instance, in a study regarding disturbance effect on wild ducks, nearly 80% of the studied individuals responded to the source of disturbance from a distance ranging between 51 – 100 m (more than 70% of them swam or flew away)³; from a similar study on Black-faced Spoonbill, the following is mentioned by the authors:

‘... Human approach had been identified as the most important disturbing stimulus that should be controlled as a priority...’⁴

8. We urge the project proponent to discuss with relevant authorities/ parties as to whether more vegetation and shrubs can be planted along the banks of the NTMDC section adjacent to the LPH site, in order to reduce the effects of the potential disturbance impacts (i.e., on NTMDC) that may be caused by the increased population in the area. Planting vegetation/ shrubs along the LPH site boundary would not help to reduce the disturbance effects (on the waterbirds within NTMDC) generated from the paths surrounding the NTMDC section of concern. We urge the proponent to directly liaise with Drainage Services Department and Highways Department (or any other relevant parties) to see what can be done before future residents start to move in.

9. The development goal of ‘Ecological Civilisation’ was included into the National Constitution in 2018⁵, and it is also a ‘Strategic Direction’ of the Northern Metropolis

³ Pease, M. L., Rose, R. K. and Butler, M. J. (2005) Effects of human disturbances on the behavior of wintering ducks. *Wildlife Society Bulletin*, 33(1), 103-112.

⁴ https://www.researchgate.net/publication/273123874_Behavioural_responses_of_wintering_black-faced_spoonbills_Platalea_minor_to_disturbance

⁵ <https://www.chinadaily.com.cn/a/202111/19/WS6196db04a310cdd39bc762a0.html>



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Kadoorie Farm & Botanic Garden Corporation

Development Strategy (NMDS)⁶. In the 14th Meeting of the Conference of the Contracting Parties to the Ramsar Convention on Wetlands, which was held in Wuhan in 2022, our Country also emphasised the importance of wetland protection, which is for the benefits of the future generation⁷. Needless to say, mainstreaming nature conservation mindset and thus improving the environmental protection performance of the present project would well match with the aforementioned guiding principles. Therefore, we urge relevant authorities and the project proponent to seriously consider our recommendation.

10. Thank you for your attention.

Ecological Advisory Programme
Kadoorie Farm and Botanic Garden

cc. Drainage Services Department
Highway Department
Housing Bureau
Architectural Services Department

⁶<https://www.policyaddress.gov.hk/2021/eng/pdf/publications/Northern/Northern-Metropolis-Development-Strategy-Report.pdf>

⁷ <https://news.rthk.hk/rthk/ch/component/k2/1674390-20221105.htm>

Figure 1. The cycle track, pedestrian walkway, Yau Pok Road and Kam Pok Road sections next/ close to the LPH site.

Are Yau Pok Road and the cycle track and pedestrian walkway alongside NTMDC usually heavily disturbed by frequent passenger and vehicle uses at present?



Are Kam Pok Road and the associated pedestrian walkway alongside NTMDC usually heavily disturbed by frequent passenger and vehicle uses at present?



Figure 2. Waterbirds utilising the NTMDC section next/ close to the LPH site.

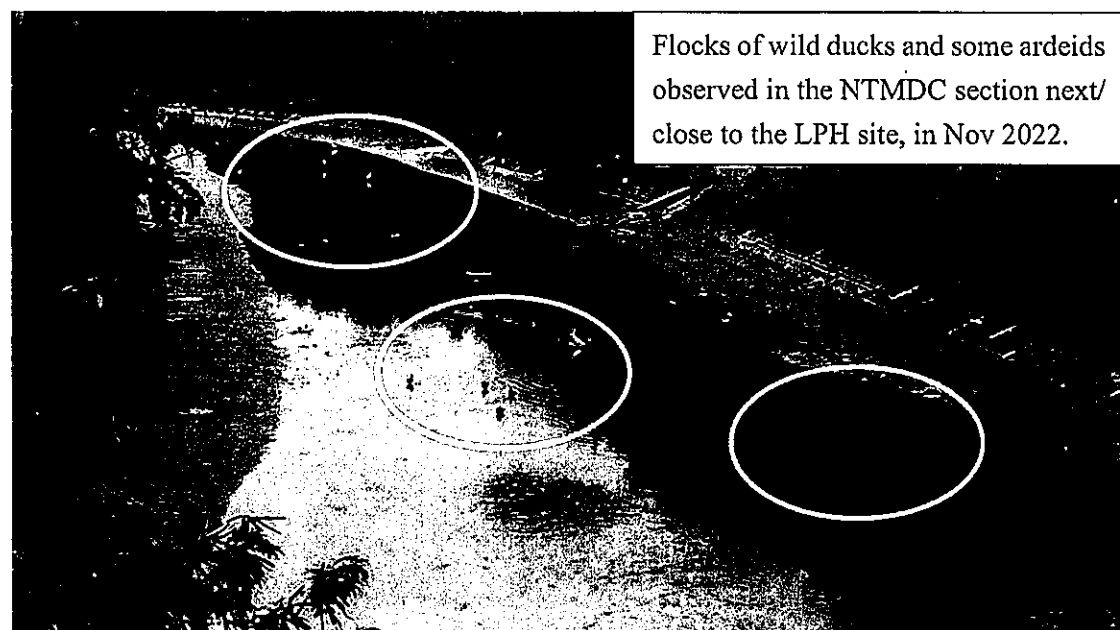
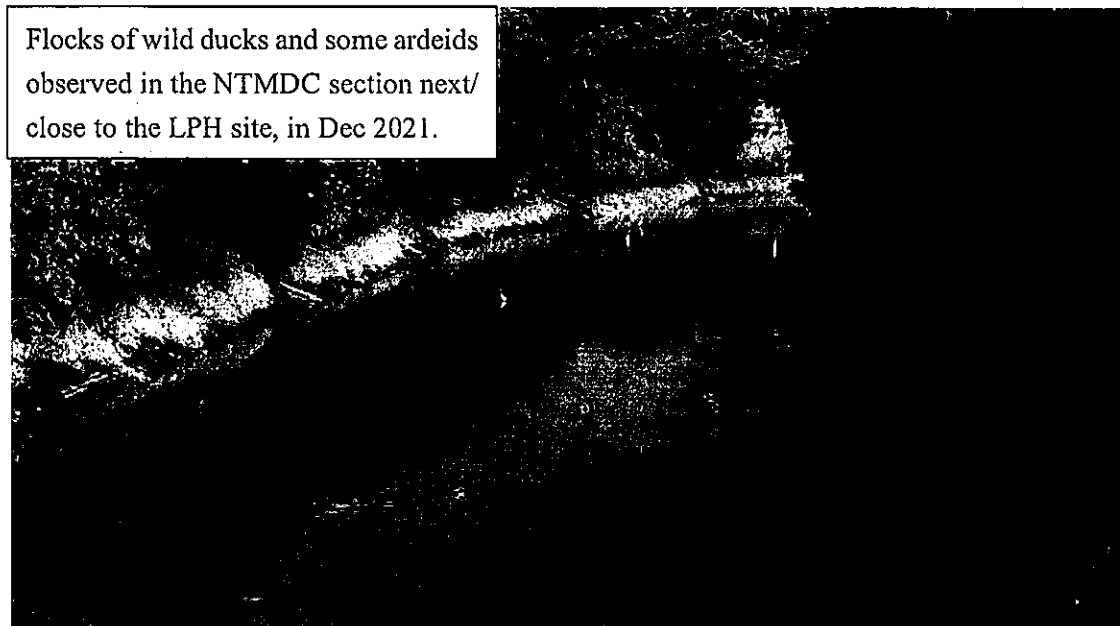
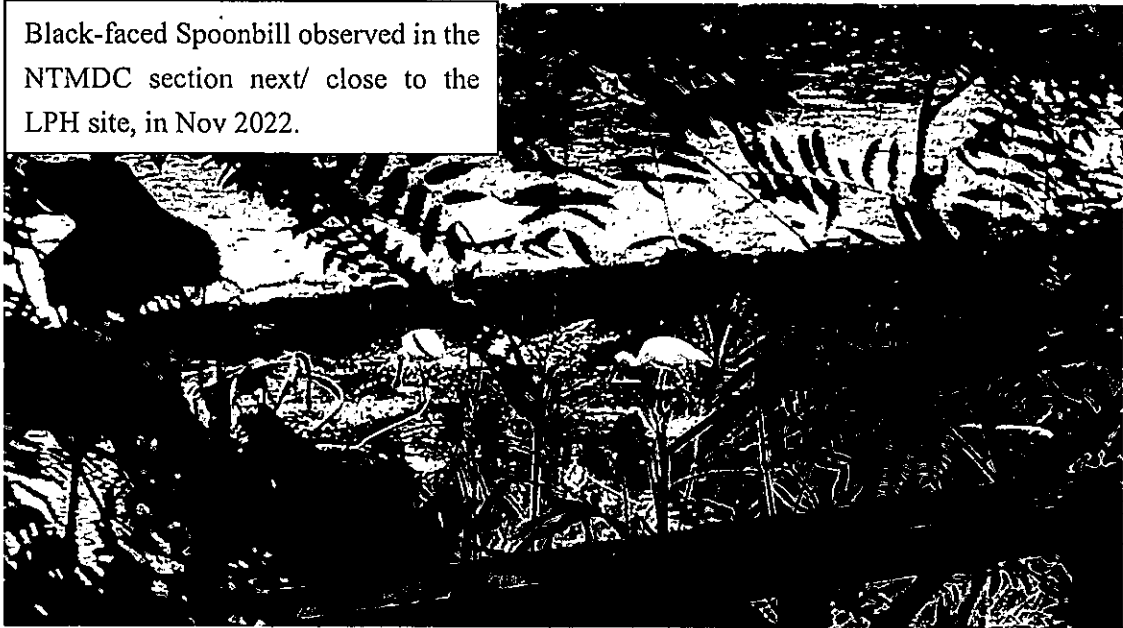


Figure 2. Cont'd.

Black-faced Spoonbill observed in the NTMDC section next/ close to the LPH site, in Nov 2022.



Black-faced Spoonbill foraging in the NTMDC section next to the LPH site, in Nov 2022.

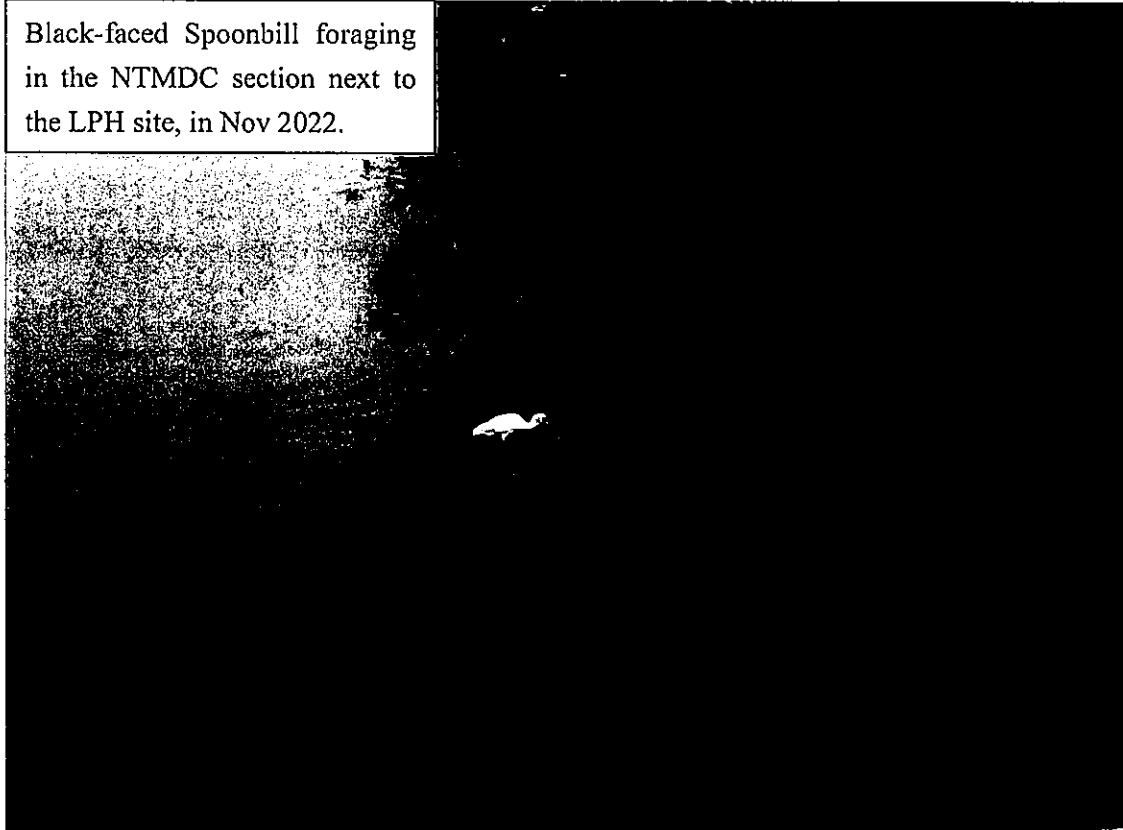
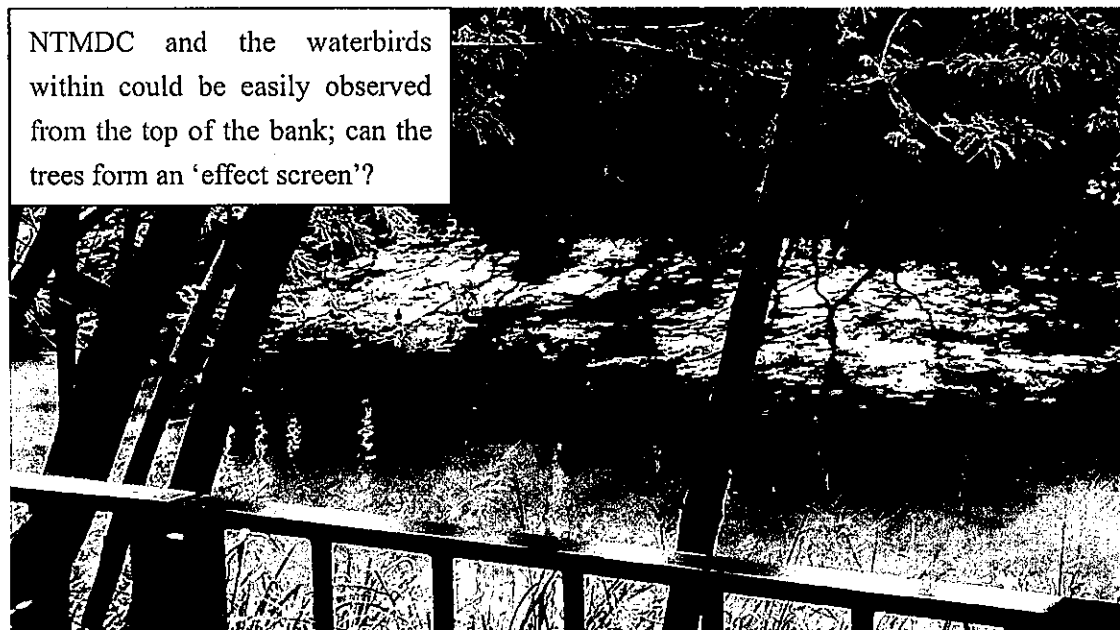
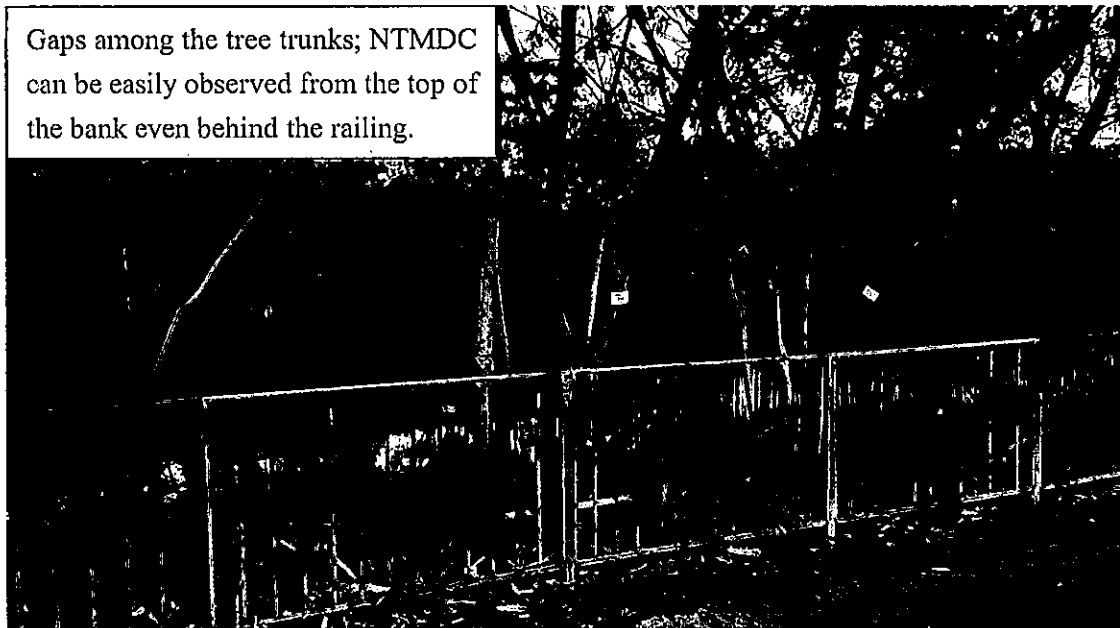


Figure 3. Gaps among the tree trunks alongside the NTMDC.

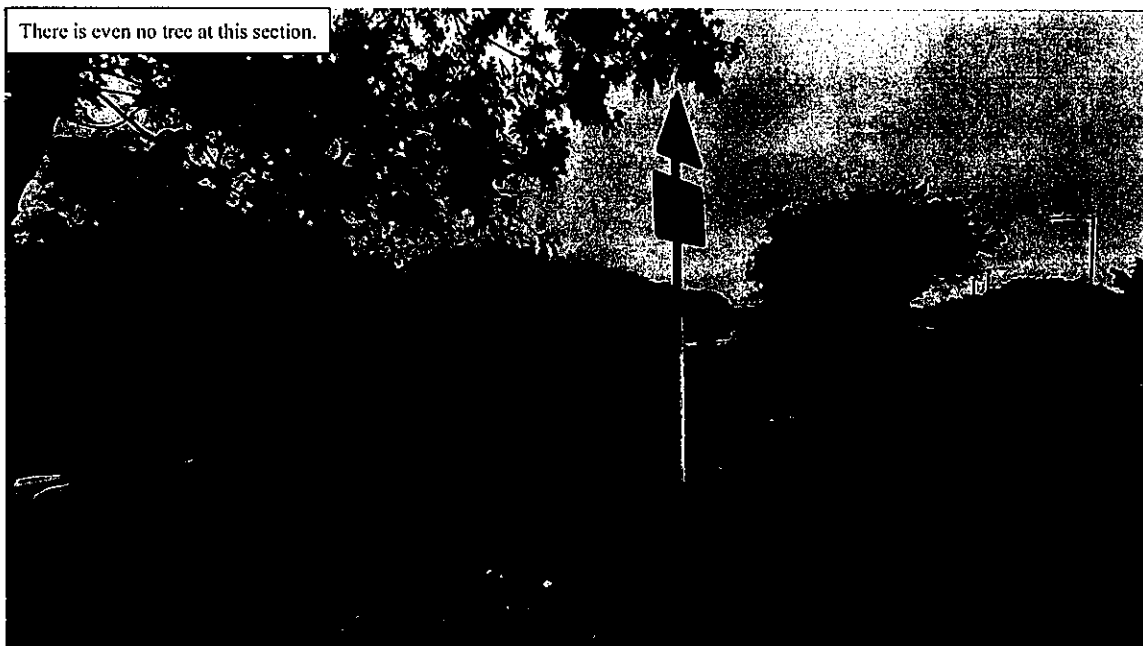




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Figure 3. Cont'd.

There is even no tree at this section.



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Figure 4. How waterbirds utilising the NTMDC responding to human disturbance.

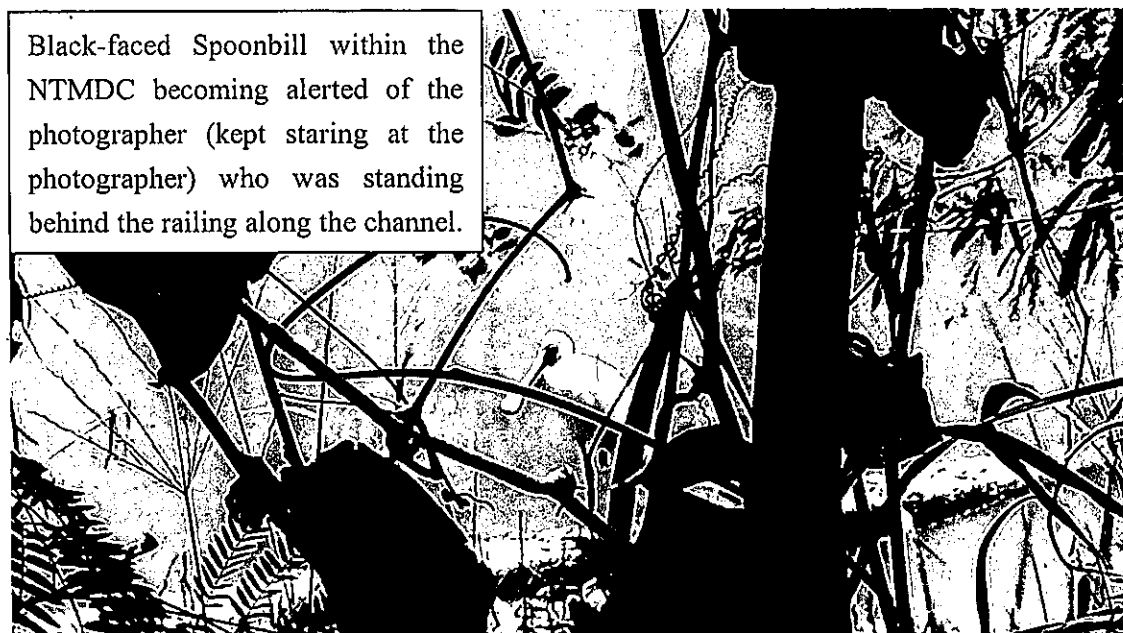
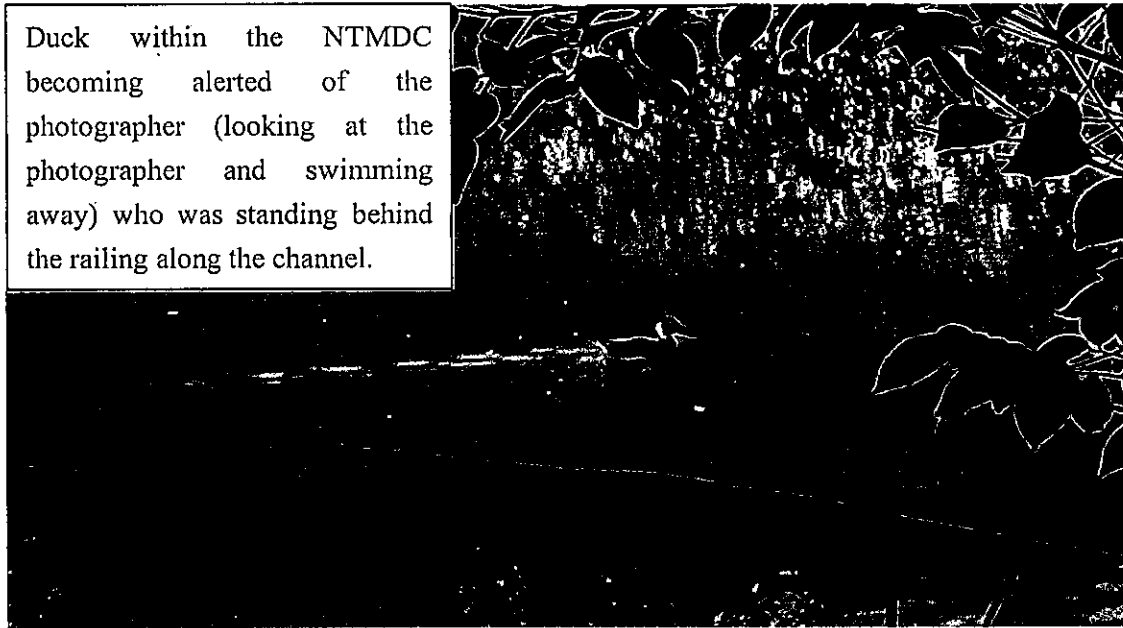
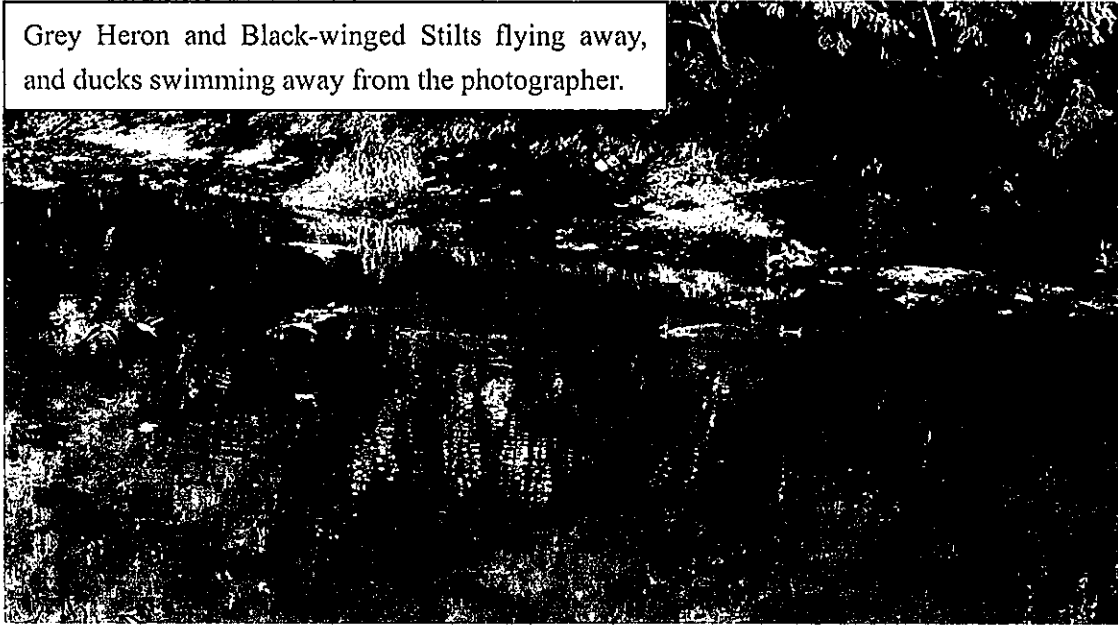
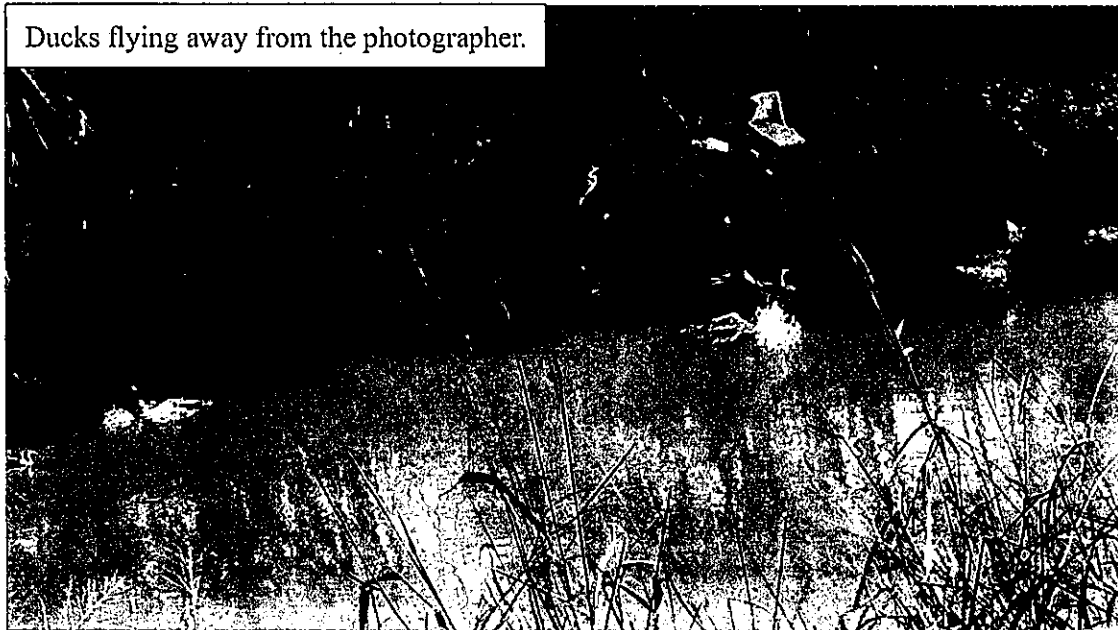


Figure 4. Cont'd.

Grey Heron and Black-winged Stilts flying away,
and ducks swimming away from the photographer.



Ducks flying away from the photographer.





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Figure 5. Most of the trees growing on the banks are the invasive *Leucaena leucocephala* (銀合歡).



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Lam Kam Road, Tai Po, New Territories, Hong Kong
Email: eap@kfbg.org

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Comments on the Section 16 Application No. A/YL-MP/341

19/05/2023 17:30

From: Kristy Chow <kristy@cahk.org.hk>
To: tpbpd <tpbpd@pland.gov.hk>
Cc: Roy Ng <roy@cahk.org.hk>
File Ref:

1 attachment



TPB20230519(MP341).pdf

Dear Sir/ Madam,

Attached please find our submission on the captioned.

Yours faithfully,
Chow Oi Chuen (Ms.)
Campaign Officer
The Conservancy Association



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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

19th May 2023

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,

Comments on the Section 16 Application No. A/YL-MP/341

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

1. Not in line with the planning intention of Wetland Buffer Area (WBA)

According to the Town Planning Board Guidelines for Application for Developments within Deep Bay Area (TPB PG-No. 12C), the application site is located within WBA. The planning intention of WBA is *"to protect the ecological integrity of the fish ponds and wetland within the WCA and prevent development that would have a negative off-site disturbance impact on the ecological value of fish ponds"*.

A Section 12A application Y/YL-MP/3 has once been submitted to Town Planning Board at part of the site currently zoned "Recreation" in 2014 to facilitate a residential development project. We note that maximum building height, maximum numbers of storeys, numbers of units of proposed development (Table 1) are higher than the previous one.

Table 1 Development parameter of Y/YL-MP/3 and A/YL-MP/341

	Y/YL-MP/3	A/YL-MP/341
Maximum building height	<6.6m	8.7m
Maximum no. of storeys	3	3



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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

No. of units	106	2,100
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In general, it appears that much higher level of development would be resulted in the application site. Such large development scale would potentially induce adverse off-site disturbance impacts on adjacent wetland in WCA, affect ecological function and integrity of Deep Bay wetland ecosystems. We opine that this is definitely not in line with the TPB PG-No. 12C and planning intention of WBA.

2. Not in line with the planning intention of Recreation Zone

According to approved Mai Po & Fairview Park Outline Zoning Plan No. S/YL-MP/6, the recreation zone is intended to:

"Primarily for recreational developments for the use of the general public. It encourages the development of active and/or passive recreation and tourism/eco-tourism." (Section 9.8.1)

"Under this zoning, residential development which should be ancillary to recreational use may be permitted on application to the Board. The development intensity should be in line with rural setting and shall not result in a total development in excess of a maximum plot ratio of 0.2, and a maximum building height of 2 storeys (6m)." (Section 9.8.2)

"Two areas to the east of Fairview Park are zoned "REC". These areas are partly occupied by existing open storage uses. In view of the presence of the ecological sensitive areas in the Area, developments of eco-tourism and compatible recreational developments are preferable within the "REC" zone." (Section 9.8.3)

"Since the area zoned for this purpose has a bearing on the overall amenity and water quality of Mai Po Nature Reserve and the Site of Special Scientific Interest (SSSI) in the Area, new development within this zone would not normally be allowed unless the applicant could demonstrate that the proposed development would have insignificant impact on environment, drainage,



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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

transportation and ecology in the area including the Mai Po Nature Reserve.”

(Section 9.8.4)

However, we cannot see how the application can comply with above intentions, and how to provide proper mitigation and compensation measures to reduce the environmental impacts.

3. Unclear methodology of ecological surveys

The applicant failed to provide complete information on methodology of ecological survey. According to the ecological impact assessment (Appendix 7) from the applicant, a literature review of existing ecological baseline and reconnaissance survey in December 2022 were conducted to verify the up-to-date ecological condition. However, the document did not provide information such as exact survey date, time duration, weather conditions, survey transect, etc.. It is expected that the applicant should clarify these basic details. The applicant should ensure that the reconnaissance survey should cover early morning which is the conventional practice for bird watching.

4. Lack of mitigation and compensation due to direct loss of habitat

The proposed development would lead to direct loss of 8.98 hectares of land which within the Wetland Buffer Area (WBA). Unfortunately, viewing the proposed layout plan of the proposed LPH, it seems that lack of mitigation and compensation due to direct loss of habitat are proposed. We cannot see the reason for not proposing any mitigation and compensation at this site which is within WBA. We are very concerned if any mitigation and compensation measures should be proposed to minimize such direct loss.

5. The layout and scale of the LPH is different from the approved EIA report

It is noticed that the application site is a private land owned by the developer. A private low-density residential and recreational development project had been raised by developer and the EIA report was completed in 2014 (AEIAR-182/2014). That EIA report was associated with the rezoning application (No: Y/YL-MP/3) which the northern part of the development site mainly included landscaped ponds, landscaped areas and some recreational and related support uses, while the southern part of the development site concentrated on building low-rise buildings (Figure 1). The development plan



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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

provided a total of 106 houses (two-storey residential building (6.6 meters) built on a basement parking lot).

On the other hand, we found the most updated layout plan of LPH proposed to build the residential building in both the northern and southern part of development site, with 2,100 units (three-storey residential building (8.7 meters)). The development layout and scale of LPH and the plan in the approved EIA(AEIA-182/2014) are different.

That EIA report assessed three development options (Figures 1 to 3), and finally confirmed that Option 3 should be further proceeded.

Option 1: There are residential buildings in the north and south of the development site

Option 2: Concentration of residences in the northern part of the development site

Option 3: Concentration of residences in the southern part of the development site

As the development layout and scale of the LPH is different from those of the approved EIA report (AEIA-182/2014), we are still very doubtful whether the applicant should refer to those environmental assessment results of that EIA report.

6. Adverse indirect environmental impact

We are still doubtful that at least some of the potential ecological impacts remains unsolved:

Disturbance on bird species at Ngau Tam Mei Drainage Channel (NTMDC): From the EcoIA for planning application Y/YL-MP7 and Y/YL-MP/8, high diversity of ardeids such as Black-faced Spoonbill, Chinese Pond Heron, Little Egret, Grey Heron, Great Egret, etc., can be spotted at NTMDC in the east of the application site. Off-site negative impact, such as construction noise during construction phase and human activities during operation phase, would adversely affect foraging behavior of these birds. Although the applicant 5.4.14 mentioned that the distance between site boundary and NTMDC have 7-10 meters which will not cost significant impact to NTMDC, we expected during the constructional and operational phases the demand of traffic and number of populations will be increased. Therefore, still worry how these impacts can



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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

be avoided or mitigated.

Disruption on flight lines of waterbirds: Figure 4a and 4b of the EcoIA for planning application Y/YL-MP7 and Y/YL-MP/8 revealed that apart from the major flight line observed along NTMDC, a minor flight line (Flight line No. 7) was recorded passing over the application site towards Park. Meanwhile, the Proposed Residential Cum Passive Recreation Development within "Recreation" Zone and "Residential (Group C)" Zone at Various Lots in DD 104, Yuen Long, N.T." EIA report (No. EIA-220/2014) once mentioned that "The birds observed in the present surveys were found flying over Fairview Park and other developed areas like Palm Springs, Royal Palms, and nearby village house developments". The previous Section 16 Application A/YL-MP/205 and Section 12A Application Y/YL-MP/6 also mentioned that flight line was observed passing over the application site.

Light disturbance: Additional light source from residential towers and open space would pose disturbance on birds and other wildlife. However, we cannot see how the applicant attempts to evaluate potential light impact properly in both daytime and nighttime during the operation phase. Particularly, we worry that the proposed transportation station and its adjacent buildings would generate additional glare, and this might bring light source even more close to NTMDC.

7. No information on land recovery after 5-years operation

We cannot find any further information provided by the applicant about the land recovery after 5 years operation of LPH. As part of the application site is within the WBA, there should be more details on land recovery, such as unloading buildings or, reinstating landscape after the short-term development.

Yours faithfully,

Chow Oi Chuen

Campaign Officer

The Conservancy Association



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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

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Figure 1-3 The EIA report assessed three development options

Option 1: There are residential buildings in the north and south of the development site

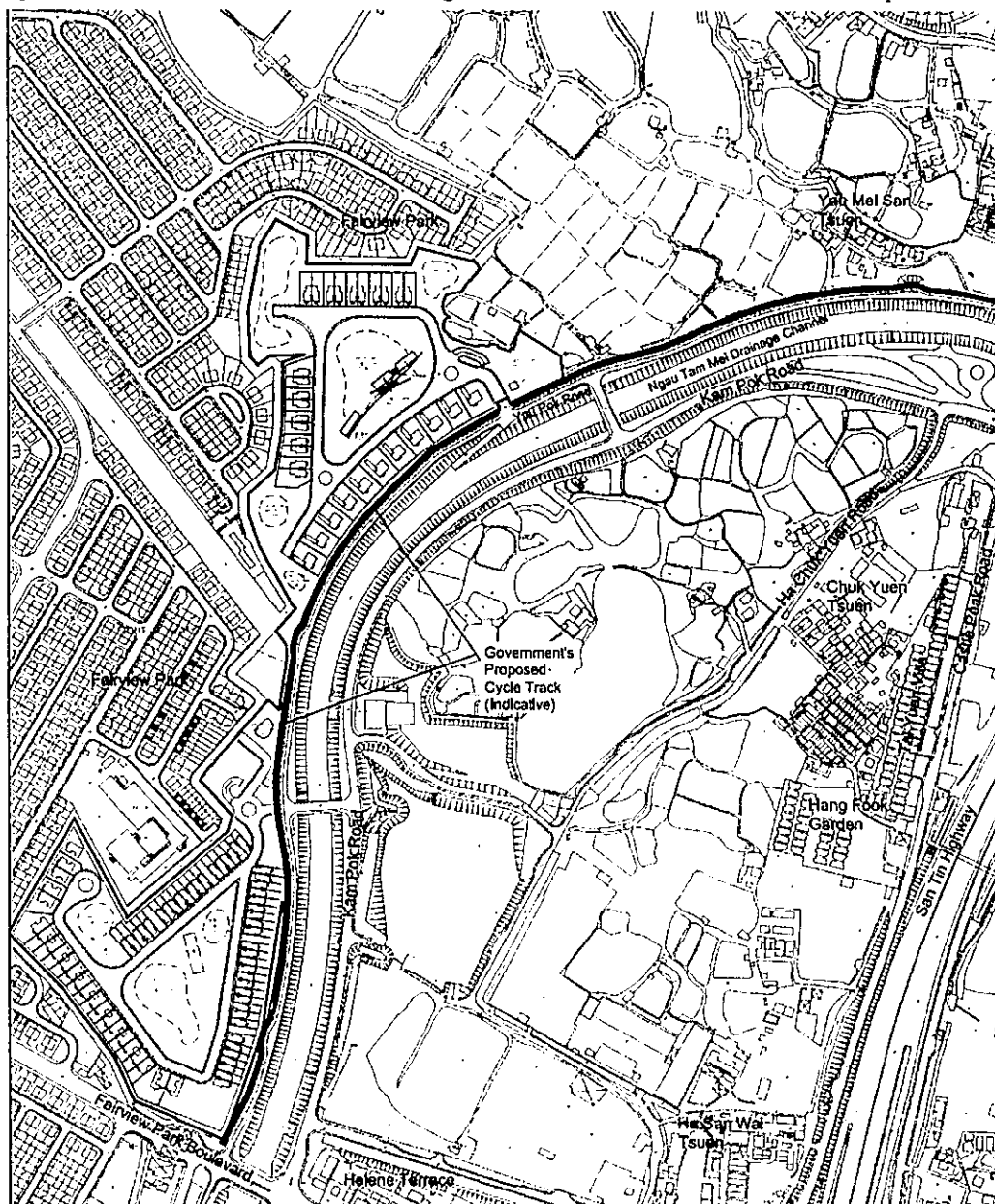


Figure: 2-2

Title: Layout of the Option 1

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Checked by: TC

Drawn by:	FIN
Checked by:	ES



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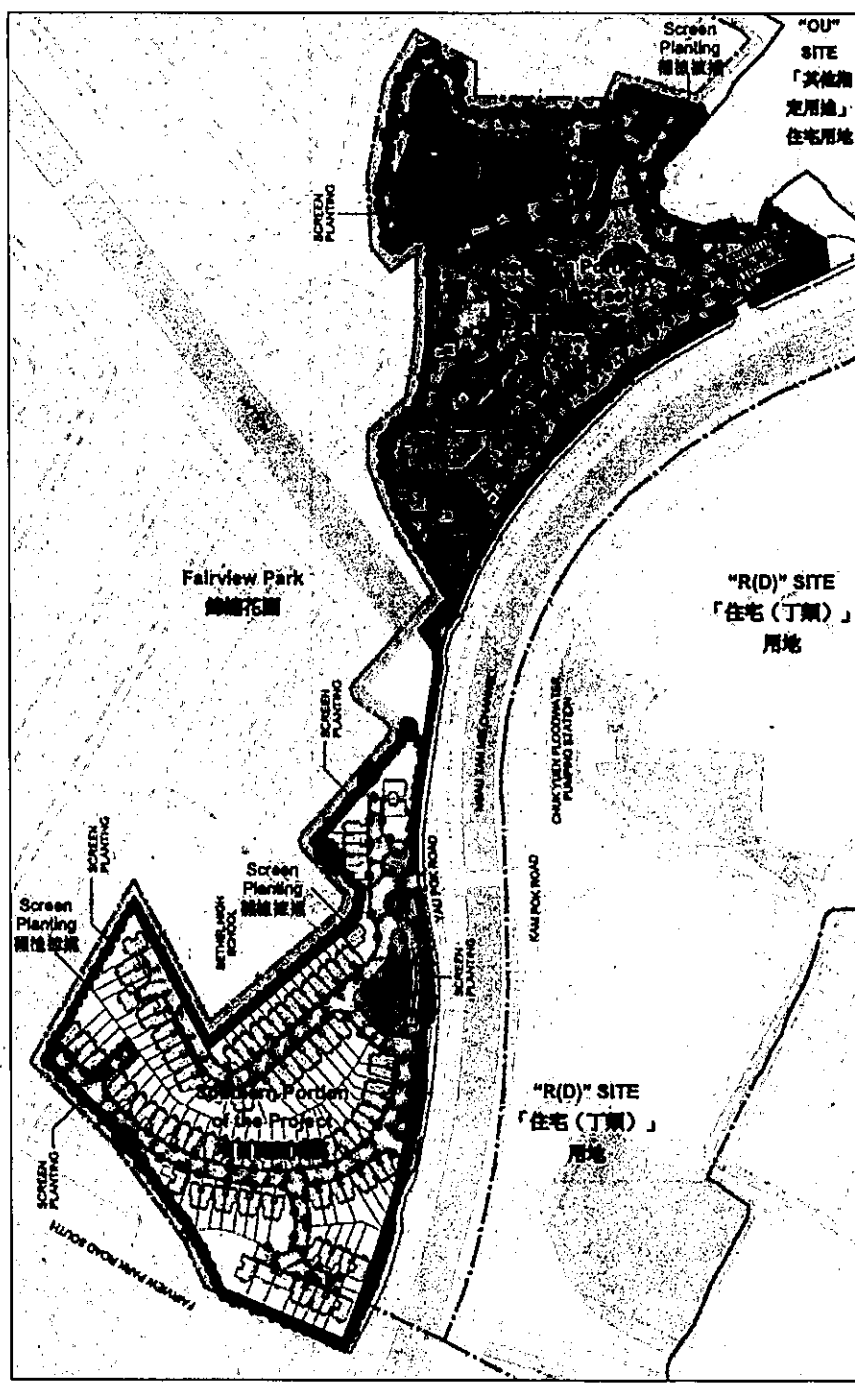
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電話 Tel.: (852) 2728 6781 傳真 Fax.: (852) 2728 5538

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Option 3: Concentration of residences in the southern part of the development site



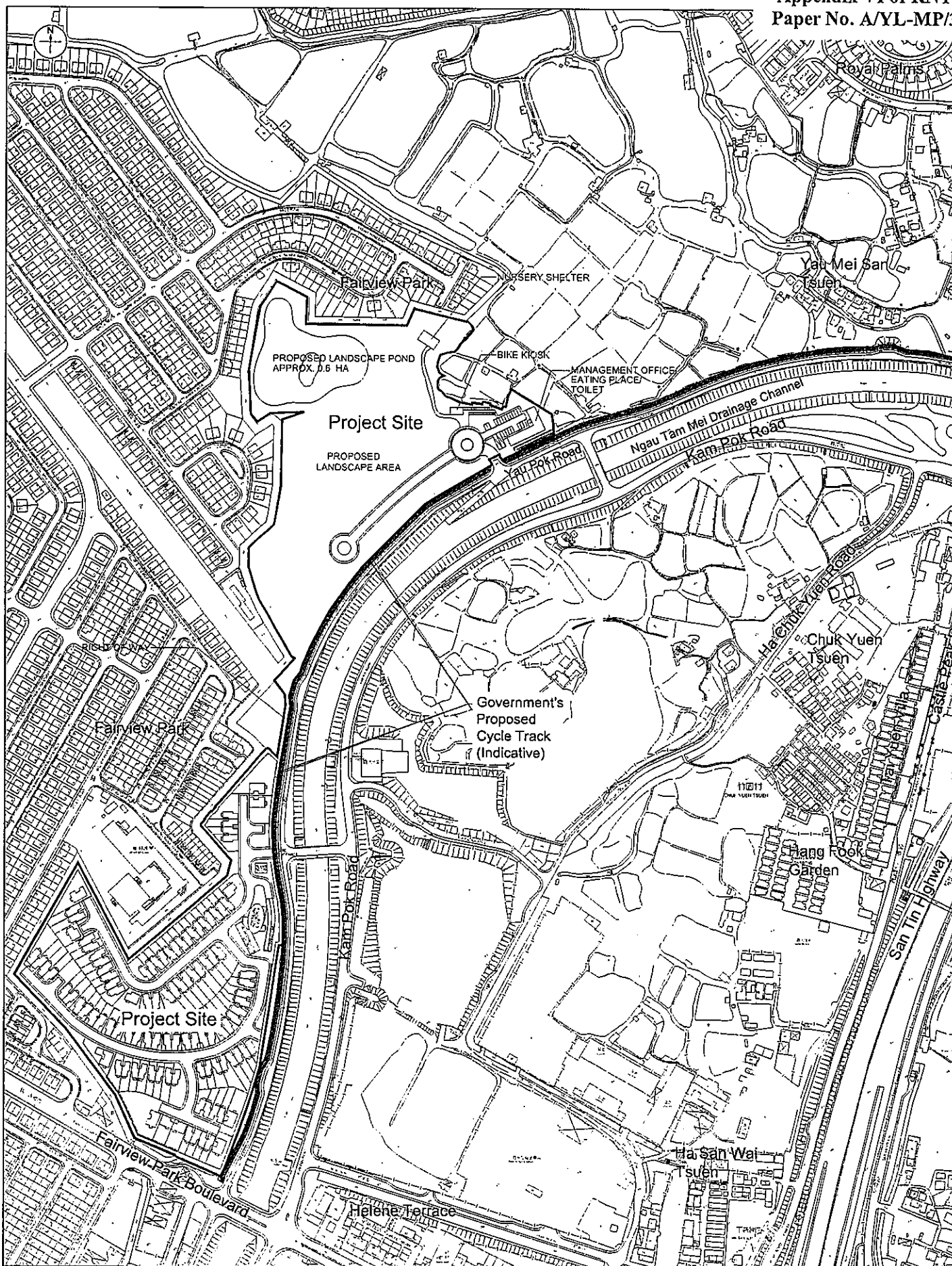


Figure: 2-1

Title: Master Layout Plan for the Proposed Development and the Environs

Project: EIA for Proposed Residential and Passive Recreation Development within "Recreation" (REC) Zone and "Residential (Group C)" Zone at Various Lots in DD 104, Yuen Long, N.T.

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Checked by: TC

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Date: May., 2013

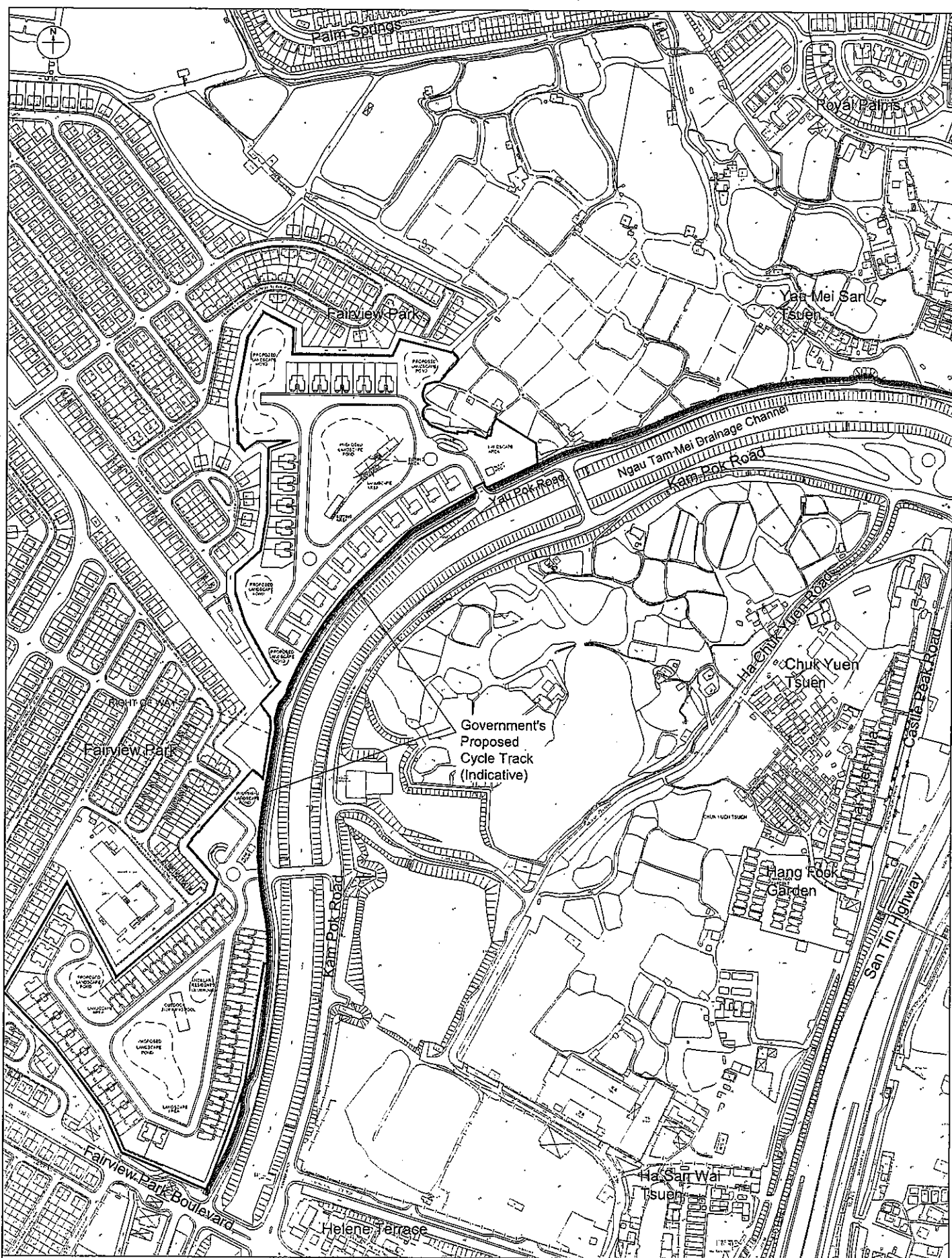


Figure: 2-2

Title: Layout of the Option 1

Project: EIA for Proposed Residential and Passive Recreation Development within "Recreation" (REC) Zone and "Residential (Group C)" Zone at Various Lots in DD 104, Yuen Long, N.T.

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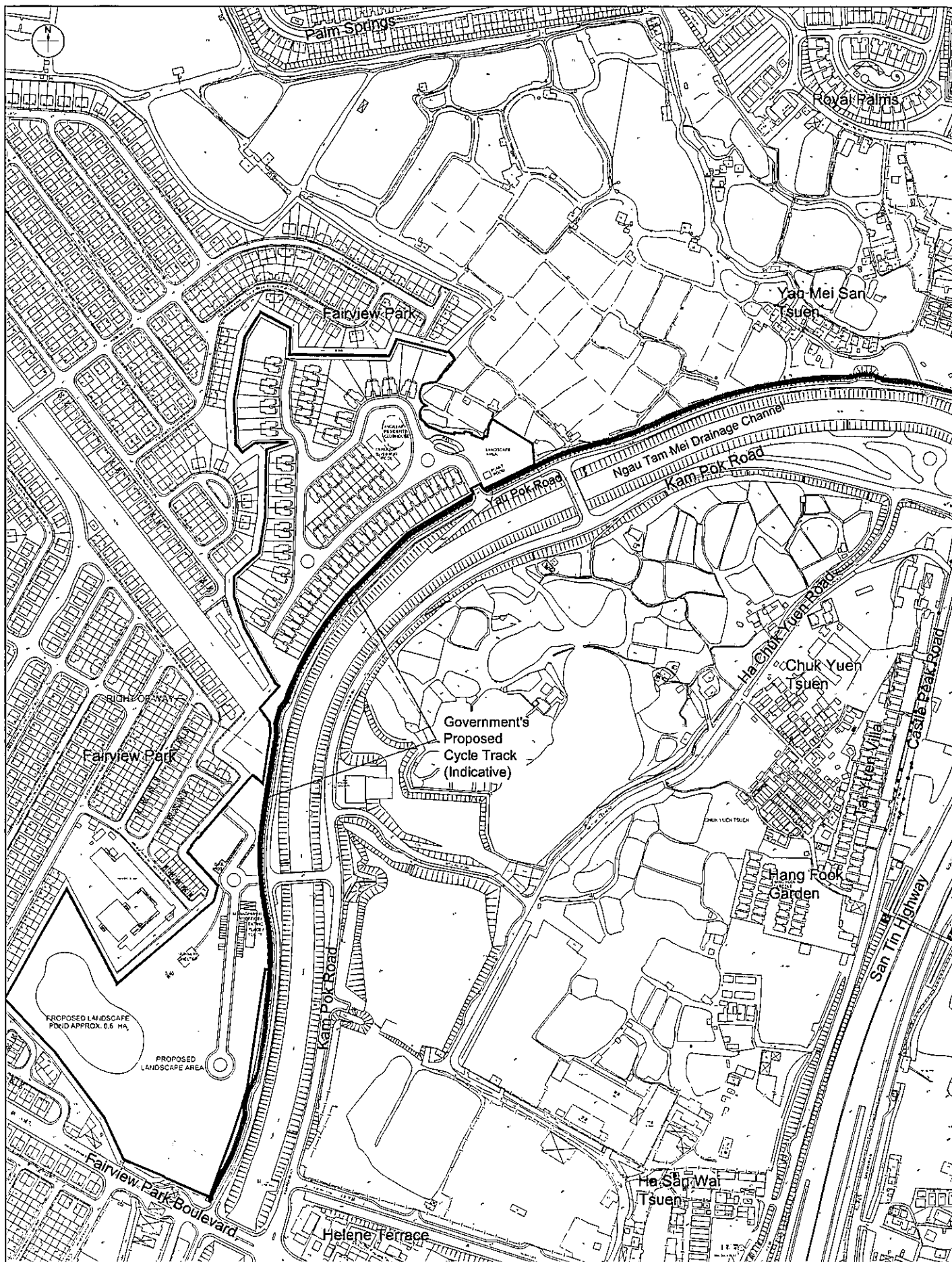


Figure: 2-3

Title: Layout of the Option 2

Project: EIA for Proposed Residential and Passive Recreation Development within "Recreation" (REC) Zone and "Residential (Group C)" Zone at Various Lots in DD 104, Yuen Long, N.T.

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