

**COMPREHENSIVE DEVELOPMENT AREA (1)**

Column 1 Uses always permitted	Column 2 Uses that may be permitted with or without conditions on application to the Town Planning Board
	Ambulance Depot Eating Place Educational Institution Flat Government Refuse Collection Point Government Use (not elsewhere specified) Hospital Hotel House Institutional Use (not elsewhere specified) Library Petrol Filling Station Place of Recreation, Sports or Culture Private Club Public Clinic Public Convenience Public Transport Terminus or Station Public Utility Installation Public Vehicle Park (excluding container vehicle) Recyclable Collection Centre Religious Institution Residential Institution School Shop and Services Social Welfare Facility Training Centre Utility Installation for Private Project

**Planning Intention**

This zone is intended for comprehensive development/redevelopment of the area for residential use with the provision of open space and other supporting facilities. The zoning is to facilitate appropriate planning control over the development mix, scale, design and layout of development, taking account of various environmental, traffic, infrastructure and other constraints.

(Please see next page)

<b>Figure No.</b>	<b>Scale</b>	<b>Figure Title</b>
5.2	-	Proposed Amendments to the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25 (1 of 3) – Schedule of Uses of “CDA(1)” Zone
<b>ARUP</b>	<b>Date</b>	<b>Source</b>
	Dec 2021	Extracted from the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25

**COMPREHENSIVE DEVELOPMENT AREA (1)** (Cont'd)

Remarks

- (a) Pursuant to section 4A(2) of the Town Planning Ordinance, and except as otherwise expressly provided that it is not required by the Town Planning Board, an applicant for permission for development on land designated “Comprehensive Development Area” shall prepare a Master Layout Plan for the approval of the Town Planning Board and include therein the following information:
- (i) the area of the proposed land uses, the nature, position, dimensions and heights of all buildings to be erected in the area;
  - (ii) the proposed total site area and gross floor area for various uses, total number of flats and flat size, where applicable;
  - (iii) the details and extent of Government, institution or community (GIC) and recreational facilities, public transport and parking facilities, and open space to be provided within the area;
  - (iv) the alignment, widths and levels of any roads proposed to be constructed within the area;
  - (v) the landscaping and urban design proposals within the area;
  - (vi) programmes of development in detail;
  - (vii) an environmental assessment report to examine any possible environmental problems that may be caused to or by the proposed development during and after construction and the proposed mitigation measures to tackle them;
  - (viii) a drainage and sewerage impact assessment report to examine any possible drainage and sewerage problems that may be caused by the proposed development and the proposed mitigation measures to tackle them;
  - (ix) a traffic impact assessment report to examine any possible traffic problems that may be caused by the proposed development and the proposed mitigation measures to tackle them; and
  - (x) such other information as may be required by the Town Planning Board.

(Please see next page)

Figure No.	Scale	Figure Title
5.2	-	Proposed Amendments to the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25 (2 of 3) – Schedule of Uses of “CDA(1)” Zone
ARUP	Date	Source
	Dec 2021	Extracted from the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25

**COMPREHENSIVE DEVELOPMENT AREA (1)** (Cont'd)

- (b) The Master Layout Plan should be supported by an explanatory statement which contains an adequate explanation of the development proposal, including such information as land tenure, relevant lease conditions, existing conditions of the site, the character of the site in relation to the surrounding areas, principles of layout design, major development parameters, design population, types of GIC facilities, and recreational and open space facilities.
- (c) *No new development, or addition, alternation and/or modification to or redevelopment of an existing building shall result in a total development and/or redevelopment in excess of a maximum domestic plot ratio of 4.3, a non-domestic gross floor area (GFA) of not less than 2,708m<sup>2</sup> (for 100-place residential care home for the elderly), a maximum site coverage of 27%, and the maximum building height in terms of metres above Principal Datum as stipulated on the Plan.*
- (d) In determining the maximum plot ratio for the purposes of paragraph (c) above, any floor space that is constructed or intended for use solely as car park, loading/unloading bay, plant room and caretaker's office, or caretaker's quarters and recreational facilities for the use and benefit of all the owners or occupiers of the domestic building or domestic part of the building, provided such uses and facilities are ancillary and directly related to the development or redevelopment, may be disregarded.
- (e) *In determining the maximum plot ratio/GFA for the purpose of paragraph (c) above, any floor space that is constructed or intended for use solely as Government, institution or community facilities, as required by the Government, will be disregarded.*
- ~~(e)~~ (f) Based on the individual merits of a development or redevelopment proposal, minor relaxation of the plot ratio/site coverage/building height restrictions stated in paragraph (c) above may be considered by the Town Planning Board on application under section 16 of the Town Planning Ordinance.

Figure No.	Scale	Figure Title
5.2	-	Proposed Amendments to the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25 (3 of 3) – Schedule of Uses of “CDA(1)” Zone
ARUP	Date	Source
	May 2022	Extracted from the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25

## 7. LAND USE ZONINGS

### 7.1 “Commercial” (“C”): Total Area 3.11 ha

- 7.1.1 This zone is intended primarily for commercial developments, which may include shop and services, place of entertainment and eating place, functioning mainly as local shopping centre(s) serving the immediate neighbourhood.
- 7.1.2 This zone comprises three existing buildings in Planning Area 30 with planning permission for wholesale conversion for retail uses which are at different stages of wholesale conversion.
- 7.1.3 In order to control the building density and avoid over-development, the site zoned “C” is restricted to a maximum non-domestic plot ratio of 5.0 and the maximum building height in terms of metres above Principal Datum as stipulated on the Plan or the plot ratio and the height of the existing building, whichever is the greater. To provide flexibility for innovative design adapted to the characteristics of particular sites, minor relaxation of the building height and/or plot ratio restrictions may be considered by the Board on application under section 16 of the Ordinance. Each application for minor relaxation of plot ratio/building height restrictions will be considered on its own merits.
- 7.1.4 In the circumstances set out in Regulation 22 of the Building (Planning) Regulations, the maximum plot ratio specified in the Notes of the Plan may be increased by what is permitted to be exceeded under Regulation 22. This is to maintain flexibility for unique circumstances such as dedication of part of a site for road widening or public uses.
- 7.1.5 The plot ratio control under “C” zone is regarded as being stipulated in a “new or amended statutory plan” according to the Joint Practice Note No. 4 “Development Control Parameters Plot Ratio/Gross Floor Area”, and shall be subject to the streamlining arrangements stated therein.

### 7.2 “Comprehensive Development Area (1)”: Total Area 3.16 ha

- 7.2.1 The planning intention of this zone is for comprehensive development/redevelopment of the area for residential use with the provision of open space and other supporting facilities. The zoning is to facilitate appropriate planning control over the development mix, scale, design and layout of development, taking account of various environmental, traffic, infrastructure and other constraints.
- 7.2.2 *A site located in the western periphery of Fanling/Sheung Shui New Town in Planning Area 35 is designated as “CDA(1)”, within which any development or redevelopment proposals will be subject to a maximum domestic plot ratio of 4.3, a non-domestic GFA of not less than 2,708m<sup>2</sup> (for 100-place residential care home for the elderly), a maximum site coverage of 27%, and the building height restriction as shown on the Plan.*
- 7.2.3 To provide flexibility for innovative design adapted to the characteristics of the site, minor relaxation of the plot ratio, site coverage and building height restrictions stated above may be considered by the Board through the planning permission system. Each proposal will be considered on the individual planning merits.
- 7.2.4 *In order to facilitate provision of GIC facilities, in determining the maximum plot ratio/GFA of the development and/or redevelopments, any floor space that is constructed or intended for use solely as Government, institution or community facilities, as required by the Government, will be disregarded.*

Figure No.	Scale	Figure Title
5.3	-	Proposed Amendments to the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25 (1 of 2) – Explanatory Statement of “CDA” Zone
ARUP	Date	Source
	May 2022	Extracted from the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25



7.2.45 Any development proposal in the zone requires the approval of the Board by way of a planning application under section 16 of the Ordinance. A Master Layout Plan (MLP) should be submitted in accordance with the requirements as specified in the Notes of the Plan for the approval of the Board under section 4A(2) of the Ordinance. A copy of the approved MLP will be made available in the Land Registry for public inspection pursuant to section 4A(3) of the Ordinance.

7.2.56 By requiring submission of MLP for approval of the Board, it allows the Board to exercise appropriate planning control on the design, layout and provision of facilities of the future development within this zone.

7.2.67 The “CDA” site will share a common ingress/egress point with the adjoining low-rise, low-density residential development.

7.3 “Commercial/Residential” (“C/R”) : Total Area 22.07 ha

7.3.1 The planning intention of this zone is intended primarily for commercial and/or residential development. Commercial, residential and mixed commercial/residential uses are always permitted.

7.3.2 The existing market towns of Shek Wu Hui and Luen Wo Hui are zoned “C/R”. This implies that sites may be developed for either residential or commercial uses, or with purpose-designed buildings containing both commercial and residential accommodation.

7.3.3 Except for the sub-areas of this zone, i.e. “C/R(1)”, “C/R(2)” and “C/R(3)”, for sites with an area of less than 340m<sup>2</sup>, only buildings of up to 20m in height with a maximum domestic plot ratio of 3.9 or a maximum non-domestic plot ratio of 6.7 will be permitted. In order to encourage the amalgamation of sites for more comprehensive development, the height limit has been relaxed to 81m with a maximum domestic plot ratio of 5.0 or a maximum non-domestic plot ratio of 9.5 for sites of 340m<sup>2</sup> or greater.

7.3.4 Three sub-areas to the north-east of Luen Wo Hui in Planning Area 19 are under this zone, namely “C/R(1)”, “C/R(2)” and “C/R(3)”. For “C/R(1)”, development is subject to a maximum building height of 135 mPD and a maximum domestic plot ratio of 5.0 or a maximum non-domestic plot ratio of 9.5. For “C/R(2)”, development is subject to a maximum building height of 135 mPD, a maximum domestic gross floor area (GFA) of 35,292m<sup>2</sup> and a maximum non-domestic GFA of 48,848m<sup>2</sup>, of the latter, not less than 27,277m<sup>2</sup> for Government uses. For “C/R(3)”, development is subject to a maximum building height of 123 mPD and a maximum domestic plot ratio of 5.0 or a maximum non-domestic plot ratio of 9.5.

7.3.5 To provide flexibility for innovative design adapted to the characteristics of particular sites, minor relaxation of the plot ratio, GFA and building height restrictions stated above may be considered by the Board through the planning permission system. Each proposal will be considered on the individual planning merits.

7.4 “Residential (Group A)” (“R(A)”) : Total Area 133.11 ha

7.4.1 The planning intention of this zone is primarily for high-density residential developments. Commercial uses are always permitted on the lowest three floors of a building or in the purpose-designed non-residential portion of an existing building.

7.4.2 The “R(A)” zone includes sites for private residential developments in proximity to the two existing market towns, East Rail Sheung Shui and Fanling Stations as well as existing and proposed public housing

Figure No.	Scale	Figure Title
5.3	-	<b>Proposed Amendments to the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25 (2 of 2) – Explanatory Statement of “CDA” Zone</b>
<b>ARUP</b>	Date	Source
	Dec 2021	Extracted from the Draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/25

**Previous Applications**

**S.16 Applications**

**Approved Applications**

<b>Application No.</b>	<b>Uses/Developments</b>	<b>Decision Date</b>	<b>Approval Conditions</b>
A/FSS/110	Comprehensive Residential Development (Master Layout Plan Submission) Minor Relaxation of Plot Ratio and Building Height Restrictions	09.04.1999	A1 – A8
A/FSS/152	Residential Development (Minor Amendments to an Approved Master Layout Plan)	25.04.2003	A6, A7, A9 – A13
A/FSS/156	Residential Development (Minor Amendments to an Approved Master Layout Plan)	05.12.2003	A6, A7, A9 – A12, A14 – A15

**Approval Conditions**

- A1      The submission of a revised Master Layout Plan by taking into account the conditions A2, A3, A6 and A7 below to the satisfaction of the Director of Planning or of the Town Planning Board;
- A2      The design and provision of vehicular access road, visitor car parking spaces, loading and unloading facilities to the satisfaction of the Commissioner for Transport or of the Town Planning Board;
- A3      The submission of a revised traffic noise assessment and implementation of mitigation measures identified therein to the satisfaction of the Director of Environmental Protection or of the Town Planning Board;
- A4      The submission of a revised drainage impact assessment and implementation of mitigation measures identified therein to the satisfaction of the Director of Drainage Services or of the Town Planning Board;
- A5      The submission and implementation of the sewage disposal facilities to the satisfaction of the Director of Environmental Protection or of the Town Planning Board;
- A6      The submission and implementation of landscaping proposals including tree preservation and felling proposals to the satisfaction of the Director of Planning or of the Town Planning Board;
- A7      The submission of an implementation programme to the satisfaction of the Director of Planning or of the Town Planning Board;
- A8      The permission shall cease to have effect on 9.4.2002 unless prior to the said date either the development hereby permitted is commenced or this permission is renewed;

- A9 The submission of a revised Master Layout Plan (MLP) by taking into account the conditions A6, A7 and A10 below to the satisfaction of the Director of Planning or of the Town Planning Board;
- A10 The design and provision of vehicular access road, parking spaces, loading and unloading facilities to the satisfaction of the Commissioner for Transport or of the Town Planning Board;
- A11 The implementation of the accepted mitigation measures on traffic noise impact and sewage disposal facilities to the satisfaction of the Director of Environmental Protection or of the Town Planning Board;
- A12 The implementation of the accepted mitigation measures on drainage impact to the Director of Drainage Services or of the Town Planning Board;
- A13 The permission should cease to have effect on 25.4.2007 unless prior to the said date either the development hereby permitted was commenced or this permission was renewed;
- A14 The surrender of land from the roundabout at the ingress/egress to the west of the application site to the Government, as proposed by the applicant, to the satisfaction of the Commissioner for Transport or of the Town Planning Board; and
- A15 The permission should cease to have effect on 5.12.2007 unless prior to the said date either the development hereby permitted was commenced or this permission was renewed.

### **Rejected Applications**

<b>Application No.</b>	<b>Uses/Developments</b>	<b>Decision Date</b>	<b>Reasons for Rejection</b>
A/FSS/8	Residential Development	23.2.1990	R1
A/FSS/37	Residential Development with Ancillary Recreational Facilities	16.07.1993	R2, R3
A/FSS/72	Residential Development with Minor Relaxation in Plot Ratio and Height Restrictions	26.01.1996	R4 – R11

### **Reasons for Rejection**

- R1 The development intensity under the revised scheme was still excessive under the previous “GB” zoning.
- R2 The proposed development plot ratio, site coverage and building height exceed the stated restrictions in the "Comprehensive Development Area" zone on the draft Fanling/Sheung Shui Outline Zoning Plan No. S/FSS/3. According to Section 16(4) of the Town Planning Ordinance, “the Board may grant permission under Section 16(3) of the Ordinance only to the extent shown or provided for or specified in the plan”; therefore, the Town Planning Board has no authority to grant planning permission to the application;
- R3 The vehicular access to the proposed development is unsatisfactory, the provision of car parking spaces is inadequate and the Traffic Impact Study is also unsatisfactory;

- R4 The proposed increase in plot ratio from 0.8 to 1 and building height from 3 storeys over 1-storey carport to 4 to 6 storeys with 2 levels of underground car-park cannot be considered as minor;
- R5 There is no strong justifications/merits in the submission to warrant the proposed deviations from the development restrictions of the "Comprehensive Development Area" ("CDA") zone on the draft Fanling/Sheung Shui OZP No. S/FSS/5;
- R6 The master layout plan is not satisfactory in the following aspects:
- (i) It has not allowed sufficient flexibility for the future upgrading of Castle Peak Road to a dual-lane road;
  - (ii) It has not provided clear information on the relationship on the site formation works necessary to produce building platforms and the vehicular access road; and
  - (iii) It has not provided sufficient details on the proposed vehicular access road which forms a common ingress/egress point with the adjoining "CDA";
- R7 The traffic forecast to support the increase in plot ratio is unsatisfactory as the traffic flow forecast is derived from out-dated information and there is no indication on the source of population assumption along both sides of Castle Peak Road and for North District for the design year of 2011. The unsatisfactory traffic forecast also affects the result of the noise modelling;
- R8 The master landscape plan is not satisfactory in that it does not provide clear and adequate description of the existing trees on the site and many trees have been mis-identified;
- R9 The construction of the proposed underground car-park in the centre of the knoll will necessitate a construction area larger than the car-park area. This will adversely affect the root systems of the trees on the site, including some of the trees which falls outside the footprint of the proposed development;
- R10 The environmental impact assessment is not satisfactory in that no air quality impact assessment has been included to derive effective mitigation measures;
- R11 The approval of the application will set an undesirable precedent for similar applications for more intensive development in the "CDA" zone in the district;

### **S.12A Applications**

<b>Application No.</b>	<b>Uses/Developments</b>	<b>Decision</b>	<b>Decision Date</b>
Y/FSS/12	To rezone the application site from "Comprehensive Development Area" to "Comprehensive Development Area (1)"	Rejected R12 – R13	27.10.2017
Y/FSS/14	To rezone the application site from "Comprehensive Development Area" to "Comprehensive Development Area (1)"	Not to consider	21.6.2019
Y/FSS/15	To rezone the application site from "Comprehensive Development Area" to "Comprehensive Development Area (1)"	Withdrawn	20.11.2020

### **Reasons for Rejection**

- R12 The development intensity of the proposed “Comprehensive Development Area (1)” (“CDA(1)”) zoning was considered excessive and not compatible with the surrounding areas. The applicant fails to provide strong justification for rezoning the site from “CDA” to “CDA(1)” with the proposed development restrictions; and
- R13 Approval of the rezoning application would set an undesirable precedent for similar rezoning applications. The cumulative effect of approving such similar applications would result in adverse impacts on the surrounding area.



**Detailed Comments from Relevant Government Departments**

**1. Social Welfare**

Comment of the Director of Social Welfare (DSW):

- (a) the applicant should ensure that the design and construction of the RCHE shall comply with all relevant licensing and statutory requirements including but not limited to the i) Residential Care Homes (Elderly Persons) Ordinance (Cap. 459) and its subsidiary legislation and ii) the latest version of the Code of Practice for Residential Care Homes (Elderly Persons) (the CoP);
- (b) having examined the application form and indicative layout, his observations are as follows:
  - (i) there are totally 108 beds spread across 2 floors in the layout plan instead of 100 beds as mentioned in the application form. Please advise the actual number of beds to be provided;
  - (ii) he noticed that two sick rooms are to be provided. If there are more than 100 beds, please take note of the requirements on the provision of isolation rooms / facilities according to para. 12.4.1 of the CoP (i.e. An additional isolation room / facility shall be provided for every extra 50 beds (or less)) (please refer to the CoP for details); and
  - (iii) please also note that habitation areas of RCHE, such as dormitories, sick / isolation rooms, end-of-life (EOL) care rooms should be provided with openable/prescribed windows according to the CoP (please refer to para 4.9 of the CoP for details). Please review whether the EOL care room could comply with the requirement.

**2. Water Supply**

Comment of the Chief Engineer/Construction, Water Supplies Department (CE/C, WSD):

- (a) existing water mains are inside the proposed lot and will be affected. The applicant is required to either divert or protect the water mains found on site;
- (b) if diversion is required, existing water mains inside the proposed lot are needed to be diverted outside the site boundary of the proposed development to lie in Government land. A strip of land of minimum 1.5m in width should be provided for diversion of existing water mains. The cost of diversion of existing water mains upon request will have to be borne by the grantee/applicant; and the applicant shall submit all the relevant proposal to WSD for consideration and agreement before works commence;
- (c) if diversion is not required, the following conditions shall apply:
  - (i) existing water mains are effected as indicated on the site plan and no

development which requires resiting of water mains will be allowed;

- (ii) details of site formation works shall be submitted to the Director of Water Supplies for approval prior to commencement of works;
- (iii) no structures shall be built or materials stored within 1.5m from the centre line(s) of water main(s) shown on the plan. Free access shall be made available at all times for staff of the Director of Water Supplies or their contractor to carry out construction, inspection, operation, maintenance and repair works;
- (iv) no trees or shrubs with penetrating roots may be planted within the Water Works Reserve or in the vicinity of the water main(s) shown on the plan. No change of existing site condition may be undertaken within the aforesaid area without the prior agreement of the Director of Water Supplies. Rigid root barriers may be required if the clear distance between the proposed tree and the pipe is 2.5m or less, and the barrier must extend below the invert level of the pipe;
- (v) no planting of obstruction of any kind except turfing shall be permitted within the space of 1.5m around the cover of any valve or within a distance of 1m from any hydrant outlet; and
- (vi) tree planting may be prohibited in the event that the Director of Water Supplies considers that there is any likelihood of damage being caused to water mains.

### **3. Fire Safety**

Comment of the Director of Fire Services (D of FS):

- (a) detailed fire safety requirements will be formulated upon receipt of formal submission of General Building Plan;
- (b) EVA arrangement shall comply with the standard as stipulated in Section 6, Part D of the Code of Practice for Fire Safety in Buildings 2011 under the Building (Planning) Regulation as administered by Building Authority. Also the EVA provision of the nearby buildings shall not be affected by the proposed work; and
- (c) Nevertheless, shall the proposed work encroached into any licensed premises in the area, such as petrol filling station or dangerous goods store, the consultant should make separate enquiry to his department to ensure work feasibility.

### **4. Building Matters**

Comment of the Chief Building Surveyor/New Territories West, Buildings Department (CBS/NTW, BD):

- (a) before any new building works are to be carried out on the Site, prior approval and consent from the Building Authority (BA) should be obtained unless they are exempted building works or commenced under the simplified requirement under the Minor Works Control System. Otherwise they are Unauthorized Building Works (UBW). An Authorized Person (AP) should be appointed as the coordinator for the

proposed building works in accordance with the BO;

- (b) for UBW erected on leased land, enforcement action may be taken by the BA to effect their removal in accordance with BD's enforcement policy against UBW as and when necessary. The granting of any planning approval should not be constructed as an acceptance of any existing building works or UBW on the Site under the BO;
- (c) if the proposed use under application is subject to the issue of a licence, please be reminded that any existing structures on the Site intended to be used for such purposes are required to comply with the building safety and other relevant requirements as may be imposed by the licensing authority;
- (d) the Site shall be provided with means of obtaining access thereto from a street under Regulation 5 of the Building (Planning) Regulations (B(P)R) and emergency vehicular access under Regulation 41D of the B(P)R;
- (e) the development intensity shall not exceed the permissible as stipulated under the First Schedule of B(P)R. if the Site is not abutting on a specified street having a width not less than 4.5m, the development intensity shall be determined by the BA under Regulation of the B(P)R at building plan submission stage;
- (f) the provision of open space about domestic buildings shall comply with the requirements as stipulated under Second Schedule of B(P)R;
- (g) sustainable building design requirements and pre-requisites under PNAP APP-151 and APP-152 shall be complied with if GFA concession for green and amenity features and non-mandatory/non-essential flat rooms and services is to be exempted/disregarded. Particular attention is drawn to the compliance with building separation requirements for buildings in close proximity to the site boundary;
- (h) criteria under PNAP APP-2 Appendix C shall be complied with if GFA of car parking, loading and unloading areas under Regulation 23(3)(b) of the B(P)R is to be excluded. Particular attention is drawn to the circumstance in accepting a car park as an underground car park;
- (i) requirements under PNAP APP-25 regarding submission of geotechnical assessment at general building plan submission stage shall be complied with if the relevant criteria are met;
- (j) amenity features and environmental protection measures including but not limited to proposed balconies, non-structural prefabricated external walls, acoustic fins and noise barriers, etc. shall comply with relevant Joint Practice Notes if GFA and/or site coverage concession is to be applied for; and
- (k) formal submission under the BO is required for any proposed new works, including any temporary structures and site formation works like filling of pond and land. Detailed comments under BO will be provided at building plan submission stage.

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk



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**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

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有關的規劃申請編號 **The application no. to which the comment relates**  
Y/FSS/19

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

*On separate sheets*

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

簽署 Signature

日期 Date

31 May 2022

It remains the intention of the developer to construct seven high tower residential blocks, as it has done since the detailed proposals were first revealed. The proposed heights of the residential blocks have been considerably increased. They now range from 25 to 32 storeys. The number of flats available has increased by 43% from 676 to 969 and the design population by the same percentage to about 2,714 persons.

The developer used to maintain that its potential development was "in an appropriate scale". That wording has now changed to "the proposed development intensity is considered appropriate and compatible with the surrounding neighbourhood."

The only development of even vaguely similar size is that of Eden Manor located on the south side of the Castle Peak Road-Kwu Tung. Sadly no one was invited to comment on this proposed development. There was no public consultation exercise. On the south side of Castle Peak Road travelling west from Eden Manor, or on the east side when the road curves south, there is no building taller than Golf Parkview until one arrives at as far away as Yuen Long. It is the same story on the other side of Castle Peak Road. Golf Parkview is the tallest structure between the junction of Castle Peak Road with the Fan Kam Road and Yuen Long.

The proposed site is adjacent mainly to village houses on its east side and the Golf Parkview development on its west. Golf Parkview has 5 storeys with a ground floor of car parks/lift lobbies plus 4 storeys of flats. There are a total of 48 flats housing and, according to the ratio of 2.8 persons per flat, approximately 135 people with 54 private car parking spaces including those for visitors. Oi Yuen has increased the number of flats planned to 969, housing approximately



2,714 people with 1,117 private car parking spaces. The contrast in size is both obvious and overwhelming. Opposite the proposed development, on the other side of Castle Peak Road, is the Fanling Golf Course with zero buildings. To the north of Oi Yuen is the Fanling Highway. On the other side of the Highway is the low-density Tsung Pak Long. It cannot be accepted that the proposed development is in any way compatible with its surrounding neighbourhood and rural environment. It is grossly excessive.

The proposed seven residential towers have been increased in height from between 19 and 23 storeys to 25 to 32 storeys aboveground, the nearest of which to Golf Parkview will be little more than the width of a narrow lane away (one of the reports gives the separation distance as 9 metres). They will undoubtedly adversely affect the residents of Golf Parkview environmentally by blocking both wind and sunlight. The negative affect on wind flow was confirmed in the air ventilation assessment which stated the former proposed development of 7 blocks ranging in height from 19 to 23 storeys “would create rather significant adverse impacts on the surrounding area under most simulated winds...”. It should be emphasised that the proposed height of the blocks has since been increased to 25 to 32 storeys. The excessive height of the 7 blocks will also result in a shadowing effect on Golf Parkview. There must also be concern that the piling and other construction activity of these seven towers, including up to 4 levels of basement for underground car parks, may affect the structural integrity of Golf Parkview, as well as having a major adverse air quality impact of potential dust emission.

One of the most important reasons why the present proposal should be rejected is that despite repeated adverse comments from petitioners and the Transport Department, the developer still plans that traffic to and from the new development should be via Pak Wai Lane. The only access to Golf Parkview whether on foot or in a

vehicle is via Pak Wai Lane. This lane is comparatively narrow both in terms of the road for traffic and the footpath for pedestrians. The Chief Highway Engineer/New Territories East described Pak Wai Lane as being “substandard in width.”

We do not believe for one moment it can possibly safely handle the dramatic increase in usage envisaged by the developer. The site which it is proposed be developed has long frontage directly onto the Castle Peak Road-Kwu Tung. It MUST arrange that access to and from Oi Yuen be direct from Castle Peak Road, just as it is at Eden Manor, and not via Pak Wai Lane. We consider this imperative not only for the safety and convenience of all users but also to permit swift access by emergency vehicles to both the existing and possible future development. In its S. 12A Application for Amendment of Plan dated February 2022, the developer in para. 2.5.1. writes that “The existing vehicular access to the Application Site is available via Castle Peak Road-Kwu Tung.” This is true so why do they not use it instead of Pak Wai Lane?

There is a further important reason why the literally hundreds of vehicles going to and from Oi Yuen every day should not be allowed to use Pak Wai Lane. When travelling in a westerly direction from the junction with Fan Kam Road on the Castle Peak Road-Kwu Tung, the third/middle lane for turning right into Pak Wai Lane is only long enough for about four vehicles. This is sufficient for Golf Parkview traffic. It is impossible to conceive that it will be long enough also to accommodate Oi Yuen traffic. More than four vehicles waiting to turn right into Pak Wai Lane will mean that all westerly bound traffic on the Castle Peak Road will have to come to an abrupt halt. This will be very dangerous as the road is narrow and one approaches Pak Wai Lane coming round a sharp right-hand bend with minimal forward visibility. Accidents will happen. There is no shadow of doubt about that. It is very frustrating that whilst surveys of traffic on the Castle Peak Road-Kwu Tung are conducted,

no attention seems to be being paid to the dangerous situation which is planned by the use of Pak Wai Lane for access to the proposed new development. A queue length assessment in respect of traffic proceeding in a westerly direction on the Castle Peak Road-Kwu Tung and turning right into Pak Wai Lane should be undertaken.

It is noted that a traffic survey was conducted in April 2020 on Castle Peak Road-Kwu Tung and an appraisal of noise environment in May 2020. It should be taken into consideration that at that time Hong Kong was already suffering from the side effects of the corona virus pandemic with people working from home where possible and schools not open. Also, Eden Manor was in no way fully occupied in April/May. Of course Eden Manor was still under construction when the 2017 traffic survey was conducted, so that survey is hardly much more reliable than the one conducted in 2021 which is the subject of a December 2021 Report. The fact remains that more and more often the traffic on Castle Peak Road outside Golf Parkview proceeding towards Fan Kam Road is either moving slowly or has come to a complete halt.

It is noteworthy that there is not one shot of Golf Parkview in all the myriad of photographs of the area provided by the developer, even the aerial ones. The proposed development is not in any way compatible with Golf Parkview or the surrounding area. It is grotesquely huge and will be detrimental to the quality of life to nearby residents as well as seriously worsening traffic congestion in the area. Various reports mention the visual impact of the new development but never from the position of the residents of Golf Parkview who will clearly be severely adversely affected in this respect.

The pavement in front of Golf Parkview is 136 inches wide. This is considerably wider than the pavement on Castle Peak Road-Kwu

Tung either to the west of Golf Parkview or that bordering the proposed new development. The latter pavement is only 76 inches wide. Ironically, this pavement is even busier than the one fronting Golf Parkview. Pedestrians and cyclists coming from the Kam Tsin area, heading towards Sheung Shui, cross the Castle Peak Road-Kwu Tung virtually opposite Pak Wai Lane because there is no pavement on the golf course side of Castle Peak Road-Kwu Tung opposite the proposed new development. The situation is already bad and should not be allowed to worsen.

We respectfully strongly urge the Town Planning Board to reject this Planning Application. Thank you.

Name of person making this comment :

Richard Arthur WITTS

Signature :



Date : 31<sup>st</sup> May 2022

Y/FSS/19

70

致城市規劃委員會秘書：

以人送達或郵遞：香港北角政府大樓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

Y/FSS/19

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

*Please see attached*

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

簽署 Signature

*Cherry Zing & Tony (M.)*

日期 Date

*June 6, 2022*



Date: 6<sup>th</sup> June, 2022

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

Dear Sirs,

Re: My Comments on Y/FSS/19

Although this application proposed a 43% increase both in the number of flats and design population over the last submission, the supporting studies (including some December 2021 updates) only incorporated minor, cosmetic changes to the previous studies, and still leaves most of our concerns (my letter dated October 6<sup>th</sup>, 2020 on Y/FSS/15 refers) unanswered. Considering the fifth coronavirus wave started in December 2021 in which most activities, especially traffic, were in a semi lockdown state, such studies cannot be adopted for meaningful planning purposes. This application, so audacious and in complete disregard of most objectors' concerns, must be rejected.

#### **Proposed increase of PR to 4.3**

We take strong exception to the applicant applying the Northern Metropolis Development Strategy liberally to seek redevelopment (raising PR to 4.3 with resultant BH increased to 130M) at all costs. The fact that the Town Planning Board (TPB) is still functioning and well is proof that the Government aims to achieve this objective within a proper framework, and with due consideration to all human factors. Thus the applicant's justification point number one is valid only within a defined framework.

Contrary to applicant's justification point number three, the proposed high rise/high density development is not in harmony with the surrounding but contradicts with the Chief Executive's stated aim of People Oriented. The proposed two floor RCHE building looks odd, ungainly, out of place and aesthetic unappealing and incompatible with the other tower blocks. Why sacrifice the interest and welfare of 23,100 (population of TPU 626 as at 2019) tax paying and law abiding citizens to accommodate only 100 elderly persons and some 2,700+ future application site residents. Why provide extremely generous incentives (on top of premium exemption, the developer is permitted to freely lease, sell or operate the RCHE premise once it is built, as per the Secretary for Labour & Welfare's reply in LCQ20 highlighted in Attachment 2) and turn the applicant's profits from handsome to exorbitant?

#### **Traffic Congestion at Pak Wai Lane**

The inherent weakness in the Traffic Impact Assessment has not been addressed. All the studies, including Junction calculation sheets on Junction A i.e. Castle Peak Road-Kwu Tung/Park Wai Lane were updated in December 2021 (where the city was still under semi lockdown) which unfortunately did not reflect the situation under normal conditions. The traffic congestion problem at the vehicle ingress and egress points of Pak Wai Lane will be

further aggravated with the 61 % increase in car parks, plus the additional RCHE vehicle flows from transiting staff/workers, visitors, RCHE elderlies, emergency vehicles and daily heavy truck movements.

I note the newly added pedestrian footpath at Pak Wai Lane is a correction of Arup's initial oversight. Unfortunately the footpath is not only short but provides very limited improvements, especially for pedestrians from application site intending to use public transportation going towards the Yuen Long direction.

I further note this application, whilst adopting the HK population norm of 2.8 per flat, conveniently skipped the fact that its average flat size of 132+ sq.m. is way above the HK average (some 50 to 65 % bigger!). Ignoring the correlation between flat size and headcount makes me question the accuracy of applicant's Traffic Impact Assessment. In my view the best, and indeed fairer approach is to adopt the Golf Parkview's actual figure of 3.9 persons per flat (same location, slightly smaller flat sizes) which shows Pak Wai Lane will be quickly overloaded and not functioning as an efficient vehicle ingress/egress point.

As long as the traffic congestion problem is not properly addressed, this application must be rejected.

### **The RCHEs**

Granted there is acute RCHE demand I firmly believe the basic principle of people oriented in choosing an appropriate RCHE site must not be deviated. Sizeable RCHEs should ideally be close to/attached to large public housing development projects which provide desirable catchment area for the RCHE; with provision of adequate ancillary services nearby, as well as ease of access for visitors, ancillary workers and logistical support. Regrettably the proposed site falls well short of these criteria.

The proposed development will not be completed until 2028. A cursory search reveals that in addition to the soon to be completed Area 29 Kwu Tung North Development area providing 1,750 RCHE beds, there will be ample RCHE beds planned in public housing development projects in the Fanling/Sheung Shui New Town area for completion around the late 2020s and early 30s (in compliance with Government's desire for the Housing Authority and Housing Society to reserve 5% of the total domestic GFA in future public housing development projects exclusively for welfare uses, including RCHEs, highlighted in Attachment 2), in particular:

- Area 4 & 30 (application no. A/FSS/280, also covered in TPB paper N0.10587 A1 site with 100 RCHE beds. Estimated completion in 2-3 years' time
- S/FSS/25 Item B Area 36 Ching Hui Road with estimated completion 2029-30, with SWD facilities planned
- S/FSS/25 Item C1 Area 35 Tai Tau Leng with estimated completion 2032-33, with SWD facilities planned
- S/FSS/25 Item B1 Area 30 Choi Shun Street with estimated completion 2030-31, with SWD facilities planned
- Fanling Golf Course with 12,000 public housing units planned.

Estimated completion into the late 2020s and early 2030s, with SWD facilities planned

The requirement of 100 RCHE beds quoted by the applicant could easily be met by the Area 4 & 30 planned development, or by Area 36 planned development. Alternatively, such could be accommodated by fine tuning the Government's 5% social welfare uses requirement in one or more of the major public housing development projects mentioned above.

Please note the above excludes possible private sector supply. I am confident the snowballing supply shortage would be viewed as great business opportunity by enterprising businessmen who will undoubtedly contribute towards meeting the shortfall timely and efficiently. The long term solution to optimize scarce land resources is to encourage and incentivize more elderlies to move to the Greater Bay Area by expanding the Portable Comprehensive Social Security Assistance Scheme enabling elderlies to take up permanent residence in Guangdong, Fujian and other provinces.

Thus, there really is no need for the applicant to propose building a RCHE, especially when the proposed site has the following deficiencies:

Bad location (remoteness: at least 20 minutes walking distance from Town Centre/MTR Stations including the future Kwu Tung Station), distance from major catchment area such as large public housing estates, serious traffic issues, and the lack of ancillary facilities including retail shops and restaurants all renders the application site as an unacceptable RCHE location.

Future application site residents may be turned off by the ugly two- floor RCHE building and appalled with the likelihood of mixing with RCHE elderlies , workers and visitors. The RCHE may not be welcome by target elderly too as they will be concerned that visits will be curtailed due to lack of shops/restaurants on site. Similarly, the RCHE ancillary staff and helpers will not be happy in making inconvenient transits to and from work whilst their social life may suffer due to the absence of supporting facilities. Most importantly, the RCHE will be an eyesore and an irritation for Golf Parkview residents who will have to endure the intermittent flow of emergency vehicles (ambulances, hearses etc.) throughout the day, the noises made by the several unloading bays, heavy vehicles for logistics support , the communal kitchen, and last but not the least the daily visitors.

Indeed, it would be traumatic (definitely depressing) to force Golf Parkview residents (especially the elderly ones) to witness regular loading and unloading of frail, old folks for regular and unscheduled medical visits, and the occasional hearse to remove the deceased. Because of the close proximity (9 m according to the studies) there is a real risk of also catching air-borne virus/germs from infected RCHE residents. Based on the above analysis I strongly resent the proposed RCHE and propose to have this application rejected.

By incorporating 100 RCHE beds which will surely drive down property value, I surmise money is not of primary concern to the applicant. I therefore sincerely propose to the applicant to revert back to the original approved 0.8 PR low rise development. This is to show the applicant is not only a good community member, but also respects the feelings of

fellow community residents by building a development that is in harmony with the surrounding low rise dwellings. The applicant still earns a healthy profit with the added benefit of able to commence construction, and hence unit presale, as soon as possible. What better way to meet Government's desire of increasing the housing supply! Indeed, the 0.8 PR approved plan aligns with most of the Proposed Amendment justifications.

### **Wall Building and Wall Effect**

By increasing the BH to 130M, the wall effect felt by Golf Parkview is further magnified. Golf Parkview Blocks 6 and 7, and to a lesser extent the rest of Golf Parkview will be blocked/robbed of natural ventilation and sunlight. There will also be greater noise pollution especially from increased traffic. The resultant poor air ventilation coupled with exacerbated air pollution may eventually create the undesirable urban heat island effect.

Would ladies and gentlemen of the TPB feel comfortable and accept the construction of wall buildings a dozen meters away from your living room and two bedrooms? I firmly believe in the protection of private property ownership, and considers the guarantee of peaceful and acceptable living environment my fundamental right.

The following quotations from a 2007 Hong Kong Institute of Planners paper titled "Development Creating the Wall Effect (2007)", though written 15 years ago, is every bit as relevant today:

"Sadly many new flats produced within these wall buildings are for speculative purpose instead of the use of real home owners. Government treasury may benefit from getting higher premium or reducing the cost in public spending by allowing such extra development potential. There are however heavy social and environment costs resulting in a deteriorating environment and a discordant community. Very often it is the lower socio-economic sector who would suffer more. This is trading short term financial gain with long term environment and social costs. As Asia's world city, shouldn't we move towards the direction of sustainable development ? Is it too much to demand for higher environmental quality by optimizing instead of maximizing development potential ? It is now time for both the government and the private sector to change their mindset of maximizing the economic return of land and try to balance the social and environmental needs. Isn't it time to treat this small fragile city with a bit more tender and care before it's too late ?"

### **Conclusion**

With the above concerns, especially the ones on RCHE, I strongly urge the Town Planning Board to reject this Planning Application, Y/FSS/19.

Sincerely Yours,  
C.Y. TSANG (Mr.)

Encl.

Attachment 1 My letter of comments on Y/FSS/15 dated October 6, 2020.

Attachment 2 LCQ20 Residential Care Homes for Elderly dated March 17, 2021

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

**To: Secretary, Town Planning Board**

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

By Fax: 2877 0245 or 2522 8426

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

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

*for further information received on 07/09/2020*

*Y/FSS/15*

意見詳情（如有需要，請另頁說明）

**Details of the Comment** (use separate sheet if necessary)

*Please see attached for details*

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

*TSANG, Cheung Yung*

簽署 Signature

*[Handwritten Signature]*

日期 Date

*6th Oct. 2020*



## **Without Prejudice**

6<sup>th</sup> October, 2020

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

Dear Sir or Madam,

**RE: APPLICATION NO. Y/FSS/15, Comments on further information received on 15/07/2020 and 07/09/2020.**

**OI YUEN, SHEUNG SHUI LOT 2 RP AND ADJOINING GOVERNMENT LAND, THE NEW TERRITORIES HEREUNDER IS REFERRED AS PROPOSED OR PLAN OR PLANNED DEVELOPMENT or PLANNING BOTH SMALL AND CAPITAL LETTER**

### **1. Comments from the Social Welfare Department dated 12<sup>th</sup> February 2020 and 22<sup>nd</sup> July, 2020**

The Town Planning Board first invited public comments on Y/FSS/15, with the deadline on 10<sup>th</sup> January 2020, stating that relevant information was available for public inspection during normal office hours at the Planning Enquiry Counters located at North Point and Shatin. I went to inspect the files at the North Point location in early January 2020 and did not see the said comment from the Social Welfare Department in the files for public inspection. The timing of Social Welfare Department's 12<sup>th</sup> February 2020 comments appears extremely convenient to the applicant given it came after the closure of public consultation of 10<sup>th</sup> January 2020.

It is noted that the Committee Meeting on Y/FSS/15 was deferred from 6<sup>th</sup> March 2020 to 15<sup>th</sup> May 2020, then to 9<sup>th</sup> October, and now further deferred to 4<sup>th</sup> December, a total deferment of over nine months.

The Town Planning Board neither brought said document from Social Welfare Department to public attention nor invited public comments (in compliance to the Town Planning Board Ordinance) in the three months plus from the date of the document (12<sup>th</sup> February 2020) to the scheduled date of the second meeting (15<sup>th</sup> May 2020). Since meeting public services demand is a good thing, why such secrecy from Social Welfare Department? What is the Town Planning Board's reason for hiding the said document from the public?

It is noted Social Welfare Department asked the applicant to explore the feasibility to incorporate a 50-p Hostel for Severely Mentally Handicapped Persons (HSMH), 50-p Day Activity Centre (DAC), 100-p Residential Care Home for the Elderly (RCHE) cum 30-p Day Care Unit (DCU). Common sense tells that a high level of supporting staff is required to maintain this sort of public facilities, not to mention the heavy daily traffic of visitors and day care users.

I am puzzled that Social Welfare Department should have made this request in the full knowledge that:

- Construction of a Residential Care Home for the Elderly (RCHE) in Kwu Tung North (Area 29 in Kwu Tung North New Development Area) will be completed in Q4 2020. This is an 8-storey multi-welfare services complex with an area of 42,600 square meters built specifically for the Social Welfare Department. The RCHE will provide 1,750 places for the elderly, DAC of 40 places, DCU and HSMH for 50 mentally disabled persons.
- Future Social Welfare Department requirements namely a 100-place RCHE, Day Activity Centre, Hostel for Severely Mentally Handicapped Persons, Hostel for Moderately Mentally Handicapped Persons and Integrated Vocational Rehabilitation Services Centre (Item A1 Site) in an area adjacent to Po Shek Wu Estate near the Sheung Shui MTR Station, as well as a 100-place RCHE in Fanling downtown (Item A4 site) were discussed and noted during development of S/FSS/23 (1211<sup>th</sup> Town planning Board Meeting held on 25<sup>th</sup> October 2019 and TPB Paper No. 10587 refers).
- Making use of the recently completed Po Shek Wu Estate. This will certainly meet HKPSG Ch.3 requirements of “to facilitate persons with disabilities to receive the day training, the location of these centers should be accessible by public transport services and barrier-free routes.”

Furthermore, is the Town Planning Board aware that setting up such facilities in the planned development is absolutely inconsistent with the surroundings and will, instead, be at detriment to the traffic, environment, other residents in the vicinity as well as staff/worker and users/visitors of the proposed RCHE and DCU?

It does not make sense at all to incorporate this sort of public government facilities in the midst of a private residential complex located far away from downtown Sheung Shui, where both traffic, vehicular and pedestrian, are already a topic of controversy from the public (see 2 below and Attachments 1A & 1B).

It is noted that the applicant is willing to incorporate only a 100 place RCHE cum 30 place DCU into the proposed scheme as Government Accommodation on the condition that the GFA of the social welfare facilities (i.e. RCHE and DCU) should be disregarded from the GFA calculation of the proposed scheme. Does it mean the plot ratio and/or the site coverage will be effectively raised again?

I remind the Board that Y/FSS/12, with plot ratio 3.6 and coverage of 27% was disagreed on 27<sup>th</sup> October 2017. The applicant then submitted her plans Y/FSS/14 with plot ratio of 3.0, which is the same as Y/FSS/15 today; all with a maximum site coverage of 27%. Even so, the plot ratio of 3.0 and coverage 27% is not accepted by majority of the stakeholders in the vicinity for the reasons highlighted in my past correspondences to you under Y/FSS/12, Y/FSS/14 and my recent letters to you dated 7<sup>th</sup> January 2020 and 12<sup>th</sup> August 2020 on Y/FSS/15.

I speculate would there somehow be a deal behind the late involvement of Social Welfare Department? Like all developers in Hong Kong, I believe the applicant must be profit-oriented (otherwise why would the applicant bother with this application for GFA revision in the first place). It is therefore puzzling to me how the applicant would agree to Social Welfare Department's request fully realizing that would effectively lower the development's overall value, whilst putting undue pressure on traffic, safety etc.

On the other hand, by choosing this relatively expensive location, Social Welfare Department is not achieving value for taxpayer money. Indeed, as discussed above, Social Welfare Department has so many options, some readily available (like Po Shek Wu Estate near MTR Station) and much closer to the town center and transport hub, than to waste valuable taxpayer money by choosing such out of the way, remote location. My interpretation is that by incorporating this request, which meets “the acute demand for social welfare facilities” and therefore forms “an integral part of the development”, approval of the planned development might be facilitated in the name of public interest/good.

I further theorize that probably sometime after TPB approval, the applicant might be notified that the RCHE and DCU would no longer be required due to say public objection.

I therefore object in the strongest possible term the construction of ANY social welfare facilities on the planned development.

## **2. Traffic Impact Assessment – Revised Final Report June 2020**

The replacement pages still failed to take into consideration the following concerns:

### **a) Inaccurate Studies**

This report does not include assessment of the extra traffic burden of a 100 place RCHE cum 30 place DCU (agreed by the applicant to Social Welfare Department) as Government Accommodation in the proposed development (see 1 above).

Notwithstanding Transport Department’s 17<sup>th</sup> January 2020 comments that “the Survey in March 2017 is considered to be outdated for this TIA. Please rearrange the site survey in 2020 and should avoid the long public holidays and school holidays.”

I noticed the revised TIA (including replacement pages) still has the following inaccuracies:

- 3.3.4 “Another survey for Junction C and E has been carried out for reference check on a typical date on April 2020.” \_Why the survey was done for the Junctions C and E only?
- 3.3.5 “[...] it is found that the surveyed 2020 flows in are lower than the estimate one. Therefore, Year 2020 traffic flows which are estimated by Year 2017 traffic flows are used as the base case for conservative approach.” This is not addressing Transport Department’s concerns.
- 3.3.7 “The Assessment results in Table 3.4 indicate all junctions are at present operating with an amply capacities.” This statement reflects situation at an abnormal time and should not be adopted as the norm.

Close on the heels of the protest movement June 2019 onward, Hong Kong was being hit hard by COVID-19 since January this year. The applicant’s revised reports were prepared during a period when Hong Kong residents were cautioned to stay home and public facilities were closed. This is a “once in a century” pandemic in which normal life in Hong Kong has come to almost a complete standstill. With people working at home, classes suspended, and the resultant reduction in cross-border traffic (human and goods), there has been significant reduction in traffic and much improvement in the environment, among other effects. As a result, any related studies carried out by the applicant during this period would be at best a reflection of life under siege rather than an accurate reflection of the normal circumstances.

Furthermore, it is an absolute mockery that data from March 2017 was still used for the projection, despite its obvious obsolescence as indicated by the Transport Department. To be fair to all stakeholders, including Golf Parkview residents living adjacent to the planned development, I request the required studies be carried out strictly on objective, fair bases and only when the epidemic is under control for public comments.

The replacement pages also failed to correct the following errors that professionals should not have committed:

**Table 3.1 Road-based Public Transport Services in the Vicinity.**

The Origin – Destination of the following routes is incorrect:

Bus route	Incorrect Origin – Destination stated on the report	Correct Origin – Destination
Franchised Bus No. 77K	Shatin Central – Lok Ma Chau Bus Terminus	Sheung Shui Bus Terminus – Yuen Long (Fung Cheung Road)
GMB 50A	Sheung Shui Station – Kam Tsin	Sheung Shui Station – Kwu Tung
GMB 50K	Yan Shing Court – Fanling Station	Sheung Shui Station – Hang Tau
GMB 51K	Sheung Shui Station – Yue Man Square	Sheung Shui Station – Ho Sheung Heung
GMB 57K	Ching Ho Estate – Tai Po Nethersole Hospital	Sheung Shui Station – Tong Kung Leng

**Table 4.1 Historical Traffic Data from Annual Traffic Census (ATC)**

For ATC Stn 6067, the AADT was drastically dropped by 90% in 2018. Is it true? Adopting the 2017 actual of 26,600, the 2018 total becomes 193,150, and the average annual growth rate becomes +1.12% instead of -1.56%. What a significant error it is!

**TIA Report 4.2.4** Presumably the consultant is still adopting the entire Fanling/Sheung Shui New Town population as projection basis. As a layman, my focus would be on areas in the vicinity of the 300m catchment area of the planned development that may have an immediate bearing on traffic, rather than developments in places kilometers away.

The consultant should therefore revise the adopted growth rate by reviewing my comments above.

In addition, the report states “From **Table 4.2**, it is found that the average annual growth rates of population and employment in Tsing Yi from year 2021 to 2026 are +0.98% per annum.” This development concerns the traffic in Sheung Shui region. Tsing Yi, which is located in western Kwai Chung, is nowhere close to this area. So why is Tsing Yi discussed at all in the report?

**Note to Table 6.3 and 6.6 “Latest average household size 2.7 in Hong Kong obtained from Census and Statistics Department”**

The following are noted from the website of Census and Statistics Department: -

Location	Average household size	
	2011 Census	2016 By-census
Fanling/Sheung Shui	3.0	2.9
Hong Kong	2.9	2.8

We denoted in our last letter dated 12<sup>th</sup> August, 2020 that an average household size of 2.7 was fabricated in the last calculation. The applicant this time corrected his mistake by using the average household size of 2.8 as per 2016 By-census.

The applicant, however, fails to understand that the importance of using figures as specific as possible to the region as basis for projection. The development is located in Sheung Shui so it is far more appropriate to use the average household size of Fanling/Sheung Shui, which is 2.9 in 2016 By-census.

Furthermore, considering the similarity between the proposed development and Golf Parkview, I suggest the applicant should consider using Golf Parkview's actual household size of 3.9 (188 residents divided by 48 units) for the TIA, particularly for evaluation of Pak Wai Lane and the junction of Castle Peak Road-Kwu Tung/Park Wai Lane.

#### **b) Public Transport Needs Not Resolved**

Adopting an inaccurate average household size of 2.8 renders the TIA incorrect. Indeed, existing public transport services in the vicinity have already reached their capacity.

TIA's conclusion regarding public transport are unacceptable as they were based on proposed solutions rather than actual commitments/guarantees from the service providers, i.e. KMB and GMB operators.

#### **c) Pedestrian Safety Not Addressed**

Safety of pedestrians (mainly from the planned development) on the way to the bus stop/town center, firstly by traversing the Golf Parkview entrance, and then crossing the Pak Wai Lane road has not been addressed in the report. Both pedestrians and drivers' safety will be compromised, not to mention further slowing down of the already heavy traffic, especially during morning rush hours. For safety reasons, pedestrian crossings at Golf Parkview entrance and Castle Peak Road-Kwu Tung/Pak Wai Lane junction are required.

#### **d) Link Capacity of Park Wai Lane (Page 8 of Responses to Departmental Comments – July 2020) unacceptable**

Whereas the consultant's V/C ratio projection indicated the link capacity of Park Wai Lane is acceptable, my actual observation done in 2018 indicates otherwise.

My personal observation for the five working days from 25<sup>th</sup> to 29<sup>th</sup> 2018 produced the following average traffic flow for a typical workday for Golf Parkview:

During 0730 to 0830 hours (Golf Parkview AM peak) 37 cars left and 5 cars entered Golf Parkview (of which 2 were school buses, 1 garbage truck and 2 cars to pick up Golf Parkview residents) in which 4 eventually left before 0830.

On extrapolation (a conservative lower outbound traffic ratio is assumed for the planned development) of the above data (ignoring the inbound traffic) onto the proposed development, I came up with an AM peak hour trip number of 472 (outward bound only). The V/C ratio of 1.18 for outbound traffic indicates the Park Wai Lane link capacity is unacceptable.

In summary, all projections were based on the parameters that are either outdated, unrealistic or unfounded. What an affront to present such inaccuracies to honorable TPB members! I therefore call upon the Board to seriously question the studies' validity before arriving at any decision.

On this basis, I strongly object the proposed rezoning.

### **3. Traffic**

Regretfully the replacement pages still do not address our concerns.

The Revised Traffic Assessment Report does not include assessment of the traffic burden created by incorporating a 100 place RCHE cum 30 place DCU (agreed by the applicant to Social Welfare Department) into the proposed development as Government Accommodation (see 3 above).

Please see Attachment IA and 1B for details.

### **4. Air Ventilation, Visual Impact, Sunlight and Noise**

All reports do not include assessment of incorporating a 100 place RCHE cum 30 place DCU (agreed by the applicant to Social Welfare Department) into the proposed development (see 3 above).

The issue that the proposed development would create rather significant adverse air ventilation impacts on the surrounding area, especially Golf Parkview to the immediate west of the planned development, is still not fully addressed/resolved.

I am still upset that Golf Parkview was deliberately excluded from the 7 key visual viewing points, leading to consultant's conclusion of no adverse VIA.

Please see Attachment II for details.

### **5. Associated Issues – Construction Period Consideration and Fung Shui**

I am seriously concerned that, despite the consultant's projection, Park Wai Lane as well as the Castle Peak-Kwu Tung/Park Wai Lane critical junction will be operated beyond capacity during Golf Parkview peak hours.

Please see Attachment III for details.

### **6. Golf Parkview not treated fairly in consultants' studies**

I am puzzled why Golf Parkview, which is only 9 m to the immediate west of the planned development, was not given fair and equal weight in the consultants' studies. Golf Parkview was only briefly mentioned in some studies, often overlooked, sometimes deliberately ignored or simply not covered at all in the rest of the studies. I strongly object to this "elephant in the room" attitude adopted by the applicant and her consultants.

## **7. Piling Work of the Proposed Development**

The foundation of Golf Parkview is intended for low rise structures of four levels only. It is doubtful if it can stand the impact of the piling work of the adjacent planned development. Who will guarantee and/or compensate Golf Parkview owners in case of resultant damages to our foundation and structures?

The Town Planning Board owes a fiduciary duty to protect the owners/residents of Golf Parkview. Therefore, a Geotechnical Impact Assessment to address our concerns is of paramount importance and must be included as a major risk measurement.

## **8. Conclusion**

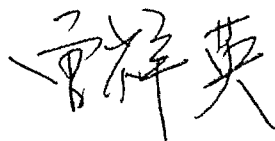
Based on my above comments, it is evident Golf Parkview's interests are consistently and deliberately ignored. My comments also show that the applicant's justifications (i.e. compatible with the surrounding areas; bring no adverse impact; and set up a good precedent for similar developments) are all untrue,

Although having been allowed ample time, little attention is given in the application to the various concerns already listed in my previous submissions on both Application No. Y/FSS/12 and Y/FSS/14 and reiterated in my last letters dated 7<sup>th</sup> January 2020 and 12<sup>th</sup> August 2020 on Y/FSS/015. The fact that Golf Parkview is deliberately left out of the chosen viewing points reinforces my suspicion that the proposed development is prepared with prejudice to Golf Parkview.

I already have Eden Manor, a high-density housing complex (Golf Parkview WAS NOT consulted in its development) down the Caste Peak-Kwu Tung Road, which will, once fully occupied and with the pandemic controlled, cause significant traffic delays to Golf Parkview. I simply do not wish the situation aggravated by another high-density development adjacent to my home.

I strongly object to the applicant's re-zoning request in Application No. Y/FSS/15.

Yours truly,



Encl.

Attachment IA – Traffic – General

Attachment IB – Traffic – Planning Parameters

Attachment II – Air Ventilation, Visual Impact, Sunlight and Noise

Attachment III – Associated Issues – Construction Period Considerations and Fung Shui

## **Attachment IA – Traffic - General**

*The Revised Traffic Assessment Report, including the replacement pages, does not include assessment of the traffic burden created by incorporating a 100 place RCHE cum 30 place DCU (agreed by the applicant to Social Welfare Department) into the as Government Accommodation in the proposed development (see 1 in the covering letter).*

### **Access road, Park Wai Lane**

I am alarmed and surprised that whilst recognizing the existing main access road (Pak Wai Lane) for both Golf Parkview and the planned development is substandard in width (only 1.67 m) and without footpath on the eastern side, Highway Department however does not insist on the widening of this lane to a standard access road, either by the applicant or the Government, as a basic requirement for rezoning approval. Also, TIA did not address the risks of pedestrians (to a lesser extent the drivers) firstly traversing the Golf Parkview entrance, and then crossing the road from Pak Wai Lane footpath to the planned development's footpath on their way to the bus stop at the planned development. This puts both the residents of Golf Parkview and planned development in jeopardy, with our safety compromised and our life and property at risk. The resultant traffic jam will significantly reduce the golden hour in rescues. My concern for safety has been raised many times already in my previous comments submitted on Y/FSS/12, Y/FSS/14 and my recent letters to you dated 7<sup>th</sup> January, 2020 and 12<sup>th</sup> August, 2020 on Y/FSS/15. The risks would only be aggravated with the proposed RCHE and DCU.

For safety reasons pedestrian crossings are required both at Golf Parkview entrance and at the junction of Castle Peak Road- Kwu Tung/Park Wai Lane.

The applicant's revised traffic impact assessment was subjective and primarily based on obsolete, unrealistic and unfounded data (see 2 in the covering letter).

I recommend the Traffic Department not to accept the said report but to ask the applicant to compile another report strictly on objective basis and only during a period when the epidemic is under control for public comments.



## **Attachment IB – Traffic - Planning Parameters**

Presumably the consultant is still adopting the entire Fanling/Sheung Shui New Town population as projection basis. However, my focus as a layman would be on areas in the vicinity of the 300m catchment area that may have an immediate bearing on traffic, rather than developments kilometers away.

Considering the relative size of the proposed development (site area 29,860.9 sq.m. with around 2,636 inhabitants) I strongly questioned the rationale of including in the revised submission areas kilometers away. Nor do I comprehend how population changes in places like Fanling South would affect the daily traffic conditions in my area. I would only be interested to know if the existing traffic congestions (along Castle Peak Road (Kwu Tung)) up to the junction with Fan Kam Road would further deteriorate with the full occupation of Eden Manor, and subsequently the planned development.

It doesn't take a genius to figure out that including Fanling (some 38% of the population shown in Table 4.2) would enable the consultant to arrive at a very low overall population growth rate for 2021 to 2026, which was in turn adopted in future projections.

I wonder if it is a Transport Department requirement for all TIAs on future Sheung Shui developments to also cover the entire Fanling/Sheung Shui New Town, not just the vicinity of such developments? Under such a macro treatment I am afraid in future all TIAs for proposed new developments in Fanling/Sheung Shui New Town will be passed at will, aggravating the already serious traffic situation in critical North District locations.

Average household size: Whereas 2.8 may be the Hong Kong norm provided by Census & Statistics Department, I stand by my figure of 3.9 based on actual Golf Parkview average and considering the fact that both Eden Manor and the proposed development have even bigger average unit size than Golf Parkview. The number of 2.8 adopted by the consultant may be too global for this particular application, and certainly would not reflect the norm specific for the planned development and its vicinity.

### **Conclusion:**

The planned development is considered unacceptable in traffic engineering point of view as the revised TIA (incorporating the above proposed changes) would demonstrate that the traffic generated by the planned development would cause significant impact to the local and cannot be absorbed by the nearby road network in the vicinity.

## **Attachment II– Air Ventilation, Visual Impact, Sunlight and Noise**

*All reports do not include assessment of incorporating a 100 place RCHE cum 30 place DCU (agreed by the applicant to Social Welfare Department) into the as Government Accommodation in the proposed development (see 1 in the covering letter).*

### **Air Ventilation Assessment**

As laymen, I do not understand the consultants' approach nor do I accept their assertion that "Higher building height was considered to generate down wash which can benefit the pedestrian wind environment " as it is against all my intuition and experience. I support Planning Department's comment that the consultant's approach is not acceptable.

As a Golf Parkview resident, I take strong exception to consultant's claim that the rezoning leads to "some improvement for village and temporary structure area in annual and summer wind situation, and improvement for Hong Kong Golf Club course department under summer wind situation", whilst downplaying the adverse impacts on Golf Parkview (which probably has a bigger permanent population vs all combined) and Park Wai Lane, as disclosed in 6. quantitative assessment result:

under ESE wind ... Wind velocity ratio is therefore lower at Park Wai Lane, Golf Parkview

under SE wind ... Wind availability at the Golf Parkview is higher under baseline scheme (i.e. original low rise development)

under SSE and S wind...building blocks of the proposed scheme block the wind flow from the winds direction and cause less wind availability in the Golf Parkview

I object to the proposed rezoning application since VR (spatial average wind velocity ratio) for Golf Parkview instead of increasing is actually reduced under certain wind directions detailed above (See also table 3 summary of spatial average wind velocity ratios(VR) on page 14 which indicate Golf Parkview indeed has the lowest VR among the 10 observation points).

Findings of the Air Ventilation Report reinforce my concern that the plot ratio is too high and not compatible with surrounding developments, specifically Golf Parkview which is most affected. I agree the solution is either to reduce the plot ratio or reduce building height.

### **Sunlight**

Blocks 6 and 7 and part of Block 5 of Golf Parkview, all on the western and leeward side of the proposed development, is currently enjoying plentiful direct sunlight in the morning. Considering the proximity (building setback from site boundary of about 8 meters) of Golf Parkview to the proposed high rise, morning sunlight will be permanently blocked. Golf Parkview residents facing the planned development will henceforth be like living in the bottom of a well.

For residents of the said Blocks 6 and 7 and part of Block 5 of Golf Parkview, their view will be sadly changed from open view of mountains, green fields and shrubs to 屏風樓!

### **Visual Impact Assessment**

The Visual Impact Assessment's conclusion that "occupational receivers have low insensitivity" as it conveniently ignored the occupiers of Golf Parkview located on the immediate west of the planned development is incorrect.

It is extremely regretful that despite its proximity, Golf Parkview was not among the Viewing Points chosen. Otherwise the result would be significantly adverse on visual composition aspect/visual obstruction aspect/effect on public viewers, and effect on visual resources. I therefore question the report's conclusion that the planned development "is considered to be acceptable in the aspect of visual impact".

The above comments reflect the general complaint about the deficiency of consultancy reports and studies in that they are jam packed with data, figures, measurements and technical jargons yet with insufficient analysis/concern/emphasis on the human aspect. As law abiding citizen I and my family just want to live peacefully in a pleasant and safe environment, with hassle free commuting to work and daily chores.

### **Noise**

Considering a significant percentage of Golf Parkview residents are seniors, I am concerned the adverse impact of the noisy construction work and eventually the claustrophobic and depressing impact such high-rise buildings may bring to bear on the seniors.

A healthy environment, especially low road traffic noise, is paramount for Golf Parkview residents, mostly seniors, who place great emphasis on a quiet surrounding.

I emphasize that the Environmental Protection Department should not be satisfied with the applicant's simple reply of "Noted" in response to the departmental comment in July 2020 "With regard to noise impact, we have no objection to the s.12A application provided that the developer is required to submit Noise Impact Assessment (NIA) report for the MLP/GBP and provision of noise mitigation measures to achieve 10% compliance with the noise criteria of HKPSG including road traffic noise standard to the satisfaction of DEP/TPB under the future MLP submission for the CDA development and relevant land title document. Some observations to be addressed in the future NIA is also shown in the attached Annex."

In summary, until the applicant further scrutinizes his submission with appropriate updates and using more realistic parameters discussed in this attachment, with the worst case scenario re-visited for consideration of relevant departments and the Town Planning Board, I consider the development intensity excessive and not compatible with surrounding areas and there is no strong justification for re-zoning.

## **Attachment III Associated Issues – Construction Period Considerations and Fung Shui.**

### **Construction Period Considerations**

During the construction of Eden Manor lasting well over 3 years, the following nuisances will occur:

- Traffic congestion due to the heavy weight vehicles in and out of the constructions site,
- Hazards to the pedestrians and cyclists in the area,
- Heavy air pollution, dust and noise due to the construction and the heavy weight vehicles traffic.
- Airflow and Sunlight blocked by the tall buildings and structures.
- Rubbish littered by the construction workers, vehicles and ancillary service providers.
- Heavy damages to the curbs and roads due to the frequent usage by heavy weight construction vehicles.
- Significant increase in pest numbers including rats, cockroaches, mosquitoes, lice and all sorts of bugs.

The above will undoubtedly be amplified for Golf Parkview and its residents which are in close proximity to the planned development.

### **Fung Shui Considerations**

Based on opinions of fung shui experts, the construction of any high rise next to Golf Parkview is bad fung shui not only for Golf Parkview and Tsung Pak Long village, but most importantly for the owners, residents and developers of the planned development.

The Government of the Hong Kong Special Administrative Region  
**Press Releases**



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LCQ20: Residential care homes for elderly

LCQ20: Residential care homes for elderly  
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Following is a question by the Hon Chan Han-pan and a written reply by the Secretary for Labour and Welfare, Dr Law Chi-kwong, in the Legislative Council today (March 17):

**Question:**

Quite a number of members of the public have relayed that the waiting time for admission to subsidised residential care homes for the elderly (RCHEs) has become longer and longer due to the persistent shortage of the places therein, and carers taking care of elderly persons single-handedly at home bear tremendous pressure. In this connection, will the Government inform this Council:

(1) of the number of elderly persons currently waiting for admission to subsidised RCHEs and the average waiting time; the new measures to be put in place in the coming three years to shorten the waiting time;

(2) given that where developers are willing to incorporate certain lease conditions in their real estate development projects to ensure the provision of eligible RCHE premises, they may apply for exemption from payment of premiums for the premises concerned under the "Scheme to Encourage Provision of RCHE Premises in New Private Developments", of the respective numbers of relevant applications received, approved and rejected by the Government since the Scheme was launched in 2003; if there were rejected applications, of the reasons for that; whether it will consider relaxing the eligibility criteria and streamlining the application procedure, so as to encourage developers to participate in the Scheme;

(3) of the total number of applications received by the Government in the past 10 years for exemption from payment of premiums in respect of the construction of private RCHEs that meet the requirements of the Social Welfare Department; and

(4) given that in order to protect the safety of elderly residents in the event of emergencies, it is stipulated in section 20 of the Residential Care Homes (Elderly Persons) Regulation (Cap. 459A) that all parts of a residential care home shall be situated at a height not more than 24 metres above the ground floor, but the Director of Social Welfare may authorise any part of the residential care home to be exempted from complying with such height restriction, of the respective numbers of exemption applications received and approved by the Director in the past 10 years, which had been made for the following purpose: to accommodate non-domestic portions such as the laundry room, kitchen and storeroom at a height more than 24 metres above the ground floor, so as to release more space on the lower floors for the provision of places for the elderly?

**Reply:**

President,

My reply to the Member's question is as follows:

(1) As at end-December 2020, the waiting time and number of people waitlisted for subsidised care and attention (C&A) places and nursing home (NH) places are as follows:

Service type	Average waiting time (in months) (Average of the previous 3 months) (Note 1)	No. of people waitlisted
C&A places	21	31 426 (Note 2)
NH places	26	6 099 (Note 3)

Note 1: It is the average number of months taken (from the waitlist date to the admission date) for normal cases to be admitted to subsidised Residential Care Homes for the Elderly (RCHEs) in the past three months. Cases accorded priority in allocation of places, cases with inactive history admitted in the past three months, and cases transferred from homes for the aged places to the converted C&A places

providing a continuum of care in the same RCHE have been excluded in the calculation because their waiting time may be extraordinarily long or short in comparison with that of normal cases.

Note 2: The figure includes the elderly persons using subsidised community care services (CCS) while waiting for subsidised C&A places, but does not include the elderly persons classified as "inactive" cases on the Central Waiting List (CWL).

Note 3: The figure includes the elderly persons using subsidised CCS while waiting for subsidised NH places, but does not include the elderly persons classified as "inactive" cases on the CWL.

The Government will continue to take a multi-pronged approach to increase elderly service places through long, medium and short-term strategies. As a long-term strategy, the Government has reinstated the population-based planning ratio in the Hong Kong Planning Standards and Guidelines in respect of elderly facilities in late 2018, specifying a ratio of 21.3 subsidised RCHE places to 1 000 elderly persons aged 65 or above. This is to set a clear service provision target for future planning work. As regards the medium-term strategy, the Government is taking forward 66 development projects which will provide about 8 800 RCHE places (including subsidised and non-subsidised places) and about 2 800 subsidised day care service place in the coming few years. Besides, in accordance with the 2020 Policy Address, the Government has invited the Hong Kong Housing Authority and the Hong Kong Housing Society to explore reserving about 5 per cent of the total domestic gross floor area in future public housing development projects exclusively for welfare uses, which include the much-needed RCHEs, without affecting the public housing supply and other ancillary facilities. In respect of short-term strategies, the Pilot Scheme on Residential Care Service Voucher (RCSV) for the Elderly has been implemented since March 2017 in order to issue a maximum of 3 000 RCSVs in batches, offering elderly persons in need of residential care service an additional choice. In addition, the Social Welfare Department (SWD) will purchase an additional 5 000 EA1 places in private RCHEs under the Enhanced Bought Place Scheme over five years starting from 2019-20 to increase the supply of subsidised RCHE places and enhance the overall service quality of private RCHEs.

Apart from the aforesaid measures, the Labour and Welfare Bureau will continue to implement the Special Scheme on Privately Owned Sites for Welfare Uses (Special Sites Scheme) with a view to encouraging non-governmental organisations to better utilise their own sites through expansion, redevelopment or new development to provide diversified subvented and self-financing services. According to the latest proposals from applicant organisations in Phase 1 of the Special Sites Scheme, it is anticipated that about 7 500 RCHE places (including subsidised and non-subsidised places) could be provided subject to the smooth implementation of all the proposed projects relating to elderly services. The Government also launched a new phase of the Special Sites Scheme in April 2019. The SWD is discussing with the applicant organisations to finalise details of their proposals such as service type, number of places, development parameters and project cost, with a view to implementing the projects as soon as possible.

(2) and (3) The Government implemented in July 2003 a scheme to encourage provision of RCHE premises in new private developments (the Scheme). The Scheme provides that eligible RCHE premises will be exempted from payment of premium under different types of land transactions including lease modification, land exchange and private treaty grant, if the developers are willing to accept incorporation of certain lease conditions to ensure the provision of RCHE premises. Premium exemption will be granted with the support of relevant departments (including the SWD). The developers will have to bear the construction cost of the RCHE premises which, once built, will become the properties of the developers. The Government will allow the developers to lease, sell or operate the premises themselves or through agencies as long as the premises remain as RCHEs. The developers/ operators are free to set their own fees having regard to the market trend.

Since the implementation of the Scheme, one project in Tuen Mun has received premium exemption. Construction and furnishing of the RCHE premises have been completed, while the application for RCHE licence is in progress. The SWD has also received other preliminary proposals submitted by interested developers/ applicants referred by the Lands Department or the Planning Department. Whether the projects can be realised is subject to various considerations and factors to be taken into account by individual developers/ applicants in the course of land transaction.

(4) RCHEs are regulated under the Residential Care Homes (Elderly Persons) Regulation (the Regulation). According to section 20(1) of the Regulation, subject to section 20(2), no part of an RCHE shall be situated at a height more than 24 metres above the ground floor. This requirement is a safety consideration for elderly residents as many of them are wheelchair-bound or even bed-ridden. In the event of fire or other emergencies, they need extensive assistance to evacuate. The difficulty of fire personnel and other rescue teams in evacuating a large number of frail elderly persons with mobility problems to the ground floor cannot be neglected. Therefore, stipulating a height restriction for RCHEs helps protecting the safety of elderly residents in the event of fire or other emergencies as well as effectively shortening the time for fire personnel to rescue or evacuate residents.

Currently, under section 20(2) of the Regulation, the Director of Social Welfare may, by notice in writing served on an operator, authorise that any part of such RCHE may be situated at a height more than 24 metres above the ground floor as may be indicated in the notice. In the past 10 years, the SWD has not received any applications made pursuant to the above provision.

Ends/Wednesday, March 17, 2021  
Issued at HKT 15:25

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**Fwd: 反對愛園修訂圖則改劃申請**  
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4 attachments



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日期: 2022年6月06日星期一 21:29 HKT

標題: 反對愛園修訂圖則改劃申請





(客家圍)

致：城市規劃委員會秘書。

### 反對修訂圖則改劃申請

敬啟者：

貴會申請檔案編號：Y/ FSS /19 把 (綜合發展區) 地帶改劃為 (綜合發展區 (1) 地帶。

地點：新界上水地段第 2 號餘段和毗連政府土地。

本人黃天寶乃是新界上水松柏塢村客家圍村民及持份者，又是黃氏族人隆福堂司理人之一，本人早已於編號：Y/ FSS /12、Y/ FSS/14 及 Y/ FSS/15 申請改劃高密度圖則的時候，已提出反對意見要求維持原方案低密度建屋。現在本人重申再向城市規劃委員會提出反對 Y/ FSS 19 改劃圖則申請，並提出反對意見如下：

1) 已逾百年松柏塢村客家圍建築群，早已被政府古蹟辦事處評為整體一級私人歷史建築物，建築群內五臟俱全，(包括：圍門、民居、祠堂、書室、更樓及禾塘)。全用青磚建造而成，未曾改動過，原汁原味，全港獨一無二，沒有其他建築群可以取代。由於申請者改劃圖則增加高密度，原址重新申請 7 座樓高接近 32 層 (包括 4 層地庫及升降機槽設施等) 樓宇，建屋密度提高後發展項目對距離不足 90 米的客家圍建築群帶來嚴重影響，將會受到打樁工程震盪，建築群實在無法承受工程帶來的衝擊，更有倒塌危機或塌陷，村民生命財產一定會受到嚴重威脅，更會屋毀人亡。

2) 欠缺土力影響評估：因為發展工程項目的倡議者和相關工務部門，均須研究工程項目會否影響具有歷史及考古學價值的地點及建築物 (統稱“文物地點”)，若有影響，便須進行文物影響評估，並且訂定緩解措施及邀請公眾參與。

3) 即使有更先進的科技儀器扶助起樓，都會影響客家圍地底水源支撐的力度，因為客家圍前身是一片魚塘，當時全用人手建屋，經歷百年歲月洗禮，地底沙泥已自然流失很多，地基不穩固，日後客家圍建築群會塌陷。

4) 欠缺對客家圍一級私人歷史建築群評估，有違文物保育政策，因為政府文物保育政策凡具一級歷史建築物（具特別重要價值而可能的話須盡一切努力予以保存的建築物。）眾所周知客家圍建築群在香港公認極為罕有，是現今碩果僅存的中式建築群。

5) 發展項目改劃申請，並非配合政府房屋正策，因為日後項目落成後，售價由千萬元起計，一般中產家庭都難以負擔購買，實是為有錢人家度身訂做。

6) 由於未來幾年，北區（上水）有多處公屋落成，排污設施將無法再容納此項目高密度人口帶來的負荷。污水排放處理衍生各種衛生問題和疾病，影響上水居民身體健康。

7) 有關交通問題，由於申請位置接近樽頸位（往上水大頭嶺村迴旋處方向），而青山公路古洞段近松柏塢路段，路短又路窄，日後縱使有東北發展配套設施解決車輛擠塞，但都不足以應付現時交通流量，如該段路面遇上事故發生，肯定會阻延消防車、救護車及警車執行救人任務，對當地居民（村民）肯定帶來不便，根本該處位置不適宜發展高密度發展建屋。

因此發展和保育必須要平衡利與弊，若然只顧圖利，不顧社會責任，只會把前人的心血手作和歷史建築物本身的皮殼（歷史痕跡）無法永久保存，是錯誤的抉擇。同時大家都知道香港現存的中國古建築物所剩無幾，惟石果僅存的客家圍一級私人歷史建築群，極需要珍惜永續保存下去。

懇請城市規劃委員會各委員否決此項改劃圖則增加高密度申請，應維持原有方案低密度建屋，反對理由充分。

此致：城市規劃委員會負責人收。

（黃錫宗公祠）



反對人：黃天寶。

[Redacted signature]

日期：2022年6月6日。

副本致：

發展局文物保育專員辦事處（收信人：文物保育專員蔣志豪先生）

（傳真：2906 1574）

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

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

By Fax : 2877 0245 or 2522 8426

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

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

Y/FSS/19

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

因屋影響環境及交通問題，詳情見附頁

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

簽署 Signature



日期 Date

6-6-2022



Planning Application Y/FSS/19  
(Comments on section 12A application)

It remains the intention of the developer to construct seven high tower residential blocks, as it has done since the detailed proposals were first revealed. The proposed heights of the residential blocks have been considerably increased. They now range from 25 to 32 storeys. The number of flats available has increased by 43% from 676 to 969 and the design population by the same percentage to about 2,714 persons.

The developer used to maintain that its potential development was "in an appropriate scale". That wording has now changed to "the proposed development intensity is considered appropriate and compatible with the surrounding neighbourhood."

The only development of even vaguely similar size is that of Eden Manor located on the south side of the Castle Peak Road-Kwu Tung. Sadly no one was invited to comment on this proposed development. There was no public consultation exercise. On the south side of Castle Peak Road travelling west from Eden Manor, or on the east side when the road curves south, there is no building taller than Golf Parkview until one arrives at as far away as Yuen Long. It is the same story on the other side of Castle Peak Road. Golf Parkview is the tallest structure between the junction of Castle Peak Road with the Fan Kam Road and Yuen Long.

The proposed site is adjacent mainly to village houses on its east side and the Golf Parkview development on its west. Golf Parkview has 5 storeys with a ground floor of car parks/lift lobbies plus 4 storeys of flats. There are a total of 48 flats housing and, according to the ratio of 2.8 persons per flat, approximately 135 people with 54 private car parking spaces including those for visitors. Oi Yuen has increased the number of flats planned to 969, housing approximately

2,714 people with 1,117 private car parking spaces. The contrast in size is both obvious and overwhelming. Opposite the proposed development, on the other side of Castle Peak Road, is the Fanling Golf Course with zero buildings. To the north of Oi Yuen is the Fanling Highway. On the other side of the Highway is the low-density Tsung Pak Long. It cannot be accepted that the proposed development is in any way compatible with its surrounding neighbourhood and rural environment. It is grossly excessive.

The proposed seven residential towers have been increased in height from between 19 and 23 storeys to 25 to 32 storeys aboveground, the nearest of which to Golf Parkview will be little more than the width of a narrow lane away (one of the reports gives the separation distance as 9 metres). They will undoubtedly adversely affect the residents of Golf Parkview environmentally by blocking both wind and sunlight. The negative affect on wind flow was confirmed in the air ventilation assessment which stated the former proposed development of 7 blocks ranging in height from 19 to 23 storeys "would create rather significant adverse impacts on the surrounding area under most simulated winds...". It should be emphasised that the proposed height of the blocks has since been increased to 25 to 32 storeys. The excessive height of the 7 blocks will also result in a shadowing effect on Golf Parkview. There must also be concern that the piling and other construction activity of these seven towers, including up to 4 levels of basement for underground car parks, may affect the structural integrity of Golf Parkview, as well as having a major adverse air quality impact of potential dust emission.

One of the most important reasons why the present proposal should be rejected is that despite repeated adverse comments from petitioners and the Transport Department, the developer still plans that traffic to and from the new development should be via Pak Wai Lane. The only access to Golf Parkview whether on foot or in a



vehicle is via Pak Wai Lane. This lane is comparatively narrow both in terms of the road for traffic and the footpath for pedestrians. The Chief Highway Engineer/New Territories East described Pak Wai Lane as being "substandard in width."

We do not believe for one moment it can possibly safely handle the dramatic increase in usage envisaged by the developer. The site which it is proposed be developed has long frontage directly onto the Castle Peak Road-Kwu Tung. It MUST arrange that access to and from Oi Yuen be direct from Castle Peak Road, just as it is at Eden Manor, and not via Pak Wai Lane. We consider this imperative not only for the safety and convenience of all users but also to permit swift access by emergency vehicles to both the existing and possible future development. In its S. 12A Application for Amendment of Plan dated February 2022, the developer in para. 2.5.1. writes that "The existing vehicular access to the Application Site is available via Castle Peak Road-Kwu Tung." This is true so why do they not use it instead of Pak Wai Lane?

There is a further important reason why the literally hundreds of vehicles going to and from Oi Yuen every day should not be allowed to use Pak Wai Lane. When travelling in a westerly direction from the junction with Fan Kam Road on the Castle Peak Road-Kwu Tung, the third/middle lane for turning right into Pak Wai Lane is only long enough for about four vehicles. This is sufficient for Golf Parkview traffic. It is impossible to conceive that it will be long enough also to accommodate Oi Yuen traffic. More than four vehicles waiting to turn right into Pak Wai Lane will mean that all westerly bound traffic on the Castle Peak Road will have to come to an abrupt halt. This will be very dangerous as the road is narrow and one approaches Pak Wai Lane coming round a sharp right-hand bend with minimal forward visibility. Accidents will happen. There is no shadow of doubt about that. It is very frustrating that whilst surveys of traffic on the Castle Peak Road-Kwu Tung are conducted,

no attention seems to be being paid to the dangerous situation which is planned by the use of Pak Wai Lane for access to the proposed new development. A queue length assessment in respect of traffic proceeding in a westerly direction on the Castle Peak Road-Kwu Tung and turning right into Pak Wai Lane should be undertaken.

It is noted that a traffic survey was conducted in April 2020 on Castle Peak Road-Kwu Tung and an appraisal of noise environment in May 2020. It should be taken into consideration that at that time Hong Kong was already suffering from the side effects of the corona virus pandemic with people working from home where possible and schools not open. Also, Eden Manor was in no way fully occupied in April/May. Of course Eden Manor was still under construction when the 2017 traffic survey was conducted, so that survey is hardly much more reliable than the one conducted in 2021 which is the subject of a December 2021 Report. The fact remains that more and more often the traffic on Castle Peak Road outside Golf Parkview proceeding towards Fan Kam Road is either moving slowly or has come to a complete halt.

It is noteworthy that there is not one shot of Golf Parkview in all the myriad of photographs of the area provided by the developer, even the aerial ones. The proposed development is not in any way compatible with Golf Parkview or the surrounding area. It is grotesquely huge and will be detrimental to the quality of life to nearby residents as well as seriously worsening traffic congestion in the area. Various reports mention the visual impact of the new development but never from the position of the residents of Golf Parkview who will clearly be severely adversely affected in this respect.


The pavement in front of Golf Parkview is 136 inches wide. This is considerably wider than the pavement on Castle Peak Road-Kwu

Tung either to the west of Golf Parkview or that bordering the proposed new development. The latter pavement is only 76 inches wide. Ironically, this pavement is even busier than the one fronting Golf Parkview. Pedestrians and cyclists coming from the Kam Tsin area, heading towards Sheung Shui, cross the Castle Peak Road-Kwu Tung virtually opposite Pak Wai Lane because there is no pavement on the golf course side of Castle Peak Road-Kwu Tung opposite the proposed new development. The situation is already bad and should not be allowed to worsen..

It is noted that the developer makes a proposal regarding the provision of a residential care home for 100 elderly persons. This proposal is strongly opposed. First, the location does not seem appropriate with it not being within easy walking distance of any major developments. Visitors to the care home will also increase the utilisation of Pak Wai Lane. It is noted that there is a large social welfare complex under construction in Kwu Tung just 5 minutes drive from Golf Parkview.

We respectfully strongly urge the Town Planning Board to reject this Planning Application. Thank you.

Name of person making this comment : *ZONG WAI MING.*

Signature : 

Date : *6-6-2022*



申請編號 Y/FSS/19

本人強烈反對以上綜合發展計劃

反對理由如下：

# 1) 安全

A) 柏蕙里本身是一條只服務高爾夫景園的小路，居民只48戶，現擬發展項目住戶969戶，共用此小路，並加上有老人宿舍，有探訪者會出入，宿舍位100個，探訪者若100人，共數千人共用小路，車多人多，構成危險，行人路狹窄且沒圍欄。

\* 實不足容納兩項目共用。(高爾夫景園及擬發展項目)

B) 車輛使用柏蕙里數量，高爾夫景園(最多58架)，擬發展項目為私家車1117架另上落客車位7架，若共用柏蕙里，怎容近1200架車出入，還有繁忙時段有的士及其他接客車輛，假設1戶兩架車出短少柏蕙里，也為2400架車輛，且發展項目車出口，於本居苑(高爾夫景園)車出口的對面還位置較前，換言之，發展項目出車，則阻塞本苑無法出車，車輛大量出車，本苑是否要待多少時才能出在柏蕙里，再出青山公路，阻礙上砵上學，該時該車也會有碰撞。

\* C) 由於柏蕙里是唯一交通出入口，也是救火，救傷等緊急車輛唯一出入口，擬發展項目大增出入柏蕙里人流及車流，塞車路不通，則阻礙救人，兩項目居民老人生命安全受威脅。

\* 老人院應設人口較疏車少空氣好，山區，免車塞阻礙院，且有疫症，散播少，可選可近上到高連地方設院。

## 2) 環境

高爾夫景園為低密度住宅，發展項目擬建 27-32 層，

共 7 座，必阻礙高爾夫景園，製造屏風樓，影响

A) 陽光 — 因距離太近，且擬發展項目地勢較高

B) 空氣流動 — 重重圍 7 座，風被阻。

\* C) 傳播疫症 — i) 若有疫症/老人院爆發疫症，柏蕙里人多共用，又有探訪者共用，狹窄短少路上擠著人流，散播容易。

ii) 若老人院有疫症，抽氣設備抽出病毒，因近民居，(近高爾夫景園 6, 7 座) 迎風吹入住戶，且又近擬建計劃民居，2000/3000 人。

D) 過去擬建項目範圍已大量砍伐寶貴樹木，令人惋惜，若批建，如何避免再砍樹？

E) 自 1919 年，愛園已成上水區名莊園，是歷史文物，今擬作為會所是歷史文物建築，於理不合，且文物維修應是政府支付。若做會所，是否有遺文物意義。

F) 噪音 — 柏蕙里上，擬建項目車出入多數件部，廢氣。車塞高爾夫景園出入口前，必做成車響號，各爭路也發號，數件部車爭出青山公路，也造成大量噪音及廢氣。

## 3) 交通

A) 青山公路 - 繁忙時段, 有時下午4時後已有塞車, 且中港兩地物臨增加, 青山公路附近如金錢路建了三座新型村屋, 其他村也人口增多, 今共小巴及私家車也比前大增, 來往路上車輛日增。

\* 若再沒有妥善安排, 怎容擬建計劃車輛大增於路上。

B) 大頭嶺迴旋處 - i) 大頭嶺迴旋處現於繁忙時段或下午4時後也擠塞, 政府未有計劃擴闊道路, 若批准擬建計劃, 更不勝負荷。  
ii) 政府又擬建公屋於高爾夫球場, 住數萬人, 交通更甚。

C) 拍蕙里出青山公路 - 每戶(擬建計劃)出車兩架也2000多架(上班上學時)(的士及私家車), 怎容?

4) 其他影响 - A) 擬建項目7座在強2產生安全, 噪音, 沙塵震動對高爾夫景園住戶影响健康, 打樁7座可能影响高爾夫景園結構。(因沒打樁, 有地下消音房, 拍蕙里有廁所水原房, 樓宇結構)

b) 政府有否就本區人口增加而增加  
設施：學校，社區會堂，街市，老人設施，  
體育館，醫療設施等。

c) 道路未有動工改善工程。

姓名：方偉明

簽名：[Signature]

致城市規劃委員會秘書：

74

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

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

By Fax : 2877 0245 or 2522 8426

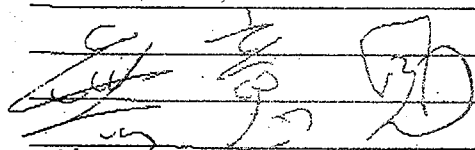
By e-mail : tpbpd@pland.gov.hk

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

Y/FSS/19 Received on 15/07/2022

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)



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

侯志強

簽署 Signature



日期 Date

29 JUL 2022

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

74 附註 1

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

Y/FSS/19 Received on 15/07/2022

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

本會對該項司表示反對。因為該區  
交通情況已飽和，導致消防及救傷  
服務恐有延誤。對附近村落及屋苑的  
環境風水及衛生影響深遠。以上是(留區)  
「提意見人」姓名/名稱 Name of person/company making this comment 居民反對區議會

簽署 Signature

日期 Date

2022.8.1

上水區鄉事委員會

侯志強 謹

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

74 P1112 v

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

補充

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

Y/FSS/19 Received on 15/07/2022

意見詳情 (如有需要, 請另頁說明)

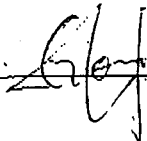
Details of the Comment (use separate sheet if necessary)

有關評估報告未能反映現時情況, 統計及評估有差異。青山公路 - 古洞段至水  
一、附近的公營房屋及私營房屋群聚較密, 交通流量及人口增多, 對交通  
及道路需求增加, 容易交通道路阻塞。再者加上北區醫院新翼落成  
對於救援急救時間更加不利, 每道路交通的不完善已影響  
救援工作, 延誤救援時間, 對患者嚴重影響。火警火災, 交通意外等都有影響。  
鐘屋樓宇密度高, 涵蓋原有環境樣貌, 空氣流通亦影響附近的鄉村  
及屋苑。空氣污染, 汽車廢氣排放, 噪音等問題亦需關注。  
有所影響。

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

侯志強 提  
上水區鄉事委員會

簽署 Signature



日期 Date

2022.8.4

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

參考編號

220803-133417-60073

Reference Number:

提交限期

12/08/2022

Deadline for submission:

提交日期及時間

03/08/2022 13:34:17

Date and time of submission:

有關的規劃申請編號

Y/FSS/19

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. 侯福達

Name of person making this comment:

意見詳情

Details of the Comment :

申請編號:Y/FSS/19

申請地點:新界上水地段第2號餘段和毗連政府土地

本人侯福達為北區區議員(上水鄉郊)，強烈反對上述地段的申請，有關反對理由如下：

1. 據了解，申請發展地段(愛園)隔鄰的政府土地，將會興建超過3000多戶的公營房屋，容納約8900人，加上古洞北大規模發展，青山公路-古洞段，各處都是工程項目，車輛來往頻繁，流量大增，上水鄉郊(坑頭村、金錢村、古洞村、河上鄉村、馬草壟村、料壘村、麒麟村)的居民，必經的地方(青山公路-古洞段)造成阻塞，可是，區內的設施及交通配套仍未完善，村民的日常生活(工作、就學)受到牽連影響，當有急事未能及時趕到，後果嚴重。有關交通評估是2021年12月，疫情仍在嚴峻的時候，不是將會建成屋苑的實際情況，故在交通問題仍未有完善的解決方案，不宜再建屋苑。

2. 該發展地段(愛園)將會興建至32層高的樓宇，恐防「打樁」會影響鄰近樓宇(距離9米)的屋宇(高爾夫景園)結構，造成牆壁破裂、樓宇沉降的現象，實在令人擔心，避免發生不愉快事件，應該諮詢鄰近的屋苑，展開討論、協調及解決方案，達成共識後才進行申請程序。並在動工前為住戶測量屋宇，監測打樁出現的沉降幅度，以確保屋宇的結構未受影響，保障鄰近屋宇及居民的安全。

3. 雖然，發展項目有排污、排水、交通、環境影響等各項評估，可是只是技術上的評估，而並非建成後的實際情況，應參照鄰近已建成約32層高相類似樓宇，作評估才合理，因此，質疑有關評估數據是否正確和合理？

4. 這區屬低密度住宅，由於上次申請樓宇高度為23至27層，我們已反對樓層太高，阻擋鄰近的屋苑已有的視線，失去原有的景觀，更會破壞鄰近村落(客家圍、松柏塢、金錢村)承傳的風水、龍脈，實在難以補償，需要減低層數，現在更變本加厲改為27至32層，實在不能接受。



5.現時由金錢路轉出青山公路往上水段，因該處為彎位地帶，駕駛者未能看清楚前面的車輛，導致難以抉擇恰當的時機右轉，倘若再增加車輛流量，車輛頻繁流動，增加造成交通意外的機率。

6. 該發展區內擬建100個宿位安老院，由於是建在私人的屋苑內，老人家的自理能力較困難，確實需要大量有關人員的照料，亦需要依賴車輛接送，導致車輛的流量增多，交通更顯擠塞，最重要是當老人家需要緊急救治時，因道路阻塞而未能及時救治，影響病情。事實上，在古洞及周邊的地方擬建設多個安老院舍服務，質疑是否必需需要在此處配套及設施不足的私人屋苑內，建設政府的安老院舍，實在令人感到疑惑，因此，需要仔細考慮各方面因素，是否恰當作為安老院用途？

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

**Comments on Y/FSS/19 - updated July 15, 2022 referred**

07/08/2022 15:21

From:

To: "tpbpd@pland.gov.hk" &lt;tpbpd@pland.gov.hk&gt;

File Ref:

2 attachments



Covering Ltr. for M. W. Li-compressed.pdf



Comments on Y\_FSS\_19 for updates on July 15, 2022-compressed-merged.pdf

Dear Sirs,

Enclosed please find the subject.

Yours truly,

Man Wai LI (Ms.)

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

**To : Secretary, Town Planning Board**

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

By Fax : 2877 0245 or 2522 8426

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

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

Y/FSS/19 Received on 15/07/2022

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

*Please see attached*

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

*LI Man Wah*

*M W L*

簽署 Signature

*Li Man Wah*  
*LI Man Wah*

日期 Date

*2022.08.08*

Date: 8<sup>th</sup> August, 2022

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

Dear Sir/Madam,

Planning Application No. Y/FSS/19 – Application for Amendment of Plan dated  
15<sup>th</sup> July, 2022

---

Instead of ameliorating the concerns raised in my last objection (letter dated 6<sup>th</sup> June, 2022 attached), the applicant's latest submission aggravates the problems previously identified, especially in the following critical issues:

#### **RCHE**

The applicant's admission that they intend to eventually seek construction cost reimbursement when the RCHE is handed back to the Government as a Government Accommodation clearly violates SWD's principle of endorsement "from the service perspective with no financial implication, both capital nor recurrent to the Government". I therefore strongly request SWD to withdraw their endorsement of this Planning Application.

I also urge the TPB to ascertain if the applicant had already reached an agreement with the Government on the disposal of the RCHE **before** the application of planning amendment was submitted on 15<sup>th</sup> July, 2022.

Since taxpayers' monies are involved here, I as a taxpayer have the right to insist if the RCHE demand around 2028 is really so critical then our money should be better spent on selecting a more acceptable site, with better ease of access and more supporting services than the Proposed Development.

Actually the RCHE supply in the vicinity of the Proposed Development (not even counting other large planned housing developments in the North District but outside the vicinity, such as Site A of Area 17 of Fanling District with proposed 8,300 flats and 23,500 residents which was recently gazette together with C1) will be greatly enhanced from 2025 onwards with the progressive launching of more major public housing developments in the surrounding area,

with most projects expecting to implement the 5% GIC (welfare uses) requirement (please refer to my objection of 6<sup>th</sup> June, 2022 for details, as well as the attached 17<sup>th</sup> March, 2021 Press Release LCQ20).

Taking together with the decrease in demand from the expected success of the Guangdong/Fujian migration initiative, the RCHEs supply/demand equilibrium may be achieved sooner than expected. Thus, I question the practicality of building a small size RCHE in such a bad location for operation in 2028. The fact that such RCHE residents may have to tolerate for four years the adjacent C1 public housing development construction noise and pollution renders the proposed RCHE even less appealing, nor justifiable.

The public perception that the applicant earns an unwarranted windfall (some 5,500 million dollars mainly due to raising the PR from 0.8 to 4.3, but in the process **destroys** the environment and quiet neighborhood of Golf Parkview, Tsung Pak Long South and Hak Ka Wai) simply by incorporating a token GIC (welfare uses) facilities in their project. Public opinion will be further incensed when they realize the taxpayers are the ones actually paying for the Proposed Development's RCHE. Both the TPB and SWD will need to carefully counter the public bias that there must be official business collusions (as well as transfer of benefits) between the approving authorities and the applicant, especially in light of the likely proliferation of RCHEs in the period 2025 to 2035 in the vicinity discussed above.

I, as well as the public, would also like to know if effective controls are in place to ensure that once approved, such RCHEs will be built and operated as SWD specified. Otherwise, it will only reinforce the public conception of another official business collusion, as demonstrated in some of the recent cases of GIC (welfare uses) abuses.

## **Traffic**

I found the applicant's reason to exclude the adjacent, yet confirmed planned public housing development known as C1 (5 tower blocks, 3,300 flats and 8,900 residents with another couple thousand of non-residents manning the commercial/retail/welfare facilities) from the Transport Impact Assessment (TIA) to be extremely unconvincing and biased. How could any professional TIA deliberately ignore the traffic impact from the 8,900+ persons living/working to the immediate east of the Planned Development? The resultant traffic flows along the Castle Peak Road (Kwu Tung) will be so

impeded that gridlock will be guaranteed, particularly during morning and evening peak hours.

I reiterate my objection to the TIA adopting the HK average household size of 2.8 (which correlates primarily to the HK average flat size of 50 sq.m.) to the Proposed Development with an average flat size of 100 +sq.m. A more equitable and reasonable method is to adopt the Golf Parkview (which has a similar flat size average) actual average of 3.9 as previously recommended.

Whilst I appreciate the difficulty of forecasting accurately traffic volume based on current traffic which are much affected by the ongoing covid situation, I take strong exception to the TIA adopting this derivation of COVID-19 factor of 1.15 which, to say the least, stretches credibility to the limit and must be revised upwards to reflect the resumption of normal life post COVID.

I have also stressed in my previous objections that the zoning requirement for the Proposed Development to share a common ingress/egress point i.e. Pak Wai Lane **is unworkable** and will result in **significant (and unavoidable) traffic overloads** along this short and narrow road. The applicant's incorporation of a short side walk as a solution is cosmetic at best and really does little to alleviate the traffic jams, expected to be further aggravated by the increased traffic at the Kam Tsin Road/Castle Peak (Kwu Tug) Road junction.

I therefore strongly demand the TIA to be revised to incorporate the impact of the C1 development, to adopt a more realistic household headcount of 3.9 as

well as the COVID-19 factor, and to propose a workable solution to the Pak Wai Lane traffic jam. I would sincerely also invite comments from the Transport Department in this respect.

### **Walled Buildings Effect**

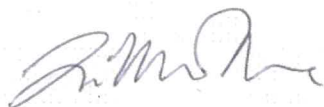
I am really angry and frustrated that despite our repeated appeals, the amended Visual Impact Assessment, similar to ALL the other studies in the Planning Application, simply gross over the effect of walled buildings on Golf Parkview. Despite the applicant's assurances, I still have to face the full impact of walled buildings just meters away. This is a grave situation for the Golf Parkview residents and I appeal to the TPB to seriously consider our predicaments when reviewing the Planning Application.

If the applicant is however willing to revert back to the originally approved low rise structures with a 0.8 PR, it will provide a much needed breathing space in the midst of surrounding high rises (Eden Manor, C1 public housing development, project 4076 in D.D.91 at the junction of Castle Peak Road(Kwu Tung) and Fan Kam Road) benefitting not only the Proposed Development itself but also Golf Parkview, Tsung Pak Long South, Hak Ka Wai and even some C1 residents. In doing so I am sure the applicant will earn, in addition to a very healthy profit also these people's eternal gratitude.

### Conclusion

With the above additional concerns, especially the ones on traffic, on top of those already raised in my 6<sup>th</sup> June, 2022 letter, I strongly urge the Town Planning Board to reject the Planning Application, Y/FSS/19.

Sincerely Yours



M. W. LI (Ms.)

Encl.

- 1 My Letter of comments on Y/FSS/19 6<sup>th</sup> June, 2022
- 2 LCQ20 Residential Care Homes for Elderly dated 17<sup>th</sup> March, 2021, and
- 3 Extract of No. 45/2021 of the North District Council Committee

Date: 6<sup>th</sup> June, 2022

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

Dear Sirs,

Re: My Comments on Y/FSS/19

Although this application proposed a 43% increase both in the number of flats and design population over the last submission, the supporting studies (including some December 2021 updates) only incorporated minor, cosmetic changes to the previous studies, and still leaves most of our concerns (my letter dated October 6<sup>th</sup>, 2020 on Y/FSS/15 refers) unanswered. Considering the fifth coronavirus wave started in December 2021 in which most activities, especially traffic, were in a semi lockdown state, such studies cannot be adopted for meaningful planning purposes. This application, so audacious and in complete disregard of most objectors' concerns, must be rejected.

### **Proposed increase of PR to 4.3**

We take strong exception to the applicant applying the Northern Metropolis Development Strategy liberally to seek redevelopment (raising PR to 4.3 with resultant BH increased to 130M) at all costs. The fact that the Town Planning Board (TPB) is still functioning and well is proof that the Government aims to achieve this objective within a proper framework, and with due consideration to all human factors. Thus the applicant's justification point number one is valid only within a defined framework.

Contrary to applicant's justification point number three, the proposed high rise/high density development is not in harmony with the surrounding but contradicts with the Chief Executive's stated aim of People Oriented. The proposed two floor RCHE building looks odd, ungainly, out of place and aesthetic unappealing and incompatible with the other tower blocks. Why sacrifice the interest and welfare of 23,100 (population of TPU 626 as at 2019) tax paying and law abiding citizens to accommodate only 100 elderly persons and some 2,700+ future application site residents. Why provide extremely generous incentives (on top of premium exemption, the developer is permitted to freely lease, sell or operate the RCHE premise once it is built, as per the Secretary for Labour & Welfare's reply in LCQ20 highlighted in Attachment 2) and turn the applicant's profits from handsome to exorbitant?

### **Traffic Congestion at Pak Wai Lane**

The inherent weakness in the Traffic Impact Assessment has not been addressed. All the studies, including Junction calculation sheets on Junction A i.e. Castle Peak Road-Kwu Tung/Park Wai Lane were updated in December 2021 (where the city was still under semi lockdown) which unfortunately did not reflect the situation under normal conditions. The traffic congestion problem at the vehicle ingress and egress points of Pak Wai Lane will be



further aggravated with the 61 % increase in car parks, plus the additional RCHE vehicle flows from transiting staff/workers, visitors, RCHE elderlies, emergency vehicles and daily heavy truck movements.

I note the newly added pedestrian footpath at Pak Wai Lane is a correction of Arup's initial oversight. Unfortunately the footpath is not only short but provides very limited improvements, especially for pedestrians from application site intending to use public transportation going towards the Yuen Long direction.

I further note this application, whilst adopting the HK population norm of 2.8 per flat, conveniently skipped the fact that its average flat size of 132+ sq.m. is way above the HK average (some 50 to 65 % bigger!). Ignoring the correlation between flat size and headcount makes me question the accuracy of applicant's Traffic Impact Assessment. In my view the best, and indeed fairer approach is to adopt the Golf Parkview's actual figure of 3.9 persons per flat (same location, slightly smaller flat sizes) which shows Pak Wai Lane will be quickly overloaded and not functioning as an efficient vehicle ingress/egress point.

As long as the traffic congestion problem is not properly addressed, this application must be rejected.

#### **The RCHEs**

Granted there is acute RCHE demand I firmly believe the basic principle of people oriented in choosing an appropriate RCHE site must not be deviated. Sizeable RCHEs should ideally be close to/attached to large public housing development projects which provide desirable catchment area for the RCHE; with provision of adequate ancillary services nearby, as well as ease of access for visitors, ancillary workers and logistical support. Regrettably the proposed site falls well short of these criteria.

The proposed development will not be completed until 2028. A cursory search reveals that in addition to the soon to be completed Area 29 Kwu Tung North Development area providing 1,750 RCHE beds, there will be ample RCHE beds planned in public housing development projects in the Fanling/Sheung Shui New Town area for completion around the late 2020s and early 30s (in compliance with Government's desire for the Housing Authority and Housing Society to reserve 5% of the total domestic GFA in future public housing development projects exclusively for welfare uses, including RCHEs, highlighted in Attachment 2), in particular:

- Area 4 & 30 (application no. A/FSS/280, also covered in TPB paper NO.10587 A1 site with 100 RCHE beds. Estimated completion in 2-3 years' time
- S/FSS/25 Item B Area 36 Ching Hui Road with estimated completion 2029-30, with SWD facilities planned
- S/FSS/25 Item C1 Area 35 Tai Tau Leng with estimated completion 2032-33, with SWD facilities planned
- S/FSS/25 Item B1 Area 30 Choi Shun Street with estimated completion 2030-31, with SWD facilities planned
- Fanling Golf Course with 12,000 public housing units planned.

Estimated completion into the late 2020s and early 2030s, with SWD facilities planned

The requirement of 100 RCHE beds quoted by the applicant could easily be met by the Area 4 & 30 planned development, or by Area 36 planned development. Alternatively, such could be accommodated by fine tuning the Government's 5% social welfare uses requirement in one or more of the major public housing development projects mentioned above.

Please note the above excludes possible private sector supply. I am confident the snowballing supply shortage would be viewed as great business opportunity by enterprising businessmen who will undoubtedly contribute towards meeting the shortfall timely and efficiently. The long term solution to optimize scarce land resources is to encourage and incentivize more elderlies to move to the Greater Bay Area by expanding the Portable Comprehensive Social Security Assistance Scheme enabling elderlies to take up permanent residence in Guangdong, Fujian and other provinces.

Thus, there really is no need for the applicant to propose building a RCHE, especially when the proposed site has the following deficiencies:

Bad location (remoteness: at least 20 minutes walking distance from Town Centre/MTR Stations including the future Kwu Tung Station), distance from major catchment area such as large public housing estates, serious traffic issues, and the lack of ancillary facilities including retail shops and restaurants all renders the application site as an unacceptable RCHE location.

Future application site residents may be turned off by the ugly two- floor RCHE building and appalled with the likelihood of mixing with RCHE elderlies , workers and visitors. The RCHE may not be welcome by target elderly too as they will be concerned that visits will be curtailed due to lack of shops/restaurants on site. Similarly, the RCHE ancillary staff and helpers will not be happy in making inconvenient transits to and from work whilst their social life may suffer due to the absence of supporting facilities. Most importantly, the RCHE will be an eyesore and an irritation for Golf Parkview residents who will have to endure the intermittent flow of emergency vehicles (ambulances, hearses etc.) throughout the day, the noises make by the several unloading bays, heavy vehicles for logistics support , the communal kitchen, and last but not the least the daily visitors.

Indeed, it would be traumatic (definitely depressing) to force Golf Parkview residents (especially the elderly ones) to witness regular loading and unloading of frail, old folks for regular and unscheduled medical visits, and the occasional hearse to remove the deceased. Because of the close proximity (9 m according to the studies) there is a real risk of also catching air-borne virus/germs from infected RCHE residents. Based on the above analysis I strongly resent the proposed RCHE and propose to have this application rejected.

By incorporating 100 RCHE beds which will surely drive down property value, I surmise money is not of primary concern to the applicant. I therefore sincerely propose to the applicant to revert back to the original approved 0.8 PR low rise development. This is to show the applicant is not only a good community member, but also respects the feelings of

fellow community residents by building a development that is in harmony with the surrounding low rise dwellings. The applicant still earns a healthy profit with the added benefit of able to commence construction, and hence unit presale, as soon as possible. What better way to meet Government's desire of increasing the housing supply! Indeed, the 0.8 PR approved plan aligns with most of the Proposed Amendment justifications.

### **Wall Building and Wall Effect**

By increasing the BH to 130M, the wall effect felt by Golf Parkview is further magnified. Golf Parkview Blocks 6 and 7, and to a lesser extent the rest of Golf Parkview will be blocked/robbed of natural ventilation and sunlight. There will also be greater noise pollution especially from increased traffic. The resultant poor air ventilation coupled with exacerbated air pollution may eventually create the undesirable urban heat island effect.

Would ladies and gentlemen of the TPB feel comfortable and accept the construction of wall buildings a dozen meters away from your living room and two bedrooms? I firmly believe in the protection of private property ownership, and considers the guarantee of peaceful and acceptable living environment my fundamental right.

The following quotations from a 2007 Hong Kong Institute of Planners paper titled "Development Creating the Wall Effect (2007)", though written 15 years ago, is every bit as relevant today:

"Sadly many new flats produced within these wall buildings are for speculative purpose instead of the use of real home owners. Government treasury may benefit from getting higher premium or reducing the cost in public spending by allowing such extra development potential. There are however heavy social and environment costs resulting in a deteriorating environment and a discordant community. Very often it is the lower socio-economic sector who would suffer more. This is trading short term financial gain with long term environment and social costs. As Asia's world city, shouldn't we move towards the direction of sustainable development? Is it too much to demand for higher environmental quality by optimizing instead of maximizing development potential? It is now time for both the government and the private sector to change their mindset of maximizing the economic return of land and try to balance the social and environmental needs. Isn't it time to treat this small fragile city with a bit more tender and care before it's too late?"

### **Conclusion**

With the above concerns, especially the ones on RCHE, I strongly urge the Town Planning Board to reject this Planning Application, Y/FSS/19.

Sincerely Yours,  
M.W. LI (Ms.)

Encl.

Attachment 1 My letter of comments on Y/FSS/15 dated October 6, 2020.

Attachment 2 LCQ20 Residential Care Homes for Elderly dated March 17, 2021

The Government of the Hong Kong Special Administrative Region  
Press Releases



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LCQ20: Residential care homes for elderly



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LCQ20: Residential care homes for elderly

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Following is a question by the Hon Chan Han-pan and a written reply by the Secretary for Labour and Welfare, Dr Law Chi-kwong, in the Legislative Council today (March 17):

## Question:

Quite a number of members of the public have relayed that the waiting time for admission to subsidised residential care homes for the elderly (RCHes) has become longer and longer due to the persistent shortage of the places therein, and carers taking care of elderly persons single-handedly at home bear tremendous pressure. In this connection, will the Government inform this Council:

(1) of the number of elderly persons currently waiting for admission to subsidised RCHes and the average waiting time; the new measures to be put in place in the coming three years to shorten the waiting time;

(2) given that where developers are willing to incorporate certain lease conditions in their real estate development projects to ensure the provision of eligible RCHE premises, they may apply for exemption from payment of premiums for the premises concerned under the "Scheme to Encourage Provision of RCHE Premises in New Private Developments", of the respective numbers of relevant applications received, approved and rejected by the Government since the Scheme was launched in 2003; if there were rejected applications, of the reasons for that; whether it will consider relaxing the eligibility criteria and streamlining the application procedure, so as to encourage developers to participate in the Scheme;

(3) of the total number of applications received by the Government in the past 10 years for exemption from payment of premiums in respect of the construction of private RCHes that meet the requirements of the Social Welfare Department; and

(4) given that in order to protect the safety of elderly residents in the event of emergencies, it is stipulated in section 20 of the Residential Care Homes (Elderly Persons) Regulation (Cap. 459A) that all parts of a residential care home shall be situated at a height not more than 24 metres above the ground floor, but the Director of Social Welfare may authorise any part of the residential care home to be exempted from complying with such height restriction, of the respective numbers of exemption applications received and approved by the Director in the past 10 years, which had been made for the following purpose: to accommodate non-domestic portions such as the laundry room, kitchen and storeroom at a height more than 24 metres above the ground floor, so as to release more space on the lower floors for the provision of places for the elderly?

## Reply:

President,

My reply to the Member's question is as follows:

(1) As at end-December 2020, the waiting time and number of people waitlisted for subsidised care and attention (C&A) places and nursing home (NH) places are as follows:

Service type	Average waiting time (in months) (Average of the previous 3 months) (Note 1)	No. of people waitlisted
C&A places	21	31 426 (Note 2)
NH places	26	6 099 (Note 3)

Note 1: It is the average number of months taken (from the waitlist date to the admission date) for normal cases to be admitted to subsidised Residential Care Homes for the Elderly (RCHes) in the past three months. Cases accorded priority in allocation of places, cases with inactive history admitted in the past three months, and cases transferred from homes for the aged places to the converted C&A places



providing a continuum of care in the same RCHE have been excluded in the calculation because their waiting time may be extraordinarily long or short in comparison with that of normal cases.

Note 2: The figure includes the elderly persons using subsidised community care services (CCS) while waiting for subsidised C&A places, but does not include the elderly persons classified as "inactive" cases on the Central Waiting List (CWL).

Note 3: The figure includes the elderly persons using subsidised CCS while waiting for subsidised NH places, but does not include the elderly persons classified as "inactive" cases on the CWL.

The Government will continue to take a multi-pronged approach to increase elderly service places through long, medium and short-term strategies. As a long-term strategy, the Government has reinstated the population-based planning ratio in the Hong Kong Planning Standards and Guidelines in respect of elderly facilities in late 2018, specifying a ratio of 21.3 subsidised RCHE places to 1 000 elderly persons aged 65 or above. This is to set a clear service provision target for future planning work. As regards the medium-term strategy, the Government is taking forward 66 development projects which will provide about 8 800 RCHE places (including subsidised and non-subsidised places) and about 2 800 subsidised day care service place in the coming few years. Besides, in accordance with the 2020 Policy Address, the Government has invited the Hong Kong Housing Authority and the Hong Kong Housing Society to explore reserving about 5 per cent of the total domestic gross floor area in future public housing development projects exclusively for welfare uses, which include the much-needed RCHEs, without affecting the public housing supply and other ancillary facilities. In respect of short-term strategies, the Pilot Scheme on Residential Care Service Voucher (RCSV) for the Elderly has been implemented since March 2017 in order to issue a maximum of 3 000 RCSVs in batches, offering elderly persons in need of residential care service an additional choice. In addition, the Social Welfare Department (SWD) will purchase an additional 5 000 EA1 places in private RCHEs under the Enhanced Bought Place Scheme over five years starting from 2019-20 to increase the supply of subsidised RCHE places and enhance the overall service quality of private RCHEs.

Apart from the aforesaid measures, the Labour and Welfare Bureau will continue to implement the Special Scheme on Privately Owned Sites for Welfare Uses (Special Sites Scheme) with a view to encouraging non-governmental organisations to better utilise their own sites through expansion, redevelopment or new development to provide diversified subvented and self-financing services. According to the latest proposals from applicant organisations in Phase 1 of the Special Sites Scheme, it is anticipated that about 7 500 RCHE places (including subsidised and non-subsidised places) could be provided subject to the smooth implementation of all the proposed projects relating to elderly services. The Government also launched a new phase of the Special Sites Scheme in April 2019. The SWD is discussing with the applicant organisations to finalise details of their proposals such as service type, number of places, development parameters and project cost, with a view to implementing the projects as soon as possible.

(2) and (3) The Government implemented in July 2003 a scheme to encourage provision of RCHE premises in new private developments (the Scheme). The Scheme provides that eligible RCHE premises will be exempted from payment of premium under different types of land transactions including lease modification, land exchange and private treaty grant, if the developers are willing to accept incorporation of certain lease conditions to ensure the provision of RCHE premises. Premium exemption will be granted with the support of relevant departments (including the SWD). The developers will have to bear the construction cost of the RCHE premises which, once built, will become the properties of the developers. The Government will allow the developers to lease, sell or operate the premises themselves or through agencies as long as the premises remain as RCHEs. The developers/ operators are free to set their own fees having regard to the market trend.

Since the implementation of the Scheme, one project in Tuen Mun has received premium exemption. Construction and furnishing of the RCHE premises have been completed, while the application for RCHE licence is in progress. The SWD has also received other preliminary proposals submitted by interested developers/ applicants referred by the Lands Department or the Planning Department. Whether the projects can be realised is subject to various considerations and factors to be taken into account by individual developers/ applicants in the course of land transaction.

(4) RCHEs are regulated under the Residential Care Homes (Elderly Persons) Regulation (the Regulation). According to section 20(1) of the Regulation, subject to section 20(2), no part of an RCHE shall be situated at a height more than 24 metres above the ground floor. This requirement is a safety consideration for elderly residents as many of them are wheelchair-bound or even bed-ridden. In the event of fire or other emergencies, they need extensive assistance to evacuate. The difficulty of fire personnel and other rescue teams in evacuating a large number of frail elderly persons with mobility problems to the ground floor cannot be neglected. Therefore, stipulating a height restriction for RCHEs helps protecting the safety of elderly residents in the event of fire or other emergencies as well as effectively shortening the time for fire personnel to rescue or evacuate residents.

Currently, under section 20(2) of the Regulation, the Director of Social Welfare may, by notice in writing served on an operator, authorise that any part of such RCHE may be situated at a height more than 24 metres above the ground floor as may be indicated in the notice. In the past 10 years, the SWD has not received any applications made pursuant to the above provision.

Ends/Wednesday, March 17, 2021

Issued at HKT 15:25

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2021 年 10 月 12 日  
討論文件

北區區議會  
文件第 45/2021 號

## 擬議修訂《粉嶺／上水分區計劃大綱核准圖編號 S/FSS/24》

### 1. 目的

本文件旨在向各議員介紹有關《粉嶺／上水分區計劃大綱核准圖編號 S/FSS/24》(下稱「大綱圖」)的擬議修訂，包括涉及擬議房屋發展及工業用地的改劃，以及相關大綱圖註釋的技術修訂(圖 1 至 2d)，並徵詢議員的意見。

### 2. 前言

- 2.1 為了配合行政長官於施政報告提出增加土地供應以回應市民對房屋的迫切需要，政府一直進行各項土地用途檢討工作，以物色更多合適用地改作住宅用途。土木工程拓展署就擬議在粉嶺／上水的四幅公營房屋用地及兩幅私人住宅用地已進行一系列技術評估，以確保擬議的發展及其緩解措施不會帶來不可接受的不良影響。
- 2.2 有關房屋發展計劃分別位於粉嶺第 17 區、上水清曉路、上水近大頭嶺青山公路-古洞段與粉錦公路交界處(下稱「大頭嶺」)及上水彩順街。四幅用地的總發展面積約為 11.44 公頃，預計可興建共約 14,600 伙公營房屋單位及 1,600 伙私人住宅單位。用地的位置圖請參閱圖 1 至 2d，根據大綱圖現時規劃的土地用途地帶如下：



公營房屋用地				
	A	B	C1	D1
	粉嶺第 17 區 A 地盤	上水清曉路	上水大頭嶺	上水彩順街
現時土地 用途地帶	「政府、機 構或社區」 及「住宅(丙 類)1」	「綠化地 帶」及「政 府、機構或 社區」	「綠化地 帶」及「政 府、機構或 社區」	「工業」
私人住宅用地				
	粉嶺第 17 區 B1 地盤		粉嶺第 17 區 B2 地盤	
現時土地 用途地帶	「政府、機構或社區」及「住 宅(丙類)1」		「政府、機構或社區」及「住 宅(丙類)1」	

2.3 同時，考慮到上水第 4 及第 30 區工業區的轉型並解決工業／住宅土地毗鄰的環境問題，規劃署正檢視上水第 4 及第 30 區的土地用途，並擬議將上水第 4 區由「工業」改劃為「其他指定用途(商貿)」及將部分上水第 30 區由「工業」改劃為「商業」地帶，及把建築物高度限制由 25 米修訂為 65 米(不包括地庫)。

### 3. 擬議修訂項目

粉嶺第 17 區(修訂項目 A1 至 A3 項目)(圖 2a 及 3a)

3.1 粉嶺第 17 區公營房屋及私人住宅發展的初步主要發展參數如下<sup>1</sup>：

	粉嶺第 17 區 A 地盤 (公營房屋)	粉嶺第 17 區 B1 地盤(私人住宅)	粉嶺第 17 區 B2 地盤(私人住宅)
擬議發展 用地面積	約 5.43 公頃	約 0.87 公頃	約 0.73 公頃
擬議地積 比率	住用: 不超過 6.5 倍 非住用: 不超過 0.5 倍	住用: 不超過 6 倍	住用: 不超過 6 倍
擬議樓宇 高度	不高於基準水平上 170 米	不高於基準水平 上 134 米	不高於基準水平 上 142 米

<sup>1</sup> 發展參數只供參考。建屋計劃的細節尚待詳細規劃及設計。



	粉嶺第 17 區 A 地盤 (公營房屋)	粉嶺第 17 區 B1 地盤(私人住宅)	粉嶺第 17 區 B2 地盤(私人住宅)
擬議單位 數目	約 8,300 伙	約 870 伙	約 730 伙
預計人口	約 23,500 人	約 4,320 人	
其他設施	社會福利設施、社區 會堂、公共運輸交匯 處、幼稚園、零售設 施、休憩用地、兒童 遊樂場、泊車設施及 其他基礎配套設施	/	/
預計竣工 年份	於 2030/31 年起分階段完成		

3.2 為配合擬議的公營房屋及私人住宅發展，現建議分別把用地由「政府、機構或社區」及「住宅(丙類)1」改劃為「住宅(甲類)7」及「住宅(甲類)8」地帶(圖 2a)(修訂項目 A1 至 A3 項)。

3.3 此外，為提供小學以配合擬議公營房屋及私人住宅發展，建議將粉嶺第 17 區 A 地盤及 B2 地盤以南的一幅「政府、機構或社區」用地預留作一間 24 班房及一間 30 班房的小學。

#### 上水清曉路(修訂項目 B 項目)(圖 2b 及 3b)

3.4 上水清曉路公營房屋發展的初步主要發展參數如下<sup>1</sup>：

Item B

擬議發展用地面積	約 0.43 公頃
擬議地積比率	住用：不超過 6.5 倍 非住用：不超過 0.06 倍
擬議樓宇高度	不高於基準水平上 140 米
擬議單位數目	約 620 伙
預計人口	約 1,750 人
其他設施	社會福利設施、休憩用地、兒童遊樂場、泊車設施及其他基礎配套設施
預計竣工年份	2029/30

- 3.5 為配合擬議的公營房屋發展，現建議把用地由「綠化地帶」及「政府、機構或社區」改劃為「住宅(甲類)9」地帶(圖 2b)(修訂項目 B 項)。

上水大頭嶺(修訂項目 C1 項目)(圖 2c 及 3c)

- 3.6 上水大頭嶺公營房屋發展的初步主要發展參數如下：

擬議發展用地面積	約 2.435 公頃
擬議地積比率	住用：不超過 6.5 倍 非住用：不超過 0.25 倍
擬議樓宇高度	不高於基準水平上 130 米
擬議單位數目	約 3,300 伙
預計人口	約 8,900 人
其他設施	社會福利設施、幼稚園、零售設施、休憩用地、兒童遊樂場、泊車設施及其他基礎配套設施
預計竣工年份	2032/33

- 3.7 為配合擬議的公營房屋發展，現建議把用地由「綠化地帶」及「政府、機構或社區」改劃為「住宅(甲類)10」地帶(圖 2c)(修訂項目 C1 項)。

上水彩順街(修訂項目 D1 至 D2(部分)項)(圖 2d 及 3d)

- 3.8 上水彩順街公營房屋發展的初步主要發展參數如下：

擬議發展用地面積	約 1.56 公頃
擬議地積比率	住用：不超過 6.5 倍 非住用：不超過 0.2 倍
擬議樓宇高度	不高於基準水平上 160 米
擬議單位數目	約 2,400 伙
預計人口	約 6,800 人

其他設施	社會福利設施、幼稚園、零售設施、休憩用地、兒童遊樂場、泊車設施及其他基礎配套設施
預計竣工年份	2030/31

3.9 為配合擬議的公營房屋發展，現建議把用地由「工業」改劃為「住宅(甲類)11」地帶(圖 2d) (修訂項目 D1 項)。

3.10 此外，為提供小學以配合擬議公營房屋發展，建議將上水彩順街公營房屋以東南的一幅約 7,000 平方呎的「工業」用地改劃為「政府、機構或社區」預留作一間 36 班房的小學(修訂項目 D2(部分)項)。

#### 擬議公營房屋及私人住宅發展工地平整和基礎設施工程的可行性研究結果

3.11 土木工程拓展署已委託顧問，就上述的多項擬議公營房屋及私人住宅發展進行了工地平整和基礎設施工程的可行性研究。該可行性研究顯示擬建的發展項目對附近地區的交通及運輸、環境、排污、供水、視覺、景觀及空氣流通等方面的潛在影響，預期沒有無法克服的技術問題。根據初步交通及運輸影響評估，在實施了建議的交通改善措施後，擬建項目對整體交通及運輸不會帶來嚴重不良影響。在視覺及空氣流通方面，擬議建築物的高度仍能大致保持區內的視覺通透性，而建築物的位置及座向亦將會按周邊發展佈局適當分隔，以促進建築物之間的空氣流通以及減少噪音及視覺等影響。此外，透過適當的園林及建築設計，將為居民提供環保及健康的生活環境。

#### 上水第 4 及 30 區工業區(修訂項目 D3 及 D4 項目) (圖 2d)

3.12 就擬議將上水第 4 及 30 區工業區由「工業」改劃為「其他指定用途(商貿)」及「商業」地帶及把建築物高度限制由 25 米修訂為 65 米(不包括地庫)，規劃署已進行視覺評核，並已委託顧問進行空氣流通專家評估，並顯示擬議建築高度限制修訂對視覺不會帶來不可接受的不良影響及仍能大致保持區內

空氣流通的通透性。

3.13 規劃署將會繼續檢視上水第 4 及 30 區的剩餘土地用途。

#### 4. 徵詢意見

歡迎各位議員對上述建議修訂項目提出意見。有關修訂項目、議員的意見，以及政府部門的意見，將一併提交城市規劃委員會(下稱「城規會」)轄下鄉郊及新市鎮規劃小組委員會(下稱「小組委員會」)考慮。如小組委員會同意有關擬議修訂項目，城規會將根據《城市規劃條例》第 5 條展示收納有關修訂項目的分區計劃大綱草圖作公眾諮詢，為期兩個月。任何人士可就大綱圖收納的修訂項目在公眾查閱期內以書面或透過城規會網站向城規會秘書提交申述。

#### 5. 附件

- 圖 1 位置圖
- 圖 2a 擬議修訂項目 A1、A2 及 A3 平面圖
- 圖 2b 擬議修訂項目 B 平面圖
- 圖 2c 擬議修訂項目 C1 及 C2 平面圖
- 圖 2d 擬議修訂項目 D1、D2、D3 及 D4 平面圖
- 圖 3a 擬建粉嶺第 17 區 A 地盤公營房屋發展計劃-概念設計圖
- 圖 3b 擬建上水清曉路公營房屋發展計劃-概念設計圖
- 圖 3c 擬建上水大頭嶺公營房屋發展計劃-概念設計圖
- 圖 3d 擬建上水彩順街公營房屋發展計劃-概念設計圖

規劃署粉嶺、上水及元朗東規劃處  
土木工程拓展署  
2021 年 10 月

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- 圖 3c 擬建上水大頭嶺公營房屋發展計劃-概念設計圖
- 圖 3d 擬建上水彩順街公營房屋發展計劃-概念設計圖

規劃署粉嶺、上水及元朗東規劃處

土木工程拓展署

2021 年 10 月



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

221130-174308-10481

**提交限期****Deadline for submission:**

02/12/2022

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

30/11/2022 17:43:08

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

Y/FSS/19

**「提意見人」姓名/名稱****Name of person making this comment:**先生 Mr. CHIU MAN KW  
ONG**意見詳情****Details of the Comment :**

It is noted that the developer has supplied further information regarding its proposed development of the Oi Yuen site. All the new materials relate to comments made by Government departments on subjects such as Traffic Impact Assessment and Air Ventilation Assessment, with replacement pages on Sewerage Impact. None of the new materials addresses in any way the serious concerns that have been raised by non-Government parties such as the residents of Golf Parkview, and we again submit them for your kind consideration.

It remains the intention of the developer to construct seven high tower residential blocks, as it has done since the detailed proposals were first revealed. The proposed heights of the residential blocks have been, however, considerably increased during the consultation period and now range from 25 to 32 storeys. The number of flats available has increased by 43% from 676 to 969 and the design population by the same percentage to about 2,714 persons.

The only development of even vaguely similar size is that of Eden Manor located on the South side of the Castle Peak Road-Kwu Tung. There was no public consultation exercise. On the South side of Castle Peak Road travelling West from Eden Manor, or on the East side when the road curves South, there is no building taller than Golf Parkview until one arrives at as far away as Yuen Long. It is the same story on the other side of Castle Peak Road. Golf Parkview is presently the tallest structure between the junction of Castle Peak Road with the Fan Kam Road and Yuen Long.

The proposed site is adjacent mainly to village houses on its East side and the Golf Parkview development on its West. Golf Parkview has 5 storeys with a ground floor of car parks/lift lobbies plus 4 storeys of flats. There are a total of 48 flats housing, according to the ratio of 2.8 persons per flat, approximately 135 people with 54 private car parking spaces including those for visitors. Oi Yuen has increased the number of flats planned to 969, housing approximately 2,714 people with 1,117 private car parking spaces. The contrast in size is both obvious and overwhelming. Opposite the proposed development, on the other side of Castle Peak Road, is the Fanling Golf Course with zero buildings. To the North of Oi Yuen is the Fanling Highway. On the other side of the highway is low-density Tsung Pak Long and Hak Ka Wai. It cannot be accepted that the proposed development is in any way compatible with its surrounding neighbourhood and rural environment. It is grossly excessive.

The proposed seven residential towers have been increased in height to 25 to 32 storeys above ground, the nearest of which to Golf Parkview will be little more than the width of a narrow lane away (one of the reports gives the separation distance as 9 metres). They will undoubtedly adversely affect the residents of Golf Parkview environmentally by blocking both wind and sunlight. The negative affect on wind flow was confirmed in the air ventilation assessment which stated that even the former proposed development of 7 lower blocks ranging in height 19 to 23 storeys "would create rather significant adverse impacts on the surrounding area under most simulated winds ...". The excessive height of the 7 blocks will also result in a shadowing effect on Golf Parkview. There must also be concern that the piling and other construction activity of these seven towers, including up to 4 levels of basement for underground car parks, may affect the structural integrity of Golf Parkview, as well as having a major adverse air quality impact of potential dust emission.

To us Golf Parkview residents the most important reason why the present proposal should be rejected is that despite repeated adverse comments from petitioners and the Transport Department, the developer still plans that traffic to and from the new development being via Pak Wai Lane. The only access to Golf Parkview whether on foot or in a vehicle is via Pak Wai Lane. This lane is comparatively narrow both in terms of the road for traffic and the footpath of pedestrians. The Chief Highway Engineer/New Territories East described Pak Wai Lane as being "substandard in width." We would here point out that there is only one footpath for pedestrians and it is narrow and on the Golf Parkview side of the Lane.

We do not believe for one moment the Lane can possibly safely handle the dramatic increase in usage envisaged by the developer. The site which it is proposed be developed has long frontage directly onto the Castle Peak Road-Kwu Tung. It MUST arrange the access to and from Oi Yuen be direct from Castle Peak Road, just as it is at Eden Manor. We consider this imperative not only for the safety and convenience of all users but also to permit swift access by emergency vehicles to both the existing and possible future development. In its S. 12A Application for Amendment of Plan dated February 2022, the developer in para. 2.5.1. writes that "The existing vehicular access to the Application Site is available via Castle Peak Road-Kwu Tung." This is true. There is a driveway giving access to Oi Yuen from Castle Peak Road. This could be expanded and utilized or a completely new driveway build on the considerable area at the developer's disposal. Proposed site coverage is presently quoted as being "Not more than 27%".

There is a further important reason why the literally hundreds of vehicles it is proposed go to and from Oi Yuen every day should not be allowed to use Pak Wai Lane. When travelling in a westerly direction from the junction with Fan Kam Road on the Castle Peak Road-Kwu Tung, the middle lane for turning right into Pak Wai Lane is only long enough for about four vehicles. This is sufficient for Golf Parkview traffic. It is impossible to conceive that it will be long enough also to accommodate Oi Yuen traffic. More than four vehicles waiting to turn right into Pak Wai Lane will mean that all westerly bound traffic on the Castle Peak Road will have to come to an abrupt halt. This will be very dangerous as the road is narrow and one approaches Pak Wai Lane coming round a sharp right-hand bend with minimal forward visibility. There is no shadow of doubt about that. It is very frustrating that whilst surveys of traffic on the Castle Peak Road-Kwu Tung are conducted, no attention seems to be paid to the dangerous situation which is planned by the use of Pak Wai Lane for access to the proposed new development. A queue length assessment in respect of traffic proceeding in a westerly direction on the Castle Peak Road-Kwu Tung and turning right into Pak Wai Lane should be undertaken.

Traffic surveys have been included from places as distant as Queen's Hill Development Extension and Pak Wo Road. We strongly request that the focus be on Pak Wai Lane. The number of private car parking spaces at the end of Pak Wai Lane is proposed be increased from 54 to 1,171, a jump of some 21.7 times! In addition, there will, of course, be additional vehicles visiting the de

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velopment site. We strongly believe that Pak Wai Lane is too narrow in width to handle the proposed enormous increase in traffic volume.

It has come to our notice that a substantial public housing development is proposed along Castle Peak Road-Kwu Tung. The proposed size of the development is huge with the number of units indicated at 3,300 and inhabitants at 8,900, though the ratio of only 2.7 persons per units seems rather low. The development will also provide social welfare measures, shops and kindergartens. The impact on the traffic conditions of Castle Peak Road-Kwu Tung and the junction with Fan Kam Road will be enormous. With the Government emphasis on public housing, especially in the Northern Metropolis, one can safely predict that this development will proceed. It is a further reason why the Oi Yuen development should be denied in its present over-sized form.

We respectfully, strongly urge Town Planning Board to reject the Planning Application. Thank you.



致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk



**To : Secretary, Town Planning Board**

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

By Fax : 2877 0245 or 2522 8426

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

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

Y/FSS/19 Received on 02/11/2022

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

*see attached plan*

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

簽署 Signature

日期 Date 25 Nov. 2022

Date: 22 November 2022

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

Dear Sirs,

**Planning Application No. Y/FSS/19 – Further Information received on 2<sup>nd</sup> November 2022**

Following are my comments to the captioned, especially on Responses to Departmental Comments- 2<sup>nd</sup> November 2022 (RDC):

**Plot Ratio and Site Area**

A previous application Y/FSS/12 with plot ratios of 3.6 was not supported by TPB as the development density was on the high side. A follow up submission Y/FSS/15 with a reduced plot ratio of 3.0 was withdrawn by the Applicant. I am aghast the applicant has the audacity to reapply, this time with a much higher plot ratio of 4.3 and the grant of Government Land of 1,762.1m mainly through the maximization of GIC facilities, and to a lesser extent the preservation of Oi Yuen Villa.

Instead of facing ugly and imposing walled buildings, I, together with residents of Golf Parkview Blocks 6 & 7, must endure in future a repulsive monstrosity with an unwanted, obnoxious RCHE just 12 meters away!

Doesn't the word Social in SWD also covers us tax paying, law abiding citizens? I was extremely dismayed with the responses of SWD (RDC No. 9) and AMO (RDC No. 1) who were supposed to have considered the interests of ALL stakeholders before endorsing this application.

**Oi Yuen Villa Preservation (RDC No.1)**

As a layman, I presume designated historic buildings should be open to the public, otherwise what is the point in designating a building as such. Nowhere in the application was there mentioned of public access to Oi Yuen Villa except for on-site residents. In return for the promise to preserve Oi Yuen Villa, the applicant was reportedly granted the adjoining Government Land of about 1,762.1 sq.m.

Is it AMO's objective to preserve even old buildings NOT for public enjoyment at all costs? Although the AMO's endorsement in this case "saves" a historic building which regrettably is not open to the public, it will adversely impact the convenience and safety of all commuters

using the pedestrian road alongside Castle Peak Road opposite the Golf Course, which, thanks to the AMO's generosity, is now narrowed further at both ends of the site area. I would therefore urge the AMO to reconsider their endorsement by putting the greater public interest first.

#### RCHE (RDC No.9)

SWD should be aware with the completion of potential RCHEs incorporated into the planned public housing developments in the vicinity identified in my August 8<sup>th</sup> letter (attached) and confirmed by the Planning Department in the RDC, the current RCHE supply/demand imbalance in 2025-2035 in the vicinity would be greatly alleviated. Coupled with the expected success of the Guangdong and Fujian Projects, RCHE shortage in Hong Kong will be capped in future despite the population ageing. Therefore, should all minor additions of RCHE places in bad (in terms of access) and inconvenient (no shops, eateries) locations such as this application be considered superfluous and hence not endorsed? Rather than focusing in meeting a rigid RCHE target, should the SWD carefully consider the merits of each RCHE site in the public interest context before giving them their blessing? I envisage the future issue is no longer the RCHE supply, but rather manning of such RCHEs.

By endorsing this application SWD unwittingly enrich the applicant (through increased plot ratio) at the expense of other stakeholders including RCHE visitors, site residents, Tsung Pak Long, especially Golf Parkview, residents.

The duplicity shown by the applicant may also mean the well-meaning RCHE incentive may be subject to abuse in that the completed RCHE facilities may ultimately be left vacant since the benefits from the increased plot ratio far outweighs the RCHE idling costs. Again, the society will be the real loser.

#### **Environmental Impact Assessment**

Golf Parkview's quiet environment would be destroyed by the walled effect of the Proposed Development, the walled buildings are very much like gigantic monsters, perching and hovering just 12 m. away from Golf Parkview Blocks 6 and 7; a situation made worse by the RCHE, a GIC built in applicant's Block 7.

#### Noise Impact Assessment (RDC No. 4)

I applaud EPD's endorsement on the construction of acoustic windows in the Proposed Development including the Sick Room in RCHE. Similarly, should EPD consider the plight of Golf Parkview residents (who have been living, and hence suffering the same road traffic noises, since 2004) by requesting the applicant to provide free installations of acoustic windows for all Golf Parkview Blocks 6 & 7 units as a precondition for approval of the NIA?

#### Urban Design and Visual (RDC No. 6)

Golf Parkview is a low-rise residential development to the immediate west of the Proposed Development sharing the Pak Wai Lane as the common ingress and egress.

TPB is strongly advised not to agree on the Proposed Development on the expectation the applicant can conscientiously “explore further design measures for enhancing the visual permeability and providing visual interest at the subsequent planning application stage.” after project approval.

Judging from applicant’s demonstrated duplicity, I am afraid once approved it would be difficult for the PD to enforce the minimization of possible visual impact on the neighborhood as it is a fait accompli.

#### Air Ventilation Assessment (RDC No. 6)

Applicant’s response to query No.2 is incomplete and misleading. In the RDC, applicant failed to highlight the fact that building separations are less than 7.5m between Block 4 & Block 5, also between Block 6 and Block 7. Indeed, the separation between Block 6 & Block 7 only starts at the +12m above ground level of the proposed development, rendering insufficient provision of local air paths for wind penetration to the downward region located 12m away i.e., Golf Parkview Blocks 6 & 7.

As the ground level of Blocks 6 & 7 of Golf Parkview is on average 3+m lower than the Blocks 6 & 7 of Proposed Development, it does not take a genius to figure out that the 4-storey Golf Parkview is absolutely walled in by the Proposed Development.

Golf Parkview residents, mostly retired elderlies, would suffer further loss of visual openness and sky view, resulting in severe sight/visual impact, potential health hazards from the Sick Room, and possibly claustrophobia.

If the PD has already recognized the need to enhance the visual permeability and promoting visual interest, what is stopping them from requiring the applicant to adopt measures to minimize possible visual impact on the surroundings as a precondition to endorsement?

#### **Traffic**

#### Exclusion of C1 in S/FSS/25 - Tai Tau Leng from the TIA (RDC No.8)

S/FSS/25 which includes C1 Tai Tau Leng (original site H) was agreed by the TPB in the hearing of 19<sup>th</sup> August 2022. The ingress and egress of Tai Lau Leng Public Housing will be Castle Peak Road, Kwu Tung, opposite to Eden Manor, and according to the Indicative Scheme very close to the Proposed Development. Crude estimate of the number of residents and non-residents (workers) on C1 of around 12,000 undoubtedly have a significant impact on Castle Peak Road traffic flow.

The applicant’s refusal to include C1 in the TIA is unacceptable. On this ground alone the TPB should reject the Proposed Development outright.



I am a firm supporter that public interests dictate that public housing should always take precedence over private development, a point that the CE of Hong Kong had emphasized on many occasions.

Public transport (RDC Nos. 10,11,12 & 13)

TIA Section 3.2.1

I have been living in Golf Parkview since 2010. I can vouch that I cannot reach the bus stops of 76K, Westbound for Yuen Long in 1 minute, and Eastbound for Sheung Shui in 2 minutes.

There is NO barrier free facilities around the area and the dropped kerb is available at the one and only pedestrian crossing in front of Golf Parkview opposite to the Golf Club workshop.

TIA Section 3.2.2

The frequency of the GMB 51B and 605 is sparse. Other GMB No. 50A, 50K, and 51K, and RMB No. 17 are always 100 per cent full during the morning and afternoon peak hours. Furthermore, the frequencies of the GMB and RMB are reduced in non-peak hours particularly during the GMB drivers' lunch and dinner breaks.

TIA Section 3.2.3 & Table 3.1

Applicant's response to TD's query that public transport (namely bus stops located in Choi Po Court and Fan Kam Road) are available in the 500m catchment area is misleading as it refers to the linear distances measured from the NE and SE corners of the proposed development. Indeed, the linear distances when measured from the Pak Wai Lane ingress and egress exceeds 500m. Actual walking distances to said bus stops is more likely to be 750 to 650m, passing 2 subways and undulating terrain/or zebra crossings.

Stops not in the vicinity of 500m. catchment area include Franchised Bus Nos. 77K, 261X, 276A, 276B, 978, 978A, 978B, N73 and N373, GMB No. 57K and 58K. Most of these stops are reachable via pedestrian subways or by crossing the traffic lights at the junctions of Castle Peak Road, Kwu Tung and Fan Kam Road, as well as across Fan Kam Road. Hardly any barrier free facility is noted in this area except dropped kerb at the pedestrian crossings. Thus, contrary to applicant's assurance, disabled or elderly persons could only negotiate the distances to these bus stops with some difficulties.

The consultant should have come and walked around the area looking for the bus stops instead of running the calculation in his airconditioned office. I would be glad to show him/her the actual ways around.

TIA Section 6.1 and the so called COVID-factor

The TIA surveys were conducted on 20 July 2021. I wished to point out that the CHP on 19<sup>th</sup> July 2021 appealed to the public, particularly the elderlies, to avoid going out, having social contacts, and dining out. All these happened concurrent with the practical cessation of cross

border traffic and the continual implementation of work from home. I remembered the typhoon signal No.3 was also hoisted on July 20<sup>th</sup>, 2021. Traffic survey data collected on that day must be way below the pre COVID normal level.

I was therefore greatly surprised the applicant revised downward the COVID-factor from an already incredible 1.15 to an absurd 1.10. Considering that most traffic was reduced on the survey day, a more realistic COVID-factor of 2.3+ should be adopted. The applicant should also apply such COVID-factor to all critical junctions

#### Average Household Size (RDC No.13)

By adopting the Yu Tai District (N10) figure of 2.8 as the average household size in the TIA, the applicant is committing the same mistake again by not comparing apple to apple.

Yu Tai District comprises mostly of 3-storey village houses with average flat size of around 65 sq.m., much smaller than the smallest flat size of the Proposed Development of 82. 35sq. m. of 165 units.

Hence, actual average household size of 3.9 as previously recommended should be applied to the average flat size of 132.51 sq. m. of 969 units of the Proposed Development.

Table 2.1 should be thus calculated and revised to a population of 3,780 people in the Proposed Development instead of 2,714 people.

The above 3,780 people has not considered the residents and workforce of the RCHE's 100-places.

#### Pak Wai Lane - the common ingress and egress shared by the applicant and Golf Parkview

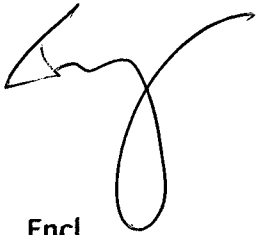
The inherent weakness in the Traffic Impact Assessment has not been properly addressed at all. All the studies, including Junction calculation sheets on Junction A i.e., Castle Peak Road-Kwu Tung/Park Wai Lane were updated in both July 2021 and December 2021 (where the city was still under semi lockdown) which unfortunately did not reflect the situation under normal conditions. The traffic congestion problem at the vehicle ingress and egress points of Pak Wai Lane will be further aggravated with the 61 % increase in car parks, plus the additional RCHE vehicle flows from transiting staff/workers, visitors, RCHE elderlies, emergency vehicles and daily heavy truck movements when compared to the applicant's previous submission.

The applicant's incorporation of a short sidewalk as a solution is cosmetic at best and really does little to alleviate the traffic jams.

#### **Conclusion**

With the above additional concerns, especially the ones on RCHE, AVA, and Traffic, on top of those already raised in my letters dated 6<sup>th</sup> June and 8<sup>th</sup> August 2022, I strongly urge the Town Planning Board to reject the Planning Application Y/FSS/19.

Yours Sincerely,

A handwritten signature in black ink, consisting of a stylized 'Y' followed by a large loop and a horizontal stroke.

Encl.

- 1 My Letter of comments on Y/FSS/19 6<sup>th</sup> June 2022
2. My Letter of comments on Y/FSS/19 8<sup>th</sup> August 2022

Date: 8<sup>th</sup> August, 2022

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

Dear Sir/Madam,

Planning Application No. Y/FSS/19 – Application for Amendment of Plan dated  
15<sup>th</sup> July, 2022

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Instead of ameliorating the concerns raised in my last objection (letter dated 6<sup>th</sup> June, 2022 attached), the applicant's latest submission aggravates the problems previously identified, especially in the following critical issues:

#### **RCHE**

The applicant's admission that they intend to eventually seek construction cost reimbursement when the RCHE is handed back to the Government as a Government Accommodation clearly violates SWD's principle of endorsement "from the service perspective with no financial implication, both capital nor recurrent to the Government". I therefore strongly request SWD to withdraw their endorsement of this Planning Application.

I also urge the TPB to ascertain if the applicant had already reached an agreement with the Government on the disposal of the RCHE **before** the application of planning amendment was submitted on 15<sup>th</sup> July, 2022.

Since taxpayers' monies are involved here, I as a taxpayer have the right to insist if the RCHE demand around 2028 is really so critical then our money should be better spent on selecting a more acceptable site, with better ease of access and more supporting services than the Proposed Development.

Actually the RCHE supply in the vicinity of the Proposed Development (not even counting other large planned housing developments in the North District but outside the vicinity, such as Site A of Area 17 of Fanling District with proposed 8,300 flats and 23,500 residents which was recently gazette together with C1) will be greatly enhanced from 2025 onwards with the progressive launching of more major public housing developments in the surrounding area,



with most projects expecting to implement the 5% GIC (welfare uses) requirement (please refer to my objection of 6<sup>th</sup> June, 2022 for details, as well as the attached 17<sup>th</sup> March, 2021 Press Release LCQ20).

Taking together with the decrease in demand from the expected success of the Guangdong/Fujian migration initiative, the RCHEs supply/demand equilibrium may be achieved sooner than expected. Thus, I question the practicality of building a small size RCHE in such a bad location for operation in 2028. The fact that such RCHE residents may have to tolerate for four years the adjacent C1 public housing development construction noise and pollution renders the proposed RCHE even less appealing, nor justifiable.

The public perception that the applicant earns an unwarranted windfall (some 5,500 million dollars mainly due to raising the PR from 0.8 to 4.3, but in the process **destroys** the environment and quiet neighborhood of Golf Parkview, Tsung Pak Long South and Hak Ka Wai) simply by incorporating a token GIC (welfare uses) facilities in their project. Public opinion will be further incensed when they realize the taxpayers are the ones actually paying for the Proposed Development's RCHE. Both the TPB and SWD will need to carefully counter the public bias that there must be official business collusions (as well as transfer of benefits) between the approving authorities and the applicant, especially in light of the likely proliferation of RCHEs in the period 2025 to 2035 in the vicinity discussed above.

I, as well as the public, would also like to know if effective controls are in place to ensure that once approved, such RCHEs will be built and operated as SWD specified. Otherwise, it will only reinforce the public conception of another official business collusion, as demonstrated in some of the recent cases of GIC (welfare uses) abuses.

## **Traffic**

I found the applicant's reason to exclude the adjacent, yet confirmed planned public housing development known as C1 (5 tower blocks, 3,300 flats and 8,900 residents with another couple thousand of non-residents manning the commercial/retail/welfare facilities) from the Transport Impact Assessment (TIA) to be extremely unconvincing and biased. How could any professional TIA deliberately ignore the traffic impact from the 8,900+ persons living/working to the immediate east of the Planned Development? The resultant traffic flows along the Castle Peak Road (Kwu Tung) will be so

impeded that gridlock will be guaranteed, particularly during morning and evening peak hours.

I reiterate my objection to the TIA adopting the HK average household size of 2.8 (which correlates primarily to the HK average flat size of 50 sq.m.) to the Proposed Development with an average flat size of 100 +sq.m. A more equitable and reasonable method is to adopt the Golf Parkview (which has a similar flat size average) actual average of 3.9 as previously recommended.

Whilst I appreciate the difficulty of forecasting accurately traffic volume based on current traffic which are much affected by the ongoing covid situation, I take strong exception to the TIA adopting this derivation of COVID-19 factor of 1.15 which, to say the least, stretches credibility to the limit and must be revised upwards to reflect the resumption of normal life post COVID.

I have also stressed in my previous objections that the zoning requirement for the Proposed Development to share a common ingress/egress point i.e. Pak Wai Lane is **unworkable** and will result in **significant (and unavoidable) traffic overloads** along this short and narrow road. The applicant's incorporation of a short side walk as a solution is cosmetic at best and really does little to alleviate the traffic jams, expected to be further aggravated by the increased traffic at the Kam Tsin Road/Castle Peak (Kwu Tung) Road junction.

I therefore strongly demand the TIA to be revised to incorporate the impact of the C1 development, to adopt a more realistic household headcount of 3.9 as

well as the COVID-19 factor, and to propose a workable solution to the Pak Wai Lane traffic jam. I would sincerely also invite comments from the Transport Department in this respect.

### **Walled Buildings Effect**

I am really angry and frustrated that despite our repeated appeals, the amended Visual Impact Assessment, similar to ALL the other studies in the Planning Application, simply gross over the effect of walled buildings on Golf Parkview. Despite the applicant's assurances, I still have to face the full impact of walled buildings just meters away. This is a grave situation for the Golf Parkview residents and I appeal to the TPB to seriously consider our predicaments when reviewing the Planning Application.

If the applicant is however willing to revert back to the originally approved low rise structures with a 0.8 PR, it will provide a much needed breathing space in the midst of surrounding high rises (Eden Manor, C1 public housing development, project 4076 in D.D.91 at the junction of Castle Peak Road(Kwu Tung) and Fan Kam Road) benefitting not only the Proposed Development itself but also Golf Parkview, Tsung Pak Long South, Hak Ka Wai and even some C1 residents. In doing so I am sure the applicant will earn, in addition to a very healthy profit also these people's eternal gratitude.

### **Conclusion**

With the above additional concerns, especially the ones on traffic, on top of those already raised in my 6<sup>th</sup> June, 2022 letter, I strongly urge the Town Planning Board to reject the Planning Application, Y/FSS/19.

Sincerely Yours



Encl.

- 1 My Letter of comments on Y/FSS/19 6<sup>th</sup> June, 2022
- 2 LCQ20 Residential Care Homes for Elderly dated 17<sup>th</sup> March, 2021, and
- 3 Extract of No. 45/2021 of the North District Council Committee

Date: 6<sup>th</sup> June, 2022

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

Dear Sirs,

Re: My Comments on Y/FSS/19

Although this application proposed a 43% increase both in the number of flats and design population over the last submission, the supporting studies (including some December 2021 updates) only incorporated minor, cosmetic changes to the previous studies, and still leaves most of our concerns (my letter dated October 6<sup>th</sup>, 2020 on Y/FSS/15 refers) unanswered. Considering the fifth coronavirus wave started in December 2021 in which most activities, especially traffic, were in a semi lockdown state, such studies cannot be adopted for meaningful planning purposes. This application, so audacious and in complete disregard of most objectors' concerns, must be rejected.

### **Proposed increase of PR to 4.3**

We take strong exception to the applicant applying the Northern Metropolis Development Strategy liberally to seek redevelopment (raising PR to 4.3 with resultant BH increased to 130M) at all costs. The fact that the Town Planning Board (TPB) is still functioning and well is proof that the Government aims to achieve this objective within a proper framework, and with due consideration to all human factors. Thus the applicant's justification point number one is valid only within a defined framework.

Contrary to applicant's justification point number three, the proposed high rise/high density development is not in harmony with the surrounding but contradicts with the Chief Executive's stated aim of People Oriented. The proposed two floor RCHE building looks odd, ungainly, out of place and aesthetic unappealing and incompatible with the other tower blocks. Why sacrifice the interest and welfare of 23,100 (population of TPU 626 as at 2019) tax paying and law abiding citizens to accommodate only 100 elderly persons and some 2,700+ future application site residents. Why provide extremely generous incentives (on top of premium exemption, the developer is permitted to freely lease, sell or operate the RCHE premise once it is built, as per the Secretary for Labour & Welfare's reply in LCQ20 highlighted in Attachment 2) and turn the applicant's profits from handsome to exorbitant?

### **Traffic Congestion at Pak Wai Lane**

The inherent weakness in the Traffic Impact Assessment has not been addressed. All the studies, including Junction calculation sheets on Junction A i.e. Castle Peak Road-Kwu Tung/Park Wai Lane were updated in December 2021 (where the city was still under semi lockdown) which unfortunately did not reflect the situation under normal conditions. The traffic congestion problem at the vehicle ingress and egress points of Pak Wai Lane will be

further aggravated with the 61 % increase in car parks, plus the additional RCHE vehicle flows from transiting staff/workers, visitors, RCHE elderlies, emergency vehicles and daily heavy truck movements.

I note the newly added pedestrian footpath at Pak Wai Lane is a correction of Arup's initial oversight. Unfortunately the footpath is not only short but provides very limited improvements, especially for pedestrians from application site intending to use public transportation going towards the Yuen Long direction.

I further note this application, whilst adopting the HK population norm of 2.8 per flat, conveniently skipped the fact that its average flat size of 132+ sq.m. is way above the HK average (some 50 to 65 % bigger!). Ignoring the correlation between flat size and headcount makes me question the accuracy of applicant's Traffic Impact Assessment. In my view the best, and indeed fairer approach is to adopt the Golf Parkview's actual figure of 3.9 persons per flat (same location, slightly smaller flat sizes) which shows Pak Wai Lane will be quickly overloaded and not functioning as an efficient vehicle ingress/egress point.

As long as the traffic congestion problem is not properly addressed, this application must be rejected.

### **The RCHEs**

Granted there is acute RCHE demand I firmly believe the basic principle of people oriented in choosing an appropriate RCHE site must not be deviated. Sizeable RCHEs should ideally be close to/attached to large public housing development projects which provide desirable catchment area for the RCHE; with provision of adequate ancillary services nearby, as well as ease of access for visitors, ancillary workers and logistical support. Regrettably the proposed site falls well short of these criteria.

The proposed development will not be completed until 2028. A cursory search reveals that in addition to the soon to be completed Area 29 Kwu Tung North Development area providing 1,750 RCHE beds, there will be ample RCHE beds planned in public housing development projects in the Fanling/Sheung Shui New Town area for completion around the late 2020s and early 30s (in compliance with Government's desire for the Housing Authority and Housing Society to reserve 5% of the total domestic GFA in future public housing development projects exclusively for welfare uses, including RCHEs, highlighted in Attachment 2), in particular:

- Area 4 & 30 (application no. A/FSS/280, also covered in TPB paper NO.10587 A1 site with 100 RCHE beds. Estimated completion in 2-3 years' time
- S/FSS/25 Item B Area 36 Ching Hui Road with estimated completion 2029-30, with SWD facilities planned
- S/FSS/25 Item C1 Area 35 Tai Tau Leng with estimated completion 2032-33, with SWD facilities planned
- S/FSS/25 Item D1 Area 30 Choi Shun Street with estimated completion 2030-31, with SWD facilities planned
- Fanling Golf Course with 12,000 public housing units planned.

Estimated completion into the late 2020s and early 2030s, with SWD facilities planned

The requirement of 100 RCHE beds quoted by the applicant could easily be met by the Area 4 & 30 planned development, or by Area 36 planned development. Alternatively, such could be accommodated by fine tuning the Government's 5% social welfare uses requirement in one or more of the major public housing development projects mentioned above.

Please note the above excludes possible private sector supply. I am confident the snowballing supply shortage would be viewed as great business opportunity by enterprising businessmen who will undoubtedly contribute towards meeting the shortfall timely and efficiently. The long term solution to optimize scarce land resources is to encourage and incentivize more elderlies to move to the Greater Bay Area by expanding the Portable Comprehensive Social Security Assistance Scheme enabling elderlies to take up permanent residence in Guangdong, Fujian and other provinces.

Thus, there really is no need for the applicant to propose building a RCHE, especially when the proposed site has the following deficiencies:

Bad location (remoteness: at least 20 minutes walking distance from Town Centre/MTR Stations including the future Kwu Tung Station), distance from major catchment area such as large public housing estates, serious traffic issues, and the lack of ancillary facilities including retail shops and restaurants all renders the application site as an unacceptable RCHE location.

Future application site residents may be turned off by the ugly two- floor RCHE building and appalled with the likelihood of mixing with RCHE elderlies , workers and visitors. The RCHE may not be welcome by target elderly too as they will be concerned that visits will be curtailed due to lack of shops/restaurants on site. Similarly, the RCHE ancillary staff and helpers will not be happy in making inconvenient transits to and from work whilst their social life may suffer due to the absence of supporting facilities. Most importantly, the RCHE will be an eyesore and an irritation for Golf Parkview residents who will have to endure the intermittent flow of emergency vehicles (ambulances, hearses etc.) throughout the day, the noises make by the several unloading bays, heavy vehicles for logistics support , the communal kitchen, and last but not the least the daily visitors.

Indeed, it would be traumatic (definitely depressing) to force Golf Parkview residents (especially the elderly ones) to witness regular loading and unloading of frail, old folks for regular and unscheduled medical visits, and the occasional hearse to remove the deceased. Because of the close proximity (9 m according to the studies) there is a real risk of also catching air-borne virus/germs from infected RCHE residents. Based on the above analysis I strongly resent the proposed RCHE and propose to have this application rejected.

By incorporating 100 RCHE beds which will surely drive down property value, I surmise money is not of primary concern to the applicant. I therefore sincerely propose to the applicant to revert back to the original approved 0.8 PR low rise development. This is to show the applicant is not only a good community member, but also respects the feelings of

fellow community residents by building a development that is in harmony with the surrounding low rise dwellings. The applicant still earns a healthy profit with the added benefit of able to commence construction, and hence unit presale, as soon as possible. What better way to meet Government's desire of increasing the housing supply! Indeed, the 0.8 PR approved plan aligns with most of the Proposed Amendment justifications.

### **Wall Building and Wall Effect**

By increasing the BH to 130M, the wall effect felt by Golf Parkview is further magnified. Golf Parkview Blocks 6 and 7, and to a lesser extent the rest of Golf Parkview will be blocked/robbed of natural ventilation and sunlight. There will also be greater noise pollution especially from increased traffic. The resultant poor air ventilation coupled with exacerbated air pollution may eventually create the undesirable urban heat island effect.

Would ladies and gentlemen of the TPB feel comfortable and accept the construction of wall buildings a dozen meters away from your living room and two bedrooms? I firmly believe in the protection of private property ownership, and considers the guarantee of peaceful and acceptable living environment my fundamental right.

The following quotations from a 2007 Hong Kong Institute of Planners paper titled "Development Creating the Wall Effect (2007)", though written 15 years ago, is every bit as relevant today:

"Sadly many new flats produced within these wall buildings are for speculative purpose instead of the use of real home owners. Government treasury may benefit from getting higher premium or reducing the cost in public spending by allowing such extra development potential. There are however heavy social and environment costs resulting in a deteriorating environment and a discordant community. Very often it is the lower socio-economic sector who would suffer more. This is trading short term financial gain with long term environment and social costs. As Asia's world city, shouldn't we move towards the direction of sustainable development? Is it too much to demand for higher environmental quality by optimizing instead of maximizing development potential? It is now time for both the government and the private sector to change their mindset of maximizing the economic return of land and try to balance the social and environmental needs. Isn't it time to treat this small fragile city with a bit more tender and care before it's too late?"

### **Conclusion**

With the above concerns, especially the ones on RCHE, I strongly urge the Town Planning Board to reject this Planning Application, Y/FSS/19.

Sincerely Yours,



Encl.

Attachment 1 My letter of comments on Y/FSS/15 dated October 6, 2020.

Attachment 2 LCQ20 Residential Care Homes for Elderly dated March 17, 2021

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

RECEIVED

28 NOV 2022

Town Planning  
Board

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

Y/FSS/19 Received on 02/11/2022

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

本人反對以上計劃，請看附頁所有

上次有提出之反對點也有效作今次反對之附加點

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

簽署 Signature ANDY LAW

日期 Date 23-11-2022



# Re: Y/FCS/19 擬建計劃

本人反對以上計劃，上次反對書內容，今再提交，以作其中反對點，並是次另加本人意見及反對：—

A) 交通方面：擬建計劃中，屋苑及老人院出入口，人及車輛仍是柏蕙里，仍是最大交通障礙，繁忙時段除擬建項目有1000多部車外，外來的士及其他車輛會近共2000部，且出入口於本苑出入口前，換言之，本苑出入車受阻。若有意外，火警急救，受阻會危害性命。  
 縱使其擬建老人須急救，汽車阻塞，也危及生命。

B) 空氣方面：1) 擬建多座高層大廈，如屏風遮擋，東南風，南風，東風也受阻，本苑空氣不流通，倘有疫，空氣不流通，病毒被困  
 2) 擬建老人院，抽出廢氣，若院內有疫症，也會傳至本苑，因距離太近。  
 3) 大量車出入造成廢氣冲天，影响健康，因柏蕙里短少，車不能行，自然停車等候，沒熄匙廢氣四散於柏蕙里，影响健康。  
 4) 若建老人院，探若人若出入柏蕙里大增行人且擬建屋苑人多出入於此，再加本苑住戶出入，若有疫症於老人院，散播兩層樓住戶，人多共用柏蕙里，傳播更甚。  
 5) 車輛大增，青山公路也廢氣冲天，影响健康。

C) 噪音方面: 柏蕙里車量大增, 青山公路也大增量, 害車造成  
响號噪音, 影响健康.

D) 陽光方面: 擬建高度數座, 屏風式阻礙陽光, 本苑  
6, 7 座難見陽光, 影响健康.

E) 老人院方面: 不宜設於擬建項目中, 除上述影响散播  
病毒, 交通增加, 人口出入多外, 更影响居於  
內者之健康.

1) 交通受阻延入院急救, 危及生命, 因分秒必  
爭

2) 空氣不佳, 汽車廢氣

3) 噪音難眠及休養

宜近馬路, 於清靜環境中, 免繁密人口中,  
易受感染, 因工作人員及探訪者, 出入人  
口繁密柏蕙里.

4) 政府於附近及大陸已計劃設老人院  
及老人計劃, 故愛園也不宜建老人院  
計劃.

ANDY LAW 城規局已批 住 8,900 人, 連商場  
人出入共 12,000 人

F) 其他方面: 1) 政府於大頭嶺有建公屋計劃共 5 座, 人口  
劇增, 車出入口於青山公路上, 更令青山  
公路阻塞火上加油, 影响出入市區交通  
及區內交通, 本苑更甚.

P.3

3) 青山公路難以擴闊, 柏蕙里難以增潤增加路長度, 政府應親臨柏蕙里及附近青山公路去視察, 是否兩路可容兩層樓共用柏蕙里及青山公路, 且有上述其他將有層數情況更甚。

簽署: ANDY LAW

23-11-2022

## Planning Application Y/FSS/19

It is noted that the developer has supplied further information regarding its proposed development of the Oi Yuen site. All of the new material relates to comments made by Government departments on subjects such as Traffic Impact Assessment and Air Ventilation Assessment, with replacement pages on Sewerage Impact. None of the new materials addresses in any way the serious concerns that have been raised by non-Government parties such as the residents of Golf Parkview, and we again submit them for your kind consideration.

It remains the intention of the developer to construct seven high tower residential blocks, as it has done since the detailed proposals were first revealed. The proposed heights of the residential blocks have been, however, considerably increased during the consultation period and now range from 25 to 32 storeys. The number of flats available has increased by 43% from 676 to 969 and the design population by the same percentage to about 2,714 persons.

The developer used to maintain that its potential development was "in an appropriate scale". That wording has since changed to "the proposed development intensity is considered appropriate and compatible with the surrounding neighbourhood."

The only development of even vaguely similar size is that of Eden Manor located on the south side of the Castle Peak Road-Kwu Tung. There was no public consultation exercise. On the south side of Castle Peak Road travelling west from Eden Manor, or on the east side when the road curves south, there is no building taller than Golf Parkview until one arrives at as far away as Yuen Long. It is the same story on the other side of Castle Peak Road. Golf Parkview is presently the tallest structure between the junction of Castle Peak Road with the Fan Kam Road and Yuen Long.

The proposed site is adjacent mainly to village houses on its east side and the Golf Parkview development on its west. Golf Parkview has 5 storeys with a ground floor of car parks/lift lobbies plus 4 storeys of flats. There are a total of 48 flats housing, according to the ratio of 2.8 persons per flat, approximately 135 people with 54 private car parking spaces including those for visitors. Oi Yuen has increased the number of flats planned to 969, housing approximately 2,714 people with 1,117 private car parking spaces. The contrast in size is both obvious and overwhelming. Opposite the proposed development, on the other side of Castle Peak Road, is the Fanling Golf Course with zero buildings. To the north of Oi Yuen is the Fanling Highway. On the other side of the Highway is low-density Tsung Pak Long and Hak Ka Wai. It cannot be accepted that the proposed development is in any way compatible with its surrounding neighbourhood and rural environment. It is grossly excessive.

The proposed seven residential towers have been increased in height to 25 to 32 storeys aboveground, the nearest of which to Golf Parkview will be little more than the width of a narrow lane away (one of the reports gives the separation distance as 9 metres). They will undoubtedly adversely affect the residents of Golf Parkview environmentally by blocking both wind and sunlight. The negative affect on wind flow was confirmed in the air ventilation assessment which stated that even the former proposed development of 7 lower blocks ranging in height from 19 to 23 storeys "would create rather significant adverse impacts on the surrounding area under most simulated winds...". The excessive height of the 7 blocks will also result in a shadowing effect on Golf Parkview. There must also be concern that the piling and other construction activity of these seven towers, including up to 4 levels of basement for underground car parks, may affect the structural integrity of Golf Parkview, as well as having a major adverse air quality impact of potential dust emission.

To us Golf Parkview residents the most important reason why the present proposal should be rejected is that despite repeated adverse comments from petitioners and the Transport Department, the developer still plans that traffic to and from the new development should be via Pak Wai Lane. The only access to Golf Parkview whether on foot or in a vehicle is via Pak Wai Lane. This lane is comparatively narrow both in terms of the road for traffic and the footpath for pedestrians. The Chief Highway Engineer/New Territories East described Pak Wai Lane as being "substandard in width." We would here point out that there is only one footpath for pedestrians and it is narrow and on the Golf Parkview side of the Lane.

We do not believe for one moment the Lane can possibly safely handle the dramatic increase in usage envisaged by the developer. The site which it is proposed be developed has long frontage directly onto the Castle Peak Road-Kwu Tung. It MUST arrange that access to and from Oi Yuen be direct from Castle Peak Road, just as it is at Eden Manor, and not via Pak Wai Lane. We consider this imperative not only for the safety and convenience of all users but also to permit swift access by emergency vehicles to both the existing and possible future development. In its S. 12A Application for Amendment of Plan dated February 2022, the developer in para. 2.5.1. writes that "The existing vehicular access to the Application Site is available via Castle Peak Road-Kwu Tung." This is true. There is a driveway giving access to Oi Yuen from Castle Peak Road. This could be expanded and utilised or a completely new driveway built on the considerable area at the developer's disposal. Proposed site coverage is presently quoted as being "Not more than 27%".

There is a further important reason why the literally hundreds of vehicles it is proposed go to and from Oi Yuen every day should not be allowed to use Pak Wai Lane. When travelling in a westerly direction from the junction with Fan Kam Road on the Castle Peak

Road-Kwu Tung, the third/middle lane for turning right into Pak Wai Lane is only long enough for about four vehicles. This is sufficient for Golf Parkview traffic. It is impossible to conceive that it will be long enough also to accommodate Oi Yuen traffic. More than four vehicles waiting to turn right into Pak Wai Lane will mean that all westerly bound traffic on the Castle Peak Road will have to come to an abrupt halt. This will be very dangerous as the road is narrow and one approaches Pak Wai Lane coming round a sharp right-hand bend with minimal forward visibility. Accidents will happen. There is no shadow of doubt about that. It is very frustrating that whilst surveys of traffic on the Castle Peak Road-Kwu Tung are conducted, no attention seems to be being paid to the dangerous situation which is planned by the use of Pak Wai Lane for access to the proposed new development. A queue length assessment in respect of traffic proceeding in a westerly direction on the Castle Peak Road-Kwu Tung and turning right into Pak Wai Lane should be undertaken.

Traffic surveys have been included from places as distant as Queen's Hill Development Extension and Pak Wo Road. We strongly request that the focus be on Pak Wai Lane. The number of private car parking spaces at the end of Pak Wai Lane is proposed be increased from 54 to 1,171, a jump of some 21.7 times! In addition there will of course be additional vehicles visiting the residential care home. We strongly believe that Pak Wai Lane is too narrow in width to handle the proposed enormous increase in traffic volume.

It is noteworthy that there is not one shot of Golf Parkview in all the myriad of photographs of the area provided by the developer, even the aerial ones. The proposed development is not in any way compatible with Golf Parkview or the surrounding area. It is grotesquely huge and will be detrimental to the quality of life to nearby residents as well as seriously worsening traffic congestion in the area. Various reports mention the visual impact of the new development but never from the position of the residents of Golf

Parkview who will clearly be severely adversely affected in this respect.

The pavement in front of Golf Parkview is 136 inches wide. This is considerably wider than the pavement on Castle Peak Road-Kwu Tung either to the west of Golf Parkview or that bordering the proposed new development. The latter pavement is only 76 inches wide. Ironically, this pavement is even busier than the one fronting Golf Parkview. Pedestrians and cyclists coming from the Kam Tsin area, heading towards Sheung Shui, cross the Castle Peak Road-Kwu Tung virtually opposite Pak Wai Lane because there is no pavement on the golf course side of Castle Peak Road-Kwu Tung opposite the proposed new development. The situation is already bad and should not be allowed to worsen.

It is noted that the developer makes a proposal regarding the provision of a residential care home for 100 elderly persons. This proposal is strongly opposed. First, the location does not seem appropriate with it not being within easy walking distance of any major developments let alone shops or restaurants. Visitors to the care home will also increase the utilisation of Pak Wai Lane. It is noted that there is a large social welfare complex under construction in Kwu Tung just 5 minutes drive from Golf Parkview.

It has come to our notice that a substantial public housing development is proposed for Castle Peak Road-Kwu Tung opposite Eden Manor. It is presently mainly cottages and workshops. The proposed size of the development is huge with the number of units indicated at 3,300 and inhabitants at 8,900, though the ratio of only 2.7 persons per unit seems rather low. The development will also provide social welfare measures, shops and kindergartens. The impact on the traffic conditions of Castle Peak Road-Kwu Tung and the junction with Fan Kam Road will be enormous. With the Government emphasis on public housing, especially in the Northern



Metropolis, one can safely predict that this development will proceed. It is a further reason why the Oi Yuen development should be denied in its present over-sized form.

We respectfully strongly urge the Town Planning Board to reject this Planning Application. Thank you.

Name of person making this comment :

Signature : *ANDY LAW*

Date : *23-11-2022*

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk



**To : Secretary, Town Planning Board**

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

By Fax : 2877 0245 or 2522 8426

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

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

Y/FSS/19 Received on 29/12/2022

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

*see attached plan*

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

簽署 Signature *for Peony*

日期 Date 28-01-2023

Without Prejudice

Date: 28<sup>th</sup> January 2023

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

Dear Sirs,

**Planning Application No. Y/FSS/19 – Responses to Departmental Comments (RDC) for Further Information received on 29 December 2022.**

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Since all my concerns raised in my last three letters (see attached) respectively on 6<sup>th</sup> June 2022, 8<sup>th</sup> August 2022 and 22<sup>nd</sup> November 2022 are not answered, I firmly recommend TPB to reject the Planning Application No. Y/FSS/19.

1. Comments on RDC:

- 1.1 I strongly disagree with the applicant's response to RDC (4) (2) by refusing to design new routes to the Kwu Tung MTR Station. Elderly people like my parents would always prefer to take westbound transport to Kwu Tung Station to avoid the eastbound (to Sheung Shui) traffic congestion and, more importantly to secure a seat especially for longer journeys. I believe the same thinking would apply to residents of all ages as well as workers of/visitors to the elderly home.
- 1.2 Contrary to TD's request in 5 (ii) to complete in design year all planned junctions/roads improvement schemes, there is no commitment from the applicant that he '*would undertake the ultimate responsibility to implement in the area that works are not implemented by others as anticipated*'. Furthermore, applicant stated that '*The ultimate responsibility to implement the improvement works would be the original proponent(s).*' which I strongly disagree. This just shows how irresponsible the applicant is.
- 1.3 The applicant's responses to TD's comments are generally evasive and unconvincing. The TIA submitted in December 2022 was merely changed to comply with TD's request to increase the 12% peak hour factor (RDC dated 2nd November 2022 referred) to 17%, an increase of 41.67%. As a result, the revised tables 6.2, 6.3, 6.5, 6.6, 6.7 and 6.9 presented an awkward picture and deviated very much from the previous version.

2. It is regrettable that the TIA on public transport service was based on assumptions bordering on wishful thinking and fails to consider the capacity shortfall outside of the peak hours.
  - 2.1 Whilst proposing to increase KMB 76K frequency from minimum 20 mins to minimum 8.6 mins during peak hours (out of the weekday total of 76 westbound and eastbound scheduled trips, only 8 belongs to the minimum 20 mins category), this TIA conveniently ignores that capacity shortfall also exists during most of the day. I have calculated the weighted average frequency is 28.5 mins westbound and 27.2 mins eastbound during weekdays, and 28.8 mins westbound and 27.9 mins eastbound if Saturday and Sunday are also included. This is unacceptable. The frequencies should be shortened to less than 15 minutes.
  - 2.2 The TIA failed to clarify how to achieve its proposed solutions (in 6.2.8, 6.2.9, 6.2.11 and 7.1.8) to the critical public transport shortfall identified. There is for example no mention of timetables, discussions with/or commitments from KMB and the GMB operators to the TIA proposals. At this stage it would appear to me more like applicant's wishful thinking as there are no assurances that TIA's proposed solutions will be achieved.
3. I have stressed in my previous comments that the short and narrow Pak Wai Lane, serving as the common ingress and egress for both Golf Parkview (53 cars) and the Proposed Development (1,134 cars), is of utmost importance in any TIAs. Why did the latest revised TIA deliberately exclude the evaluation, if any, of Junction A, Castle Peak Road – Kwu Tung/Pak Wai Lane in both Table 3.6 Queue Length Analysis of Identified Junctions in 2021 and Table 5.4 Queue Length Analysis of Identified Junctions in 2029?
4. This TIA is incomplete with the applicant's resistance to consider the impact of Tai Tau Leng Public Housing Site (Site C1 in OZP no. S/FSS/25, lies to the immediate east of the proposed site).
  - 4.1 The applicant seems to imply in 5.1.2 that based on the TIAs of both the partial development of Fanling Golf Course at Fan Kam Road/Po Kin Road, and the Tai Tau Leng Public Housing Site (site C1), no further action is required regarding traffic impact of the Proposed Development on all the planned junctions/roads improvements in the vicinity. This is entirely unacceptable.
  - 4.2 The fact that S/FSS/25 (Site C1) agreed by the Town Planning Board on 19<sup>th</sup> August, 2022 while Y/FSS/19 was still under the application stage leads me to speculate that as far as the Proposed Development is concerned, C1's TIA may be prepared based on the approved A/FSS/156 with estimated **95 units, 266 people (95\*2.8) and 190 cars (95\*2)** which are significantly less than the applicant's latest estimation of **969 units, 2,814 people (2714 people plus 100 places in RCHE) and 1,134 cars**.
  - 4.3 It is evident that the applicant is trying to piggyback on the TIAs conducted by (i) partial development of Fanling Golf Course at Fan Kam Road/Po Kin Road, and (ii) Tai Tau Leng public housing site (Site C1) by NOT conducting its own independent and thorough TIA

on said two projects. By cutting corners the TIA is both unacceptable and unprofessional.

4.4 I must point out that while refusing to conduct its own traffic impact of Site C1 claiming its completion is outside the Proposed Developments' design year, the applicant at the same time accepts Site C1's planned junctions/roads improvement schemes in this TIA. The applicant's duplicity renders this TIA not only inconsistent, but also irresponsible and simply unprofessional.

5. I indicated clearly in all my previous correspondence that the applicant had grossly underestimated the number of people in the Proposed Development by adopting the Yu Tai District (N10) figure of 2.8 as the average household size in the TIA. Yu Tai District comprises mostly of 3-storey village houses with an average flat size of around 65 sq.m., much smaller than the smallest flat size of the Proposed Development of 82.35 sq. m. This was substantiated by the applicant in their notes for Table 2.2: *'No bicycle parking spaces as all of the flat sizes are over 70 sq. m.'*

I therefore strongly insist to apply Golf Parkview's actual average household size of 3.9 as previously recommended to all the Proposed Development's 969 units with an average flat size of 132.51 sq. m. Table 2.1 should be revised to a population of 3,780 people in the Proposed Development (instead of 2,714 people) plus the residents and the workforce of the RCHE.

It is clear the short and narrow pedestrian roads along Pak Wai Lane (existing and the planned addition) cannot handle this surge of people. The Applicant should therefore also conduct a TIA on pedestrians, additional to that on vehicles.

6. As mentioned in my last letter and confirmed by the TD, stops not in the vicinity of 500m. catchment area include Franchised Bus Nos. 77K, 261X, 276A, 276B, 978, 978A, 978B, N73 and N373, GMB No. 57K and 58K. Most of these stops are reachable only via pedestrian subways or by crossing the traffic lights at the junctions of Castle Peak Road, Kwu Tung and Fan Kam Road, as well as across Fan Kam Road. Hardly any barrier-free facility is noted in this area except dropped curb at the pedestrian crossings. Thus, contrary to applicant's assurance, disabled or elderly persons could only negotiate the distances to these bus stops with some difficulties.

I am really disgusted with the applicant's quibbles when responding to TD in RDC No. 3: *'The stops of these routes are located at Po Shek Wu Road and Fan Kam Road which are at the edge of 500m catchment area.'* This further reinforce my impression of the applicant's arrogance and lack of professionalism.

7. The revised December 2022 TIA is generally inaccurate.

7.1 The TIA surveys were conducted on 20 July 2021 when the CHP appealed to the public, particularly the elderlies, to avoid going out, having social contacts, and dining out. All these happened concurrent with the practical cessation of cross border traffic and the continual implementation of work from home. I remembered the typhoon signal No.3

was also hoisted on July 20<sup>th</sup>, 2021. Traffic survey data collected on that day must be way below the pre COVID normal level.

7.2 With the application of an absurd COVID-factor of 1.10 (2.3+ should be more realistic) this revised TIA is not only inaccurate but downright misleading.

7.3 I wish to point out even with the semi-reopening of the border, peak hour traffic congestions in the Castle Peak Road (Kwu Tung) lasting over 45 minutes are now observed due to the recently installed, but to be operated, traffic lights in front of the Regal Manor.


7.4 This TIA is incomplete, inaccurate and should not be used for decision making.

7.5 I recommend the applicant to conduct a TIA on both vehicles and pedestrians when Hong Kong is fully reopening after the pandemic or, at the very least, when all road traffic to and from the Mainland has resumed 100% to pre-COVID volumes.

## Conclusion

With the above additional concerns, on top of those already raised in my letters especially RCHE, Environmental, Walled Effect on Golf Parkview dated 6<sup>th</sup> June 8<sup>th</sup> August and 22<sup>nd</sup> November, 2022, I strongly urge the Town Planning Board to reject the Planning Application Y/FSS/19.

Yours sincerely,

  
P. Tsang (Ms.)

Encl.

My Letter of comments on Y/FSS/19:

6<sup>th</sup> June 2022,

8<sup>th</sup> August 2022, and

22<sup>nd</sup> November 2022.

Date: 22 November 2022

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

Dear Sirs,

**Planning Application No. Y/FSS/19 – Further Information received on 2<sup>nd</sup> November 2022**

Following are my comments to the captioned, especially on Responses to Departmental Comments- 2<sup>nd</sup> November 2022 (RDC):

**Plot Ratio and Site Area**

A previous application Y/FSS/12 with plot ratios of 3.6 was not supported by TPB as the development density was on the high side. A follow up submission Y/FSS/15 with a reduced plot ratio of 3.0 was withdrawn by the Applicant. I am aghast the applicant has the audacity to reapply, this time with a much higher plot ratio of 4.3 and the grant of Government Land of 1,762.1m mainly through the maximization of GIC facilities, and to a lesser extent the preservation of Oi Yuen Villa.

Instead of facing ugly and imposing walled buildings, I, together with residents of Golf Parkview Blocks 6 & 7, must endure in future a repulsive monstrosity with an unwanted, obnoxious RCHE just 12 meters away!

Doesn't the word Social in SWD also covers us tax paying, law abiding citizens? I was extremely dismayed with the responses of SWD (RDC No. 9) and AMO (RDC No. 1) who were supposed to have considered the interests of ALL stakeholders before endorsing this application.

**Oi Yuen Villa Preservation (RDC No.1)**

As a layman, I presume designated historic buildings should be open to the public, otherwise what is the point in designating a building as such. Nowhere in the application was there mentioned of public access to Oi Yuen Villa except for on-site residents. In return for the promise to preserve Oi Yuen Villa, the applicant was reportedly granted the adjoining Government Land of about 1,762.1 sq.m.

Is it AMO's objective to preserve even old buildings NOT for public enjoyment at all costs? Although the AMO's endorsement in this case "saves" a historic building which regrettably is not open to the public, it will adversely impact the convenience and safety of all commuters

using the pedestrian road alongside Castle Peak Road opposite the Golf Course, which, thanks the AMO's generosity, is now narrowed further at both ends of the site area. I would therefore urge the AMO to reconsider their endorsement by putting the greater public interest first.

#### RCHE (RDC No.9)

SWD should be aware with the completion of potential RCHEs incorporated into the planned public housing developments in the vicinity identified in my August 8<sup>th</sup> letter (attached) and confirmed by the Planning Department in the RDC, the current RCHE supply/demand imbalance in 2025-2035 in the vicinity would be greatly alleviated. Coupled with the expected success of the Guangdong and Fujian Projects, RCHE shortage in Hong Kong will be capped in future despite the population ageing. Therefore, should all minor additions of RCHE places in bad (in terms of access) and inconvenient (no shops, eateries) locations such as this application be considered superfluous and hence not endorsed? Rather than focusing in meeting a rigid RCHE target, should the SWD carefully consider the merits of each RCHE site in the public interest context before giving them their blessing? I envisage the future issue is no longer the RCHE supply, but rather manning of such RCHEs.

By endorsing this application SWD unwittingly enrich the applicant (through increased plot ratio) at the expense of other stakeholders including RCHE visitors, site residents, Tsung Pak Long, especially Golf Parkview, residents.

The duplicity shown by the applicant may also mean the well-meaning RCHE incentive may be subject to abuse in that the completed RCHE facilities may ultimately be left vacant since the benefits from the increased plot ratio far outweighs the RCHE idling costs. Again, the society will be the real loser.

#### **Environmental Impact Assessment**

Golf Parkview's quiet environment would be destroyed by the walled effect of the Proposed Development, the walled buildings are very much like gigantic monsters, perching and hovering just 12 m. away from Golf Parkview Blocks 6 and 7; a situation made worse by the RCHE, a GIC built in applicant's Block 7.

#### Noise Impact Assessment (RDC No. 4)

I applaud EPD's endorsement on the construction of acoustic windows in the Proposed Development including the Sick Room in RCHE. Similarly, should EPD consider the plight of Golf Parkview residents (who have been living, and hence suffering the same road traffic noises, since 2004) by requesting the applicant to provide free installations of acoustic windows for all Golf Parkview Blocks 6 & 7 units as a precondition for approval of the NIA?

#### Urban Design and Visual (RDC No. 6)

Golf Parkview is a low-rise residential development to the immediate west of the Proposed Development sharing the Pak Wai Lane as the common ingress and egress.



TPB is strongly advised not to agree on the Proposed Development on the expectation the applicant can conscientiously “explore further design measures for enhancing the visual permeability and providing visual interest at the subsequent planning application stage.” after project approval.

Judging from applicant’s demonstrated duplicity, I am afraid once approved it would be difficult for the PD to enforce the minimization of possible visual impact on the neighborhood as it is a fait accompli.

#### Air Ventilation Assessment (RDC No. 6)

Applicant’s response to query No.2 is incomplete and misleading. In the RDC, applicant failed to highlight the fact that building separations are less than 7.5m between Block 4 & Block 5, also between Block 6 and Block 7. Indeed, the separation between Block 6 & Block 7 only starts at the +12m above ground level of the proposed development, rendering insufficient provision of local air paths for wind penetration to the downward region located 12m away i.e., Golf Parkview Blocks 6 & 7.

As the ground level of Blocks 6 & 7 of Golf Parkview is on average 3+m lower than the Blocks 6 & 7 of Proposed Development, it does not take a genius to figure out that the 4-storey Golf Parkview is absolutely walled in by the Proposed Development.

Golf Parkview residents, mostly retired elderlies, would suffer further loss of visual openness and sky view, resulting in severe sight/visual impact, potential health hazards from the Sick Room, and possibly claustrophobia.

If the PD has already recognized the need to enhance the visual permeability and promoting visual interest, what is stopping them from requiring the applicant to adopt measures to minimize possible visual impact on the surroundings as a precondition to endorsement?

#### **Traffic**

#### Exclusion of C1 in S/FSS/25 - Tai Tau Leng from the TIA (RDC No.8)

S/FSS/25 which includes C1 Tai Tau Leng (original site H) was agreed by the TPB in the hearing of 19<sup>th</sup> August 2022. The ingress and egress of Tai Lau Leng Public Housing will be Castle Peak Road, Kwu Tung, opposite to Eden Manor, and according to the Indicative Scheme very close to the Proposed Development. Crude estimate of the number of residents and non-residents (workers) on C1 of around 12,000 undoubtedly have a significant impact on Castle Peak Road traffic flow.

The applicant’s refusal to include C1 in the TIA is unacceptable. On this ground alone the TPB should reject the Proposed Development outright.

I am a firm supporter that public interests dictate that public housing should always take precedence over private development, a point that the CE of Hong Kong had emphasized on many occasions.

Public transport (RDC Nos. 10,11,12 & 13)

TIA Section 3.2.1

I have been living in Golf Parkview since 2010. I can vouch that I cannot reach the bus stops of 76K, Westbound for Yuen Long in 1 minute, and Eastbound for Sheung Shui in 2 minutes.

There is NO barrier free facilities around the area and the dropped kerb is available at the one and only pedestrian crossing in front of Golf Parkview opposite to the Golf Club workshop.

TIA Section 3.2.2

The frequency of the GMB 51B and 605 is sparse. Other GMB No. 50A, 50K, and 51K, and RMB No. 17 are always 100 per cent full during the morning and afternoon peak hours. Furthermore, the frequencies of the GMB and RMB are reduced in non-peak hours particularly during the GMB drivers' lunch and dinner breaks.

TIA Section 3.2.3 & Table 3.1

Applicant's response to TD's query that public transport (namely bus stops located in Choi Po Court and Fan Kam Road) are available in the 500m catchment area is misleading as it refers to the linear distances measured from the NE and SE corners of the proposed development. Indeed, the linear distances when measured from the Pak Wai Lane ingress and egress exceeds 500m. Actual walking distances to said bus stops is more likely to be 750 to 650m, passing 2 subways and undulating terrain/or zebra crossings.

Stops not in the vicinity of 500m. catchment area include Franchised Bus Nos. 77K, 261X, 276A, 276B, 978, 978A, 978B, N73 and N373, GMB No. 57K and 58K. Most of these stops are reachable via pedestrian subways or by crossing the traffic lights at the junctions of Castle Peak Road, Kwu Tung and Fan Kam Road, as well as across Fan Kam Road. Hardly any barrier free facility is noted in this area except dropped kerb at the pedestrian crossings. Thus, contrary to applicant's assurance, disabled or elderly persons could only negotiate the distances to these bus stops with some difficulties.

The consultant should have come and walked around the area looking for the bus stops instead of running the calculation in his airconditioned office. I would be glad to show him/her the actual ways around.

TIA Section 6.1 and the so called COVID-factor

The TIA surveys were conducted on 20 July 2021. I wished to point out that the CHP on 19<sup>th</sup> July 2021 appealed to the public, particularly the elderlies, to avoid going out, having social contacts, and dining out. All these happened concurrent with the practical cessation of cross

border traffic and the continual implementation of work from home. I remembered the typhoon signal No.3 was also hoisted on July 20<sup>th</sup>, 2021. Traffic survey data collected on that day must be way below the pre COVID normal level.

I was therefore greatly surprised the applicant revised downward the COVID-factor from an already incredible 1.15 to an absurd 1.10. Considering that most traffic was reduced on the survey day, a more realistic COVID-factor of 2.3+ should be adopted. The applicant should also apply such COVID-factor to all critical junctions

#### Average Household Size (RDC No.13)

By adopting the Yu Tai District (N10) figure of 2.8 as the average household size in the TIA, the applicant is committing the same mistake again by not comparing apple to apple.

Yu Tai District comprises mostly of 3-storey village houses with average flat size of around 65 sq.m., much smaller than the smallest flat size of the Proposed Development of 82. 35sq. m. of 165 units.

Hence, actual average household size of 3.9 as previously recommended should be applied to the average flat size of 132.51 sq. m. of 969 units of the Proposed Development.

Table 2.1 should be thus calculated and revised to a population of 3,780 people in the Proposed Development instead of 2,714 people.

The above 3,780 people has not considered the residents and workforce of the RCHE's 100-places.

#### Pak Wai Lane - the common ingress and egress shared by the applicant and Golf Parkview

The inherent weakness in the Traffic Impact Assessment has not been properly addressed at all. All the studies, including Junction calculation sheets on Junction A i.e., Castle Peak Road-Kwu Tung/Park Wai Lane were updated in both July 2021 and December 2021 (where the city was still under semi lockdown) which unfortunately did not reflect the situation under normal conditions. The traffic congestion problem at the vehicle ingress and egress points of Pak Wai Lane will be further aggravated with the 61 % increase in car parks, plus the additional RCHE vehicle flows from transiting staff/workers, visitors, RCHE elderlies, emergency vehicles and daily heavy truck movements when compared to the applicant's previous submission.

The applicant's incorporation of a short sidewalk as a solution is cosmetic at best and really does little to alleviate the traffic jams.

#### **Conclusion**

With the above additional concerns, especially the ones on RCHE, AVA, and Traffic, on top of those already raised in my letters dated 6<sup>th</sup> June and 8<sup>th</sup> August 2022, I strongly urge the Town Planning Board to reject the Planning Application Y/FSS/19.

Yours Sincerely,

Encl.

- 1 My Letter of comments on Y/FSS/19 6<sup>th</sup> June 2022
2. My Letter of comments on Y/FSS/19 8<sup>th</sup> August 2022

Date: 8<sup>th</sup> August, 2022

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

Dear Sir/Madam,

Planning Application No. Y/FSS/19 – Application for Amendment of Plan dated  
15<sup>th</sup> July, 2022

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Instead of ameliorating the concerns raised in my last objection (letter dated 6<sup>th</sup> June, 2022 attached), the applicant's latest submission aggravates the problems previously identified, especially in the following critical issues:

#### **RCHE**

The applicant's admission that they intend to eventually seek construction cost reimbursement when the RCHC is handed back to the Government as a Government Accommodation clearly violates SWD's principle of endorsement "from the service perspective with no financial implication, both capital nor recurrent to the Government". I therefore strongly request SWD to withdraw their endorsement of this Planning Application.

I also urge the TPB to ascertain if the applicant had already reached an agreement with the Government on the disposal of the RCHC **before** the application of planning amendment was submitted on 15<sup>th</sup> July, 2022.

Since taxpayers' monies are involved here, I as a taxpayer have the right to insist if the RCHC demand around 2028 is really so critical then our money should be better spent on selecting a more acceptable site, with better ease of access and more supporting services than the Proposed Development.

Actually the RCHC supply in the vicinity of the Proposed Development (not even counting other large planned housing developments in the North District but outside the vicinity, such as Site A of Area 17 of Fanling District with proposed 8,300 flats and 23,500 residents which was recently gazette together with C1) will be greatly enhanced from 2025 onwards with the progressive launching of more major public housing developments in the surrounding area,

with most projects expecting to implement the 5% GIC (welfare uses) requirement (please refer to my objection of 6<sup>th</sup> June, 2022 for details, as well as the attached 17<sup>th</sup> March, 2021 Press Release LCQ20).

Taking together with the decrease in demand from the expected success of the Guangdong/Fujian migration initiative, the RCHEs supply/demand equilibrium may be achieved sooner than expected. Thus, I question the practicality of building a small size RCHE in such a bad location for operation in 2028. The fact that such RCHE residents may have to tolerate for four years the adjacent C1 public housing development construction noise and pollution renders the proposed RCHE even less appealing, nor justifiable.

The public perception that the applicant earns an unwarranted windfall (some 5,500 million dollars mainly due to raising the PR from 0.8 to 4.3, but in the process **destroys** the environment and quiet neighborhood of Golf Parkview, Tsung Pak Long South and Hak Ka Wai) simply by incorporating a token GIC (welfare uses) facilities in their project. Public opinion will be further incensed when they realize the taxpayers are the ones actually paying for the Proposed Development's RCHE. Both the TPB and SWD will need to carefully counter the public bias that there must be official business collusions (as well as transfer of benefits) between the approving authorities and the applicant, especially in light of the likely proliferation of RCHEs in the period 2025 to 2035 in the vicinity discussed above.

I, as well as the public, would also like to know if effective controls are in place to ensure that once approved, such RCHEs will be built and operated as SWD specified. Otherwise, it will only reinforce the public conception of another official business collusion, as demonstrated in some of the recent cases of GIC (welfare uses) abuses.

## **Traffic**

I found the applicant's reason to exclude the adjacent, yet confirmed planned public housing development known as C1 (5 tower blocks, 3,300 flats and 8,900 residents with another couple thousand of non-residents manning the commercial/retail/welfare facilities) from the Transport Impact Assessment (TIA) to be extremely unconvincing and biased. How could any professional TIA deliberately ignore the traffic impact from the 8,900+ persons living/working to the immediate east of the Planned Development? The resultant traffic flows along the Castle Peak Road (Kwu Tung) will be so

impeded that gridlock will be guaranteed, particularly during morning and evening peak hours.

I reiterate my objection to the TIA adopting the HK average household size of 2.8 (which correlates primarily to the HK average flat size of 50 sq.m.) to the Proposed Development with an average flat size of 100 +sq.m. A more equitable and reasonable method is to adopt the Golf Parkview (which has a similar flat size average) actual average of 3.9 as previously recommended.

Whilst I appreciate the difficulty of forecasting accurately traffic volume based on current traffic which are much affected by the ongoing covid situation, I take strong exception to the TIA adopting this derivation of COVID-19 factor of 1.15 which, to say the least, stretches credibility to the limit and must be revised upwards to reflect the resumption of normal life post COVID.

I have also stressed in my previous objections that the zoning requirement for the Proposed Development to share a common ingress/egress point i.e. Pak Wai Lane is **unworkable** and will result in **significant (and unavoidable) traffic overloads** along this short and narrow road. The applicant's incorporation of a short side walk as a solution is cosmetic at best and really does little to alleviate the traffic jams, expected to be further aggravated by the increased traffic at the Kam Tsing Road/Castle Peak (Kwun Tung) Road junction.

I therefore strongly demand the TIA to be revised to incorporate the impact of the C1 development, to adopt a more realistic household headcount of 3.9 as

well as the COVID-19 factor, and to propose a workable solution to the Pak Wai Lane traffic jam. I would sincerely also invite comments from the Transport Department in this respect.

### **Walled Buildings Effect**

I am really angry and frustrated that despite our repeated appeals, the amended Visual Impact Assessment, similar to ALL the other studies in the Planning Application, simply gloss over the effect of walled buildings on Golf Parkview. Despite the applicant's assurances, I still have to face the full impact of walled buildings just meters away. This is a grave situation for the Golf Parkview residents and I appeal to the TPB to seriously consider our predicaments when reviewing the Planning Application.

If the applicant is however willing to revert back to the originally approved low rise structures with a 0.8 PR, it will provide a much needed breathing space in the midst of surrounding high rises (Eden Manor, C1 public housing development, project 4076 in D.D.91 at the junction of Castle Peak Road(Kwu Tung) and Fan Kam Road) benefitting not only the Proposed Development itself but also Golf Parkview, Tsung Pak Long South, Hak Ka Wai and even some C1 residents. In doing so I am sure the applicant will earn, in addition to a very healthy profit also these people's eternal gratitude.

### **Conclusion**

With the above additional concerns, especially the ones on traffic, on top of those already raised in my 6<sup>th</sup> June, 2022 letter, I strongly urge the Town Planning Board to reject the Planning Application, Y/FSS/19.

Sincerely Yours

Encl.

- 1 My Letter of comments on Y/FSS/19 6<sup>th</sup> June, 2022
- 2 LCQ20 Residential Care Homes for Elderly dated 17<sup>th</sup> March, 2021, and
- 3 Extract of No. 45/2021 of the North District Council Committee



Date: 6<sup>th</sup> June, 2022

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

Dear Sirs,

Re: My Comments on Y/FSS/19

Although this application proposed a 43% increase both in the number of flats and design population over the last submission, the supporting studies (including some December 2021 updates) only incorporated minor, cosmetic changes to the previous studies, and still leaves most of our concerns (my letter dated October 6<sup>th</sup>, 2020 on Y/FSS/15 refers) unanswered. Considering the fifth coronavirus wave started in December 2021 in which most activities, especially traffic, were in a semi lockdown state, such studies cannot be adopted for meaningful planning purposes. This application, so audacious and in complete disregard of most objectors' concerns, must be rejected.

#### **Proposed increase of PR to 4.3**

We take strong exception to the applicant applying the Northern Metropolis Development Strategy liberally to seek redevelopment (raising PR to 4.3 with resultant BH increased to 130M) at all costs. The fact that the Town Planning Board (TPB) is still functioning and well is proof that the Government aims to achieve this objective within a proper framework, and with due consideration to all human factors. Thus the applicant's justification point number one is valid only within a defined framework.

Contrary to applicant's justification point number three, the proposed high rise/high density development is not in harmony with the surrounding but contradicts with the Chief Executive's stated aim of People Oriented. The proposed two floor RCHE building looks odd, ungainly, out of place and aesthetic unappealing and incompatible with the other tower blocks. Why sacrifice the interest and welfare of 23,100 (population of TPU 626 as at 2019) tax paying and law abiding citizens to accommodate only 100 elderly persons and some 2,700+ future application site residents. Why provide extremely generous incentives (on top of premium exemption, the developer is permitted to freely lease, sell or operate the RCHE premise once it is built, as per the Secretary for Labour & Welfare's reply in LCQ20 highlighted in Attachment 2) and turn the applicant's profits from handsome to exorbitant?

#### **Traffic Congestion at Pak Wai Lane**

The inherent weakness in the Traffic Impact Assessment has not been addressed. All the studies, including Junction calculation sheets on Junction A i.e. Castle Peak Road-Kwu Tung/Park Wai Lane were updated in December 2021 (where the city was still under semi lockdown) which unfortunately did not reflect the situation under normal conditions. The traffic congestion problem at the vehicle ingress and egress points of Pak Wai Lane will be

further aggravated with the 61 % increase in car parks, plus the additional RCHE vehicle flows from transiting staff/workers, visitors, RCHE elderlies, emergency vehicles and daily heavy truck movements.

I note the newly added pedestrian footpath at Pak Wai Lane is a correction of Arup's initial oversight. Unfortunately the footpath is not only short but provides very limited improvements, especially for pedestrians from application site intending to use public transportation going towards the Yuen Long direction.

I further note this application, whilst adopting the HK population norm of 2.8 per flat, conveniently skipped the fact that its average flat size of 132+ sq.m. is way above the HK average (some 50 to 65 % bigger!). Ignoring the correlation between flat size and headcount makes me question the accuracy of applicant's Traffic Impact Assessment. In my view the best, and indeed fairer approach is to adopt the Golf Parkview's actual figure of 3.9 persons per flat (same location, slightly smaller flat sizes) which shows Pak Wai Lane will be quickly overloaded and not functioning as an efficient vehicle ingress/egress point.

As long as the traffic congestion problem is not properly addressed, this application must be rejected.

### **The RCHEs**

Granted there is acute RCHE demand I firmly believe the basic principle of people oriented in choosing an appropriate RCHE site must not be deviated. Sizeable RCHEs should ideally be close to/attached to large public housing development projects which provide desirable catchment area for the RCHE; with provision of adequate ancillary services nearby, as well as ease of access for visitors, ancillary workers and logistical support. Regrettably the proposed site falls well short of these criteria.

The proposed development will not be completed until 2028. A cursory search reveals that in addition to the soon to be completed Area 29 Kwu Tung North Development area providing 1,750 RCHE beds, there will be ample RCHE beds planned in public housing development projects in the Fanling/Sheung Shui New Town area for completion around the late 2020s and early 30s (in compliance with Government's desire for the Housing Authority and Housing Society to reserve 5% of the total domestic GFA in future public housing development projects exclusively for welfare uses, including RCHEs, highlighted in Attachment 2), in particular:

- Area 4 & 30 (application no. A/FSS/280, also covered in TPB paper N0.10587 A1 site with 100 RCHE beds. Estimated completion in 2-3 years' time
- S/FSS/25 Item B Area 36 Ching Hui Road with estimated completion 2029-30, with SWD facilities planned
- S/FSS/25 Item C1 Area 35 Tai Tau Leng with estimated completion 2032-33, with SWD facilities planned
- S/FSS/25 Item D1 Area 30 Choi Shun Street with estimated completion 2030-31, with SWD facilities planned
- Fanling Golf Course with 12,000 public housing units planned.

Estimated completion into the late 2020s and early 2030s, with SWD facilities planned

The requirement of 100 RCHE beds quoted by the applicant could easily be met by the Area 4 & 30 planned development, or by Area 36 planned development. Alternatively, such could be accommodated by fine tuning the Government's 5% social welfare uses requirement in one or more of the major public housing development projects mentioned above.

Please note the above excludes possible private sector supply. I am confident the snowballing supply shortage would be viewed as great business opportunity by enterprising businessmen who will undoubtedly contribute towards meeting the shortfall timely and efficiently. The long term solution to optimize scarce land resources is to encourage and incentivize more elderlies to move to the Greater Bay Area by expanding the Portable Comprehensive Social Security Assistance Scheme enabling elderlies to take up permanent residence in Guangdong, Fujian and other provinces.

Thus, there really is no need for the applicant to propose building a RCHE, especially when the proposed site has the following deficiencies:

Bad location (remoteness: at least 20 minutes walking distance from Town Centre/MTR Stations including the future Kwu Tung Station), distance from major catchment area such as large public housing estates, serious traffic issues, and the lack of ancillary facilities including retail shops and restaurants all renders the application site as an unacceptable RCHE location.

Future application site residents may be turned off by the ugly two- floor RCHE building and appalled with the likelihood of mixing with RCHE elderlies , workers and visitors. The RCHE may not be welcome by target elderly too as they will be concerned that visits will be curtailed due to lack of shops/restaurants on site. Similarly, the RCHE ancillary staff and helpers will not be happy in making inconvenient transits to and from work whilst their social life may suffer due to the absence of supporting facilities. Most importantly, the RCHE will be an eyesore and an irritation for Golf Parkview residents who will have to endure the intermittent flow of emergency vehicles (ambulances, hearses etc.) throughout the day, the noises made by the several unloading bays, heavy vehicles for logistics support , the communal kitchen, and last but not the least the daily visitors.

Indeed, it would be traumatic (definitely depressing) to force Golf Parkview residents (especially the elderly ones) to witness regular loading and unloading of frail, old folks for regular and unscheduled medical visits, and the occasional hearse to remove the deceased. Because of the close proximity (9 m according to the studies) there is a real risk of also catching air-borne virus/germs from infected RCHE residents. Based on the above analysis I strongly resent the proposed RCHE and propose to have this application rejected.

By incorporating 100 RCHE beds which will surely drive down property value, I surmise money is not of primary concern to the applicant. I therefore sincerely propose to the applicant to revert back to the original approved 0.8 PR low rise development. This is to show the applicant is not only a good community member, but also respects the feelings of

fellow community residents by building a development that is in harmony with the surrounding low rise dwellings. The applicant still earns a healthy profit with the added benefit of able to commence construction, and hence unit presale, as soon as possible. What better way to meet Government's desire of increasing the housing supply! Indeed, the 0.8 PR approved plan aligns with most of the Proposed Amendment justifications.

### **Wall Building and Wall Effect**

By increasing the BH to 130M, the wall effect felt by Golf Parkview is further magnified. Golf Parkview Blocks 6 and 7, and to a lesser extent the rest of Golf Parkview will be blocked/robbed of natural ventilation and sunlight. There will also be greater noise pollution especially from increased traffic. The resultant poor air ventilation coupled with exacerbated air pollution may eventually create the undesirable urban heat island effect.

Would ladies and gentlemen of the TPB feel comfortable and accept the construction of wall buildings a dozen meters away from your living room and two bedrooms? I firmly believe in the protection of private property ownership, and considers the guarantee of peaceful and acceptable living environment my fundamental right.

The following quotations from a 2007 Hong Kong Institute of Planners paper titled "Development Creating the Wall Effect (2007)", though written 15 years ago, is every bit as relevant today:

"Sadly many new flats produced within these wall buildings are for speculative purpose instead of the use of real home owners. Government treasury may benefit from getting higher premium or reducing the cost in public spending by allowing such extra development potential. There are however heavy social and environment costs resulting in a deteriorating environment and a discordant community. Very often it is the lower socio-economic sector who would suffer more. This is trading short term financial gain with long term environment and social costs. As Asia's world city, shouldn't we move towards the direction of sustainable development ? Is it too much to demand for higher environmental quality by optimizing instead of maximizing development potential ? It is now time for both the government and the private sector to change their mindset of maximizing the economic return of land and try to balance the social and environmental needs. Isn't it time to treat this small fragile city with a bit more tender and care before it's too late ?"

### **Conclusion**

With the above concerns, especially the ones on RCHE, I strongly urge the Town Planning Board to reject this Planning Application, Y/FSS/19.

Sincerely Yours,

Encl.

Attachment 1 My letter of comments on Y/FSS/15 dated October 6, 2020.

Attachment 2 LCQ20 Residential Care Homes for Elderly dated March 17, 2021

致城市規劃委員會秘書：

專人送遞或郵遞：香港北角渣華道 333 號北角政府合署 15 樓

傳真：2877 0245 或 2522 8426

電郵：tpbpd@pland.gov.hk

To : Secretary, Town Planning Board

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

By Fax : 2877 0245 or 2522 8426

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

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

Y/FSS/19 Received on 29/12/2022

意見詳情 (如有需要，請另頁說明)

Details of the Comment (use separate sheet if necessary)

本人反對以上規劃，附上附頁①英文意見②中文補充意見

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

簽署 Signature Andy 日期 Date 31/1/2023

RZ: Y/FSS/19 擬建計劃

本人反對以上計劃, 上次反對書內容, 今再提交, 以作其中反對點一部份, 是次另加意見 (陳英文反對書提及反對點)

1) 柏蕙里右面是擬建地盤, 開出入口比高爾夫景園出入口還要前, 有1000多部車出入, 且探病者(探老人)出入用車, 既此里不能增長增潤, 請城規會指示於繁忙時段, 高爾夫景園怎出車出散公路, 是否政府有上冊, 若急救、急火, 再諮詢怎樣安排到出入, 老人院及本屋苑內性命是否斷送於柏蕙里車窩塞上。

2) 路口擬建一座呈Y型樓高30多層, 另於高爾夫景園6, 7座對面擬建老人院會所, 如屏風式至本苑頂才見擬建兩座樓宇, 本苑最近距離只12米至擬建會所、老人院, 即如一幅牆, 本苑空氣陽光被擋, 政府時稱着重環境、健康, 有否為本苑居民着想, 是否應建屋距離較遠些。

3) 若有疫症, 抽氣抽出繞流易飄至本苑6, 7座露台、窗戶, 感染機會大。

2) A. ~~擬~~ 擬建屋第6, 7座及4, 5座相距兩座只7.5米, 阻礙空氣流通至本苑, 陽光也受阻。

2) B. 老人院擬建本苑 6 座對面，太近民居，其害處請看上次本人提交意見。

另如本次意見：老人院護理人員，探老人者出入狹窄車多，行人路細窄的柏蕙里，是否危險？有疫更傳染擬建屋住戶，更易傳染本苑（因本苑住戶只有此柏蕙里出入）

3) 擬建者曾著人調查交通狀況，有否看日子是否假日，今次調查是學校假期，車少人少，怎可作準？每週星期一、二、五、六較多中國內陸車來港，且每日繁忙時段，有否來錄影。每早上午青山公路塞車至大頭嶺迴旋處出市區，下午 4 時半後至傍晚塞車（青山公路及上述迴旋處及寶石湖路）

將來加上青山公路上有公屋 8900 人居住，出入口於青山公路上更甚，有否評估？政府有否上冊？人口越多，高爾夫球場又會建屋，青山公路及柏蕙里更被塞車不能出市區或上水壩。

- 4) 另其估計居住人口是否有低估人數?  
 每戶不是3人? 地方寬單位人口也相應多  
 還有些有家傭,是否也預在內?
- 5) 政府已有上水區安老計劃及福建安老計劃.  
 且古洞河上鄉有路上高連,是否可建安老  
 院? 交通方便且不致誤時(因塞車)而誤人  
 命.
- 6) 古洞河套區發展,若車輛路經青山公路,更加重  
 負荷,若Y/FCS/19擬建密度高,人口大增,成大問題
- 7) 擬建項目地下停車場挖建及打樁,也會影響丰苑  
 屋宇結構,相連牆結構,因座數多且為層

提出反對意見 姓名: LAW KWONG YIN

簽名: Andy.

日期: 31/1/2023



## Planning Application Y/FSS/19

It is noted that the developer has supplied further information regarding its proposed development of the Oi Yuen site. All of the new material relates to comments made by Government departments on Traffic Impact Assessment. None of the new materials addresses in any way the serious concerns that have been raised by non-Government parties such as the residents of Golf Parkview, and we again submit them for your kind consideration.

- 1) It remains the intention of the developer to construct seven high tower residential blocks, as it has done since the detailed proposals were first revealed. The proposed heights of the residential blocks have been, however, considerably increased during the consultation period and now range from 25 to 32 storeys. The number of flats available has increased by 43% from 676 to 969 and the design population by the same percentage to about 2,714 persons.

The developer used to maintain that its potential development was "in an appropriate scale". That wording has since changed to "the proposed development intensity is considered appropriate and compatible with the surrounding neighbourhood."

- 2) The only development of even vaguely similar size is that of Eden Manor located on the south side of the Castle Peak Road-Kwu Tung. There was no public consultation exercise. On the south side of Castle Peak Road travelling west from Eden Manor, or on the east side when the road curves south, there is no building taller than Golf Parkview until one arrives at as far away as Yuen Long. It is the same story on the other side of Castle Peak Road. Golf Parkview is presently the tallest structure between the junction of Castle Peak Road-Kwu Tung with the Fan Kam Road and Yuen Long.

- 3) The proposed site is adjacent mainly to village houses on its east side and the Golf Parkview development on its west. Golf Parkview has 5 storeys with a ground floor of car parks/lift lobbies plus 4 storeys of flats. There are a total of 48 flats housing, according to the ratio of 2.8 persons per flat, approximately 135 people with 54 private car parking spaces including those for visitors. Oi Yuen has increased the number of flats planned to 969, housing approximately 2,714 people with 1,117 private car parking spaces. The contrast in size is both obvious and overwhelming. Opposite the proposed development, on the other side of Castle Peak Road, is the Fanling Golf Course with zero buildings. To the north of Oi Yuen is the Fanling Highway. On the other side of the Highway is low-density Tsung Pak Long and Hak Ka Wai. It cannot be accepted that the proposed development is in any way compatible with its surrounding neighbourhood and rural environment. It is grossly excessive.
- 4) The proposed seven residential towers have been increased in height to 25 to 32 storeys aboveground, the nearest of which to Golf Parkview will be little more than the width of a narrow lane away (one of the reports gives the separation distance as 9 metres). They will undoubtedly adversely affect the residents of Golf Parkview environmentally by blocking both wind and sunlight. The negative affect on wind flow was confirmed in the air ventilation assessment which stated that even the former proposed development of 7 lower blocks ranging in height from 19 to 23 storeys "would create rather significant adverse impacts on the surrounding area under most simulated winds...". The excessive height of the 7 blocks will also result in a shadowing effect on Golf Parkview. There must also be concern that the piling and other construction activity of these seven towers, including up to 4 levels of basement for underground car parks, may affect the structural integrity of Golf Parkview, as well as having a major adverse air quality impact of potential dust emission.
-

- 4) To us Golf Parkview residents the most important reason why the present proposal should be rejected is that despite repeated adverse comments from petitioners and the Transport Department, the developer still plans that traffic to and from the new development should be via Pak Wai Lane. The only access to Golf Parkview whether on foot or in a vehicle is via Pak Wai Lane. This lane is comparatively narrow both in terms of the road for traffic and the footpath for pedestrians. The Chief Highway Engineer/New Territories East described Pak Wai Lane as being "substandard in width." We would here point out that there is only one footpath for pedestrians and it is narrow and on the Golf Parkview side of the Lane.

We do not believe for one moment that the Lane can possibly safely handle the dramatic increase in usage envisaged by the developer. The site which it is proposed be developed has long frontage directly onto the Castle Peak Road-Kwu Tung. It MUST arrange that access to and from Oi Yuen be direct from Castle Peak Road, just as it is at Eden Manor, and not via Pak Wai Lane. We consider this imperative not only for the safety and convenience of all users but also to permit swift access by emergency vehicles to both the existing and possible future development. In its S. 12A Application for Amendment of Plan dated February 2022, the developer in para. 2.5.1. writes that "The existing vehicular access to the Application Site is available via Castle Peak Road-Kwu Tung." This is true. There is a driveway giving access to Oi Yuen from Castle Peak Road. This could be expanded and utilised or a completely new driveway built on the considerable area at the developer's disposal. Proposed site coverage is presently quoted as being "Not more than 27%".

- 6) There is a further important reason why the literally hundreds of vehicles it is proposed go to and from Oi Yuen every day should not be allowed to use Pak Wai Lane. When travelling in a westerly direction from the junction with Fan Kam Road on the Castle Peak Road-Kwu Tung, the third/middle lane for turning right into Pak Wai

Lane is only long enough for about four vehicles. This is sufficient for Golf Parkview traffic. It is impossible to conceive that it will be long enough also to accommodate Oi Yuen traffic. More than four vehicles waiting to turn right into Pak Wai Lane will mean that all westerly bound traffic on the Castle Peak Road will have to come to an abrupt halt. This will be very dangerous as the road is narrow and one approaches Pak Wai Lane coming round a sharp right-hand bend with minimal forward visibility. Accidents will happen. There is no shadow of doubt about that. It is very frustrating that whilst surveys of traffic on the Castle Peak Road-Kwu Tung are conducted, no attention seems to be being paid to the dangerous situation which is planned by the use of Pak Wai Lane for access to the proposed new development. A queue length assessment in respect of traffic proceeding in a westerly direction on the Castle Peak Road-Kwu Tung and turning right into Pak Wai Lane should be undertaken.

- 7) Traffic surveys have been included from places as distant as Queen's Hill Development Extension and Pak Wo Road. We strongly request that the focus be on Pak Wai Lane. The number of private car parking spaces at the end of Pak Wai Lane is proposed be increased from 54 to 1,171, a jump of some 21.7 times! In addition there will of course be additional vehicles visiting the residential care home. We strongly believe that Pak Wai Lane is too narrow in width to handle the proposed enormous increase in traffic volume.
- 8) It is noteworthy that there is not one shot of Golf Parkview in all the myriad of photographs of the area provided by the developer, even the aerial ones. The proposed development is not in any way compatible with Golf Parkview or the surrounding area. It is grotesquely huge and will be detrimental to the quality of life to nearby residents as well as seriously worsening traffic congestion in the area. Various reports mention the visual impact of the new development but never from the position of the residents of Golf

Parkview who will clearly be severely adversely affected in this respect.

- 4) The pavement in front of Golf Parkview is 136 inches wide. This is considerably wider than the pavement on Castle Peak Road-Kwu Tung either to the west of Golf Parkview or that bordering the proposed new development. The latter pavement is only 76 inches wide. Ironically, this pavement is even busier than the one fronting Golf Parkview. Pedestrians and cyclists coming from the Kam Tsin area, heading towards Sheung Shui, cross the Castle Peak Road-Kwu Tung virtually opposite Pak Wai Lane because there is no pavement on the golf course side of Castle Peak Road-Kwu Tung opposite the proposed new development. The situation is already bad and should not be allowed to worsen.
- 10) It is noted that the developer makes a proposal regarding the provision of a residential care home for 100 elderly persons. This proposal is strongly opposed. First, the location does not seem appropriate with it not being within easy walking distance of any major developments let alone shops or restaurants. Visitors to the care home will also increase the utilisation of Pak Wai Lane. It is noted that there is a large social welfare complex under construction in Kwu Tung just 5 minutes drive from Golf Parkview.
- 11) It has come to our notice that a substantial public housing development is proposed for Castle Peak Road-Kwu Tung opposite Eden Manor. It is presently mainly cottages and workshops. The proposed size of the development is huge with the number of units indicated at 3,300 and inhabitants at 8,900, though the ratio of only 2.7 persons per unit seems rather low. The development will also provide social welfare measures, shops and kindergartens. The impact on the traffic conditions of Castle Peak Road-Kwu Tung and the junction with Fan Kam Road will be enormous. With the Government emphasis on public housing, especially in the Northern

Metropolis, one can safely predict that this development will proceed. It is a further reason why the Oi Yuen development should be denied in its present over-sized form.

- <sup>12)</sup> The most recent Traffic Impact Assessment figures have been taken in the last three years during the Covid 19 epidemic when vehicular traffic was relatively subdued. As the impact of the epidemic fades, traffic figures will increase. There are also references to the development of Kwu Tung North. We believe that Sheung Shui will remain the more important focus for residents in our area. A major concern is whether the Castle Peak Road-Kwu Tung can support the proposed increase in traffic.

We respectfully strongly urge the Town Planning Board to reject this Planning Application. Thank you.

Name of person making this comment :

LAW KWONG YIN

Signature : Andy

Date : 31/1/2023

# 上次交規委會反對意見

p. 1

Re: Y/FSS/19 擬建計劃

本人反對以上計劃，上次反對書內容，今再提交，以作其中反對點，並是次另加本人意見及反對：

A) 交通方面：擬建計劃中，屋苑及老人院出入口，人及車輛仍是相蕙里，仍是最大交通障礙，繁忙時段除擬建項目有1000多部車外，外來的士及其他車輛會近共2000部，且出入口於本苑出入口前，換言之，本苑出入車受阻。若有意外，失警急救，受阻會危害性命。  
縱使其擬建老人須急救，汽車阻塞，也危及生命。

B) 空氣方面：1) 擬建多座高層大廈，如屏風遮擋，東南風、南風、東風也受阻，本苑空氣不流通，倘有疫，空氣不流通，病毒被困。

2) 擬建老人院，抽出廢氣，若院內有疫症，也會傳至本苑，因距離太近。

3) 大量車出入造成廢氣冲天，影响健康因相蕙里短少，車不能行，自然停車等候，沒熄匙廢氣四散於相蕙里，影响健康。

4) 若建老人院，探若人皆出入相蕙里大增行人且擬建屋苑人多出入於此，再加本苑住戶出入，若有疫症於老人院散播兩層樓住戶，人多共用相蕙里，傳播更甚。

5) 車輛大增，青山公路也廢氣冲天，影响健康。

C) 噪音方面: 柏蕙里車量大增, 青山公路也大增量, 塞車造成响號噪音, 影响健康.

D) 陽光方面: 擬建高層數座, 屏風式阻礙陽光, 本苑6, 7座難見陽光, 影响健康.

E) 老人院方面: 不宜設於擬建項目中, 除上述影响散播病毒, 交通增加, 人口出入多外, 更影响居於內者之健康.

- 1) 交通受阻延入院急救, 危及生命, 因分秒必爭
- 2) 空氣不佳, 汽車廢氣
- 3) 噪音難眠及休養

宜近高速, 於清靜環境中, 免繁密人口中, 易受感染, 因工作人員及探訪者, 出入人口繁密柏蕙里.

4) 政府於附近及大陸已計劃設老人院及老人計劃, 故愛園也不宜建老人院計劃.

F) 其他方面 1) 政府於大頭嶺有建公屋計劃共5座, 人口劇增, 車出入口於青山公路上, 更令青山公路阻塞火上加油, 影响出入市區交通及區內交通, 本苑更甚. (城規會已批人口8900, 另加上商場, 人口總共12,000人)

2) 政府於大頭嶺迴旋交通計劃, 是否足以應付兩新屋苑落成所須及北區醫院附近也將有新屋苑建屋計劃, 是否足應付? (已批是私人屋苑)



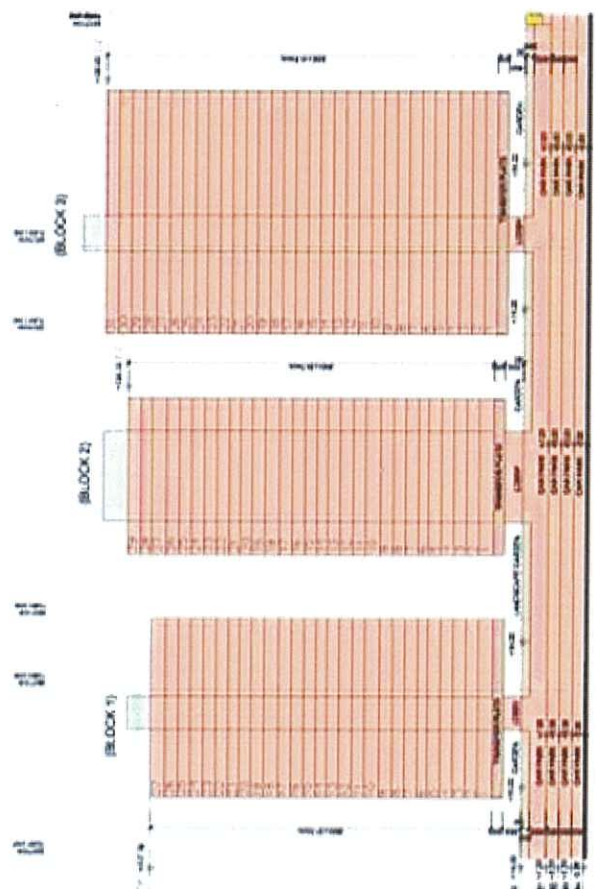
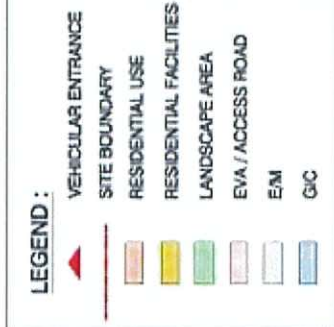
3) 青山公路難以擴闊，栢蕙里難以增闊增加路寬度，政府應親臨栢蕙里及附近青山公路去視察，是否兩路可容兩層樓共用栢蕙里及青山公路，且有上述其他將有層數情況更甚。

**DLN**

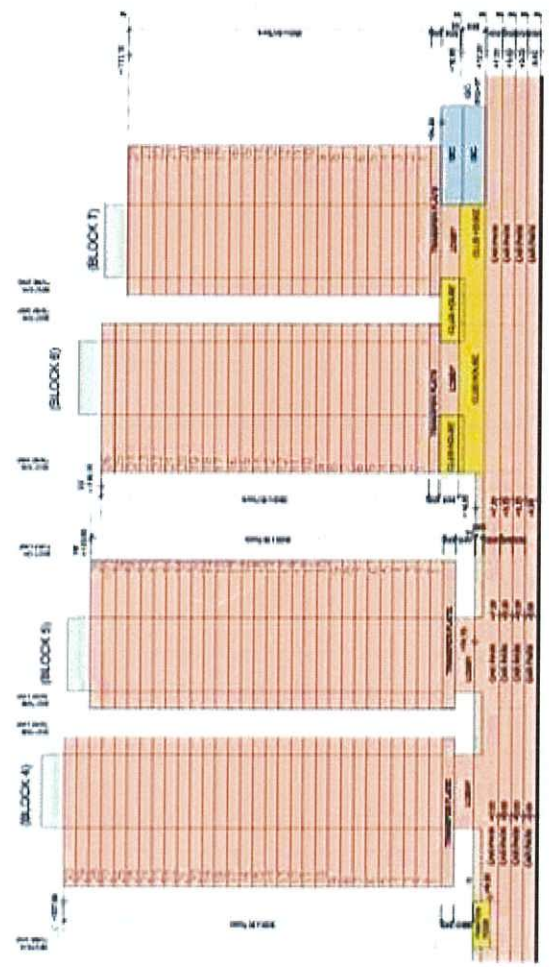
**DLM Architects Limited**  
新加坡分公司建築師有限公司  
401 Cecil Street, Suite 1201, Singapore 048635  
Tel: +65 6339 1234 Fax: +65 6339 1235  
www.dlmarchitects.com

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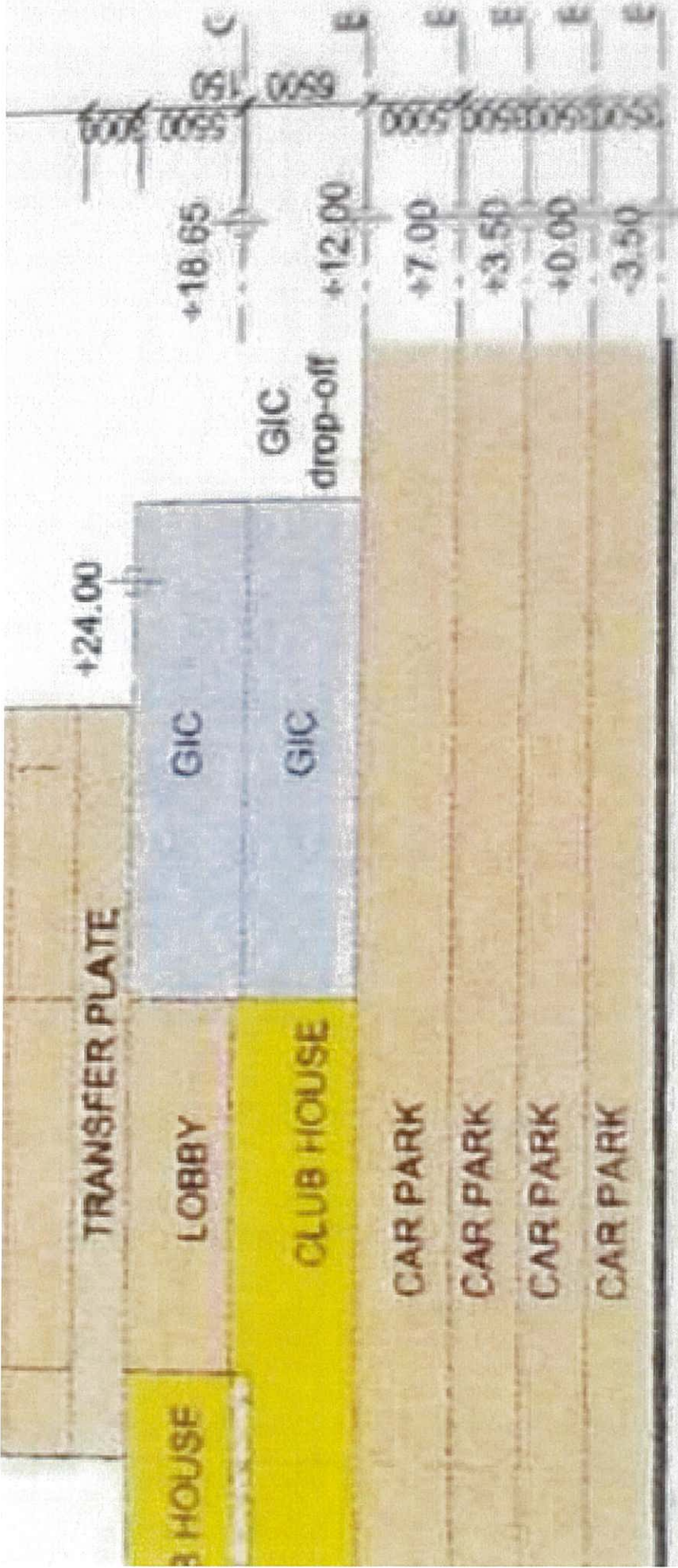
申請編號 Application No. : Y / FSS / 19



SECTION C - C



SECTION D - D



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

參考編號

220523-144116-44388

Reference Number:

提交限期

10/06/2022

Deadline for submission:

提交日期及時間

23/05/2022 14:41:16

Date and time of submission:

有關的規劃申請編號

Y/FSS/19

The application no. to which the comment relates:

「提意見人」姓名/名稱

先生 Mr. LAW

Name of person making this comment:

意見詳情

Details of the Comment :

現時本苑對出一段青山公路行車已十分繁忙，本處亦在去年底要求及在本年初得悉將在本苑出入口對出位置加設行人過路設施，惟至今未有收到進一步回覆。如在未有合適的過路設施下發展新住宅項目，將對出入本屋苑人士進一步增加過路時的風險，影響行人安全。

承上述原因，現時青山公路行車已十分繁忙，如再增加負荷，恐加重交通問題。

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

220529-130255-55640

**提交限期****Deadline for submission:**

10/06/2022

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

29/05/2022 13:02:55

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

Y/FSS/19

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

先生 Mr. Ng Chin Man

**意見詳情****Details of the Comment :**

The bridge on Pak Wo Road across Fanling Highway has one of the best sunset view in Sheung Shui.

People that live around Ching Hiu Road often go home by Pak Wo Road.

Please consider to lower the average building height to keep the view. Thank you



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

220610-175733-99557

**提交限期****Deadline for submission:**

10/06/2022

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

10/06/2022 17:57:33

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

Y/FSS/19

**「提意見人」姓名/名稱****Name of person making this comment:**先生 Mr. Edmond Fong for  
the Hong Kong & China Ga  
s Co. Ltd.**意見詳情****Details of the Comment :**

Since the land lot boundary of the proposed rezoning of "Comprehensive Development Area" is located at the existing High Pressure gas pipeline along Castle Peak Road-Kwu Tung, the rezoning/project proponent should conduct Quantitative Risk Assessment (QRA) to evaluate the potential risk and determine/implement the necessary mitigation measure(s) if required. The QRA should take into account the future population of the area, such as those in the existing buildings, in the proposed development, and in other approved developments, etc. where applicable. The applicant should not alter the "Landscape Buffer" in adjacent to Castle Peak Road – Kwu Tung as indicated in their submitted Landscape Master Plan, and should not construct any structure or building in close proximity to the gas pipe at the "Landscape Buffer". The rezoning/project proponent should consult our company in the design stage and closely coordinate with our company during the construction stage, and provide protective measures.

Form No. S12A  
表格第 S12A 號

Team  
S/N: 2200517  
By Hand: 24/2/2022

APPLICATION FOR  
AMENDMENT OF PLAN UNDER SECTION 12A OF  
THE TOWN PLANNING ORDINANCE  
(CAP.131)

根據《城市規劃條例》(第131章)  
第12A條遞交的修訂圖則申請

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

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

2022年05月10日  
此文件在 收到。城市規劃委員會  
只會在收到所有必要的資料及文件後才正式確認收到  
申請的日期。

This document is received on 10 MAY 2022  
The Town Planning Board will formally acknowledge  
the date of receipt of the application only upon receipt  
of all the required information and documents.

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

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

& Please attach documentary proof 請夾附證明文件

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

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

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

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

For Official Use Only 請勿填寫此欄	Application No. 申請編號	Y / FSS / 19
	Date Received 收到日期	10 MAY 2022

- 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)

HUI, Chun Hang Julian

### 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)

Ove Arup & Partners Hong Kong Limited  
奧雅納工程顧問

### 3. Application Site 申請地點

(a) Whether the application directly relates to any specific site?  
申請是否直接與某地點有關? Yes 是 ☒ No 否 ☐ (Please proceed to Part 6 請繼續填寫第 6 部分)

(b) 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)  
The remaining portion of Sheung Shui Lot No. 2 (Sheung Shui Lot No. 2 RP) and adjoining Government land in Sheung Shui, New Territories  
新界上水地段第 2 號餘段和毗連政府土地

(c) Site Area 申請地點面積 31,623 sq.m 平方米 ☒ About 約



(d) Area of Government land included (if any) 所包括的政府土地面積 (倘有)	1,762.1 sq.m 平方米 <input checked="" type="checkbox"/> About 約
(e) Current use(s) 現時用途	Residential with landscaped area  (If there are any Government, institution or community facilities, please illustrate on plan and specify the use and gross floor area) (如有任何政府、機構或社區設施，請在圖則上顯示，並註明用途及總樓面面積)

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

The applicant 申請人 -

- ☒ is the sole "current land owner"<sup>#</sup> (please proceed to Part 6 and attach documentary proof of ownership).  
是唯一的「現行土地擁有人」<sup>#</sup> (請繼續填寫第 6 部分，並夾附業權證明文件)。
- ☐ is one of the "current land owners"<sup>#</sup> (please attach documentary proof of ownership).  
是其中一名「現行土地擁有人」<sup>#</sup> (請夾附業權證明文件)。
- ☐ is not a "current land owner"<sup>#</sup>.  
並不是「現行土地擁有人」<sup>#</sup>。
- ☐ The application site is entirely on Government land (please proceed to Part 6).  
申請地點完全位於政府土地上 (請繼續填寫第 6 部分)。

5. Statement on Owner's Consent/Notification  
就土地擁有人的同意/通知土地擁有人的陳述

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

(b) The applicant 申請人 -

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

Details of consent of "current land owner(s)" <sup>#</sup> obtained 取得「現行土地擁有人」 <sup>#</sup> 同意的詳情		
No. of 'Current Land Owner(s)' 「現行土地擁有人」數目	Lot number/address of premises as shown in the record of the Land Registry where consent(s) has/have been obtained 根據土地註冊處記錄已獲得同意的地段號碼/處所地址	Date of consent obtained (DD/MM/YYYY) 取得同意的日期 (日/月/年)

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

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

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

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

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

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

- ☐ sent request for consent to the "current land owner(s)"<sup>#</sup> on ..... (DD/MM/YYYY)  
於 ..... (日/月/年)向每一名「現行土地擁有人」<sup>#</sup>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. Plan Proposed to be Amended 擬議修訂的圖則	
(a) Name and number of the related statutory plan(s) 有關法定圖則的名稱及編號	Draft Fanling / Sheung Shui Outline Zoning Plan No. S/FSS/25
(b) Land use zone(s) involved (if applicable) 涉及的土地用途地帶(如適用)	"Comprehensive Development Area"

7. Proposed Amendments 擬議修訂	
(a) Propose to rezone the application site to the following zone(s)/use(s) (May insert more than one "✓") (Please illustrate the details on plan) 建議將申請地點的用途地帶改劃作下列地帶 / 用途 (可在多於一個方格內加上 "✓" 號) (請在圖則顯示詳情)	
<input checked="" type="checkbox"/> Comprehensive Development Area [ 1 ] 綜合發展區 [ 1 ] <input type="checkbox"/> Residential (Group <input type="checkbox"/> A/ <input type="checkbox"/> B/ <input type="checkbox"/> C/ <input type="checkbox"/> D/ <input type="checkbox"/> E) [ ] 住宅 ( <input type="checkbox"/> 甲類 / <input type="checkbox"/> 乙類 / <input type="checkbox"/> 丙類 / <input type="checkbox"/> 丁類 / <input type="checkbox"/> 戊類 ) [ ] <input type="checkbox"/> Agriculture [ ] 農業 [ ] <input type="checkbox"/> Industrial (Group D) [ ] 工業 (丁類) [ ] <input type="checkbox"/> Government, Institution or Community [ ] 政府、機構或社區 [ ] <input type="checkbox"/> Recreation [ ] 康樂 [ ] <input type="checkbox"/> Country Park [ ] 郊野公園 [ ] <input type="checkbox"/> Conservation Area [ ] 自然保育區 [ ] <input type="checkbox"/> Other Specified Uses ( <input type="checkbox"/> Business/ <input type="checkbox"/> Industrial Estate/ <input type="checkbox"/> Mixed Use/ <input type="checkbox"/> Rural Use/ <input type="checkbox"/> Petrol Filling Station/ <input type="checkbox"/> Others (please specify _____) ) [ ] 其他指定用途 ( <input type="checkbox"/> 商貿 / <input type="checkbox"/> 工業邨 / <input type="checkbox"/> 混合用途 / <input type="checkbox"/> 鄉郊用途 / <input type="checkbox"/> 加油站 / <input type="checkbox"/> 其他 (請註明: _____) ) [ ] <input type="checkbox"/> Road 道路	<input type="checkbox"/> Commercial [ ] 商業 [ ] <input type="checkbox"/> Village Type Development [ ] 鄉村式發展 [ ] <input type="checkbox"/> Industrial [ ] 工業 [ ] <input type="checkbox"/> Open Storage [ ] 露天貯物 [ ] <input type="checkbox"/> Open Space [ ] 休憩用地 [ ] <input type="checkbox"/> Green Belt [ ] 綠化地帶 [ ] <input type="checkbox"/> Coastal Protection Area [ ] 海岸保護區 [ ] <input type="checkbox"/> Site of Special Scientific Interest [ ] 具特殊科學價值地點 [ ] <input type="checkbox"/> Others (please specify _____) 其他 (請註明: _____)

Please insert subzone in [ ] as appropriate.  
請於 [ ] 內註明支區，如適用。

## (b) Propose to amend the Notes of the Plan(s) 建議修訂圖則的《註釋》

☐ Covering Notes 《註釋》說明頁☒ Notes of the zone applicable to the Site 適用於申請地點土地用途地帶的《註釋》

Details of the proposed amendment(s) to the Notes of the Plan, where appropriate, are as follows:

(Please use separate sheets if the space below is insufficient)

建議修訂圖則的《註釋》的詳情，如適用：

(如下列空間不足，請另頁說明)

**Please refer to the Supporting Planning Statement.**☒ Proposed Notes of Schedule of Uses of the zone attached  
夾附對《註釋》的擬議修訂**8. Details of Proposed Amendment (if any) 擬議修訂詳情 (倘有)**☒ Particulars of development are included in the Appendix.

附錄包括一個擬議發展的細節。

☐ No specific development proposal is included in this application.

這宗申請並不包括任何指定的擬議發展計劃。

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



**10. 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

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

YEUNG WING SHAN, THERESA

Name in Block Letters  
姓名（請以正楷填寫）

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 .. MRTPI

on behalf of  
代表

Ove Arup & Partners Hong Kong Limited

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

Date 日期

23/02/2022

(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：
  - 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
  - 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。

APPLICATION FOR AMENDMENT OF PLAN UNDER  
SECTION 12A OF THE TOWN PLANNING ORDINANCE (CAP. 131)

根據城市規劃條例(第 131 章)第 12A 條遞交的修訂圖則申請

Development Proposal (only for indicative purpose)

擬議發展的發展計劃 (只作指示用途)

1. Development Proposal 擬議發展計劃			
<input checked="" type="checkbox"/> Proposed Gross floor area (GFA) 擬議總樓面面積	128,401.87	sq.m. 平方米	<input checked="" type="checkbox"/> About 約
<input checked="" type="checkbox"/> Proposed plot ratio 擬議地積比率	4.3 (based on development site area of about 29,860.9 sq.m.)		<input checked="" type="checkbox"/> About 約
<input checked="" type="checkbox"/> Proposed site coverage 擬議上蓋面積	not more than 27	%	<input type="checkbox"/> About 約
<input checked="" type="checkbox"/> Proposed number of blocks 擬議座數	7 + 1 clubhouse		
<input checked="" type="checkbox"/> Proposed number of storeys of each block 每座建築物的擬議層數	Blk1: 28 storeys with 4 basements Blk2: 30 storeys with 4 basements Blk3: 32 storeys with 4 basements Blk4: 31 storeys with 4 basements Blk5: 29 storeys with 4 basements Blk6: 27 storeys with 4 basements and 2 podiums Blk7: 25 storeys with 4 basements and 2 podiums		
<input checked="" type="checkbox"/> Proposed building height of each block 每座建築物的擬議高度	Blk1: 117.15 mPD    Blk5: 120.65 mPD Blk2: 124.15 mPD    Blk6: 118.15 mPD Blk3: 130.00 mPD    Blk7: 111.15 mPD Blk4: 127.65 mPD (main roof)	m 米	<input type="checkbox"/> About 約
<input checked="" type="checkbox"/> Domestic part 住用部分			
GFA 總樓面面積	128,401.87	sq.m. 平方米	<input checked="" type="checkbox"/> About 約
number of units 單位數目	969		
average unit size 單位平均面積	132.51	sq.m. 平方米	<input checked="" type="checkbox"/> About 約
estimated number of residents 估計住客數目	About 2,714		
<input checked="" type="checkbox"/> Non-domestic part 非住用部分			
<input type="checkbox"/> hotel 酒店		sq.m. 平方米	<input type="checkbox"/> About 約
<input type="checkbox"/> office 辦公室		sq.m. 平方米	<input type="checkbox"/> About 約
<input type="checkbox"/> shop and services/eating place 商店及服務行業/食肆		sq.m. 平方米	<input type="checkbox"/> About 約
<input checked="" type="checkbox"/> Government, institution or community facilities 政府、機構或社區設施	(please specify the use(s) and concerned land area(s)/GFA(s)) (請註明用途及有關的地面面積/總樓面面積) 100-p Residential Care Home for the Elderly: GFA: 2,450sq.m. (Proposed to be disregarded from the PR calculations, and based on an assumption of NOFA to GFA factor.) (please specify the use(s) and concerned land area(s)/GFA(s)) (請註明用途及有關的地面面積/總樓面面積) Clubhouse: GFA of 3,750 sq.m. (According to Building (Planning) Regulations 23(3)(a) and PNAP APP-104, for total domestic GFA of >125,000sq.m., maximum 2.5% of the total domestic GFA/3,750sq.m. could be exempted from GFA calculations) (please specify land area(s)) (請註明面積) .....2,714..... sq.m. 平方米 <input checked="" type="checkbox"/> Not less than 不少於 ..... sq.m. 平方米 <input type="checkbox"/> Not less than 不少於		
<input checked="" type="checkbox"/> Open space 休憩用地			
<input checked="" type="checkbox"/> private open space 私人休憩用地			
<input type="checkbox"/> public open space 公共休憩用地			

☒ Transport-related facilities 與運輸有關的設施☒ parking spaces 停車位

(please specify type(s) and number(s))

(請註明種類及數目)

Private Car Parking Spaces 私家車車位

1,117

Motorcycle Parking Spaces 電單車車位

10

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)

☒ loading/unloading spaces 上落客貨車位

(please specify type(s) and number(s))

(請註明種類及數目)

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)

7

☐ other transport-related facilities

其他與運輸有關的設施

(please specify type(s) and number(s))

(請註明種類及數目)

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

[Block number]

[Floor(s)]

[Proposed use(s)]

[座數]

[層數]

[擬議用途]

1-7

B1 - B4/F

Carpark

4

B1/F

Function Room

6

G/F - M/F

Clubhouse/Lobby/Transfer Plate

7

G/F - M/F

Clubhouse/Lobby/GIC/Transfer Plate

1-5

G/F - M/F

Lobby/Transfer Plate

1

1-27/F

Flats

2

1-29/F

Flats

3

1-31/F

Flats

4

1-30/F

Flats

5

1-28/F

Flats

6

1-26/F

Flats

7

1-24/F

Flats

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

Landscape area, swimming pool, EVA / access road, existing grave.

Please refer to Supporting Planning Statement for details.

## Any vehicular access to the site? 是否有車路通往地盤?

Yes 是

☒ There is an existing access. (please indicate the street name, where appropriate)

有一條現有車路。(請註明道路名稱(如適用))

Castle Peak Road - Kwu Tung

☐ 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)

No 否

☐

For Development involving columbarium use, please complete the table in the Annex to this Appendix.

如發展涉及靈灰安置所用途, 請填妥於此附件後附錄的表格。



## 2. 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。

<p>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?</p>	<p>Yes 是  No 否</p>	<p><input checked="" type="checkbox"/> Please provide details 請提供詳情 <b>Extension of the existing historic building as clubhouse.....</b> <b>Please refer to Supporting Planning Statement for details.</b> .....</p> <p><input type="checkbox"/></p>																													
<p>Does the development proposal involve the operation on the right? 擬議發展是否涉及右列的工程?</p>	<p>Yes 是          No 否</p>	<p><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)</p> <p><input type="checkbox"/> Diversion of stream 河道改道</p> <p><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</p> <p><input type="checkbox"/> Filling of land 填土 Area of filling 填土面積 ..... sq.m 平方米 <input type="checkbox"/> About 約 Depth of filling 填土厚度 ..... m 米 <input type="checkbox"/> About 約</p> <p><input checked="" type="checkbox"/> Excavation of land 挖土 Area of excavation 挖土面積... <b>16,000</b>... sq.m 平方米 <input checked="" type="checkbox"/> About 約 Depth of excavation 挖土深度 <b>17.5m (+14.0mPD, -3.50 mPD) to 22m (+18.50mPD, -3.50mPD)</b> .....m 米 <input checked="" type="checkbox"/> About 約</p> <p><input type="checkbox"/></p>																													
<p>Would the development proposal cause any adverse impacts? 擬議發展計劃會否造成不良影響?</p>	<table border="0"> <tr> <td>On environment 對環境</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>On traffic 對交通</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>On water supply 對供水</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>On drainage 對排水</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>On slopes 對斜坡</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>Affected by slopes 受斜坡影響</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>Landscape Impact 構成景觀影響</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>Tree Felling 砍伐樹木</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>Visual Impact 構成視覺影響</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input checked="" type="checkbox"/></td> </tr> <tr> <td>Others (Please Specify) 其他 (請列明)</td> <td>Yes 會 <input type="checkbox"/></td> <td>No 不會 <input type="checkbox"/></td> </tr> </table> <p>.....</p> <p>.....</p> <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) 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><b>Please refer to the Supporting Planning Statement for details.</b> ..... ..... ..... ..... ..... .....</p>	On environment 對環境	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	On traffic 對交通	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	On water supply 對供水	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	On drainage 對排水	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	On slopes 對斜坡	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	Affected by slopes 受斜坡影響	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	Landscape Impact 構成景觀影響	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	Tree Felling 砍伐樹木	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	Visual Impact 構成視覺影響	Yes 會 <input type="checkbox"/>	No 不會 <input checked="" type="checkbox"/>	Others (Please Specify) 其他 (請列明)	Yes 會 <input type="checkbox"/>	No 不會 <input type="checkbox"/>
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"/>																													
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Others (Please Specify) 其他 (請列明)	Yes 會 <input type="checkbox"/>	No 不會 <input type="checkbox"/>																													

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

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

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

在龕位內最多可安放骨灰的數量

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

在非龕位的範圍內最多可安放骨灰的數量

Total number of niches 龕位總數

Total number of single niches

單人龕位總數

Number of single niches (sold and occupied)

單人龕位數目 (已售並佔用)

Number of single niches (sold but unoccupied)

單人龕位數目 (已售但未佔用)

Number of single niches (residual for sale)

單人龕位數目 (待售)

Total number of double niches

雙人龕位總數

Number of double niches (sold and fully occupied)

雙人龕位數目 (已售並全部佔用)

Number of double niches (sold and partially occupied)

雙人龕位數目 (已售並部分佔用)

Number of double niches (sold but unoccupied)

雙人龕位數目 (已售但未佔用)

Number of double niches (residual for sale)

雙人龕位數目 (待售)

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

除單人及雙人龕位外的其他龕位總數 (請列明類別)

Number of niches (sold and fully occupied)

龕位數目 (已售並全部佔用)

Number of niches (sold and partially occupied)

龕位數目 (已售並部分佔用)

Number of niches (sold but unoccupied)

龕位數目 (已售但未佔用)

Number of niches (residual for sale)

龕位數目 (待售)

Proposed operating hours 擬議營運時間

<sup>@</sup> Ash interment capacity in relation to a columbarium means –

就靈灰安置所而言，骨灰安放容量指：

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

## Gist of Application 申請摘要

(Please provide details in both English and Chinese as far as possible. This part will be circulated to relevant consultees, uploaded to the Town Planning Board's Website for browsing and free downloading by the public and 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. (For Official Use Only) (請勿填寫此欄)

申請編號

Location/address

位置/地址

The remaining portion of Sheung Shui Lot No. 2 (Sheung Shui lot No.2 RP) and adjoining Government land in Sheung Shui, New Territories  
新界上水地段第2號餘段和毗連政府土地

Site area  
地盤面積

31,623sq. m 平方米 ☒ About 約

(includes Government land of 包括政府土地 1,762.1sq. m 平方米 ☒ About 約)

Plan  
圖則

Draft Fanling / Sheung Shui Outline Zoning Plan No. S/FSS/25  
粉嶺/上水分區計劃大綱草圖編號S/FSS/25

Zoning  
地帶

"Comprehensive Development Area"  
「綜合發展區」

Proposed  
Amendment(s)  
擬議修訂

☐ Amend the Covering Notes of the Plan

修訂圖則《註釋》的說明頁

☒ Amend the Notes of the zone applicable to the site

修訂適用於申請地點土地用途地帶的《註釋》

☒ Rezone the application site from "CDA" to "CDA(1)"

把申請地點由「綜合發展區」地帶改劃為「綜合發展區(1)」

## Development Parameters (for indicative purpose only) 發展參數(只作指示用途)

(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	128,401.87 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於	4.3 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
(ii) No. of block. 幢數	Non-domestic 非住用	2,450 <input checked="" type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於 <small>(Proposed to be disregarded from the PR calculations, and based on an assumption of NOFA to GFA factor.)</small>	N/A <input type="checkbox"/> About 約 <input type="checkbox"/> Not more than 不多於
	Domestic 住用	6	
(ii) No. of block. 幢數	Non-domestic 非住用	N/A	
	Composite 綜合用途	1 (Block 7)	

(iii) Building height/No. of storeys 建築物高度／層數	Domestic 住用	N/A m 米 <input type="checkbox"/> (Not more than 不多於)
		117.15 - 130.00 (main roof) mPD 米(主水平基準上) <input checked="" type="checkbox"/> (Not more than 不多於)
		27 - 32 Storeys(s) 層 <input checked="" type="checkbox"/> (Not more than 不多於) ( <input type="checkbox"/> Include 包括 <input checked="" type="checkbox"/> Exclude 不包括) 4 <input type="checkbox"/> Carport 停車間 <input checked="" type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 2 (Block 6 for Clubhouse) <input checked="" type="checkbox"/> Podium 平台)
	Non-domestic 非住用	N/A m 米 <input type="checkbox"/> (Not more than 不多於)
		N/A mPD 米(主水平基準上) <input type="checkbox"/> (Not more than 不多於)
		N/A Storeys(s) 層 <input type="checkbox"/> (Not more than 不多於) ( <input type="checkbox"/> Include 包括 <input type="checkbox"/> Exclude 不包括) <input type="checkbox"/> Carport 停車間 <input type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 <input type="checkbox"/> Podium 平台)
	Composite 綜合用途	N/A m 米 <input type="checkbox"/> (Not more than 不多於)
		111.15 (main roof) mPD 米(主水平基準上) <input checked="" type="checkbox"/> (Not more than 不多於)
		25 Storeys(s) 層 <input checked="" type="checkbox"/> (Not more than 不多於) ( <input type="checkbox"/> Include 包括 <input checked="" type="checkbox"/> Exclude 不包括) 4 <input type="checkbox"/> Carport 停車間 <input checked="" type="checkbox"/> Basement 地庫 <input type="checkbox"/> Refuge Floor 防火層 2 (Block 7 for GIC) <input checked="" type="checkbox"/> Podium 平台)
(iv) Site coverage 上蓋面積	Not more than 27 % <input type="checkbox"/> About 約	
(v) No. of units 單位數目	969	
(vi) Open space 休憩用地	Private 私人	2,714 sq.m 平方米 <input checked="" type="checkbox"/> Not less than 不少於
	Public 公眾	sq.m 平方米 <input type="checkbox"/> Not less than 不少於

(vii) No. of parking spaces and loading / unloading spaces 停車位及上落客貨車位數目	Total no. of vehicle parking spaces 停車位總數	1,127
	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)	1,117 10
	Total no. of vehicle loading/unloading bays/lay-bys 上落客貨車位／停車處總數	7
	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)	7

Submitted Plans, Drawings and Documents 提交的圖則、繪圖及文件		
	Chinese 中文	English 英文
<b>Plans and Drawings 圖則及繪圖</b>		
Master layout plan(s)/Layout plan(s) 總綱發展藍圖／布局設計圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Block plan(s) 樓宇位置圖	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Floor plan(s) 樓宇平面圖	<input type="checkbox"/>	<input checked="" 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"/>
<b>Reports 報告書</b>		
Planning Statement/Justifications 規劃綱領/理據	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Environmental assessment (noise, air and/or water pollutions) 環境評估 (噪音、空氣及／或水的污染)	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on vehicles) 就車輛的交通影響評估	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Traffic impact assessment (on pedestrians) 就行人的交通影響評估	<input type="checkbox"/>	<input type="checkbox"/>
Visual impact assessment 視覺影響評估	<input type="checkbox"/>	<input 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"/>
<b>Air Ventilation Assessment, Water Supply Impact Assessment and Quantitative Risk Assessment</b>		
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。